



# Reynolds

## Training Services

<b>POLICY NAME</b>	Conflict of Interest			<b>POLICY NUMBER</b>	Po-018-RTS
<b>EFFECTIVE DATE</b>	November 2023	<b>NEXT REVISION</b>	November 2024	<b>VERSION NUMBER</b>	1.0

VERSION HISTORY				
VERSION	AUTHOR	REVISION DATE	DESCRIPTION OF CHANGE	APPROVED BY
1	John Reynolds	January 2023	Policy Implemented	John Reynolds
1	John Reynolds	November 2023	Annual Review – No Amends	John Reynolds

**Approved by:** John Reynolds  
**Position:** Managing Director  
**Date:** 15<sup>th</sup> November 2023

**Approved by:** Andrew Reynolds  
**Position:** Centre Manager  
**Date:** 15<sup>th</sup> November 2023



**Policy Statement**

All employees of Reynolds Training Services are required to perform the duties and activities of their position with the highest level of integrity and independence, in a professional and ethical manner. They must also ensure that they avoid or eliminate any conflict of interest or situation that could reasonably be perceived as a conflict of interest and immediately report it to their manager.

Although this policy details certain behaviours that may lead to a conflict of interest or the appearance of a conflict of interest, it is impossible to anticipate all situations that could lead to one. Employees may also inadvertently find themselves in a situation that leads to or could be perceived as a conflict of interest. These situations must also be disclosed.

Compliance with this policy is a condition of employment. Failure to comply with these provisions may result in disciplinary action, up to and including termination of employment. This is to be updated on an annual basis. Arranged with the Centre Manager.

**Scope**

This policy applies to all employees of Reynolds Training Services, as well as contractual third parties or partners doing business with the company. All are expected to abide by the provisions of this policy that are reasonably applicable to them.

**Action or Behaviours to Avoid**

Below, you will find some situations, behaviours or events that should be avoided at all costs by employees, managers or other contractual third parties doing business with the company.

**Personal Interest**

Employees must ensure that no conflict exists or could appear to exist between their personal interests and those of Reynolds Training Services, potential competitor, customer, partner, vendor, supplier or other business entity in which you have a direct or indirect financial interest.

Employees must not:

- ❖ Take part in or attempt to influence any Reynolds Training Services decision or any business dealings with a current or potential competitor, customer, partner, vendor, supplier, or other business entity in which you have a direct or indirect financial interest;
- ❖ Use the premises, equipment, supplies, or services of other employees of Reynolds Training Services to promote their personal interests;
- ❖ Use confidential information for their personal benefit during or after employment with Reynolds Training Services;
- ❖ To be in a position where they could benefit directly or indirectly from a Reynolds Training Services business transaction (eg. Supplier of goods or services, contract, licence, or partnership);
- ❖ Give preferential treatment to any supplier or other person doing business with Reynolds Training Services in order to serve their personal interests;
- ❖ Invest in, own, have an interest in, or be an employee of an organisation that might have an interest, direct or indirect, in any Reynolds Training Services commercial transaction, except in the case of a widely held public company whose dealings with Reynolds Training Services do not represent a substantial portion of its total business.

This should not be interpreted as an exhaustive list of all circumstances that could lead to a real or perceived conflict of interest.

**Family, Friends, and Romantic Relationships**

Employees and managers must not:

- ❖ Use their position or contacts at Reynolds Training Services to promote their personal interests or those of a family member or person with whom they have a close personal or professional relationship;
- ❖ Take part in or attempt to influence any Reynolds Training Services related decision or business dealings (including those concerning current or potential customers, partners, vendors, or suppliers) that may benefit or appear to benefit a relative, close personal friend, or a business enterprise in which a relative or close personal friend is involved or has a direct or indirect financial interest;
- ❖ If, during the course of your employment, a romantic relationship develops between you and another Reynolds Training Services employee within your direct or indirect reporting chain, you both must promptly disclose that information. Although employees involved in a consensual relationship are individually responsible for disclosure, a manager's failure to report such a relationship will be grounds for appropriate disciplinary action.

**Outside Business Activities**

Employees are permitted to engage in outside employment or activities as long as they inform their manager prior to starting such activity, and to the extent that;

- ❖ It does not compete with or reflect adversely on Reynolds Training Services or give rise to conflict of interest;
- ❖ It does not engage in any outside activity that is likely to involve disclosure of Reynolds Training Services' proprietary information or that is likely to divert time and attention from your responsibility at Reynolds Training Services;
- ❖ It could not be reasonably perceived as compromising the integrity, independence and impartiality expected from Reynolds Training Services or bring The Company into disrepute;
- ❖ It does not inappropriately exploit the employee's connection with Reynolds Training Services;
- ❖ It does not restrict your availability or efficiency;
- ❖ It does not involve acting as a spokesperson for another organisation;
- ❖ Employees are permitted to act as board members of an organisation external to Reynolds Training Services, if their participation meets the criteria above, and if authorized by their manager beforehand. You cannot serve as a board member or technical advisor of a competitor or of a company that may reasonably be expected to become a competitor;
- ❖ Employees may be permitted to write books or work on other creative projects that are not in competition with Reynolds Training Services as long as they respect the criteria for outside activities mentions above and obtain prior written authorisation from their manager.

You are not required to seek approval of the following activities

- ❖ Any affiliation with a trade association, professional association, or other such organisation related to your work or position at Reynolds Training Services
- ❖ Participation in non-profit civic or charitable activities, including serving as a member of a board of directors or technical advisory board. However, you must obtain approval if the entity is a Reynolds Training Services customer or expects to receive or seek contribution from Reynolds Training Services;
- ❖ Positions with holding companies, trusts, or other non-operating entities established solely for purposes of you or your family's investment, estate, or tax planning or hold to you, your family's real estate or other investments that would not otherwise require disclosure under this policy.

If the manager considers the outside activity to be inappropriate, considering the criteria mentioned above, it must inform the employee in writing and the employee must avoid, discontinue or modify his/her participation in such activities accordingly. Disclosures and their assessment by the manager must be documented.

### **Gifts, Hospitality, and Other Benefits**

Accepting a gift, a benefit or an offer of hospitality for oneself or for a colleague, family member or friend can lead to uncomfortable situations or to real or perceived conflicts of interest.

Employees may occasionally accept unsolicited gifts, hospitality, free travel, tickets, or invitations to sports or entertainment events, or other benefits. It is also permitted to occasionally accept a working meal of reasonable value paid for by a third party.

However, employees must not accept gifts, hospitality, free travel, tickets, or invitations to sports or entertainment events or any other benefits:

- ❖ That could influence, or be perceived to influence, their judgement and/or their performance of duties;
- ❖ That are offered by a business partner and/or supplier of goods or services involved in an active request for proposal, sole source contract procedure or contract discussions, or in the six months following such a process, or as soon as they know such a process will begin in the near future;
- ❖ That are offered by a business partner and/or supplier whose performance the employee is evaluating;
- ❖ That are cash, loans, discounts or work rendered free of charge for personal purposes.

Employees must also refuse invitations to a conference or other formal gathering not mentioned above, organised or sponsored by an external party, a supplier, potential supplier or business partner, unless their manager determines that their attendance at such an event would not compromise or appear to compromise the objectivity, independence, impartiality or integrity of the employee of Reynolds Training Services.

### **Reporting of Conflict of Interest**

In the event of any confusion or uncertainty regarding a conflict of interest, employees need to speak to their line manager in the first instance, who will escalate and advise accordingly. .