



## CONFLICTS OF INTEREST POLICY

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## **1. Policy statement**

- 1.1 At Moy Park, everything we do starts with our Values: Determination, Simplicity, Availability, Humility, Sincerity, Discipline & Ownership.
- 1.2 Consistent with our Values, our position is simple: we conduct our business to the highest legal and ethical standards. We are committed to acting professionally, honestly, fairly and with integrity in all our business dealings and business relationships and to ensuring openness and transparency underpin all that we do.
- 1.3 This Policy must be read in conjunction with the following key policies, which all staff must observe:
  - (a) Code of Business Conduct;
  - (b) Anti-bribery & Corruption Policy;
  - (c) Whistleblowing Policy.

## **2. About this Policy**

- 2.1 The purpose of this Policy is to:
  - (a) set out our responsibilities and the responsibilities of those working for us, in observing and upholding our position on conflicts of interests; and
  - (b) provide information and guidance on how to recognise and deal with conflicts of interest.
- 2.2 The Policy is intended to provide broad guidance on certain key principles which we should observe in all our dealings and conduct. It is, therefore, important that we observe the spirit, as much as the letter, of this Policy and not simply to mechanically apply the Policy.
- 2.3 This Policy contains controls to minimise this risk of conflicts, but we rely on staff to be open and transparent and exercise their judgment about actual conflicts and how conflicts might be perceived by others.
- 2.4 This Policy does not form part of any employee's contract of employment and we may amend it at any time.

### 3. Who must comply with this Policy?

This Policy applies to all individuals working at all levels including consultants, employees (whether permanent, fixed-term or temporary), contractors, trainees, seconded staff, homeworkers, casual staff, agency staff, interns and students, agents, sponsors, volunteers or any other person associated with the Company, wherever located.

### 4. Who is responsible for this Policy?

4.1 The board of directors has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Executive member overseeing this Policy is Kirsty Wilkins - HR and Performance Director.

4.2 The Code Compliance Officer (CCO) has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and agreeing auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption. The Code Compliance Officer, Debbie Bloomfield, can be contacted at [CCO@moypark.com](mailto:CCO@moypark.com)

4.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it.

### 5. What is a conflict of interest?

5.1 A conflict will arise when your personal or commercial interests or activities influence, or appear to influence, your duty to act in the best interests of the Company or the decisions you take on behalf of the Company.

A conflict may arise directly or indirectly – it may be real, potential or perceived. In cases where there might be a conflict, you should always challenge yourself by asking four basic questions:

1. Is it consistent with our Company Values?

2. Is it consistent with our Code of Conduct and Ethics and/or this Policy?

3. Am I confident my personal or commercial interests do not conflict with the Company's interests?

4. Will it reflect well on me and the Company to others?

If the answer is "No" to any of these questions, do not do it, at least not before making us aware.

## **6. Relatives and friends**

- 6.1 Be mindful that a conflict may arise in relation to a relative or friend if your dealings with a customer or supplier are influenced by that relationship.
- 6.2 For example, you may have friends or relatives who are employed by, or are interested in, or have commercial relationships with, our customers, suppliers or competitors. So, when you are dealing with customers or suppliers, you must always ensure that such connections do not influence, or appear to influence, your duty to act impartially and in the best interests of the Company.
- 6.3 For the purposes of this Policy the term “relative” includes spouse, parent, sibling, grandparent, child, grandchild, mother / father-in-law, or domestic/civil partner and any family member who lives with you or who is otherwise financially dependent on you, or on whom you are financially dependent or with whom you have financial transactions.

## **7. Financial dealings**

- 7.1 You should avoid personal financial transactions with customers and suppliers that may influence your ability to perform your job impartially and in the best interests of the Company.
- 7.2 You should avoid making external investments that could affect, or appear to affect, your decision-making on behalf of the Company, including investments in the Company’s customers, suppliers and competitors.

## **8. Discretionary authority**

Where friends or relatives are employed by, or have an interest in, a customer or supplier and you have any discretionary authority in your dealings with the customer or supplier as part of your job, you must not proceed without seeking approval by submitting a Conflicts Report Form as set out in section 11.

## **9. Employment**

- 9.1 You are encouraged to raise concerns about any issue or suspicion of tax evasion or foreign tax evasion at the earliest possible stage.
- 9.2 If you would like to serve as an officer or director or consultant to an outside business on your own time, you must receive prior approval by submitting a Conflicts Report Form. If approved, you will be required to submit an Annual Conflicts Certification Form as set out in Section 13 for the time that you continue to hold that position.

## **10. Personal relationships**

10.1 Personal relationships at work require careful consideration so as not to give rise to a conflict of interest situation. Such relationships must not create a conflict or affect that staff member's ability to act in the best interests of the Company, and must not affect any employment relationship. Specifically:

10.1.1 Employment-related decisions should be based on qualifications, performance, skills and experience.

10.1.2 You may date and develop friendships and relationships with co-workers - both inside and outside of the workplace - as long as the relationships do not have a negative impact on your work or the work of others.

10.1.3 At all times you are expected to behave in a professional manner in carrying out your Company duties and to keep separate from the work environment at all times any personal relationships.

10.1.4 If you are in a line management, supervisory role or in a more senior position you need to be mindful of the fact that personal relationships with staff who report to you may be perceived as favouritism, misuse of authority, or potentially, sexual harassment. To avoid the possibility of an actual or perceived conflict in these circumstances you should not be involved in –

- (a) the performance review, promotion or discipline or any other management activity or process involving a member of staff with whom you have a personal relationship;
- (b) the authorisation of any financial payments/decisions relating to financial matters, e.g. expense claims, salary changes for any member of staff with whom you have a personal relationship without additional independent authorisation;
- (c) in the recruitment, selection or appointment of any applicant with whom you have a personal relationship. Where, however, this is not practical, all recruitment panel members should be made aware of the personal relationship and every recruitment panel decision should be justified (as guided by the HR Team ) as fair and equitable, without bias or conflict of interest.

## **11. How to deal with a conflict**

11.1 Where a potential conflict is identified, you should complete the Conflicts Report Form which can be found on the Moy Space Legal Hub under the Compliance tab. This form will be submitted to your Line Manager and the CCO. Your Line Manager will contact you in relation to

discuss the matter and where required agree a conflict management plan. The CCO will provide guidance and support as required and where necessary will complete the Conflicts Register which is maintained by the Legal team and reviewed annually.

- 11.2 While a conflict of interest is not necessarily a breach of the Code of Conduct or of this Policy, failure to make us aware of the situation will be a breach. If, therefore, you are not sure you should always seek guidance from the Code Compliance Officer ([CCO@moypark.com](mailto:CCO@moypark.com)) or from any member of the Legal team.

## **12. Record keeping and annual certification**

- 12.1 We keep records and have appropriate internal controls in place for evidencing all conflicts reported to us.
- 12.2 To ensure our records are up to date, you may be asked to submit an Annual Conflicts Certification Form to confirm that the information held on the Conflicts register is correct or to confirm that you are not aware of any conflicts affecting your role in the Company.

## **13. Your responsibilities**

- 13.1 You must ensure that you read, understand and comply with this Policy.
- 13.2 You must declare any actual or potential conflicts as soon as you are aware of them using the Conflicts Report Form.
- 13.3 You must promptly complete any Annual Conflicts Certification Forms or declarations that you may be asked to complete either annually or from time to time as required by the business.
- 13.4 The prevention, detection and reporting of conflicts is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 13.5 Employees may be liable to disciplinary action if they fail to comply with the provisions of this Policy.

## **14. Training and communication**

All relevant staff will receive training on this and related policies and further training will be provided annually or whenever there is a substantial change in the law or our Policy and procedure.

## **15. Consequences of failing to comply**

- 15.1 We take compliance with this Policy very seriously.
- 15.2 Failure to comply puts both you and the business at risk.
- 15.3 Because of the importance of this Policy, failure to comply with any requirement may lead to disciplinary action under our procedures, and this action may result in dismissal for gross misconduct.
- 15.4 If you are ever unsure about whether a conflict situation exists or you have any questions or concerns about anything in this Policy, always discuss your concerns with your Line Manager or contact the CCO or any member of the Legal Team.

## **16. Some potential conflict indicators: “red flags”**

- 16.1 Please see below some examples of situations that may create a conflict of interest (and where a failure to make us aware of the situation will be a violation of this Policy).
- 16.2 If you encounter any of these red flags while working for us, you must report them promptly using either the Conflicts Report Form, by contacting the CCO or any member of the Legal team or via the Speak Up Ethics Line.

- 1. You have an outside interest or investment in a competitor, customer or supplier.
- 2. Friends or relatives are employed by, or have an interest in, a customer or supplier, where you or they have discretionary authority in dealing with any of these businesses – e.g. awarding contracts or agreeing terms.
- 3. You have outside employment, office, consultancy or a directorship with a third party which competes, or collaborates, with the Company.
- 4. Arranging for the employment or engagement by the Company of a friend, relative or someone you have a personal relationship with in your team (other than for say short term summer jobs).
- 5. Being asked by a customer or supplier to employ a relative or someone they have a personal relationship with.