



Conflict of Interest Policy

As an employee of Doctore On Track Training Services Ltd, you are expected to act at all times in the Company's best interests and to exercise sound judgement unclouded by personal interests or divided loyalties. Both in performing your duties at Doctore On Track Training Services Ltd and in your outside activities, you should avoid the appearance as well as the reality of a conflict of interest.

A conflict of interest exists if your circumstances would lead a reasonable person to question whether your motivations are aligned with the Doctore On Track Training Services Ltd and SQA/NSAR best interests. If, for example, you are involved in an outside activity or have a financial or other personal interest that might interfere with your objectivity in performing Doctore On Track Training Services Ltd duties and responsibilities, you may have a conflict of interest.

While it is impractical to describe all situations that may create a conflict of interest, the following provides policy guidance about some of the most common conflict of interest situations;

- Use of Doctore On Track Training Services Ltd company information for private or personal gain
- Outside activities – Not for profit and civic organisations
- Employment outside Doctore On Track Training Services Ltd i.e. moonlighting
- Service on a board of directors
- Technical Advisory Boards
- Family and romantic relationships
- Spouses, domestic partners, immediate family members or relatives as suppliers/vendors, and other business partners
- Kickbacks and rebates by suppliers or vendors
- Gifts from vendors, suppliers or customers
- Anyone with a personal interest in the outcome of an assessment is to be involved in the assessment process

Please note that the above is not an exhaustive list of examples. There are many other situations that may also create a potential for a conflict of interest or the appearance of a conflict of interest. It is up to you to be aware of the potential for a conflict of interest in your own particular situation and to resolve the issue in accordance with this policy.

Declarations

Assessors, IVs and invigilators must declare at induction to their line manager in writing if they;

- are related to or have a private relationship, or have a close professional or business relationship with a candidate, and are currently deployed to:
 - set assessments which this candidate will undertake
 - make assessment judgements on this candidate's evidence
 - internally verify assessment decisions on this candidate's work
 - invigilate an assessment which this candidate is sitting

Staff are also required to make a declaration if they are related to or have a private relationship with another member of centre staff involved in the internal verification of assessments . For



example, where the assessment decisions of an assessor are to be internally verified by a relative.

Please refer to Appendix A for Declaration Assessment

Service on Board of Directors for a Profit Organisation

Directors owe a duty of loyalty to the Company on whose board they serve. You should carefully consider all potential conflict of interest issues before agreeing to serve on the board of a “for profit” company.

Any approval granted is subject to the Doctore On Track Training Services Ltd periodic review and Doctore On Track Training Services Ltd may at any time revoke its approval. Previous approvals are no guarantee that future approvals will be granted. Under no circumstances may a Doctore On Track Training Services Ltd employee serve on the audit committee for another company's board of directors.

If your position on the board of directors of another company becomes potentially relevant to an Doctore On Track Training Services Ltd decision or action, you must promptly disclose your relationship with the other company to the Doctore On Track Training Services Ltd employees responsible for the decision or action and you must not participate in that decision or action on behalf of either Doctore On Track Training Services Ltd or the other company. For example, if your Doctore On Track Training Services Ltd business unit is considering a transaction with the company on whose board you serve, you must disclose your relationship with the other company to the decision makers in your business unit and you must refrain from any discussions about or involvement in the transaction on behalf of either Doctore On Track Training Services Ltd or the other company.

Any employee considering service on another company's board should understand that such service can lead to personal liability, particularly with financially troubled companies. As your board service is outside the scope of your employment, Doctore On Track Training Services Ltd will not defend or indemnify you if you are sued in your capacity as a board member of another company. Doctore On Track Training Services Ltd approval of your request to serve on an outside board does not constitute any endorsement or ratification of any action you take as a board member of another company.

Doctore On Track Training Services Ltd may at times ask an employee to serve on the board of directors of a for profit organization pursuant to a Doctore On Track Training Services Ltd investment in, or strategic partnership with, that organisation. Doctore On Track Training Services Ltd may also request that an employee serve on the board of a non-profit organisation, such as a standards body. Service on such boards as a representative of Doctore On Track Training Services Ltd is outside the scope of this policy.

Technical Advisory Boards

Before accepting appointment to or service on a technical advisory board for a company other than Doctore On Track Training Services Ltd , you should consider whether the entity is offering you this opportunity in order to leverage your relationship with Doctore On Track Training Services Ltd to gain a special advantage for itself with Doctore On Track Training Services Ltd , whether serving on this board will interfere with your ability to exercise your independent judgment in the best interest of Doctore On Track Training Services Ltd , and whether the products and technologies you work on



at Doctore On Track Training Services Ltd are so similar to those of the company on whose board you wish to serve that it would be difficult to serve as a technical advisor without using or disclosing Doctore On Track Training Services Ltd confidential information and trade secrets.

If, after considering these questions, you still to serve on the technical advisory board, you must obtain prior written approval from your manager. If any decision is to be made or action taken by Doctore On Track Training Services Ltd concerning a company for which you serve as a member of a technical advisory board, you must disclose to Doctore On Track Training Services Ltd employees responsible for the decision or action your relationship to the entity and not participate in that decision or action on behalf of either party.

Employees who are asked by Doctore On Track Training Services Ltd to serve on a technical advisory board of another company as part of their Doctore On Track Training Services Ltd duties are not required to obtain approval under this policy.

Outside Activities, Non-Profit and Civic Organisations

Doctore On Track Training Services Ltd may encourage its employees to be active in their communities and to volunteer their time to bona fide charitable, educational, civic, and trade organisations, provided of course that such activities do not detract from their job performance. Participation in these types of activities does not generally require prior approval. In taking on outside obligations, however; you should guard against possible conflicts of interest or the appearance of such conflicts. If participation in an outside activity has the potential to cloud your judgment, prevent you from acting in Doctore On Track Training Services Ltd best interests, or create an appearance that you will not act objectively, you must refrain from participation in the activity unless you obtain prior written approval through the conflict of interest review process.

You must also honour your non-disclosure obligation in all your outside activities. If an outside organisation's interests are so closely related to your work at Doctore On Track Training Services Ltd that you might inadvertently use or disclose Doctore On Track Training Services Ltd confidential information in the course of that outside work, you must not participate in the organisation.

If you are affiliated with a non-profit organisation that is pursuing the same goals as Doctore On Track Training Services Ltd or goals that conflict with Doctore On Track Training Services Ltd , and you participate in a Doctore On Track Training Services Ltd decision that implicates those goals, you must disclose at the earliest opportunity your affiliation with the non-profit organization and the nature of the potential conflict to the other Doctore On Track Training Services Ltd employees responsible for making the decision and to the Conflict of Interest Review Team.

Employees who are asked by Doctore On Track Training Services Ltd to serve on the board of non-profit software industry organisations, such as public standards bodies, as part of their Doctore On Track Training Services Ltd duties are not required to obtain conflict of interest review.

This policy shall be reviewed on an annual basis.

Signed



Managing Director
31st December 2024



Appendix A

Declaration of conflict of interest in an assessment

Name of assessor/internal verifier/invigilator	
Name of candidate (if applicable)	
Candidate number (If applicable)	
Qualification	
Unit(s) involved	
Assessment(s) involved	
Nature of Conflict	

Senior Management review and declaration

I have reviewed the above declaration and noted the issue raised but have decided that ACTION / NO ACTION is required
(Please delete as appropriate)

I have reviewed the above declaration and have decided that, to mitigate the risk of this declared conflict of interest in assessment, the following action will be taken:

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Signature of senior manager:

Position:

Date: