

Conflict of Interest Policy

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Revision History

REVISION	DATE	DESCRIPTION OF CHANGE
00	22-12-19	First Issue

CONFLICT OF INTEREST POLICY

Darwish Interserve Facility Management ('The Company') is committed to maintaining the trust and confidence of those with whom it deals. That trust and confidence can be undermined if, when workers find themselves in a position where they have a conflict of interest, or where there is a potential for a conflict of interest to arise, and they do not deal with that conflict or potential conflict of interest appropriately.

This Policy and associated procedures are designed to help workers recognise when a conflict of interest arises, or where there is the potential for a conflict of interest to arise, and to deal with that situation.

The Policy and associated procedures extends to all the business dealings of the Company and its subsidiaries ('Group Companies') in all countries in which Group Companies operate and is designed to further 'Conducting Business with Interserve'. We will also seek to encourage the adoption of similar arrangements by those associate companies and joint ventures over which the Group does not exercise overall control. It does not form part of any employee's contract of employment and we may amend it at any time.

This Policy and associated implementation documentation does not form part of any employee's contract of employment, will be publicised to all employees and will be reviewed on a regular basis to be updated or revalidated as appropriate.

Mohamed Saadeh
General Manager

CONFLICT OF INTEREST PROCEDURE

The way in which conflicts or potential conflicts of interest are dealt with will not only affect the way in which the Company is viewed by others but will also affect workers views and their attitudes towards each other.

Whilst it is not possible to describe in detail all the circumstances where a conflict or potential conflict of interest may arise, if a worker asks him or herself whether an impartial observer might reasonably conclude that any decision or course of action by that worker was or could reasonably have been influenced by the worker's own personal interests then a potential or actual conflict of interest has probably arisen.

Examples

Examples of a potential conflict of interest would be:

A worker arranging for a contract to be placed by his employer with a close family member (i.e. partner, partner's close relations, brother or sister or their partner or any of his or his partner's children); or
a close friend; or
a close associate; or

a business in which any of the above holds a senior position (i.e. director, manager or significant shareholder

A worker, on behalf of the Company, either employing or becoming involved in the recruitment of a close family member or a close friend or close associate.

A worker purchasing materials or services for his own use, in the Company's name, and then reimbursing the Company.

A worker purchasing materials or services in his own name from a supplier to the Company.

In the above cases, the worker's action may have been without ulterior motive or for the best possible reason. It may even have been in the Company's best interest. But by doing this the worker puts him or herself in a position where his or her actions would be open to question by an impartial observer.

This Procedure exists to ensure that workers do not put themselves into such a position.

What to do

When a potential or actual conflict of interest arises, this should be reported in writing by the worker to his immediate line manager. It does not have to be by letter, an email will suffice.

The worker and his manager must then agree a procedure for the way in which the actual or potential conflict of interest should be handled.

Ideally, the worker should no longer be involved. If this is not possible, then a way forward should be agreed with the manager and documented (again an email will suffice) which will ensure that the worker does not make any final recommendation or decision. A copy of this Procedure should then be retained by the worker in both electronic and hard copy.

Any final recommendation or decision made by the manager should then be recorded in writing.
A copy of this should also be retained by the worker in both electronic and hard copy.

It is the responsibility of the worker with the conflict of interest to ensure that this Procedure is followed, as this is for his or her own benefit and protection.

DARWISH INTERSERVE

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