

## CONFLICT OF INTEREST POLICY

### Policy Statement

**Wharton sustainable solutions** is committed to pursuing "a common good that transcends the interests of particular individuals or groups" and to distinguishing itself as "a diverse, socially responsible learning community." Among its core values is the belief that "no individual or group may rightfully prosper at the expense of the other."

### Reason for Policy

The Conflict of Interest Policy primarily intends to guide employees of the WSS to carry out their employment responsibilities in a manner that reflects and reinforces the values of Wharton sustainable solutions. It further aims to ensure compliance with federal and state law and contractual obligations. Wharton sustainable solutions expects all employees to maintain the highest level of integrity and objectivity in performing their job duties. Employees are expected to conduct their business dealings with vendors, consultants, and/or clients in a manner that will avoid any conflict of interest, or appearance of a conflict of interest, between the employees' interests and the interest of the Company (Wharton sustainable solutions).

### Who Should Read This Policy

All Wharton sustainable solutions employees should read this Policy.

### Policy Text

In general, the company (Wharton sustainable solutions) expects all employees to:

- Be aware of the potential for real or apparent conflicts of interest in all their employment activities.
- Abide by the standards set forth in the policy (including any additional procedures adopted by individual or companies in furtherance of this policy).
- Fully disclose professional and relevant personal activities and relationships that create a real or apparent conflict of interest.
- Address conflicts of interest that arise.
- Conduct Company's (Wharton sustainable solutions) business with appropriate transparency.

All Wharton sustainable solutions employees are obligated to conduct the affairs of the company in a manner that promotes the company mission, vision, and values. A conflict of interest may exist on two levels:

**Individual Level:** when an employee has financial, personal, or other considerations that may affect or appear to affect their professional judgment in decision making on behalf of the company

or

**Institutional Level:** when the company itself has financial or other considerations that may affect or appear to affect its decision making as it relates to the Organization's values, mission, and/or business practices.

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contact@whartonehs.com

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+91-9903387117

#### Address

32, Chowringhee Road, OmTower, 7th Floor (Opp- Park Street Metro) kolkata-700071

## INDIVIDUAL CONFLICTS OF INTEREST

Each employee must:

1. Refrain from using Wharton sustainable solutions resources to further employees' interests (or the interests of their family) or the interests of any individual or group above the best interests of the company.
2. Disclose any significant ownership, board service, consulting relationship, management, or financial interest in any entity doing business or proposing to do business with the company.
3. Refrain from participating in transactions with the company (other than one's employment), which could result in personal profit except upon the written approval by the appropriate Managing Director and the Manager.
4. Refrain from accepting (without disclosing to the appropriate Managing Director and the Manager.) any gift, compensation, or benefit with a value of more than Rs.20,000 from any person or organization who aims to influence the employee's professional judgment. This includes any person or organization with whom the employee may transact business on behalf of the company. Items valuing Rs. 20,000 or less are not included within this policy unless in the aggregate the total value exceeds Rs. 20,000 per year, in which case they must be reported to the appropriate Managing Director and the Manager.
5. Refrain from making payments or providing gifts or services in the name of, or on behalf of, the company or with company funds, services, or facilities to anyone affiliated with a government or accrediting agency who is in a position to influence an action or decision related to the company.
6. Refrain from making or soliciting partisan contributions in the name of, or on behalf of, the company or with company funds, services, or facilities in any manner to, or in aid of, any political party, group, candidate, or cause, so as not to jeopardize the company's tax exempt status which prohibits it from endorsing any political party, group, or cause.

## INSTITUTIONAL CONFLICTS OF INTEREST

An institutional conflict of interest may exist if the company has commercial arrangements that provide collateral benefits to the institution, such as when a vendor offers a gift to the company or if the company's shares in the revenue generated by sale of the vendor's product to students or employees. To ensure that the company's best interests are served, these situations should be carefully reviewed by senior leadership. The appropriate Managing Director will consider the following questions:

1. Does the transaction entail a conflict between the Wharton sustainable solutions's values, mission, and/or financial interests?
2. Does the transaction entail receipt by the company of financial benefit that may affect or appear to affect the quality or price of goods or services offered to students or other constituents?
3. Does the transaction entail the actuality or appearance that the company is profiting to the detriment of students or other constituents?
4. Would disclosure of the collateral benefit alleviate any actual or apparent conflict of interest?

*If the answer to any of the above questions is yes, the Managing Director must resolve the matter.*

## Procedures

A conflict or a potential conflict of interest can arise at any time. Employees must disclose such situations to their Manager before occurrence, if possible, and in any event as quickly as possible

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after it arises. If employees are in doubt about a situation, they should fully disclose the situation. There is no harm in over-disclosing; by contrast, failures to disclose may subject employees to disciplinary action.

To disclose a conflict or potential conflict of interest, employees and Manager should adhere to the following procedures:

1. Employees complete section 1 of the Conflict of Interest Disclosure Form and submit it to their Manager.
2. The Manager completes section 2 of the Conflict of Interest Disclosure Form and submits it to Managing Director [director@whartonehs.com](mailto:director@whartonehs.com).
3. The Managing Director along with Manager evaluates the situation and completes section 3 of the Conflict of Interest Disclosure Form (i.e. reports the results) within ten business days, or up to 20 business days if more time is needed to gather information.
4. If no conflict of interest is found, the Managing Director will send the updated Conflict of Interest Disclosure Form to the employee's Manager. The Manager will communicate the result to the employee.

If a potential conflict of interest is detected, the Managing Director will send the updated Conflict of Interest Disclosure Form to the employee's Manager for joint resolution. The Managing Director will then notify the Manager who will communicate this to the employee. The Manager will advise the Managing Director of the resolution. The Managing Director will then notify the Manager who will communicate this to the employee.

### Violations

Violation of this policy will result in disciplinary action up to and including termination of employment.

### Exceptions

Any exception to this policy must be approved in writing by the appropriate Managing Director and the Manager.

**Signature:** 

**Date:** 02/05/2022

**Name:** Shadab Ahmed Ghazaly

**Designation:** CEO/ Managing Director