



Conflicts of Interest Policy

All trustees, directors and committee members of Diabetes Care Trust (ABCD) Ltd and/ or its subsidiaries; ABCD (Diabetes) Care Ltd and BJDVD Ltd, will strive to avoid any conflict between the interests of DCT and its subsidiaries on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The purpose of this policy is to protect the integrity of DCT's and its subsidiaries decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of those working within the organisation.

Conflicts of interest may arise where an individual's personal (or family) interests and / or loyalties conflict with those of DCT and its subsidiaries. Such conflicts may create problems such as:

- Inhibits free discussion.
- Results in decisions or actions taken that are not in the best interests of the DCT and its subsidiaries.
- Risks causing the impression that DCT and or its subsidiaries has acted improperly.

Examples of conflicts of interest include:

1. A trustee who is related to a member of staff and there is decision to be taken on staff pay and/or conditions.
2. A trustee who is also on the committee of another organisation that is competing for the same funding.
3. A trustee who has shares in a business that may be awarded a contract to do work or provide services for the trust.

Upon appointment, all trustees, directors and committee members, will be asked to declare their interests such as relationships, and posts held, that could potentially result in a conflict of interest, using an online webform and on an annual basis thereafter. This disclosure will be kept on file and will be updated as appropriate. Any new interests accrued during the year should be updated via the webform and / or declared at the next committee or trustee meeting. The trustees of DCT will undertake an annual review of the list of conflicts of interest as part of the organisation's risk management policy.

In the course of meetings or activities, trustees or directors will disclose any interests in a transaction or decision where there may be a conflict between DCT's and its subsidiaries best interests and the trustee or director's best interests or a conflict between the best interests of the two organisations that the trustee is involved with. If individuals fail to declare an interest that is known to the Chair of the Committee (or any other member of the committee), the Chair or member should declare the interest.

After disclosure, a trustee or director may be asked to leave the room for the discussion and may not be able to take part in the decision, depending on the judgement of the other trustees present at that time. Any such disclosure and the subsequent actions taken will be noted in the minutes.



THE BRITISH JOURNAL OF
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If an enquiry is received from any source about a potential Conflict of Interest, the enquirer will be asked to make the request in writing to the Chair who will follow it up with the individual member concerned. A response will be given within a reasonable period.

This policy is meant to supplement good judgment, and staff, volunteers, trustees and director should respect its spirit as well as its wording.

The board of trustees should review this Conflict of Interest Policy at 3-year intervals or as appropriate.

Date last approved by DCT Trustees: 19th November 2020

Date of next review: November 2023