

Conflict of Interest Policy

Introduction

This Conflict of Interest Policy has been developed to outline obligations and expected best practice, as well as provide guidance in dealing with any unavoidable conflicts of interest, as they may arise.

All C.S. Todd & Associates Ltd employees have an obligation to act in the best interests of C.S. Todd & Associates Ltd.

Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of C.S. Todd & Associates Ltd. Such conflicts may create problems; they can:

- Inhibit free discussion.
- Result in decisions or actions that are not in the interests of the company.
- Risk the impression that C.S. Todd & Associates Ltd has acted improperly.

Specifically, conflicts of interests include matters of material and financial benefit, as well as those involving reputation or other more intangible factors.

The aim of this policy is to provide guidance to ensure C.S. Todd & Associates Ltd or its employees do not become involved in any impropriety, or even appearance of such.

Gifts Register

Accordingly, we expect C.S. Todd & Associates Ltd employees to freely, openly and honestly declare all and any gifts (over the value of £10) received in connection with their role in the company, whether from clients, competitors and/or suppliers, whether financial or other. Details of gift, value of gift (if known), giver/recipient and date will be recorded in a book held in the main office, Hutton Roof.

Conflict of Interests

C.S. Todd & Associates Ltd employees are expected to declare all and any potential conflict of interests at the earliest opportunity.

Where any potential conflict of interests may arise in relation to tender contract, negotiations, pricing or other factors, where the person is directly related to or has

C.S. Todd & Associates Ltd

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Director: N. Davies BA (Hons), PGDip
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interest in the other party, C.S. Todd & Associates Ltd employees are expected to recuse themselves from discussions, negotiations etc., unless directed to do so by the Managing Director. This does not include where the benefits are universal, or where the benefit is insignificant. Nevertheless, all interests are expected to be declared formally and in advance (wherever possible) to the Managing Director and Director of Administration.

Where required, the SMT will convene a formal meeting. This meeting will decide:

- The nature and extent of the conflict;
- The actions taken to manage the conflict.

A de minimis exemption will apply to contracts less than £500 in value.

Managing Contracts Where There is a Conflict of Interest

No person may be involved in managing or monitoring a contract where they have a direct interest unless directed to do so by the Managing Director.

Date: 01.06.2024

Signature: 

Name: Colin Todd

Position: Managing Director