# Conflict of Interest Policy

1. Purpose

The purpose of this Conflict of Interest Policy is to ensure that the interests of Portstar Machinery ("the Company") are protected, and that its employees, directors, and officers conduct themselves with integrity and transparency in all business dealings. This policy outlines the procedures to identify, disclose, and manage conflicts of interest effectively.

2. Scope

This policy applies to all employees, directors, officers, and contractors of Portstar Machinery.

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests, relationships, or financial interests interfere with their ability to act in the best interests of the Company. Conflicts of interest may arise in various forms, including but not limited to:

- Financial interests in competing businesses or suppliers.
- Family or personal relationships with suppliers, clients, or competitors.
- Outside employment or consulting arrangements that could influence decisions at the Company.
- Access to confidential information for personal gain.

4. Disclosure of Conflicts

All employees, directors, officers, and contractors have a duty to disclose any potential or actual conflicts of interest to the Company. This includes promptly informing the relevant supervisor, manager, or the designated ethics officer about any situation that may give rise to a conflict of interest.

5. Review and Assessment

Upon receipt of a disclosure, the Company will review the situation to determine the extent of the conflict and the potential impact on the Company's operations, reputation, or financial interests. The Company may request additional information from the individual to fully understand the nature of the conflict.

6. Management of Conflicts

Depending on the severity and nature of the conflict, the Company may implement various measures to manage the conflict, including but not limited to:

- Recusal: The individual may be required to recuse themselves from decision-making processes or discussions where a conflict exists.
- Divestment: The individual may be required to divest themselves of any conflicting financial interests or relationships.
- Monitoring: The Company may implement monitoring mechanisms to ensure that the conflict is managed appropriately and does not impact the Company's operations.

7. Annual Declarations

All employees, directors, officers, and contractors are required to make an annual declaration of any potential conflicts of interest. This declaration will be reviewed by the Company's ethics officer or designated committee to ensure compliance with this policy.

8. Consequences of Non-Compliance

Failure to comply with this Conflict of Interest Policy may result in disciplinary action, up to and including termination of employment or contract. The Company reserves the right to take legal action against individuals who knowingly or negligently breach this policy.

9. Training and Education

The Company will provide regular training and education to all employees, directors, officers, and contractors on identifying, disclosing, and managing conflicts of interest effectively.

10. Confidentiality

All disclosures of conflicts of interest will be treated with the utmost confidentiality, and information will only be shared with individuals who have a legitimate need to know.

11. Policy Review

This Conflict of Interest Policy will be reviewed annually and updated as necessary to ensure its effectiveness and compliance with relevant laws and regulations.

12. Compliance with Laws and Regulations

This policy is subject to all applicable laws and regulations governing conflicts of interest in the jurisdictions where the Company operates. Employees, directors, officers, and contractors are expected to comply with all such laws and regulations in addition to this policy.

Conclusion

By adhering to this Conflict of Interest Policy, employees, directors, officers, and contractors demonstrate their commitment to upholding the highest standards of integrity, transparency, and ethical conduct in all business dealings involving Portstar Machinery.

[Signature of CEO or Ethics Officer] [Date]