



HR POLICY

POLICY NAME: IMPARTIALITY POLICY

REFERENCE No.: HR/CCSA/IP/7/2025

POLICY VERSION: HR/IP/001

W.E.F: 1-July-2025

Date	Policy Version No.	Approved By
1 st July 2025	HR/IP/001	Abhishek Nambiar (Chief People Officer)

TABLE OF CONTENT

S. No.	Policy Content	Page No.
I	Introduction	03
II	Scope	03
III	Objectives	03
IV	Impartiality policy	04
1.	Impartiality Commitment Statement	04
2.	Principles of Impartiality	04
3.	Identification and Management of COI	04
4.	Impartiality in Stakeholder Engagement	05
5.	Roles and Responsibilities	05
6.	Training and Awareness	06
7.	Third Party Relationships	06
8.	Reporting Mechanisms	07
9.	Disciplinary Measures	07
10.	Review and Amendments	07

I. INTRODUCTION

This Impartiality Policy ("**Policy**") is made available to all the individuals associated with CottonConnect South Asia Private Limited (hereinafter referred to as the "**Company**" or "**CottonConnect**" or "**We**" or "**Us**" or "**Our**"). CottonConnect is committed to maintaining the highest standards of impartiality, transparency and integrity in all aspects of its operations, particularly in its engagement with farmers, supply chain actors, brands, and other stakeholders.

The Company recognizes that actual or perceived conflicts of interest may compromise the credibility of its work, and therefore adopts a zero-tolerance approach toward any compromise on impartiality.

This Policy establishes a framework for identifying, managing, and mitigating risks of bias or conflict of interest. By adhering to the principles herein, we aim to foster stakeholder confidence and uphold the credibility of our sustainability and traceability programs.

II. SCOPE

This Policy applies to all individuals affiliated with CottonConnect, including employees, consultants, seasonal workers, interns, and relevant external stakeholders.

III. OBJECTIVES

The objectives of this Policy are to:

1. Ensure that all decisions and activities are free from bias, undue influence, or conflict of interest;
2. Promote transparency and accountability in stakeholder engagements;
3. Identify, disclose, and manage relationships or situations that may compromise impartiality;
4. Align internal procedures with ethical and governance best practices;
5. Support CottonConnect's mission of fostering equitable and sustainable supply chains.

IV. IMPARTIALITY POLICY

1. **Impartiality Commitment Statement.** CottonConnect is committed to ensuring that all decisions and activities, especially those impacting producers, suppliers, and brand partners, are based on objective, fair, and consistent principles. CottonConnect prohibits any form of preferential treatment.
2. **Principles of Impartiality.** CottonConnect adheres to the following core principles to ensure impartiality in all its operations, partnerships, and programmatic engagements:
 - 2.1. *Objectivity:* All judgments, decisions, assessments and audits must be based on verifiable facts, evidence, and transparent processes, not on assumptions, preferences, personal interests or external influence/relationships.

- 2.2. *Independence*: Personnel involved in decision-making must operate independently of any personal, financial, or organizational interest that could affect their judgment.
 - 2.3. *Fairness*: All stakeholders, including farmers, partners, clients, and team members, must be treated equitably and without discrimination or bias.
 - 2.4. *Transparency*: Processes, criteria, and decisions should be clearly documented, communicated where appropriate, and open to scrutiny.
 - 2.5. *Accountability*: Individuals and teams must be accountable for upholding impartiality and addressing any breaches or risks of conflict of interest.
 - 2.6. *Confidentiality*: Sensitive information obtained during the course of work must not be misused to favor or disadvantage any party.
3. **Identification and Management of Conflicts of Interest (COI)**
- 3.1. Employees must disclose conflicts in the format as annexed in **Annexure A**:
 - At the time of joining;
 - Annually, via reaffirmation;
 - Immediately upon any material change in circumstances.
 - 3.2. Examples of COI include:
 - Having a close family member or relative as a vendor, auditor, or grantee;
 - Auditing or managing a project in which the employee was previously involved as a participant or implementer;
 - Receiving gifts, benefits, or hospitality from stakeholders that may influence decision-making;
 - Holding direct or indirect financial interest in a supplier, grantee, or program partner;
 - Participating in procurement or hiring decisions involving personal or business acquaintances.
 - 3.3. In cases of existing or prior relationships (e.g., employment, consultancy, kinship), staff must recuse themselves from associated decision-making roles.
4. **Impartiality in Stakeholder Engagement**. CottonConnect will:
- 4.1. Treat all farmers, suppliers, brands, and community groups equally, regardless of geography, scale, or financial capacity.
 - 4.2. Not allow project funding sources to influence the objectivity of reporting, traceability records, or farmer-related data.
 - 4.3. Avoid preferential partnerships that may lead to biased selection of beneficiaries, cooperatives, or service providers.
5. **Roles and Responsibilities**

- 5.1. Senior Management shall be accountable for establishing a culture of impartiality and ethical conduct throughout the organization. Their responsibilities include:
- providing visible leadership and unequivocal commitment to impartiality across all programs, partnerships, and business units.
 - ensuring that appropriate structures, systems, and resources are in place for the effective implementation of this Policy.
 - reviewing and acting upon conflict-of-interest disclosures submitted by the concerned person.
 - approving mitigation measures or recusals in cases where impartiality may be compromised.
- 5.2. All CottonConnect members, including employees, interns, and external consultants, are individually responsible for upholding the principles of impartiality in the performance of their duties. This includes:
- conducting all work-related activities with fairness, objectivity, and independence, irrespective of stakeholder affiliation or commercial interest.
 - identifying and promptly declaring any actual, potential, or perceived conflicts of interest in accordance with the reporting mechanism outlined under this Policy.
 - refraining from participation in any program, decision-making process, or partnership engagement where a conflict of interest exists, unless authorized through formal disclosure and approval procedures.
 - participating in mandatory training and familiarizing themselves with ongoing obligations under this Policy.
6. Training and Awareness All relevant stakeholders shall be periodically trained on:
- 6.1. The importance of impartiality.
 - 6.2. How to identify and report potential conflicts.
 - 6.3. Ethical engagement protocols with farmers, vendors, and partners.
7. Third-Party Relationships. CottonConnect shall ensure that relationships with partner organizations, local implementing agencies, auditors, consultants, or donors do not:
- 7.1. Create dependencies that compromise decision-making,
 - 7.2. Unduly influence the objectivity of evaluations or data reporting,
 - 7.3. Breach confidentiality or fair treatment norms.

Third-party engagements shall be governed by agreements containing impartiality and non-conflict clauses. Breach of these clauses may lead to corrective action, suspension, or blacklisting.

8. Reporting Mechanisms. Concerns regarding impartiality may be reported by:
 - 8.1. Contacting the HR Department;
 - 8.2. Writing an Email to speakup@cottonconnect.org
 - 8.3. Submitting written communication at the Company's registered office.

Anonymous reports will also be accepted through designated secure channels, and all disclosures will be treated with strict confidentiality. No individual shall face retaliation for raising a concern in good faith. All reports will be acknowledged and investigated impartially and promptly. Where a breach is confirmed, appropriate corrective actions—including disciplinary measures or systemic improvements—will be taken to uphold the integrity and impartiality of the Company's operations.

9. Disciplinary Measures. Violations of this Policy, including failure to declare conflicts or engaging in biased conduct, may result in disciplinary action, up to and including termination of employment or contract.
10. Review and Amendments. CottonConnect shall review this Policy on an annual basis, or earlier if deemed necessary due to changes in applicable laws, internal governance structures, operational requirements, or stakeholder expectations. CottonConnect expressly reserves the right to amend, update, or withdraw this Policy, in whole or in part, at its sole discretion, following such review. All material amendments shall be communicated to relevant stakeholders and members in an appropriate and timely manner.

Reviewed By:

HR Department

Approved By:

Chief People Officer

References:

- [Code of Conduct](#)
- [Whistleblower Policy](#)
- [Anti-Bribery and Corruption Policy](#)

Annexure A: Conflict of Interest Declaration Form

CONFIDENTIAL

Name of Declarant: _____

Designation/Role: _____

Department/Project: _____

Date of Declaration: _____

1. **Declaration Scope.** This declaration is made in accordance with CottonConnect' s Impartiality Policy. It covers actual, potential, or perceived conflicts of interest that may affect my role, decision-making, or professional integrity.

2. **Do You Have Any Actual, Potential, or Perceived Conflicts of Interest to Declare?**

No, I hereby declare that to the best of my knowledge, I do not have any actual, potential, or perceived conflicts of interest.

Yes, I declare the following conflicts of interest:

Nature of Conflict	Involved Party (Name & Entity)	Details & Relevance

3. **Acknowledgment and Affirmation**

I confirm that:

- I have read and understood the Impartiality and Conflict of Interest provisions of the Company;
- I undertake to immediately inform the Company of any change in the above declaration or emergence of new conflicts;
- I understand that failure to declare a conflict may lead to disciplinary action, including immediate removal from relevant roles or termination of engagement.

Signature: _____

Name: _____

Date: _____

For Office Use Only

Reviewed by (HR/Compliance): _____

Date of Review: _____

Action Taken (if any): _____