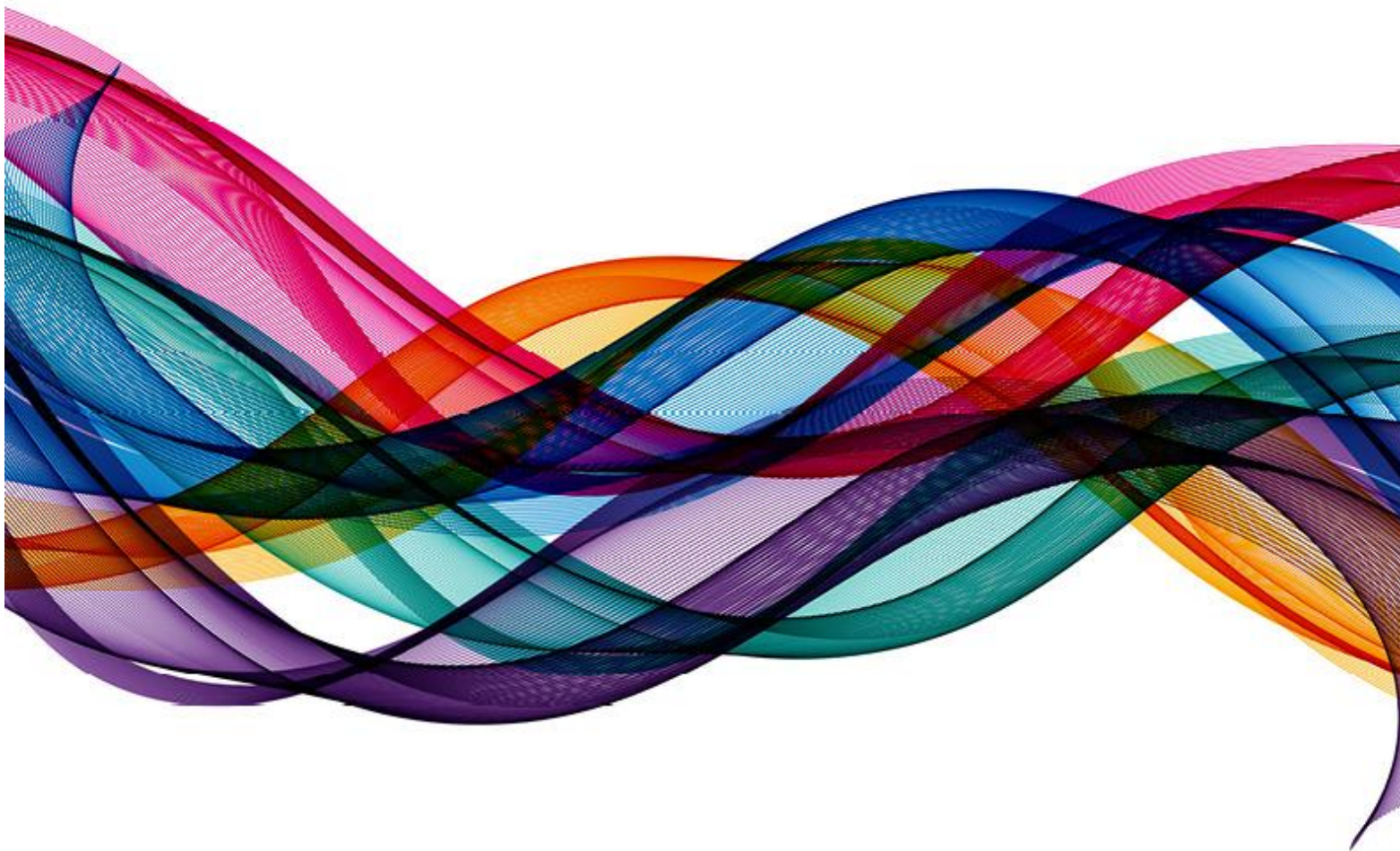




Active
Black Country

ABC Board

Conflicts of Interest Policy



Conflicts of Interest

It is important that all Board members understand their duties and responsibilities as informed by the Companies Act 2006 which came into force on 1st October 2008 and comply with the rules of the Board on handling conflicts of interest. Whilst the role of an Active Black Country Independent Board Member is that of a non-voting Executive, it remains the personal responsibility of each Board member to ensure they are up to date with conflicts of interest matters and exercise their duties as only members themselves will ultimately be aware of any actual or potential conflicts.

You are required, as a minimum, to review and declare as necessary any private interests (either for yourself or a close relative/friend) which may, or may be perceived to, conflict with your role. This includes:-

- avoiding conflicts of interests arising (situational conflicts).
- declaring any interest in a proposed transaction or arrangement with the Board and/or ABC Partnership, and a separate and independent duty to disclose any interest in an existing transaction or arrangement with the Board and/or ABC Partnership (transactional conflicts).

Non-compliance and failure to declare an interest in an existing transaction or arrangement is seen as a serious breach of your duties and deemed a criminal offence.

If you realise that you are in anyway, directly or indirectly, interested in a proposed matter, you must declare the nature and extent of that interest to the Chair and Director as soon as practicable as interests must be notified before any transaction is entered into.

You will be required to remove yourself from any discussion or determination of matters in which you have a financial interest. In matters in which you have a non-financial interest, you should not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.

An interest which is regarded by the Chair and the Director as remote or insignificant so that it cannot reasonably be regarded as likely to influence others, or result in personal gain, may be disregarded, should they chose to do so.

Individuals who are deemed by the Chair and the Director to be unable to fulfil their duties effectively as a Board member due to any such continuing conflict of interests, may be asked to end their term of appointment due to such matters.

Members have an ongoing duty to update on any changes to these interests. The Secretariat of the Board will keep an annual register of Board member interests which shall be open for public inspection and updated and maintained on an annual basis.