

SNIEF TRAINING SERVICES LTD

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Conflict of Interest or Loyalty Policy

Definition

A 'conflict of interest' or "Loyalty" arises when the best interests of an individual employee/director of SNIEF Training Services Ltd are, or could be, different from the best interests of the Company. This may be something that affects an employee or director directly, or indirectly, through a family member or friend or business partner or business relationship.

For example this might include an employee/director favouring a particular apprentice, employer, college or supplier due their relationship with that apprentice, employer, college or supplier as a result of any personal or business relationship with that apprentice employer, college or supplier.

or

A director may sit on the Board of another company or supplier and as a result may have a conflict of interest or loyalty when carrying out their responsibilities on behalf of the Company.

Statement of Intent

The Company is committed to ensuring its decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with the business of the Company as a training provider.

Policy

It is the policy of the Company to:

- Ensure every employee/director understands what constitutes a conflict of interest and that they have a responsibility to recognise and declare any conflicts that might exist which could impact on their ability to carry out their responsibilities on behalf of the company.
- Document any declared conflict of interest and the action(s) taken to ensure that the said conflict does not affect the decision making and performance of the Company in meeting its obligations and responsibilities.
- Ensure that every employee/director understands that no gifts or payments may be given to, or accepted from any person or body as they may be construed as an "inducement or reward" to favour one party over another (anti bribery policy).

Procedure

When an employee/director identifies that they have a potential conflict of interest they must:

- a) Declare any conflict of interest as soon as they become aware of the conflict of interest.
- b) Ensure it is entered in the conflict of interest register (ongoing conflicts), and/or minuted in the appropriate board/management meeting papers (one-off conflicts).
- c) Not take part in any meeting, or discussions or voting relating to the matter of conflict.
- d) Not be counted in the quorum for decision-making related to the matter.
- e) In the interests of frank and open discussion, an employee, employer or supplier affected by a conflict of interest may be asked to leave the meeting while related discussion / decision making is taking place.

The minutes of any meeting/discussion should state:

- I. The declared conflict.
- II. That the employee/director left the meeting, or the reason they were permitted to stay.
- III. That the employee/director took no part in discussion or decision making on the matter.
- IV. That the meeting was quorate (not counting the affected individual).
- V. Any other actions taken to manage the conflict.

If an employee/director is unsure what to declare, they should err on the side of caution and discuss the matter with the Top Management for confidential guidance. This Conflict of Interest / Loyalty Policy is authorised and approved by the Board of Directors of the Company.

Signed.....*James Bullock*.....Chairman.....*12/14/19*.....Date

Signed.....*Shirley L. Hodgson*.....Company Secretary.....*12/14/19*.....Date

Policy adopted on *12/14/19*.....Due for review on *April 2020*.....