

## Conflict of Interest Policy

Approved: 27 November 2019

Next Review: November 2020

### Preamble

We commit to provide professional, objective and impartial advice, and at all times hold the client's interests paramount, strictly avoiding conflicts with other assignments or our corporate or individual interests.

We commit to identifying and managing all actual, potential and perceived Conflicts of Interest.

We commit to provide an environment for employees, associates and Directors where Conflict of Interest situations can be raised and are addressed.

We inform our employees, associates and Directors that each of them has the obligation to raise actual, potential or perceived Conflicts of Interest the moment they become aware of them.

We commit to fully disclose any actual, potential or perceived Conflict of Interest at the earliest opportunity, and to continuously monitor developments in the company to ensure that subsequent events do not affect their previously stated position.

We commit to publish the Conflict of Interest Policy to make it available to all clients, employees, associates, Directors and other stakeholders.

### Definitions

A Conflict of Interest is a situation in which a company or an individual provides biased professional advice to a client in order to obtain an undue benefit for the company, associated businesses or the individual. A Conflict of Interest is a concern when the company's, an associated business', or an individual's interests could prevail over the interests of the client, and where independence and objectivity of the company's or individual's services and advice might be impaired.

A Conflict of Interest can be actual, potential or perceived:

- Actual Conflict of Interest: Where one or more individuals has knowledge of the Conflict of Interest.
- Potential Conflict of Interest: Where a Conflict of Interest may arise given particular circumstances.
- Perceived Conflict of Interest: A situation that a reasonable observer would assume is a Conflict of Interest, whether or not that is accurate.



Whenever the term 'Conflict of Interest' is used, we mean an actual, potential or perceived Conflict of Interest.

### **Purpose of the Policy**

We recognise that because of the nature of the company's work, Conflicts of Interest can arise.

Conflicts of Interest give rise to the risk of one or more of the following consequences:

- the company, an employee, an associate and/or a Director failing to comply with legal or regulatory obligations;
- the company, an employee, an associate and/or a Director failing to fulfil a duty of care, trust or loyalty owed to another person or entity such as a client;
- the company's, an employee's, an associate's and/or a Director's professional judgement and objectivity being compromised and/or hindering the proper discharge of their duties and responsibilities;
- an employee, associate or Director engaging in unethical conduct;
- and/or the company obtaining improper advantage or treatment or giving rise to the appearance of impropriety and reputational damage, including as it relates to the manner in which business is awarded to or by the company.

The Conflict of Interest Policy serves to prevent and mitigate these risks.

We commit not to take any business decisions until after the company has gone through the complete process of identifying and managing any Conflict of Interest.

### **Identifying a Conflict of Interest**

The process of identifying Conflicts of Interest involves at the minimum the following measures:

- A yearly e-mail reminder to all employees to declare any Conflict of Interest;
- A Declaration of Interests Form to be completed by each Director on an annual basis;
- Regular meetings of the technical senior management team (SMT) to discuss Conflicts of Interest, and consensual decisions taken therein;
- A Director being nominated to provide oversight of Conflict of Interest decisions of the technical SMT;
- An entry into the Conflict of Interest register on the nature and extent of the Conflict of Interest, decisions taken at technical SMT meetings, and proposed management strategy.

We encourage any third party to notify us of any actual, potential and perceived Conflict of Interest by sending an e-mail to [hello@levinsources.com](mailto:hello@levinsources.com).

As soon as a Conflict of Interest is identified, the company informs the respective client(s) about the Conflict of Interest.



In case of ambiguity, the technical SMT may refer to a legal expert for external advice.

### **Managing a conflict of interest**

If the technical SMT decides that an identified Conflict of Interest needs to be managed, one of the following actions must be undertaken, as appropriate:

- Decision not to undertake a certain piece of work.
- Creating a strict division of labour and information flows, through
  - Strict division of labour between individuals and/or teams;
  - Limitation of the information flow between individuals and/or teams about the projects concerned;
  - Creation of password protected folders;
  - Storage of data on separate drives.

Whenever a Conflict of Interest is identified, the technical SMT will specify the appropriate measures to take and monitor their implementation. All measures taken shall be recorded in the Conflict of Interest register.

Every Conflict of Interest must be reviewed in regular intervals, namely when business decisions are about to be taken or at a minimum at quarterly technical SMT meetings. Before these review discussions, no commitments or business decisions may be made.

Clients must be informed about new developments regarding Conflicts of Interest that concern them.

In the event of an unresolved dispute between the company and the client, both agree to refer the matter to independent arbitration, the arbiters being chosen by mutual agreement.

*Approved by Estelle Levin-Nally this day, 27 November 2019*