

Conflict of Interest Policy

1. Policy Statement

SeenEm® is committed to conducting its business with integrity, transparency and objectivity. This policy is designed to help individuals identify, disclose and appropriately manage situations where personal interests could conflict, or appear to conflict, with the best interests of SeenEm®.

All individuals are expected to act in a manner that protects SeenEm®'s reputation and avoids improper influence on business decisions.

2. Scope

This policy applies to all:

-  Employees
-  Directors and officers
-  Contractors and consultants
-  Agency workers
-  Anyone acting on behalf of SeenEm®

Compliance with this policy is mandatory.

3. Legal Framework

This policy is aligned with:

-  **Companies Act 2006**
-  **Employment Rights Act 1996**
-  **Bribery Act 2010**



UK GDPR & Data Protection Act 2018 (where disclosure involves personal data)

4. What Is a Conflict of Interest

A conflict of interest arises where an individual's personal, financial or other interests could interfere with, or be perceived to interfere with, their duty to act in SeenEm®'s best interests.

Conflicts may be:



Actual



Potential



Perceived

All three must be disclosed.

5. Examples of Conflicts of Interest

Examples include, but are not limited to:



Financial interests in suppliers, competitors or clients



Outside employment or consultancy that overlaps with SeenEm®'s business



Personal relationships influencing business decisions



Use of SeenEm® information or resources for personal gain



Gifts or hospitality that could influence impartiality

6. Duty to Disclose

All individuals must:



- Declare any actual, potential or perceived conflict of interest immediately
- Update disclosures if circumstances change
- Cooperate fully in managing the conflict

Failure to disclose a conflict may be treated as a disciplinary matter.

7. Disclosure Process

Conflicts should be disclosed to management or the designated contact in writing.

Disclosures will be:



- Reviewed objectively
- Handled confidentially where possible
- Assessed for risk and impact

8. Managing Conflicts of Interest

SeenEm® may manage conflicts by:



- Reassigning duties
- Restricting access to information
- Requiring withdrawal from decision-making
- Ending or restructuring external arrangements

The approach taken will be proportionate and documented.

9. Gifts, Hospitality and Benefits

Any gifts, hospitality or benefits must:



- Be reasonable, proportionate and infrequent
- Not influence business decisions
- Be declared where required

SeenEm® has a zero-tolerance approach to bribery or inducement.

10. Confidentiality

All disclosures and related records will be handled in accordance with data protection legislation and retained only as long as necessary.

11. Breaches of Policy

Failure to comply with this policy may result in:



- Disciplinary action
- Termination of employment or engagement
- Legal or regulatory action where appropriate

12. Review and Approval

This policy is reviewed annually by the Board of SeenEm® to ensure it remains compliant with UK law, technological developments and best practice.

Approved by: The Board of SeenEm®

Review frequency: Annual