

# Conflict of Interest Policy

Effective Date: 12/03/2026

Review Date: 12/03/2027

## 1. Introduction

This Conflict of Interest Policy sets out the expectations, obligations, and best-practice principles for all employees, contractors, and representatives of **Delyn Safety UK Ltd.**

Its purpose is to ensure transparency, integrity, and trust in all business activities.

A conflict of interest may arise when an individual's personal, financial, or family interests—or their loyalties—could influence, or appear to influence, their professional judgement or actions on behalf of the company. Even the perception of impropriety can damage confidence in our work.

Conflicts of interest can:

- Limit open and objective discussion
- Lead to decisions that are not in the best interests of the company
- Create reputational risk or the impression of improper conduct

This policy provides guidance to prevent such situations and to ensure that any unavoidable conflicts are managed appropriately and transparently.

## 2. Gifts and Hospitality Register

To maintain transparency and avoid undue influence, all employees must declare **any gift or hospitality valued at more than £10** received in connection with their role at Delyn Safety UK Ltd.

Declarations must include:

- Description of the gift or hospitality
- Estimated value (if known)
- Name of the giver and recipient
- Date received

All entries will be recorded in the **Gifts and Hospitality Register**, maintained at the company's main office.

## 3. Declaration of Conflicts of Interest

Employees must declare **any actual, potential, or perceived conflict of interest** at the earliest opportunity.

Conflicts may arise in situations involving:

- Tendering or procurement
- Contract negotiations
- Pricing decisions

- Recruitment
- Relationships with clients, suppliers, or competitors

Where an employee has a personal connection or financial interest in another party involved in company business, they must **formally declare this** to the Managing Director and the Administration Manager.

Employees must **recuse themselves** from related discussions, decisions, or negotiations unless explicitly instructed otherwise by the Managing Director.

#### **4. Managing Conflicts of Interest**

Where a conflict is declared, the Managing Director may convene a formal review to determine:

- The nature and extent of the conflict
- Whether the conflict can be managed
- What actions are required to mitigate risk

Possible actions include:

- Removal from decision-making processes
- Reassignment of responsibilities
- Enhanced oversight or monitoring

All decisions will be documented and retained for audit purposes.

#### **5. Contract Management Restrictions**

No employee may manage, oversee, or monitor a contract where they have a direct personal or financial interest, unless expressly authorised by the Managing Director.

This ensures impartiality and protects both the company and the individual from allegations of bias or misconduct.

#### **6. Review and Compliance**

This policy will be reviewed every **three years**, or sooner if required due to legislative, organisational, or operational changes.

All employees are expected to comply fully with this policy. Failure to do so may result in disciplinary action.

**Date:** \_\_\_\_\_ **Signature:** \_\_\_\_\_ **Name:** \_\_\_\_\_  
**Position:** \_\_\_\_\_