

**Legate Group Limited**  
**Conflict of Interest Policy**  
**6 October 2018**

**1. Purpose**

- 1.1 The purpose of this policy is to help staff, consultants and service providers of and to Legate Group (the Company) to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of the Company and manage risk.
- 1.2 The policy describes the Company's Conflict of Interest Policy for all work undertaken by internal and external staff, including investigations, information assurance, general management and consultancy work. There is no right or wrong approach to handling potential conflicts of interest. Ultimately, the issue is about the application of common sense within a legislative, regulatory, contractual or ethical framework.

**2. Scope and Definition**

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the charity. Personal interests include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder). It also includes a conflict between a person's duty to the Company and another duty that the person has. A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the Company and must be managed accordingly.

**3. Objective**

The Company aims to ensure that board members are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of the Company.

**4. Identification and Disclosure of Conflicts of Interest**

- 4.1 The Company aims to ensure that board members are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of the Company.
- 4.2 At the start of any Legate Group specific case assignment, the employees involved must consider the scope of the assignment and consider if they have now, in the past or in the foreseeable future, any possible conflicts of interest relating to the assignment. These should be recorded on the case management system.
- 4.3 These may arise from such issues as:
  - 4.3.1 personal, or familial involvement, with someone who is involved in the management of the contract of the assignment or with someone who is the subject of a forensic assignment;
  - 4.3.2 a breach of the code of ethics of any professional organisation that any individual on the assignment may belong to, or be bound by;

- 4.3.3 the offer (or acceptance) of any inducement, hospitality or gift that may impair, limit the extent, rigour or objectivity in the performance of the assignment, case or project;
- 4.3.4 having a financial interest in the outcome of the assignment;
- 4.3.5 impaired decisions or actions that may not be in the best interest of Legate Group's client, or in the case of criminal assignments, the police;
- 4.4 Where a general business conflict is identified after the start of any assignment, it must be brought to the attention as soon as is practicably possible, and within 24 hours at the maximum, to the Managing Director (who has accountability and responsibility for Compliance and Governance). As soon as the conflict is identified, the individual should excuse themselves from any decision taking until the conflict has been resolved. In some cases, it will be necessary for the individual to excuse themselves from any work on the assignment. This is specifically the case for government work and may be applicable in other assignments as identified.
- 4.5 Once an actual, potential or perceived conflict of interest is identified, it must be entered into the Company's register of interests.

An applicable 'Declaration of Interest' should also be completed within each case instruction in accordance with the principles of Legate Group's case and risk assessment process.

Where a conflict is declared to the Managing Director, such action will be taken as deemed fit to both declare and resolve the conflict. This may (and probably will) involve communication with the other parties in the assignment. All discussions and decisions shall be regarded as records and be retained and secured appropriately.

All possible or actual conflicts of interest shall be investigated thoroughly, quickly, impartially and all relevant parties advised of the outcome.

## 5. Scope of and Compliance with Policy

- 5.1 This Policy applies to all employees, consultants, agents, contractors, subcontractors, business partners and any other parties (including individuals, partnerships and bodies corporate) associated with the Company.
- 5.2 It is the responsibility of all of the abovementioned parties to ensure that conflicts of interest are recorded and reported in accordance with the Conflict of Interest Policy.
- 5.3 If the board has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances. If it is found that this person has failed to disclose a conflict of interest, the Company may take action against them. This may include seeking to terminate their relationship with the Company

**This policy has been approved & authorised by:**

**Name:** Tony Clarke, Director

**Date:** 06/10/2018

Version Control:

Version	Date	Date Approved	Next Review Date
V1	01/10/2014	01/10/2014	30/09/2016
V2	06/10/2018	06/10/2018	30/09/2019

## Legate Group Limited – Conflict of Interest Register (Example)

Name	Date advised of interest	Interest disclosed	Nature of potential conflict and estimated value (if known)	Action taken / recommendations	Date implemented	Review / comments