CORPORATE POLICY

Conflicts of Interest Policy

EFFECTIVE DATE	VERSION	NEXT REVIEW
11 August 2026	1.0	12 months after approval

POLICY OWNER	APPROVED BY
Compliance Officer	Board of Directors, [date]

APPLIES TO
All directors, managers and staff of Boafo Nsa Ltd

01 Purpose

Decisions at Boafo Nsa must be made in the company's interest, not for private gain. A conflict of interest is not wrong in itself; hiding it is. This policy sets out how conflicts are declared and managed.

02 What is a conflict of interest

A conflict arises when a personal, family or financial interest could influence, or appear to influence, a person's judgement at work. Common examples in construction:

- Owning or being related to the owner of a subcontractor, supplier, quarry, plant-hire firm or transport company that Boafo Nsa uses
- Hiring or supervising a close relative
- Selling company scrap, surplus materials or used equipment to oneself or a relative
- A family member working for a client, the Engineer, a ministry or a district assembly that awards or supervises our contracts
- Working privately for a competitor or running a side business in building work
- Holding land or property next to a project site whose value our work may affect

03 Rules

01 Declare any actual, potential or perceived conflict in writing to the Compliance Officer as soon as it arises

02 Complete an annual declaration, even if there is nothing to declare

03 Take no part in any decision, tender evaluation, purchase order, measurement or approval where you have a conflict

04 Never use company information, contacts or time for private business

05 Obtain written approval before taking outside employment or a directorship

04 Management of declared conflicts

The Compliance Officer (or the Board chair, if the conflict involves the Managing Director or Compliance Officer) decides how each conflict is managed. Options include removing the person from the decision, independent review of the transaction, competitive quotes, or declining the arrangement. Every declaration and decision is recorded in the Conflicts of Interest Register.

05 Related-party transactions

Any contract between Boafo Nsa and a director, shareholder or their related companies must be on arm's-length terms, approved by the Board without the conflicted director voting, and recorded in the Board minutes.

06 Breaches

Failure to declare a conflict is a disciplinary matter and may lead to dismissal. Contracts awarded in breach of this policy may be reviewed and cancelled.

07 Review

The Compliance Officer reviews the Register every quarter and reports to the Board annually. This policy is reviewed at least every 12 months.

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