

Conflict of Interest Policy

1. Scope

This policy applies to all Customised Curriculum employees, as well as other Business representatives.

2. Fiduciary Responsibilities

Employees and other representatives of Customised Curriculum serve the public trust and are required to fulfil their responsibilities with care and loyalty. All decisions and actions of the business and the administration are to be made for the sole purpose of advancing the best interests of the business and the public good. The integrity of Customised Curriculum must be always protected, and the fiduciary relationship of officers, employees, and other representatives to Customised Curriculum must be respected in both actuality and appearance.

A conflict of interest exists when a business representative's direct or indirect personal interests are inconsistent with or interfere in any way with the best interests of the Business.

Through this policy, the Business intends to implement the highest possible ethical standards and to establish that the Business will not tolerate conflicts of interest. The Business, through its management staff, will administer this policy strictly, with complete transparency, and in accordance with the following principles:

- In general, it is the policy of the Business that it will not engage in business or financial relationships with employees.
- No business or financial relationship between the Business and any employee or a member of his or her immediate family, or any entity with which an employee or a member of his or her immediate family is affiliated, will be permitted unless it has been thoroughly reviewed and considered by the management and has been found to be of clear benefit to the Business.
- No employee, or a member of his or her immediate family, may knowingly invest directly in any non-publicly traded entity in which the Business has an investment, or in any publicly traded entity in which the Business owns more than 1% of the outstanding security in question. The Business will not knowingly invest directly in any non-publicly traded entity in which an employee or a member of his or her immediate family, has an investment, or in any publicly traded entity in which an employee, or a member of his or her immediate family, owns more than 1% of the outstanding security in question.
- Any proposed business or financial relationship between the Business and an employee or other representative, or a member of his or her immediate family, or any entity with which the employee or other representative or a member of his or her immediate family is affiliated, is subject to the prior review and approval of the Director.

- Any offer of full-time employment to a member of the immediate family of an employee, or a selected employee or other representative, is subject to the prior review and approval of the Chief Executive
- Any employee, or other representative who serves at the Business's request and represents the Business as a director, employee, or other agent of another organisation shall turn over to the Business any compensation received from such other organisation for such service. Personal participation in outside organisations shall be disclosed for conflict of interest (including conflict of duty and loyalty) assessment in the Conflict-of-Interest Disclosure Form, but no indemnification will be provided by the business for such participation unless the business has specifically requested such service as its designated representative.

The policy will be reviewed every 12 months by Claire Hoult, Quality Manager, Customised Curriculum Ltd.

Last updated: October 2024