

## 02 Conflict of Interest Policy

Version 2 | October 2021

HCV Network Ltd. recognises that many potential conflicts of interest arise because of its work. Through the application of our policy on conflict of interest, we attempt to identify and manage conflicts that do arise systematically. We also undertake to monitor the implementation of this policy to ensure that conflicts of interest do not compromise the integrity and objectivity of our work.

Conflict of interest is addressed at two levels:

- Individual employees and subcontractors.
- HCV Network Ltd. as a whole.

### 1. Individual conflicts of interest

#### Employees

- A requirement for proper management of conflict of interest by employees, including notifying HCV Network Ltd. Directors of any potential conflicts, is included in the Terms of Employment which form part of every employee contract.
- HCV Network Ltd. requires each employee to complete a **Declaration of Interests** on joining HCV Network Ltd. The Declaration of Interests is reviewed during staff annual performance reviews and any changes or updates noted.

#### Subcontractors

- The requirement for proper management of conflict of interest, including notifying HCV Network Ltd. Directors of any potential conflicts, is included in the Terms and Conditions for Contractors which forms part of every subcontractor contract.

## **2. HCV Network Ltd. conflicts of interest**

As part of the project planning process, before accepting the terms of reference for an individual contract, the project manager considers any potential conflicts of interest.

Special consideration must be given to potential conflicts arising from:

- Past, on-going, or future work with the same client.
- Past, on-going, or future work with a different client.
- The declared interests of the project team and any other staff likely to be involved in the project.

If any potential conflicts are identified:

- A Director must be informed.
- Measures to remove or manage the potential conflict must be identified.
- The identified measures must be implemented.

If, after the implementation of the identified measures, a potential conflict is likely to remain which could affect HCV Network Ltd.'s ability to deliver the terms of reference, or if the perception of such a conflict is likely, HCV Network Ltd. will formally notify the client before accepting the contract.