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Certificate Number FM29298

# Conflicts of Interest Policy

## 1. Policy Brief & Purpose

- 1.1 Lee-Dickens Ltd's Conflict of Interest Policy refers to any case where an employee's personal interest might contradict the interest of the Company. This is an unwanted circumstance as it may affect the employee's judgement and commitment to the Company, and, by extension to the realisation of its goals.
- 1.2 This policy outlines the rules regarding conflict of interest and the responsibilities of employees and the Company in resolving any such discrepancies.

## 2. Scope

- 2.1 Lee-Dickens Ltd's Conflict of Interest Policy applies to all prospective and current employees, as well as independent contractors and those persons acting on behalf of the Company.

## 3. Policy Elements

- 3.1 The relationship of the Company with its employees is based on mutual trust. As the Company is committed to preserve the interests of people under its employment, it expects them to act only in its own fundamental interests.
- 3.2 Conflict of Interest may occur whenever an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine the Company and which may place it at a disadvantage.

## 4. What is an Employee Conflict of Interest?

- 4.1 This situation may take many different forms that include, but are not limited to, the following conflict of interest examples:
  - Employees' ability to use their position with the company to their personal advantage
  - Employees engaging in activities that will bring direct or indirect profit to a competitor
  - Employees owning shares of a competitor's stock
  - Employees using connections obtained through the company for their own private purposes
  - Employees using company equipment or means to support an external business
  - Employees acting in ways that may compromise the company's legality (e.g. taking bribes or bribing representatives of external authorities)

- 4.2 The possibility that a Conflict of Interest may occur must be addressed and resolved before any actual damage is done. Therefore, when an employee understands or suspects that a conflict of interest exists, they should bring this matter to the attention of management so immediate action may be taken. Management must also keep an eye on potential conflict of interests of subordinates.
- 4.3 All conflicts of interest will be resolved as swiftly and fairly as possible and Senior Management has the responsibility of the final decision.
- 4.4 In general, employees are advised to refrain from letting personal and/or financial interests and external activities oppose the Company's fundamental interests.
- 4.5 Note: The same principles apply to the Company in regard to its clients. When applicable, we are committed to not offer services or form partnerships with companies who are in direct competition with one of our existing clients. Anyone who has placed its confidence and trust in us will not be exploited for the Company's interests.

## 5. Disciplinary Consequences

- 5.1 In cases when a conflict of interest is deliberately concealed or when a solution cannot be found, disciplinary action may be invoked up to and including termination.



Signed

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Managing Director  
Lee-Dickens Limited

Date      12 May 2022

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