VERNER WHEELOCK
Excellence in food industry training

Brewery Lane Studio, 2 Belle Vue Square
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Verner Wheelock Associates Limited
Conflict of Interest Policy
01 June 2020

Conflict of Interest Policy

All employees, freelance auditors **(auditors)** and freelance trainers **(trainers)** of Verner Wheelock Associates Limited **(VWA)** are required to perform the duties and activities of their position with the highest level of integrity and independence, in a professional and ethical manner. They must also ensure that they avoid or eliminate any conflict of interest or situation that could be reasonably be perceived as a conflict of interest and immediately report it to the VWA Managing Director. This can include conflicts of interest that, in fact or in appearance, may create an incentive to report anything other than the true and accurate facts gathered during a social compliance service.

Although this policy details certain behaviours that may lead to a conflict of interest or the appearance of a conflict of interest, it is impossible to anticipate all situations that could lead to one. Employees, auditors and trainers may also inadvertently find themselves in a situation that leads to or could be perceived as a conflict of interest. These situations must also be disclosed.

Compliance with this policy is a condition of employment for employees and a condition of contract of services with auditors and trainers.

Failure to comply with these provisions may result in disciplinary action, up to and including termination of employment for employees and termination of use of services for auditors and trainers.

Scope

This policy applies to all employees of VWA, as well as contractual third parties or partners doing business with the company. All are expected to adhere by the provisions of this policy that are reasonably applicable to them.

Personal Interest

All persons conducting business on behalf of VWA must ensure that no conflict exits or could appear to exist between their personal interests and those of VWA, potential competitor, customer, partner, vendor or other business entity in which you have a direct or indirect financial interest.

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Employees, auditors and trainers must not:

- Take part in or attempt to influence any VWA decision or any business dealings with a current or potential competitor, customer, partner, vendor or other business entity in which you have a direct or indirect financial interest
- Use the premises, equipment, supplies or services of other employees of VWA to promote their personal interest
- Use confidential information for their personal benefit during on or after employment with VWA
- To be in a position where they could benefit directly or indirectly from a VWA business transaction (i.e. supplier of goods or services, contract, licence or partnership)
- Give preferential treatment to any supplier or other person doing business with VWA in order to serve their personal interests
- Invest in, own, have an interest in, or be an employee of an organisation that might have an interest, direct or indirect, in any VWA commercial transaction.

This should not be interpreted as an exhaustive list of all circumstances that could lead to a real or perceived conflict of interest.

Preferential Treatment

Employees, auditors and trainers shall not grant or appear to grant preferential treatment to a person with whom they have a personal or professional relationship.

Employees - If an employee is in a situation where they could make a decision (i.e. recruitment, award of a contract of services) involving, directly or indirectly, a person with whom they have a close personal or professional relationship, the employee must

- Disclose the potential conflict to the Managing Director
- Refrain from making any recommendations or conveying views related to the decision.

Consultancy and Auditing

VWA will endeavour to ensure that any customer who requests and receives a consultancy visit will not be audited by an auditor affiliated to VWA.

Should an employee, auditor or consultant suspect a conflict of interest they should notify the Managing Director.

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Gifts, Hospitality and Other Benefits

Accepting a gift, benefit or an offer of hospitality can lead to a real or perceived conflict of interest.

- Employees, auditors and trainers must not accept gifts, hospitality or other benefits that are cash, loans or discounts being offered
- Gifts and hospitality to or from any party directly or indirectly related to a social compliance service should be avoided at all times
- Employees or sub-contractors shall not accept meals, except for beverages such as water, coffee, tea or soft drinks which are customarily provided to visitors at the facility, from any party directly or indirectly related to a social compliance service. To the extent an employee or sub-contractor is provided any meal from any party directly or indirectly related to a social compliance service, the employee or sub-contractor shall pay for the meal at the current market rate and obtain a receipt to evidence payment.

Transport

Employees or sub-contractors s shall not accept transportation from any party directly or indirectly related to a social compliance service. To the extent an employee or sub-contractor is provided any transportation by any party directly or indirectly related to a social compliance service, the employee or sub-contractor shall pay for the transportation at the current market rate and obtain a receipt to evidence payment. This does not relate to transport **within** a site or a collection of sites for the purposes of completing a social compliance service.

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Agreement on Conflicts of Interest Policy

I have read, understood and agree to comply with the rules and conditions governing the Conflicts of Interest Policy.

Employees - I am aware that this policy may subject me to disciplinary action, including termination from employment. I am also aware that this Policy is subject to change at any time.

Auditors and Trainers – I am aware that this policy may subject me to termination of services. I am also aware that this Policy is subject to change at any time.

Print Name……

Position: ……

Signature ……

Date ……