

CONFLICT OF INTEREST POLICY

A Conflict of interest is defined as "A situation where a person has a personal interest in a matter, the subject of a decision or duty of the person".

Kestrel Apprentice Solutions has a fully documented conflict of interest policy which aims to both safeguard our staff members in the performance of their duties as well as protect the interests of our Host Employers and our apprentices and trainees.

Where a host employer, apprentice or trainee believes a conflict of interest occurs in the discharge of a staff member's duties they should raise their concern with the staff member and / or the Kestrel Apprentice Solutions Regional Manager to review.

The board places great importance on making clear any existing or potential conflicts of interest for its directors. All such conflicts of interest shall be declared by the director concerned and officially minuted at an appropriate Board Meeting.

The employees of Kestrel Apprentice Solutions are responsible for:

- being aware of their obligation to avoid conflicts of interest where possible, and manage those conflicts of interest that cannot be avoided;
- assessing their private and personal interests, and whether they conflict, or have the potential to conflict, with their official duties;
- disclosing conflicts of interest they may have in accordance with specified procedures; and
- complying with the requirements of this general policy.

Any personal or business matter which is/or could lead to a conflict of interest must be declared at the earliest possible time to the Regional Manager (for managers and employees).

For employees, the Regional Manager will decide if there is an actual conflict of interest and if it is of a material nature will inform the Chairperson. All conflicts of interest involving the Regional Manager will be referred to the Chairperson for a determination about materiality.

All material declarations are to be recorded in a Register of Interests held by the Regional Manager.