**CONFLICT OF INTEREST POLICY**  
**OF**  
**Shinaux NPO**

Effective as of [Дата]

**1. PURPOSE**

The purpose of this Conflict of Interest Policy (the "Policy") is to protect the integrity of **Shinaux NPO** (the "Corporation") by ensuring that decisions are made in the best interest of the Corporation and not based on personal gain or outside influences.

**2. DEFINITION OF CONFLICT OF INTEREST**

A conflict of interest arises when an individual’s personal, professional, or financial interests may compromise or appear to compromise their duty to act in the best interest of the Corporation. Examples include but are not limited to:

* Engaging in transactions where an officer or director has a financial interest.
* Accepting gifts or benefits from individuals or entities doing business with the Corporation.
* Participating in decision-making processes that involve family members or business associates.

**3. DISCLOSURE REQUIREMENTS**

**3.1 Duty to Disclose**

* All directors, officers, and key employees must disclose potential conflicts of interest in writing to the Board of Directors as soon as they arise.
* Such disclosures shall be recorded in the meeting minutes.

**3.2 Annual Disclosure**

* All directors and officers shall complete a Conflict of Interest Disclosure Form annually.

**4. PROCEDURES FOR HANDLING CONFLICTS**

**4.1 Determination of Conflict**

* The Board shall review all disclosed conflicts and determine whether a conflict exists.
* The interested party shall not be present during discussions or voting on matters involving the conflict.

**4.2 Recusal from Decision-Making**

* Any individual with a conflict shall abstain from influencing decisions related to the matter.
* If necessary, the Board may seek legal counsel for further guidance.

**4.3 Documentation**

* All conflict-related decisions shall be documented in meeting minutes.
* The Corporation shall retain these records for transparency and compliance purposes.

**5. VIOLATIONS OF POLICY**

* If the Board determines that an individual has failed to disclose a conflict, appropriate disciplinary action may be taken, including removal from office if necessary.

**6. REVIEW AND AMENDMENTS**

* This Policy shall be reviewed annually by the Board and amended as needed to remain compliant with applicable laws and best practices.

**IN WITNESS WHEREOF, the undersigned, being all of the directors of the Corporation, have executed this Policy as of the date first written above.**

**Signed and Acknowledged by:**

[President]  
Shinaux NPO

[Vice-President]  
Shinaux NPO

[General Secretary]  
Shinaux NPO