



Zenith Professional Training Ltd
...providing creative business and management solution

Conflict of Interest Policy

Unit 10A Evelyn Court, Grinstead Road London SE8 5AD

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CONFLICTS OF INTEREST POLICY

The purpose of the conflict of interest policy is to protect Zenith Professional Ltd, its subsidiaries and employees from any improprieties in its financial and contractual dealings. The company has worked hard at building a reputation and is therefore committed to preserving its good name by maintaining the highest ethical standards when conducting business transactions. Dealings that could bring the company into disrepute, would have a negative impact on the companies' reputation and ultimately on the financial performance of the organisation.

Objectives

All employees, contractors, sub-contractors, or any person/organisation that supplies products and services should avoid any situation that could place them in conflict of interest with Zenith Professional Training.

Conflicts of Interest defined and explained.

There are numerous ways in which a conflict of interest may arise and therefore not possible to provide an exhaustive list. Here are some examples for the purposes of guidance:

- Having any interest (including employment) in any supplier, customer or competitor of the company (With disclosure and written permission, it is acceptable to own shares in a supplier or customer, as long as it does not provide management influence or control).
- Having interest in any activities that compete with ZP Training.
- When a relation or friend is attending a regulated course that requires examination.
- Obtaining any personal financial gain or advantage (other than through normal remuneration gained from employment with ZPT) in any business transaction or dealings arising from the relationship established through employment or engagement with Zenith Professional Training.
- Making use of your position of employment to influence the employment, remuneration, or promotion prospects of any connected person employed in any capacity by Zenith Professional Training.
- When making application for a tendering to secure business, it is important to remain transparent and declare any conflict of interest (having any personal association with any employee that may influence the awarding of a tender) that may arise through engagement with the organisation "putting out to tender". Failure to make such a disclosure could result in the reputation of the company suffering significant damage, as well as having an awarded contract withdrawn.

What to ask yourself when considering an action that may constitute a breach of conflict of interest:

- Would this action bring the company name and reputation into disrepute?
- Would this action present me in a bad light and affect my reputation?
- How would my colleagues perceive me?
- Would I still be able to hold my head up high?

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- If there is any doubt as to whether an action could lead to conflict of interest, clear it with your manager or line of report.

Who qualifies as a connected person?

- A spouse, civil partner, sexual partner, or close friend.
- Partner with whom you live, and the relationship constitutes them being family.
- Children, adopted children or stepchildren
- Stepchild of a person with whom you live in an enduring family relationship.
- Parent or stepparent
- A quoted company (involved or seeking to become involved with ZPT) in which you hold 1% or more shares in that company.
- A private company (involved or seeking to become involved with ZPT) in which you hold 5% or more of the shares in that company.

This is not an exhaustive list and a conflict of Interest may arise through your own interest or through those of a connected person.

Gifts, Entertainment and Hospitality

Be considerate of the fact that the giving of gifts, entertainment and or hospitality may lead to a potential conflict of interest. Having a policy that covers this will provide guidance for all employees to ensure that they act with the highest level of integrity and avoid allegations of conflict of interest.

Will be dealt with in more detail in a separate policy.

What action to take should if you suspect that you may have a conflict of interest?

The need for a policy is an indication that a conflict of interest may arise from time to time. If you become aware of, or suspect a conflict of interest, it is your duty to immediately inform you manager. Depending on the circumstances, it may simply be necessary to record the interest or alternatively some other form of action may be required, of which you will be notified.

If the potential conflict of interest relates to conduct or supervision of an examination in which a relation is part-taking, you must exclude yourself from the process completely.

It is a serious offence to ignore the policy and tom deliberately fail to disclose a conflict of interest as this may constitute gross misconduct. If you have any doubts about this policy or should you require any clarity on it you can request that your manager to further explain the requirements of this policy.

In conclusion it is the expectation of Zenith Professional Training that all employees, subsidiaries, contractors or representatives of the company maintain the highest of standards when conducting business adhere to the letter and spirit of legislative requirements and policies on business conduct. The company expects all its' employees and representatives to act professionally, honestly and ethically in all their dealings with customers, colleagues and third parties and it has a clear policy on conflicts of interest:

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- Conflicts of interest should always be avoided wherever possible.
- Conflicts of interest or potential conflicts of interest must be always disclosed. Zenith Professional Training as an organisation will not tolerate any non-disclosure by its employees or representatives.

Board Members

Board members will be asked separately to confirm their interests outside of the company operations (including a nil return/) annually.

Date of Review: 28/06/2024

Review by: Management

Next Review Date: 27/06/2025

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