

Loida British Ltd - Conflict of Interest Policy

1. Purpose

The purpose of this policy is to ensure that all employees, contractors, board members, and external partners of Loida British Ltd. maintain the highest standards of integrity, transparency, and fairness. This policy aims to prevent conflicts of interest from arising and provides a framework for identifying, reporting, and managing conflicts to protect the company's reputation and ensure that all decisions are made in the best interest of Loida British Ltd. and its stakeholders.

2. Scope

This policy applies to:

- All employees, directors, board members, contractors, consultants, and any other individuals or external partners engaged in activities on behalf of Loida British Ltd.
- All business dealings, decisions, and activities involving Loida British Ltd. or any of its subsidiaries, suppliers, customers, or clients.

3. Definitions

3.1 Conflict of Interest

A conflict of interest arises when an individual's personal, financial, or other interests have the potential to interfere with their ability to act in the best interest of Loida British Ltd. Such conflicts can occur when personal interests or relationships overlap or compete with professional responsibilities.

Examples of conflicts of interest include, but are not limited to:

- **Personal Financial Interest:** When an employee or their family member has a financial interest in a supplier, customer, or competitor of Loida British Ltd.
- **Personal Relationships:** When an employee hires, supervises, or makes decisions about the employment or promotion of a close family member or friend.
- **Gifts and Hospitality:** When an employee accepts gifts, entertainment, or favors from suppliers, clients, or competitors that could influence business decisions.
- **Outside Employment or Directorships:** When an employee works for or holds a position in another company that competes with, supplies, or conducts business with Loida British Ltd.

- **Use of Company Resources for Personal Gain:** When an employee uses company assets, intellectual property, or confidential information for personal benefit or for a third party.

4. Identifying Conflicts of Interest

All individuals covered by this policy are responsible for identifying any potential or actual conflicts of interest and taking the appropriate steps to declare them. The following circumstances may give rise to a conflict of interest:

- **Financial Investments:** Any personal financial stake in a company that does business with Loida British Ltd., including stock ownership, partnerships, or directorships.
- **Personal Relationships at Work:** Any familial, romantic, or close personal relationship with another employee, supplier, client, or competitor.
- **Employment Outside of Loida British Ltd.:** Holding secondary employment or performing consulting services for another company, particularly if that company is a competitor or does business with Loida British Ltd.
- **Receiving Gifts or Benefits:** Accepting significant gifts, monetary incentives, or personal benefits from a third party with whom Loida British Ltd. has a business relationship.

5. Disclosure and Reporting

5.1 Responsibility to Disclose

Employees, directors, and other relevant individuals are required to disclose any potential or actual conflicts of interest as soon as they become aware of them. Disclosures should be made in writing to the **Compliance Officer** or **Human Resources Department**.

5.2 Reporting Process

- A **Conflict-of-Interest Declaration Form** must be completed and submitted to the Compliance Officer or HR, providing details of the potential conflict.
- The individual must refrain from participating in any discussions, decisions, or activities related to the matter until a resolution is determined.

5.3 Obligation to Update

Employees are required to regularly review their potential conflicts of interest, particularly when changes occur in their personal circumstances or job responsibilities. Any updates to previously declared interests must be reported immediately.

6. Managing Conflicts of Interest

6.1 Review Process

Upon receiving a conflict-of-interest disclosure, the **Compliance Officer** or designated committee will:

- Review the nature of the disclosed interest.
- Assess the potential impact on the individual's ability to perform their duties impartially and in the best interest of Loida British Ltd.
- Recommend appropriate actions to manage or eliminate the conflict.

6.2 Resolution Options

Depending on the nature and severity of the conflict, the following actions may be taken to manage the conflict:

- **Recusal from Decision-Making:** The individual may be excluded from discussions or decisions related to the matter in which the conflict arises.
- **Divestment of Interest:** The individual may be required to dispose of a financial interest that causes the conflict.
- **Reassignment of Duties:** The individual's duties may be reassigned to remove them from areas where conflicts exist.
- **Resignation or Termination:** In extreme cases where the conflict cannot be adequately managed, the individual may be required to resign, or their contract may be terminated.

7. Prohibited Actions

7.1 Acceptance of Inappropriate Gifts

Employees and individuals covered by this policy may not accept any gifts, Favors, or hospitality that could be seen as an attempt to influence business decisions. Any gift or benefit over a nominal value (typically £50) must be declared to the Compliance Officer, and approval must be sought to retain it.

7.2 Insider Trading

Employees with access to confidential or proprietary information regarding Loida British Ltd. or its business partners may not use that information for personal financial gain, including trading shares or advising others to do so.

7.3 Use of Company Resources

No employee or external partner may use Loida British Ltd.'s resources (such as information, assets, or technology) for personal gain or for the benefit of third parties.

8. Consequences of Non-Compliance

Failure to disclose conflicts of interest or attempts to conceal conflicts may result in disciplinary action, up to and including termination of employment or contract. In addition,

individuals who violate this policy may be subject to legal action if their behaviour breaches applicable laws or regulations.

9. Responsibilities

9.1 Employees

- Proactively identify and disclose any potential conflicts of interest.
- Refrain from participating in activities where a conflict exists unless resolved or approved.
- Report any concerns regarding conflicts of interest involving colleagues.

9.2 Managers and Supervisors

- Encourage employees to disclose potential conflicts of interest.
- Ensure that any reported conflicts are addressed promptly and appropriately.
- Support the fair and consistent implementation of this policy.

9.3 Compliance Officer

- Review and assess all conflict-of-interest disclosures.
- Provide guidance on how to manage or resolve conflicts.
- Maintain a record of all disclosed conflicts and their resolutions.
- Conduct regular audits to ensure compliance with this policy.

10. Review

This policy will be reviewed annually or when significant changes in legislation or company operations occur, ensuring it remains current and effective.

Date of Last Review: [Insert Date]

Next Review Date: [Insert Date]

11. Contact Information

For further information regarding this policy or to report a conflict of interest, please contact:

Compliance Office

Loida British Ltd.

[Insert Address]

[Insert Email]

[Insert Phone Number]