Halo Benefits

POLICY

Conflicts of Interest Policy

How we identify, declare and manage conflicts of interest.

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23 November 2026	2.0	November 2027

Halo Benefits Ltd · Owner: Dionne Clarke, Head of People & Partnerships · Classification: Internal & Public

Document control

Policy owner	Dionne Clarke, Head of People & Partnerships
Approved by	Board of Directors
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Review frequency	Annually
Applies to	All directors, employees, contractors and consultants of Halo Benefits Ltd
Related policies	Code of Conduct and Business Ethics, Anti-Bribery and Corruption Policy, Whistleblowing Policy

Version history

Version	Date	Summary of changes	Author
1.0	30 Oct 2026	First issue	Dionne Clarke
2.0	23 Nov 2026	Rebranded and restructured for clarity and readability	Dionne Clarke

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1. Purpose of the policy

Our customers and partners need to trust that our decisions are made in their legitimate interests and ours, not for anyone's private benefit. This policy explains how Halo Benefits Ltd identifies, declares, records and manages conflicts of interest so that they never affect our judgement or our customers.

2. Scope

This policy applies to **Halo Benefits Ltd** (company number 17577358) and to all directors, employees, contractors and consultants. It also covers arrangements with related companies under common ownership or management.

3. What is a conflict of interest?

A conflict of interest arises when your personal interests, or those of someone close to you, could influence, or could reasonably appear to influence, how you do your work. This includes actual, potential and perceived conflicts. Examples include:

- a financial interest in a customer, supplier, competitor or partner;
- a close family member or partner working for, or owning, a customer, supplier or competitor;
- outside employment, directorships, advisory roles or freelance work;
- being involved in hiring, managing or setting the pay of a relative or partner;
- using company information or opportunities for personal gain; and
- a personal interest in a customer whose data you can access.

Having a conflict is not wrongdoing in itself. Failing to declare one is.

4. Declaring interests

- **On joining:** every director, employee and contractor completes a declaration of interests before or on their first day, covering outside roles, relevant shareholdings, close relationships with people at customers, suppliers or competitors, and anything else that could create a conflict. A "nothing to declare" return is required if there is nothing to declare.
- **Every year:** everyone confirms or updates their declaration as part of our annual policy sign-off.

- **When things change:** declarations must be updated within ten working days of any change in circumstances.
- **For specific decisions:** any conflict relating to a particular decision, tender, recruitment, purchase or customer matter must be disclosed as soon as you are aware of it, and before taking part in the decision, even if it is already declared.

5. Our conflicts register

We keep a single Conflicts of Interest Register, which records each person and interest, when it was declared, how serious it is, the agreed safeguards, the director who approved them and the next review date. The Board reviews the register at least once a year.

Directors' interests are also handled in line with sections 175 to 177 of the Companies Act 2006, including declaring an interest in a proposed transaction before the company enters into it, and are recorded in Board minutes.

6. Managing conflicts

Once declared, a conflict is assessed by our Ethics Director (or by another director, if the conflict involves the Ethics Director). Depending on the circumstances, safeguards may include:

- removing the person from the decision, process or account;
- having decisions approved by an independent colleague;
- restricting access to particular systems or data;
- telling the customer concerned, with their consent where appropriate; or
- requiring the person to give up the conflicting interest.

Where a conflict cannot be managed, we will decline the work or end the conflicting activity.

7. Outside activities and related companies

- Staff must get approval from a director before taking on outside employment, directorships or paid work that could compete with us, create a conflict or affect their ability to do their job.
- Any services or data shared with related companies under common ownership or management must be documented, fairly priced and compliant with data protection law.

- If we recommend a related company to a customer, we always tell the customer about the relationship.

8. Roles and responsibilities

- **Board of Directors:** reviews the register every year and manages directors' conflicts.
- **Ethics Director:** assesses declarations and agrees safeguards.
- **Managers:** identify conflicts in their teams and make sure safeguards are followed.
- **Everyone:** declares interests on joining, every year and for specific decisions, and follows agreed safeguards.

9. Raising concerns and breaches

Questions or concerns about a possible conflict, including someone else's undeclared conflict, should be raised with the Ethics Director, at **compliance@halobenefits.co.uk**, or under our Whistleblowing Policy.

Failing to declare a conflict, or to follow agreed safeguards, is a disciplinary matter and may amount to gross misconduct. For contractors, it may lead to the engagement being ended.

10. Review

This policy is reviewed annually, and sooner after any significant change to our business or structure. The Head of People & Partnerships proposes changes and the Board of Directors approves them.

> QUESTIONS ABOUT THIS POLICY?
>
> Contact Dionne Clarke, Head of People & Partnerships, at dionne@halobenefits.co.uk.