

1 Introduction

1.1 The purpose of this Policy is to ensure:

1.1.1 staff understand where conflicts of interest are likely to arise;

1.1.2 staff know what to do when a conflict of interest arises;

1.1.3 the Company is able to demonstrate to external parties that we have appropriate policies and procedures in place to deal with conflicts of interest; and

1.1.4 that the Company and staff are protected from any appearance of impropriety.

2 Scope of the Policy

This Policy applies to all employees, freelancers, contractors and to others associated with the Company who in whatever capacity, undertake work or provide services to the Company. For the purposes of this Policy only, this group shall be collectively referred to as 'staff' or 'member of staff'.

3 Conflict of Interest

3.1 A conflict of interest may arise when personal interests could or do improperly influence a member of staff in the performance of their duties or could or do prevent them from making objective decisions in the course of their work.

3.2 It is essential that care is taken to avoid actual conflicts of interests as well as any perceived conflicts of interests.

3.3 Examples of scenarios where potential conflicts of interest may arise are:

3.3.1 **"Personal Interests"** - where a member of staff has an interest in any client/customer/supplier/contractor or charitable beneficiary of the Company;

3.3.2 **"Personal Relationships"** – where a member of staff is related in any way to any client/customer/supplier/contractor or charitable beneficiary of the Company; and

3.3.3 **"Commercial Interests"** – where a member of staff has a personal commercial or vested interest on the outcome of an activity related to our dealings with any client/customer/supplier/contractor or charitable beneficiary of the Company.

4 Disclosing Interests

From time-to-time members of staff may be asked to complete and/or update a Register of Interests Form which enables the Company to monitor potential risks of conflicts of interest.

5 Reporting Conflicts of Interest

- 5.1 In the event that any member of staff finds themselves or perceives that they may be in a conflict-of-interest situation, they should notify their immediate Line Manager.
- 5.2 It will be the responsibility of the line manager to report the conflict or potential conflict of interest to the Compliance Manager who will record the conflict or potential conflict of interest and advise the Line Manager what if any action should be taken to remove any danger of impropriety. This may involve work/responsibility of relationships being reallocated.

6 Other Policies

- 6.1 This Policy should be read in conjunction with the Anti-Bribery and Corruption Policy and the Third-party Payment Policy.
- 6.2 Any contravention of this Policy will constitute a disciplinary offence which will be dealt with under the Disciplinary Policy and Procedure.
- 6.3 Please see Register of Interest Form to disclose any potential conflict of interest.