

# P-CO-10 CONFLICT OF INTEREST POLICY

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- 1. PURPOSE** The purpose of this policy is to help LEI employees, consultants and representatives of LEI to effectively identify, disclose and manage any actual, potential or perceived conflicts of interests in order to protect the integrity of LEI and manage risk.
- 2. RESPONSIBILITY** All LEI employees, consultants and representatives of the company.
- 3. DEFINITION** A conflict of interest arises from a conflict between the performance of a company duty and a private or personal interest. A conflict of interest may affect a person's judgement as to what is in the company's interest or may lead to a bias in their decision making. It is not always possible to avoid a conflict of interest. A conflict of interest is not necessarily unethical or wrong.
- 4. POLICY** It is important that any actual, perceived or potential conflict of interest is identified, disclosed and effectively managed (including avoided if possible). Management of conflicts of interest must be fair, transparent, accountable and free from bias.  
All LEI employees and consultants must:
  - disclose any actual, perceived or potential conflict of interest;
  - seek independent advice about how a conflict will be managed; and
  - are encouraged to report any actual, perceived or potential conflict of interest that they observe.The Conflict of Interest Procedure [P-CO-11\_Conflict of Interest Procedure] specifies how and to whom disclosures or reports must be made, the roles and responsibilities of various persons, steps or processes that may be used to avoid or manage a conflict of interest, and how a conflict of interest is to be recorded and reported.

**FORMS** P-CO-11\_Conflict of Interest Procedure

**SIGN OFF:**

**MANAGING DIRECTOR:**



**Date:** 29-05-19