

Conflicts of Interest Policy

OnBoarding Group Limited values the importance of staff/sub-contractors engaging in diverse commercial and public activities which benefit Onboarding Group Limited and further the Centre's interests of staff/sub-contractors. Such activities should in no way conflict with the interests and obligations of OnBoarding Group Limited. OnBoarding Group Limited also recognises that personal relationships may exist or develop within OnBoarding Group Limited. OnBoarding Group Limited values and relies upon the professionalism and integrity of its staff/sub-contractors and learners; should an employee conduct such a relationship, his/her behaviour must be appropriate. Improper behaviour, abuse of authority, conflicts of interest, or acts of a biased nature will not be tolerated.

In keeping with its Centre aims and purposes, OnBoarding Group Limited encourages the closest liaison between its staff/sub-contractors and external bodies, including industry. In encouraging such interaction, OnBoarding Group Limited is mindful of its obligation to provide safeguards against anything arising from these interests which could be detrimental to OnBoarding Group Limited or to individual members.

These policies have been revised to provide greater clarity regarding OnBoarding Group Limited members' obligations and responsibilities in:

- Seeking approval in advance for external interests.
- Identifying conflicts of interest.
- Ensuring accurate declarations, no less than annually.

The revised policies also define what is meant by an External Interest.

Scope

The Code of Conduct applies to all staff/sub-contractors. Although this document does not provide an exhaustive list of activities that sit within the boundaries of the Code, it does however outline the main areas of activity within OnBoarding Group Limited where a conflict of interest may arise, these being:

- Research, contracts, and other services.
- Fraud, bribery, and corruption.
- Procurement.
- Inducement, hospitality, and gifts.
- Relationships between staff/sub-contractors and learners.
- The recruitment and selection process.

This policy will be reviewed annually by the Management Team.
Last reviewed 07/04/2025 – next review date 07/04/2026