

Conflict of Interest Policy

V1:090626

1. Purpose

This Conflict of Interest Policy establishes guidelines and procedures to identify, disclose and manage conflicts of interest within HHF Training Ltd to ensure integrity, impartiality and transparency in all operations.

2. Scope

This policy applies to all employees, directors, contractors, consultants, assessors, IQAs, volunteers and any other individuals acting on behalf of HHF Training Ltd.

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, financial, or professional interests interfere with, or appear to interfere with, their ability to act in the best interests of HHF Training Ltd.

4. Disclosure

All individuals covered by this policy must promptly disclose any actual, potential or perceived conflicts of interest to the management of HHF Training Ltd.

5. Review and Evaluation

Management will review all disclosures to determine the existence and significance of any conflict and may request further information where necessary.

6. Management of Conflicts

Where a conflict is identified, appropriate measures will be implemented, including recusal from decisions, reassignment of duties or other suitable controls.

7. Documentation

All disclosures, reviews, and actions relating to conflicts of interest will be documented and retained in confidence.

8. Annual Review

This policy will be reviewed annually to ensure ongoing effectiveness and compliance with relevant requirements.

9. Education and Training

HHF Training Ltd will provide guidance and training to increase awareness of conflicts of interest and associated responsibilities.

10. Consequences of Non-Compliance

Failure to comply with this policy may result in disciplinary action and, where applicable, legal or contractual consequences.

11. Reporting Violations

Any suspected breaches of this policy should be reported to management in accordance with HHF Training Ltd procedures.

Approval

The management of HHF Training Ltd approves this Conflict of Interest Policy, effective from 9 June 2026.

Review Date: 9 June 2027.