



SMART 5 Consulting Limited

Conflicts of Interest Policy

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Effective Date: 12-06-2024

1. Introduction

SMART 5 CONSULTING LIMITED ("the Company") is committed to maintaining the highest standards of ethical conduct and integrity in its business activities. This policy aims to ensure that employees act in the best interests of the Company and avoid any situation where their personal interests conflict, or appear to conflict, with the interests of the Company.

2. Purpose

The purpose of this policy is to provide guidance on identifying and managing conflicts of interest, ensuring transparency, and protecting the integrity of the Company's business decisions and actions.

3. Scope

This policy applies to all employees, contractors, consultants, temporary workers, volunteers, interns, and agents ("employees") working for or on behalf of the Company, regardless of their location. It also extends to all third-party individuals and entities the Company engages with, including clients, suppliers, and business partners.

4. Definition of Conflicts of Interest

A conflict of interest occurs when an individual's personal interests, relationships, or activities interfere, or appear to interfere, with their ability to act in the best interests of the Company. This includes situations where:

- Personal interests could influence the individual's judgment, decisions, or actions in their work for the Company.
- The individual's actions could create an unfair advantage for themselves or someone they are associated with.
- The individual's actions could result in a financial or other gain at the expense of the Company.

5. Policy Statements

- **Avoidance of Conflicts:** Employees must avoid any activities, investments, interests, or associations that might interfere with, or appear to interfere with, the independent exercise of judgment in the best interests of the Company.



- Disclosure of Conflicts: Employees are required to disclose any actual, potential, or perceived conflicts of interest to their manager or the designated compliance officer as soon as they become aware of them. This includes, but is not limited to, financial interests in competitors, suppliers, or clients, and personal relationships that might influence business decisions.

- Management of Conflicts: Once a conflict of interest is disclosed, the Company will take appropriate steps to manage it. This may include reassigning responsibilities, obtaining a third-party review, or implementing other measures to ensure that decisions are made in the best interests of the Company.

- Prohibition of Certain Activities: Employees are prohibited from engaging in activities that directly compete with the Company's business, using Company resources or information for personal gain, or accepting personal benefits from suppliers, clients, or competitors that could influence their judgment.

6. Responsibilities

- Management: Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy. They must also take appropriate action if a conflict of interest is disclosed or identified.

- Employees: Employees are responsible for identifying and avoiding conflicts of interest and for disclosing any conflicts to their manager or the designated compliance officer. Employees must also comply with any measures put in place to manage or mitigate conflicts of interest.

7. Reporting and Compliance

- Employees are encouraged to report any concerns or suspicions regarding conflicts of interest to their manager or the designated compliance officer. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of reporting a conflict of interest in good faith.

- All reports will be thoroughly investigated, and appropriate action will be taken to address any issues identified.

8. Training and Communication

- Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to adhere to this policy.

- The Company's approach to managing conflicts of interest will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

9. Record Keeping

- The Company will keep detailed records of any conflicts of interest disclosed, the steps taken to manage or mitigate them, and any decisions made regarding their resolution.

10. Monitoring and Review

- The Company will regularly monitor and review procedures designed to prevent and manage conflicts of interest. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in managing conflicts of interest.

11. Sanctions for Breach

- Any breach of this policy by an employee will be grounds for disciplinary action, up to and including termination of employment. Any breach by a third party will be grounds for termination of the relationship and potential legal action.

12. Contact Information

For any questions or concerns regarding this policy, please contact:

SMART 5 CONSULTING LIMITED

Registered Address: 23 Quarles Park Road, Chadwell Heath, Romford, RM6 4DE, UK

Email: [appropriate contact email]

Acknowledgment

I, [Employee Name], acknowledge that I have read and understood the Conflicts of Interest Policy of SMART 5 CONSULTING LIMITED, and I agree to comply with it.

Signature: _____

Date: _____

This policy will be reviewed annually and may be amended at any time to ensure its effectiveness.

SMART 5 CONSULTING LIMITED

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Company Number: 12281263

VAT Registration Number: 415164715

