



Creative Services Limited (CSL)
Conflict of Interest Management Policy
(Version-1, Effective from January 01, 2024)

1. Introduction

Creative Services Limited (CSL) is committed to upholding the highest standards of integrity, transparency, and ethical conduct in all its operations. This Conflict of Interest Management Policy reflects CSL's dedication to managing conflicts of interest effectively to safeguard its reputation, stakeholders' interests, and the integrity of its services.

2. Purpose

The Conflict of Interest Management Policy of Creative Services Limited (CSL) aims to establish guidelines and procedures to identify, disclose, and manage conflicts of interest to ensure transparency, integrity, and ethical conduct in all organizational activities.

3. Scope

This policy applies to all directors, officers, employees, consultants, and volunteers of CSL, as well as to any individuals or entities with a contractual relationship with CSL.

4. Definition of Conflict of Interest

A conflict of interest arises when an individual or entity's personal, financial, or other interests conflict or appear to conflict with the interests of CSL, thereby potentially influencing the individual's or entity's decisions or actions in a manner that could adversely affect CSL's integrity, objectivity, or performance of duties.

5. Identification of Conflict of Interest

All individuals associated with CSL are required to promptly identify and disclose any actual, potential, or perceived conflicts of interest that may arise in the course of their duties or relationships with CSL. Such conflicts may include, but are not limited to:

- Financial interests in competitors, suppliers, or clients of CSL.
- Personal relationships with stakeholders that may influence decision-making.
- External employment or consulting arrangements that may create divided loyalties.
- Receipt of gifts, favors, or other benefits that could influence judgment.

6. Disclosure Procedures

Individuals are obligated to disclose any conflicts of interest to CSL's designated authority, typically the Ethics Committee or a designated officer, using the prescribed disclosure form. The disclosure should include all relevant details regarding the nature and extent of the conflict.

7. Evaluation and Management

Upon receipt of a conflict of interest disclosure, CSL's designated authority will assess the disclosed conflict to determine its significance and potential impact on CSL's interests. Depending on the circumstances, CSL may employ various strategies to manage conflicts of interest, including but not limited to:

- **Recusal:** Individuals may be required to abstain from participating in decisions or activities where a conflict exists.
- **Disclosure:** Relevant stakeholders may be informed of the conflict to ensure transparency.
- **Modification of duties:** Adjustments to roles or responsibilities may be made to mitigate conflicts.
- **Divestment:** Individuals may be required to divest conflicting financial interests.

8. Review and Monitoring

CSL will regularly review and monitor compliance with this policy to ensure its effectiveness and relevance. Any updates or revisions to the policy will be communicated to all stakeholders.

9. Consequences of Non-Compliance

Failure to comply with this policy may result in disciplinary action, including but not limited to reprimand, termination of employment or contractual relationship, and legal action, depending on the severity and impact of the non-compliance.

10. Confidentiality

All disclosures of conflicts of interest will be handled with utmost confidentiality, with information disclosed only to individuals with a legitimate need to know for the purpose of managing the conflict.

11. Training and Awareness

CSL will provide training and educational programs to ensure that all individuals are aware of their obligations under this policy and understand how to identify, disclose, and manage conflicts of interest effectively.

12. Compliance with Laws and Regulations

This policy is intended to supplement, not supersede, any applicable laws, regulations, or contractual obligations governing conflicts of interest. CSL is committed to full compliance with all relevant legal requirements.

13. Contact Information

For inquiries or concerns regarding this policy or to report a potential conflict of interest, individuals may contact CSL's designated Ethics Committee or the appointed officer responsible for conflict of interest management.