

**Form ID:** FIN-FRM-ETH-002-V1

**Version:** 1.0

**Effective Date:** [Insert Date]

**Owner:** Finance Department

**Review Cycle:** Annual

This declaration is required **annually** and whenever circumstances change (e.g., new outside interests, gifts, or relationships). It supports the Finance Department Code of Ethics & Conduct (POL-FIN-ETH-001) and the ISO-aligned Finance Policy (POL-FIN-001).

## A. Employee Details

- **Name:** \_\_\_\_\_
- **Position/Title:** \_\_\_\_\_
- **Entity/Department:** \_\_\_\_\_
- **Work Location:** \_\_\_\_\_
- **Employee ID:** \_\_\_\_\_
- **Email / Phone:** \_\_\_\_\_

## B. Annual Acknowledgements (tick )

- I have read and understood **POL-FIN-ETH-001 Finance Code of Ethics & Conduct** and agree to comply with it.
- I have read **POL-FIN-001 Finance Department Policy** and **SOP-FIN-001 Finance SOP** relevant to my role.
- I completed the **annual ethics training** (date): \_\_\_ / \_\_\_ / \_\_\_\_.
- I understand my **confidentiality** obligations regarding financial, payroll, personal, and bank information.
- I will not engage in fraud, bribery, kickbacks, or facilitation payments and will report suspected misconduct.
- I will maintain accurate records and follow Delegation of Authority (DOA) and bank mandate controls.
- I understand this form must be updated **within 14 days** if my circumstances change.

## C. Conflicts of Interest (COI) — Declaration

**Question C1.** Do you have any actual, potential, or perceived conflicts of interest related to your Finance duties (e.g., family/close relationships with suppliers/customers/employees; outside employment; ownership or financial interests; advisory roles; personal loans; or any situation that could influence objectivity)?

- **No conflicts to declare** (skip to Section D)
- **Yes** (complete table below and attach details)

### COI Disclosure Table

#Nature of Interest (e.g., family ties, ownership, outside work)	Organization/Person Relationship & Role	Finance Decisions Affected	Dates (From-To)	Mitigation/Recusal Plan
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1  
2  
3

**Attachments:**  COI memo  Contract/Offer  Shareholding proof  Other: \_\_\_\_\_

## D. Gifts, Hospitality & Entertainment — Declaration

**Question D1.** In the last 12 months, did you **offer, request, receive, or accept** any gift, hospitality, travel, or entertainment from current/prospective suppliers, customers, banks, or advisors related to your Finance role?

- **No** (skip to Section E)
- **Yes** (complete table below)

#### Gifts & Hospitality Register Extract

#	Date From (Company/Person)	Description	Estimated Value (K)	Context (e.g., meeting/tender)	Accepted or Declined	Pre-approval Ref	Entry # in FIN-REG-GIFT
1							
2							
3							

**Note:** Cash or equivalents (vouchers, gift cards) are prohibited. Anything above **K[Insert threshold]** requires pre-approval by the Financial Controller.

## E. Outside Employment, Directorships & Financial Interests

**Question E1.** Do you hold any **outside employment, consultancy, directorships, trusteeships, or board/advisory roles?**

- No
- Yes (provide details): \_\_\_\_\_

**Question E2.** Do you hold any **financial interests** (shares, options, beneficial interests) in entities that are current or potential suppliers/customers/banks/competitors?

- No
- Yes (provide details): \_\_\_\_\_

**Question E3.** Do you have any **close personal relationships** with individuals employed by or owning a current/potential supplier, customer, or bank?

- No
- Yes (provide details): \_\_\_\_\_

## F. Data Privacy, Confidentiality & Security

- I will protect confidential and personal data, use only approved systems, and follow least-privilege access.
- I will not share credentials or bank tokens and will report suspected compromise immediately.

## G. Declaration & Signature

I declare that the information provided is **true, complete, and accurate** to the best of my knowledge. I understand that **omissions or false statements** may result in disciplinary action. I agree to **update this declaration within 14 days** of any change.

- **Employee Name (print):** \_\_\_\_\_
- **Signature:** \_\_\_\_\_
- **Date:** \_\_\_ / \_\_\_ / \_\_\_

## H. Reviewer Section (Finance Use Only)

**Reviewed by Finance Manager**

- Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_
- Findings/Notes: \_\_\_\_\_

- **COI Register (FIN-REG-COI) Entry #:** \_\_\_\_\_
- **Gifts Register (FIN-REG-GIFT) Entry #(s):** \_\_\_\_\_
- **Mitigations/Recusals Required:**  Yes  No  
If Yes, describe and record owner/dates: \_\_\_\_\_

**Financial Controller Approval (if required)**

- Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_

**Follow-ups / CAPA (if any)**

- FIN-REG-CAPA Ref: \_\_\_\_\_ Owner: \_\_\_\_\_ Due: \_\_\_ / \_\_\_ / \_\_\_

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## I. Submission & Retention

- **Submission:** Return the signed original to Finance by **[Insert annual due date, e.g., 31 January]** or within **14 days** of any change.
  - **Storage:** File in the controlled repository under **\Finance\Ethics-Compliance\Declarations**.
  - **Retention:** Keep for **≥ 7 years** (or longer per law/contract).
  - **Confidentiality:** Declarations are confidential; access is limited to authorized reviewers.
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