

NON-DISCLOSURE, LOOKALIKE CLIENTS & CONFLICT OF INTEREST POLICY

1. PURPOSE

This policy defines how comsim manages confidentiality, conflicts of interest, and work with lookalike or competing clients.

Its purpose is to:

- Protect client trust and confidential information
- Preserve comsim's objectivity and judgement
- Enable comsim to operate as a specialist consultancy without artificial exclusivity
- Ensure alignment with comsim's ethical standards and B Corp commitments

This policy applies to all comsim directors, employees, contractors, and subcontractors.

2. CORE PRINCIPLES

Confidentiality is absolute. All client information is treated as confidential unless explicitly public.

Conflict is defined by risk, not similarity. Sector overlap alone does not constitute conflict.

Learning is abstracted, not transferred. Generalised patterns may be applied; client-specific tactics may not.

3. LOOKALIKE CLIENTS

Lookalike clients are organisations with similar sectors, business models, or growth stages.

Comsim may work with multiple lookalike clients concurrently provided confidentiality is preserved and no divided judgement exists.

4. DIRECT COMPETITORS

Direct competitors operate in the same category, geography, and route to market.

Engagements are permitted only with scope limitation, leadership approval, and where necessary, prior disclosure and consent.

5. PROHIBITED CONFLICTS

Comsim will not act as lead commercial advisor to competing parties or accept engagements where success for one client disadvantages another.

6. SUBCONTRACTORS AND PARTNERS

All subcontractors and partners are bound by equivalent confidentiality and conflict standards. Comsim remains accountable for compliance.

7. RIGHT TO DECLINE

Comsim retains the unilateral right to decline or exit engagements where conflict risk is unacceptable.

8. GOVERNANCE

This policy is mandatory and takes precedence over commercial pressure. Breaches may result in termination of engagement.