



# Armstrong Lloyd

RECRUITMENT PARTNERS

<b>Company Name:</b>	Armstrong Lloyd Ltd (“the Company”)
<b>Policy Name:</b>	Conflict of Interest Policy
<b>Date:</b>	2016

## 1. SCOPE

Armstrong Lloyd’s Conflict of Interest Policy applies to all staff. Although this document does not provide an exhaustive list of activities that sit within the boundaries of the policy, it does however outline the main areas of activity where a conflict of interest may arise.

## 2. DEFINITIONS

In the scope of this policy, a relationship is a personal relationship, which overlaps a professional one. This is defined as:

- A family/close personal relationship
- A business/commercial/financial relationship
- A romantic/sexual relationship

And is covered by this policy if it occurs:

- Between an employee and a candidate
- Between an employee and a client
- Between an employee and another employee or prospective employee

## 3. PROCEDURE

### *3.1 Disclosure of Interest*

Any member of staff who becomes aware of any personal, financial or other beneficial interest resulting from the engagement for the purposes of filling a role, or any other interaction or transaction carried out on behalf of Armstrong Lloyd must at the earliest opportunity, disclose the information, stating the nature of the interest to Karen Lloyd, Director.

In the event that an employee has an interest in a business which may trade or supply services to Armstrong Lloyd, he/she must declare the interest to Karen Lloyd, Director.

### *3.2 Managing Conflicts of Interest*

All employees must avoid any action, which may lead to a potential or actual conflict of interest. This particularly applies to:

#### *3.2.1 Contracts and Other Services (including External Consultancy Work)*

In bidding for or negotiating external contracts, employees must declare any personal or financial link with the external agency to Karen Lloyd, Director prior to the start of any such negotiations.

### *3.2.2 Selection and Shortlisting of Candidates*

Where an employee is involved in the selection, shortlisting and interviewing of a candidate with whom they have a personal, financial or other beneficial relationship, they must declare the nature of the relationship to Karen Lloyd, Director, prior to any type of introduction made to the client.

### *3.2.3 Fraud, Bribery and Corruption*

In accordance with the UK Bribery Act 2010 employees or those engaged to work on behalf of Armstrong Lloyd must not accept/make: inducements, direct or indirect monetary rewards for engaging in or refraining from a particular activity or engage in a corrupt act by showing favour or disfavour whilst managing a contract where he/she is carrying out an official role on behalf of the Armstrong Lloyd.

Individuals can face up to 10 years imprisonment if convicted of carrying out a bribe or a corrupt act. Armstrong Lloyd may also be liable for unlimited fines and face damages to its reputation if it is found to have engaged in any form of corruption.

### *3.2.4 Inducements, Hospitality and Gifts*

Armstrong Lloyd acknowledges that hospitality and gifts may be offered to staff from suppliers, potential suppliers and other sources. Any offer of such inducements should be reported to Karen Lloyd, Director immediately who will take the full and final decision as to whether it is appropriate to accept.

Staff who breach or do not adhere to the provisions outlined in this policy may face disciplinary action depending on the level of seriousness and nature of the issue.

### *3.2.5 Managing Personal Relationships between Employees*

Where employees who work together are in a personal relationship, there is potential for a conflict of interest or breach of confidentiality, and the gaining of an unfair advantage may be perceived, with either party being thus disadvantaged.

Therefore, where such a personal relationship exists or develops between employees who either work together in the same area, or where one employee is in a position of authority, the individuals are strongly advised to declare their relationship in confidence to each of their line managers, when there is the potential for a conflict of interest to arise. This is intended for the long-term protection of both parties.

## **4. RESPONSIBILITIES**

All employees should note that this policy forms part of their contract of employment and are therefore required to adhere to its terms and conditions.

The following have responsibilities under this policy:

Employees

- Disclose personal, financial or other beneficial interest arising from an interaction or transaction on behalf of Armstrong Lloyd.
- Refrain from engaging in activities that may give rise to an actual or potential conflict of interest.
- Refrain from accepting/making inducements, direct or indirect monetary rewards or engaging in corrupt acts in any capacity on behalf of Armstrong Lloyd.
- Refrain from working with suppliers in a personal/private capacity where a conflict of interest may apply.
- Disclose any actual, potential or perceived conflict of interest.

Line Managers:

- Take reasonable steps to ensure that staff are aware of and implement, where appropriate, the provisions set out in this policy.
- Manage conflicts of interest with employees and external partner agencies where appropriate.