



Conflicts of Interest Policy and Procedure

1. POLICY STATEMENT

1. Kindred LCR CIC (“the Company”) always seeks to conduct its business ethically, treat its Members and employees fairly and promote market integrity.
2. However, it recognises that it may sometimes have interests that conflict with its members interests or with the duties that it owes to its members.
3. The Company will strive to avoid any such conflict of interests, including actual conflicts of interest as well as perceived potential conflicts of interest.

2. POLICY OBJECTIVES

1. To provide employees and Board members guidance to identify, prevent and manage conflicts of interest.
2. To include arrangements to safeguard the interests of the Company and its members and stakeholders

3. DEFINITIONS AND TYPES

1. A conflict of interest is a situation or arrangement where the Company, an organisation it is associated with, and/or any of its members are subject to direct or indirect competition which might adversely affect decision-making and outcomes in the course of conducting business.
2. The Company has identified the following general types of conflicts of interest that are the most relevant to its work:



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- Direct interests – including an employee or directors own personal, family, professional or business interests
- Indirect interests – includes the personal, family, professional or business interests of individuals or groups with whom the employee, director or member is or was, recently, closely associated
- Financial interests - involves an actual, potential or perceived financial gain or loss – benefitting financially from decision significantly influenced or made by the organisation
- Non-financial interests – these include any tendency toward favouritism or prejudice resulting from friendship, animosity, or other personal involvement with another person or group.

4. SCOPE

1. The rights and obligations set out in this policy and procedure applies to employees and Board members of the Company.

5. DUTIES – ROLES AND RESPONSIBILITIES

1. The Board of Directors has the ultimate responsibility to provide, implement and review this policy.
2. Upon appointment, Board members will be required to make a full written disclosure of interests such as relationships, and posts held etc. that could potentially result in a conflict of interest. This disclosure will be kept on file and updated as required.
3. Upon appointment, any employees or Investment Committee members will undertake the same procedure as described in 5.2



6. PROCEDURES

Identifying Conflicts

1. For the purposes of identifying conflicts of interest that arise, or may arise, the Company must take into account whether the Company, a relevant person (e.g. a member, an employee or Board member etc.) or a person directly or indirectly linked by control to the Company:
 - is likely to make a financial gain, or avoid a financial loss, by the companies act or omission
 - has an interest in the outcome of the service to, or a transaction carried out for, a third party which differs from the third parties' interest;
 - has a financial or other incentive to favour one person/organisation/member (or group of) over the interests of another;
 - carries on the same or similar business as a stakeholder/member; and/or
 - receives an inducement from a third party in the execution of the service provided, other than the standard commission/fee for that service

Prevention of conflicts

1. Employees and Board members, on behalf of the Company, are required to consider whether the risk is actual or potential for the different types of conflicts

Management of conflicts

1. All employees and Board members should disclose any interests in a transaction or decision where there may be a conflict of interests. If there is any doubt, the potential conflict should be disclosed, and further clarification sought.

Disclosure

1. The Company may make general disclosures about types of potential conflicts and explain how these conflicts will be managed to mitigate the risk of potential damage the company's interests and reputation.
2. In some circumstances, where the Company has already made reasonable efforts to prevent or manage a conflict, a specific disclosure about the presence of a conflict will be made and recorded.

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3. These disclosures should be made in writing and where possible done before undertaking any business, so that the relevant decision can be made in regard to the basis of these conflicts.
4. If the Company believes it is not possible to avoid or effectively manage a conflict, it may have no choice but to decline any act or omission arising from this conflict.

This policy has been approved and authorised by:

Policy Name	Version	Developed by	Amended y/n	Review Date
Conflicts of Interest Policy & Procedure	1	NH/ JA	n/a	2/10/21

