







# Conflict of Interest Policy

Identifying, declaring and managing actual, potential and perceived conflicts.

<p> <b>Actual conflict</b></p> <p>A private interest is already affecting, or could affect, a business decision.</p>	<p> <b>Potential conflict</b></p> <p>A situation could develop into a conflict depending on future events.</p>
<p> <b>Perceived conflict</b></p> <p>Others could reasonably think independence or fairness is compromised.</p>	<p> <b>Manage fairly</b></p> <p>Declare, record, remove, recuse or mitigate before decisions are affected.</p>

## Conflict management route

A simple control route that is proportionate for Veraxus Ltd and useful for tender evidence.



Company	Veraxus Ltd
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Approved by	Alex Stefan, Director
Next review	11 May 2027, or earlier if required

This policy supports fair tendering, supplier appointment, subcontractor selection and client confidence. It is especially useful for public-sector and framework opportunities where conflicts and unfair advantage must be actively managed.

# 1. Purpose and procurement alignment

Veraxus Ltd is committed to making business decisions fairly, objectively and transparently. A conflict of interest can damage trust, create unfair advantage, distort procurement and lead to poor commercial decisions.

This policy provides a practical system for identifying, declaring, assessing and managing actual, potential and perceived conflicts. It aligns with public procurement expectations under the Procurement Act 2023 and common supplier declaration requirements.

# 2. Scope

This policy applies to directors, employees, workers, subcontractors, suppliers, consultants and anyone involved in decision-making, tendering, estimating, procurement, subcontractor selection, project management or client-facing activity on behalf of Veraxus Ltd.

# 3. Types of conflict

Type	Description	Example
<b>Actual conflict</b>	A personal, financial or relationship interest is affecting, or could directly affect, a decision.	A decision-maker appoints a supplier owned by a close relative without declaring the relationship.
<b>Potential conflict</b>	The situation could become a conflict depending on circumstances.	A subcontractor being considered for a package has a close personal relationship with someone involved in pricing.
<b>Perceived conflict</b>	A reasonable person could think the decision may not be independent, even if no improper conduct exists.	A former client contact privately advises on a live tender without disclosure.

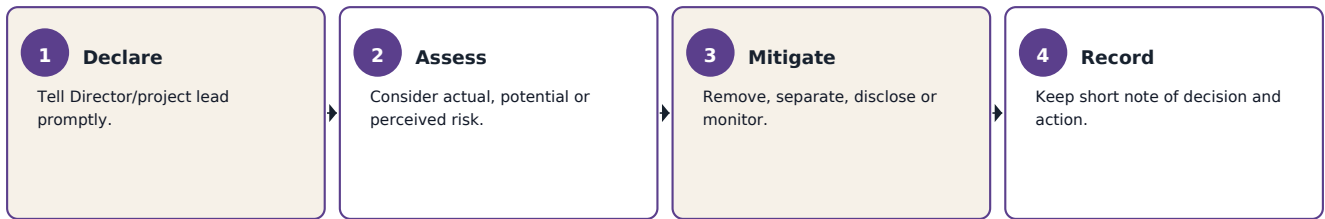
# 4. Core commitments

- Declare conflicts early, including actual, potential and perceived conflicts.
- Avoid using relationships, inside knowledge or private interests to gain unfair advantage.
- Make supplier and subcontractor decisions on objective business criteria.
- Record conflict discussions and mitigation actions where proportionate.
- Remove or separate conflicted individuals from decisions where necessary.

# 5. Common conflict areas for Veraxus

Area	What to watch for	Control
<b>Tendering</b>	Prior contact, privileged information, informal advice, family or friendship links with evaluator or client representative.	Declare and use official communication routes only.
<b>Supplier/subcontractor appointment</b>	Personal relationships, financial interests, hidden commissions or repeated use without fair reason.	Record business reason and compare capability, price, availability and compliance.
<b>Employment and labour engagement</b>	Family/friends engaged without considering suitability, competence, payment and supervision.	Apply basic competence, right-to-work and supervision checks consistently.
<b>Gifts and hospitality</b>	Hospitality influencing supplier or contract decisions.	Use anti-bribery rules and decline anything excessive or linked to a live decision.
<b>Information handling</b>	Use of confidential client, competitor or supplier information outside agreed purpose.	Protect confidential data and escalate accidental disclosures.

## 6. Declaration and mitigation process



## 7. Practical mitigation options

- Declare the conflict to the client or tender authority if required by the procurement rules.
- Remove the conflicted person from pricing, supplier selection or evaluation decisions.
- Use an alternative supplier selection route or obtain comparative quotations.
- Restrict access to confidential documents or pricing information.
- Decline gifts, hospitality, commissions or private benefits linked to a decision.
- Withdraw from an opportunity if the conflict cannot be managed fairly.

## 8. Tender wording

*Veraxus Ltd has a Conflict of Interest Policy in place. The company requires actual, potential and perceived conflicts to be declared promptly and managed proportionately. Where a conflict could create unfair advantage, distort decision-making or undermine tender integrity, Veraxus Ltd will disclose, mitigate, remove affected individuals from decisions or take other appropriate action.*

## 9. Monitoring and review

This policy will be reviewed annually or earlier if procurement rules, client requirements, tender feedback or business operations change.

## 10. Reference alignment

Reference	Reason for relevance
<b>Procurement Act 2023, Section 82 and conflict guidance</b>	Relevant to reasonable steps to ensure a conflict does not put a supplier at an unfair advantage or disadvantage.
<b>Civil Service Procurement Pathway conflict declaration template</b>	Provides a public-sector model for identifying actual and potential procurement conflicts.
<b>Government Supplier Code of Conduct</b>	Supports transparency, ethical behaviour and responsible management of business relationships.

# Declaration and electronic approval

## Electronic approval and signature

This document has been electronically approved and signed by the Director of Veraxus Ltd. The typed signature below is intended to authenticate and approve this document on behalf of the company.

<b>Company</b>	Veraxus Ltd
<b>Document status</b>	Approved
<b>Name</b>	Alex Stefan
<b>Position</b>	Director
<b>Signature</b>	Alex Stefan
<b>Date</b>	11 May 2026
<b>Next review</b>	11 May 2027, or earlier if required

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