

HUBFORT

CONFLICTS OF INTEREST POLICY

Policy Title	Conflicts of Interest Policy
Document Owner	Managing Director, HUBFORT
Applies To	All employees, contractors, directors and agents of HUBFORT
Effective Date	16 April 2026
Version	1.0
Review Cycle	Annual
Jurisdiction	United Kingdom

1. Purpose

A conflict of interest arises where a personal interest could influence, or reasonably appear to influence, the objectivity of a decision made on behalf of HUBFORT. This policy sets out how conflicts are identified, declared, and managed so that decisions are made on merit and stakeholders can trust the integrity of our business.

2. Scope

This policy applies to all employees, directors, contractors, consultants, and agents of HUBFORT. It covers both actual conflicts and situations that could reasonably be perceived as conflicts, as perception alone can damage trust.

3. Policy Statement

HUBFORT expects everyone acting on its behalf to put the interests of the company and its clients ahead of personal interest, to declare actual and perceived conflicts promptly, and to withdraw from decisions where a conflict exists.

4. What Counts as a Conflict

Common examples include, but are not limited to:

- A close family member or personal relationship with a client, supplier, prospect, or competitor contact
- Ownership or a material financial interest in a client, supplier, or competitor
- A secondary employment, consultancy, or directorship outside HUBFORT that relates to our market
- A personal interest in the outcome of a procurement, tender, hiring decision, or promotion
- Receipt of gifts, hospitality, or other benefit that could influence a decision (see Gifts and Entertainment Policies)

- Use of HUBFORT's information, equipment, or position for personal gain
- Taking on a voluntary role or public position that could conflict with HUBFORT's clients or interests
- A personal political role or candidacy that intersects with a public-sector client engagement

5. Declaring a Conflict

Anyone who becomes aware of an actual, potential, or perceived conflict must declare it in writing to their line manager and to the Managing Director without delay. Declarations should cover:

- The nature of the interest
- The parties involved
- The decision, process, or relationship affected
- Any steps already taken to manage the conflict

An annual declaration of outside interests is required from all employees and directors, completed in Q1 each year. New joiners complete an initial declaration during onboarding.

6. Managing a Conflict

Once a conflict is declared, the Managing Director will decide on the appropriate management action, which may include:

- Noting the declaration in the central register with no further action where the conflict is immaterial
- Recusing the individual from the specific decision or account
- Reassigning the work or introducing an independent reviewer
- Requiring the individual to step back from a secondary engagement
- In serious cases, requiring the individual to divest an interest or, exceptionally, ending the HUBFORT engagement

Decisions on how to manage a conflict are recorded in writing and reviewed periodically.

7. Outside Employment and Directorships

Secondary employment, consultancy, directorships, and other paid external roles require written approval in advance from the Managing Director. Approval will normally be granted where the role:

- Does not compete with HUBFORT's services
- Does not use HUBFORT's confidential information, equipment, or time
- Does not risk an overlap with HUBFORT clients or suppliers
- Does not affect the employee's ability to perform their HUBFORT role

Trustee and voluntary roles, unpaid community activities, and roles with registered charities do not usually require approval but should be declared in the annual declaration.

8. Relationships at Work

HUBFORT does not seek to interfere with personal lives. However, a close personal relationship between colleagues where one has authority over the other, or where both are involved in the same significant decision, can create a conflict. Such relationships must be

declared to the Managing Director so that reporting lines, decision-making, or team structure can be adjusted. The focus is always on managing the situation fairly, not on judging the relationship.

9. Procurement and Hiring

- Anyone involved in procurement must declare any relationship with a bidder or supplier before the process begins
- Hiring managers must declare any personal relationship with a candidate; where declared, the manager will not sit on the selection panel
- Former HUBFORT staff joining a client or supplier must be managed under the same principles, with sensitive commercial information ringfenced for an appropriate period

10. Register of Interests

Finance maintains a central register of declared interests. Entries include the nature of the interest, parties involved, the management action agreed, and review date. The register is confidential but is available to the board on request. The Managing Director reviews the register quarterly.

11. Confidential Information

HUBFORT's confidential information, and that of its clients, must never be used to advance a personal interest or the interest of an outside party. Employees are reminded of their contractual confidentiality obligations, which continue after employment ends.

12. Post-Employment

Employees leaving HUBFORT must continue to respect confidentiality obligations. Where an individual's contract includes restrictive covenants (non-compete, non-solicitation), those covenants apply for the specified period and will be enforced where necessary.

13. Breach

Failure to declare a known conflict, or acting despite an undeclared or unmanaged conflict, is a disciplinary matter. Where the conflict has resulted in financial gain at HUBFORT's or a client's expense, or has involved corruption, it may be treated as gross misconduct and may trigger reporting under the Anti-Bribery and Corruption Policy and, where relevant, to external authorities.

14. Related Documents

- Anti-Bribery and Corruption Policy
- Gifts Policy
- Entertainment Policy
- Political Contributions Policy
- Whistleblowing Policy
- Code of Conduct
- Employment Contract and Restrictive Covenants

Approval

This policy has been reviewed and approved for release by the undersigned.

Approved By	Role	Date
Syed Ehsan	Managing Director	16 April 2026