

SPRING CONFLICTS OF INTEREST POLICY

31st January 2020

OBJECTIVE

This Policy shows how to identify, mitigate or manage potential Conflicts of Interest between, amongst others, the Company's interests; the interests of one or more of our Clients; and persons engaged in activities on behalf of the Company.

DEFINITION

A conflict of interest (COI) is a situation in which someone (a firm or an individual) has competing professional or personal interests which can make it difficult for the person to fulfil their duties impartially. This is particularly relevant where the Spring CCR Ltd., or an individual within this organisation, has a conflict of interest between any of their personal interests, those of Spring CCR Ltd., the interests of the Client, or the interests of any of the Client's customers that we come into contact with.

KEY PRINCIPLE

A conflict of interest, if not managed appropriately, poses the risk of detriment to one or more Clients, or to the Company. Furthermore, the conflict or mere appearance of a potential conflict of interest can significantly impact the Company and its reputation.

Compliance with this policy will help ensure fair treatment of Clients and the development of deep and long lasting relationships, to reduce the risk of Client disadvantage and to reduce the risk of legal liability, regulatory censure or damage to the Company's commercial interests or reputation.

COMPLIANCE PROCESS

1. Representatives of Spring CCR Ltd must identify any actual or potential conflict of interest and escalate it by reporting it by email to a Company Director immediately and always within 48 hours. Every COI event must be logged and the log retained at the Company's registered office.
2. A Company Director must eliminate, mitigate or manage the COI and where necessary make changes to the way Company personnel go about their duties.
3. Representatives must adhere to all relevant legal and regulatory requirements and encourage high moral and ethical standards in all business activities.
4. Representatives must be cognisant with the business of their Clients and pay particular attention to confidentiality.
5. Before acceptance of any contract the Representative and a Company Director must always assess the risk conflict of interest. A record of the risk assessment must be made and kept at the Company's registered office.
6. Where a potential Conflict of Interest arises, the Spring Representative must ask the Client for *their* Non Disclosure Agreement which must be signed by the relevant Spring person *before* formal work commences. A copy must be retained by that person *and* a copy emailed to a Director of Spring CCR Ltd.
7. All Spring Representatives must sign the Policy acceptance undertaking form attached.

AWARENESS, TRAINING AND MONITORING

1. As trainers, coaches & mentors, Representatives may be exposed to confidential information that might give rise to a conflict of interest between one Client and another.



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2. Any new person to the Company must be made aware of this policy and it must be an agenda review item at least yearly at a Company meeting of all personnel to ensure its continuing relevance.
3. Explanation and training to identify likely sources of conflicts of interest must be provided by the Company and especially in the event of a lack of understanding by any member of the Company.
4. A log of Conflicts of Interest arising and the path of resolution taken must be maintained by a Company Director and retained securely at the Company's registered office.
5. Offers such as entertainment, gifts and hospitality either made or received could give rise to a Conflict of Interest. A Director, who must maintain a record at the Company's registered office, must sanction any such offer. For further details please refer to the Spring Anti-Bribery Policy.



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SPRING REPRESENTATIVE'S 'CONFLICTS OF INTEREST POLICY' UNDERTAKING

1. I confirm that I have read the March 2016 **Conflicts of Interest Policy** and will comply with the requirements and responsibilities therein.
2. I undertake to remain aware at all times of my own conduct and that of others in the course of doing business on behalf of Spring CCR Ltd. in relation to the risk of Conflicts of Interest.

Signed by:

Date

Print Name:

In the capacity of: Director, Associate, Employee, Contractor (delete as appropriate)

PLEASE SIGN & RETURN THIS FORM BY *EMAIL TO: luke@spring.uk.com

***Form Emailing Options: insert signature eg .jpg and email; print, sign, scan and email; print, sign and take photo with phone and then email.**

If emailing cannot be done please print, sign and return to Luke Thomas, Director, Spring CCR Ltd., The Old Smithy, Broadway, Chilton Polden, Somerset, TA7 9DN

End. **Conflicts of Interest Policy Undertaking** form 290316



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