

	Pheon Auto Tech Pvt Ltd	Format Ref.	F-MR-05
Format Name	Controlled Guidelines & Policies	Rev No/Dt	02/ 09.02.2022

Sec.	Description	Particulars			
1	Particulars	Type of Guideline	Policy ☒ Guidelines ☐		
		Name	Conflict of Interest Policy		
		Ref.	G-H-16		
		Department	Human Resource		
2	Purpose	At Pheon Auto Tech, we are committed to conducting our business with the highest standards of integrity, independence, and objectivity. This Conflict of Interest (COI) Policy is designed to help employees and stakeholders recognize and appropriately manage situations where personal, financial, or external interests may interfere with their professional responsibilities or company decisions.			
3	Scope	This policy applies to: All employees, including full-time, part-time, temporary, who are part of decision-making process Directors and senior management Consultants, advisors, and external partners acting on behalf of Pheon Auto Tech It covers actual, potential, and perceived conflicts across all company operations, including procurement, hiring, vendor relationships, business development, and governance.			
4	Owner	Manager HR & Admin			

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5	Guideline / Policy
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1. Definition

A **conflict of interest** arises when an individual's **personal interests**—such as relationships, financial investments, outside roles, or family ties could:

- Compromise their objectivity or independence
- Influence their professional judgment or actions
- Appear to do so in the eyes of others

Conflicts may be:

- **Actual:** A real and current conflict
- **Potential:** A situation that could develop into a conflict
- **Perceived:** When it appears a conflict exists, even if none actually does

2. Common Examples

- Having a **financial interest** in a supplier, vendor, or competitor
- **Hiring or supervising** a close relative or friend.
- **Receiving gifts or hospitality** that could influence business decisions
- Engaging in **outside employment or business activities** that conflict with company duties
- Participating in **procurement or vendor selection** where the employee has a personal stake

3. Guiding Principles

To prevent and manage conflicts of interest, Pheon Auto Tech employees must:

- **Disclose Promptly**
Declare any actual or potential conflict of interest **as soon as it arises** using the internal reporting system. (i.e. through an e-mail to their supervisor)
- **Avoid Undue Influence**
Do not participate in decisions or approvals related to any entity or individual where a conflict exists.
- **Seek Approval**
In some cases, a declared conflict may be permitted with written approval from the HR, subject to mitigating controls.

4. Reporting & Disclosure Process

- **Identify** any actual or potential conflict
- **E-mail to the supervisor with a CC to designated HR.**
- **Await guidance**—actions may include recusal, reallocation of tasks, or written clearance
- **Maintain confidentiality**—all disclosures are treated with discretion

5. Consequences of Non-Compliance

Failure to disclose or improperly managing a conflict of interest may result in:

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- Disciplinary action (including termination of employment)
- Reputational damage
- Legal or regulatory consequences for both the employee and the company

6. Annual Declarations

All directors and key personnel are required to complete an **annual conflict of interest declaration**, even if no conflict exists, to affirm ongoing compliance.

Declaration can be taken on a Microsoft form from all relevant staff and employees.

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Sec.	Description	Details				
		Particulars		From	Reference	
6	Inputs					
7	Outputs					
8	Monitoring & Measurement	Frequency		KPI	Responsibility	
		Annual		Conflict of Interest Declaration from All Employee	Manager - HR	
9	Revision History	Rev No.	Details of Revision	Date	DCR No.	
		00	INITIAL RELEASE	01.09.2025		
		01				
10	Format Usage Related	Format Template Loc.	Not Applicable			
		Document Retention Format	Policies	To be Stamped and Signed by MD and then Retained in PDF Format.		
			Guidelines	Controlled Document to be retained in PDF Format		
		Document Retention Loc.	PAT Systems Data > PAT - Document Resource > Controlled - PAT - Guidelines and Policies > Human Resource (H) Related > Controlled G-H-16 - Conflict of Interest Policy			
		Retention Period	Perpetual			
		Circulation	MD, MIS, All Team Members.			
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APPROVED
By MR at 5:37 pm, Sep 02, 2025