# Conflict of Interest Policy

**Purpose**
The relationship of the Erith Group and its employees is based on mutual trust. This policy sets out what actions should be taken in the event of a conflict of interest.

**Definition**
In general, an employee should refrain from allowing their personal and/or financial activities from coming into opposition with the interests and integrity of the organisation and thus placing it at a disadvantage.

Where this does happen is known as a conflict of interest. Conflicts of interest between an organisation and its employees can arise in many circumstances and it is not possible to provide a single definition. If, however, an employee is aware of a conflict of interest, they, as a matter of urgency, should raise the issue with their immediate manager so that corrective action may be taken before actual damage is done.

An example of a conflict of interest may be where an employee has a family member who works with a client of, or supplier to the Erith Group.
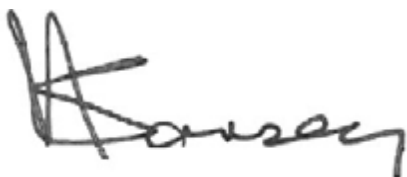
**Responsibilities**
The responsibility for resolving any conflict of interest lies with the immediate manager - although it must be reported to Compliance for monitoring and review purposes. This can be done through the SharePoint Compliance portal.

**Resolution**
The organisation will attempt to resolve any conflicts of interest as fairly and as reasonably as possible.

One way this may be done (but not limited to this action) is by ensuring that the client/supplier is dealt with by another employee, and not their family member.

If no resolution can be found, the final action to be taken will rest with senior management. If a conflict of interest is deliberately concealed by an employee, the organisation may invoke disciplinary action that could lead to the employee's dismissal.

Signed for and on behalf of the Executive Board
Steven Darsey, Chairman

30th April 2023