

CONFLICT OF INTEREST POLICY

1 Introduction – A Policy to identify, disclose, reduce and manage Conflict of Interest

- 1.1 This policy is to ensure that Directors, consultants and volunteers of Thrive Scotland (Thrive) disclose and manage any potential conflicts of interest.
- 1.2 This policy defines conflict of interest as any situation where there is a potential for any of the above people’s personal or business interests (or the interests of someone they are connected with) to be different from the interests of Thrive.

2. Thrive approach to management of conflicts of interest

- 2.1. Thrive recognises that conflicts of interest occur, and that many potential conflicts of interest can be managed through disclosing the potential conflict of interest and eliminating the areas of conflict.
- 2.2. Thrive Directors, consultants and volunteers are responsible for disclosing their potential conflicts of interest, using the form attached to this Policy, and for detailing in that form how they will manage them.

3. Procedures to identify and ensure management of potential conflicts of interest

- 3.1. Thrive asks its Directors, consultants and volunteers to complete its Conflict of Interest Declaration Form annually and whenever potential conflicts of interest occur. The Thrive Director of Finance maintains these as a Conflicts of Interest Register.
- 3.2. Thrive Directors review the Conflict of Interests Register at their quarterly meetings.

4. Monitoring Controls to ensure that this Policy is implemented

- 4.1. The Director of Finance leads review at board meetings of potential conflicts of interest and of the Conflict of Interests Register.

5. Policy review

Policy owner	Director of Finance
Reviewed annually	Board of Directors
Policy date	July 2021
Next policy review date	August July