



CONFLICT OF INTEREST POLICY

A. POLICY STATEMENT:

The purpose of this Conflict of Interest Policy is to ensure that all decisions and activities within Eurosafes are conducted with integrity, transparency, and in the best interests of the Group as a whole. This policy is designed to identify, disclose, manage, and where necessary mitigate conflicts of interest that may arise across the Eurosafes Group, including its parent company and three subsidiaries.

This policy is particularly relevant where one group entity provides services to another, including where Eurosafes Training & PPE Ltd delivers training to employees of other subsidiaries.

B. POLICY SCOPE

This policy applies to:

- The parent company – Eurosafes Solutions Ltd
- Eurosafes subsidiaries including Eurosafes Compliance Ltd, Eurosafes Contracting Ltd and Eurosafes Training & PPE Ltd
- Directors, officers, employees, agency workers, contractors, consultants, and trainers acting on behalf of any Eurosafes Group entity
- All individuals covered by this policy are required to comply with its provisions.

C. DEFINITION

A conflict of interest arises where an individual's personal, financial, or other interests could improperly influence, or be perceived to influence, their judgment, decision-making, or actions in relation to their duties within the Eurosafes Group.

Conflicts of interest may be:

- Actual: a real conflict exists
- Potential: a conflict could arise in the future
- Perceived: a reasonable third party could believe a conflict exists

Examples of Conflicts of Interest

Conflicts of interest may include, but are not limited to:

Financial and Personal Interests

- Holding a financial interest in a supplier, customer, or competitor of any Eurosafes Group entity
- Outside employment or consultancy that competes with or conflicts with Eurosafes Group interests
- Personal relationships (family, close friends, partners) influencing business decisions

Intra-Group Relationships

- Decision-making that favours one subsidiary over another without objective justification
- Individuals holding roles across multiple group entities where duties may conflict

Training Centre-Specific Conflicts

- Trainers or managers assessing, certifying, or approving competence of employees where there is a personal relationship or reporting-line dependency

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- Preferential treatment of one subsidiary's employees in training access, assessment outcomes, scheduling, or pricing
- Pressure to modify training outcomes, records, or certifications to meet operational or commercial objectives

D. PRINCIPLES

Eurosafe is committed to:

- Acting fairly and objectively across all group entities
- Ensuring training, assessment, and certification activities are independent, impartial, and consistent
- Maintaining transparency in all commercial and operational arrangements between group companies
- Complying with applicable legal, regulatory, and accreditation requirements

E. PROCEDURES

Disclosure of Conflicts of Interest

All individuals covered by this policy must:

- Promptly disclose any actual, potential, or perceived conflict of interest
- Make disclosures in writing to their line manager or HR
- Update disclosures if circumstances change

Directors must disclose conflicts in accordance with applicable company law and governance requirements.

Management of Conflicts of Interest

Where a conflict of interest is identified, Eurosafe will take appropriate steps to manage it, which may include:

- Removing the individual from the relevant decision-making process
- Reassigning duties or responsibilities
- Implementing independent review or oversight
- Segregating roles between training delivery, assessment, and operational management
- Documenting and approving arm's-length arrangements between group entities

No individual may participate in decisions where they have a declared conflict unless expressly authorised in writing.

Training Centre Safeguards

To maintain independence and integrity, the Group Training Centre will:

- Apply consistent standards, assessment criteria, and outcomes across all subsidiaries
- Maintain clear separation between training/assessment functions and operational performance management
- Ensure trainers and assessors declare conflicts prior to delivery or assessment
- Use objective, documented criteria for competence decisions
- Allow independent verification, audit, or appeal of training and assessment outcomes where required

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F. BREACHES OF POLICY

Failure to disclose or appropriately manage a conflict of interest may result in:

- Disciplinary action, up to and including dismissal
- Removal from specific duties or roles
- Termination of contracts (for contractors or consultants)

Serious breaches may also expose the individual and the organisation to legal or regulatory consequences.

G. RESPONSIBILITIES

Employees and Contractors: Identify and disclose conflicts of interest

Managers: Ensure disclosures are made and conflicts are managed appropriately

HR: Maintain records of disclosures and provide guidance

Directors and Senior Management: Promote compliance and ensure effective implementation

Authorised By:

Gavin Ellis

Managing Director

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