



Conflict of Interest Policy

Date of Policy Statement: December 2021

1. Policy

The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise because of our work. This policy applies to all staff, volunteers, and other individuals whenever they interact or potentially interact with the organization.

Staff and Board Members have a legal obligation to act in the best interests of Humentum and in accordance with its governing documents, and to avoid situations where there may be a potential conflict of interest.

A conflict of interest (COI) is a situation in which an individual's personal or family interests and/or loyalties conflict and may undermine interests with those of Humentum. Such conflicts may create problems as they can:

- Inhibit free discussion.
- Result in decisions or actions that are not in the interests of Humentum; and risk the impression that Humentum has acted improperly.

These may occur when an individual:

- Has a position of authority in another organization which conflicts with their interests in Humentum.
- Has personal interests that conflict with their professional position
- Works for or carries out work on Humentum's behalf, but who may have personal interests, including relatives or friends, paid or unpaid, in another business which provides similar services.
- Works for or carries out work on Humentum's behalf, who has friends or relatives working in Humentum.

The aim of this policy is to protect both the organization and the individuals involved from any appearance of impropriety. All relevant staff and other individuals have a responsibility to be aware of the potential for a conflict of interest. It is likely that individuals working with Humentum will encounter potential conflicts of interest from time to time. Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards or reputation of Humentum. The most important feature of the policy is the requirement that an individual disclose any activity if there is any doubt whether it represents a conflict of interest: if in doubt, report it! It is an individual's responsibility to ensure that they take part in conflict-of-interest training.

2. Declaration of Interests

The Senior Manager, HR is responsible for sharing the COI Policy to all staff, whilst the Global Director, Finance & Administration will share with Board Members and the Senior Manager, Associates Program will share to all associates on their induction.

Every individual has responsibility for ensuring they are familiar with the COI Policy and will be required to sign the COI declaration on joining and updated annually.

The register of interest/gifts shall be used to record all gifts over USD 15.00 (GBP 10.00) received by individuals in the context of their employment/engagement with Humentum.

Any staff member considering taking on additional paid work (on either an employed or self-employed basis) outside Humentum must seek the Global Director, Finance & Administration agreement beforehand. An individual must not take on any such activities that could be deemed to compete or conflict with Humentum's activities or values.

Data Protection

The information provided will be processed in accordance with data protection principles set out in the UK Data Protection Act 2018 to conform to GDPR. Data is only kept for the purpose to ensure related individuals act in the best interest of the organization. The information provided will not be used for any other purpose.

3. What to do if you face a Conflict of Interest?

Where there is a potential or actual conflict of interest the individual and line manager/Humentum contact are responsible for ensuring that the issue is documented carefully. You should declare your interest at the earliest opportunity and withdraw from any subsequent part of the process as requested. It is an individual's responsibility to raise concerns relating to a conflict of interest directly with the line manager or contact and the individual is entitled to a response to their concerns in a confidential discussion. It should be noted that individuals are protected under the organization's Whistleblowing Policy.

The person informed about the conflict must either resolve the issue or escalate it to the relevant member of the Senior Leadership team (SLT). The report will record:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict

All records are required to be available for audit purposes.