



CONFLICT OF INTEREST

INTRODUCTION

Conflict of interest arises whenever the personal, professional or business interests of an employee are potentially at odds with the best interests of Horizon Capital Services.

All employees are required to act in good faith towards Horizon Capital Services. Employees need to be aware of the potential for a conflict of interest to arise and should always act in the best interests of Horizon Capital Services.

As individuals, employees may have private interests that from time to time conflict, or appear to conflict, with their employment with Horizon Capital Services. Employees should aim to avoid being put in a situation where there may be a conflict between the interests of Horizon Capital Services and their own personal or professional interests, or those of relatives or friends. Where such a conflict occurs (or is perceived to occur), the interests of Horizon Capital Services will be balanced against the interests of the staff member and, unless exceptional circumstances exist, resolved in favour of Horizon Capital Services.

It is impossible to define all potential areas of conflict of interest. If an employee is in doubt if a conflict exists, they should raise the matter with their manager.

PROCEDURE

Employees must:

- Declare any potential, actual or perceived conflicts of interest that exist on becoming employed by Horizon Capital Services to management
- Declare any potential, actual or perceived conflicts of interest that arise or are likely to arise during employment by Horizon Capital Services to management
- Avoid being placed in a situation where there is potential, actual or perceived conflict of interest if at all possible



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If an employee declares such an interest, Horizon Capital Services will review the potential areas of conflict with the employee and mutually agree on practical arrangements to resolve the situation.

Employees must disclose any other employment that might cause a conflict of interest with Horizon Capital Services to their manager. Where there are external involvements that do not represent a conflict of interest, these must not affect performance or attendance whilst working at Horizon Capital Services. If such involvement does affect performance or attendance it will be considered a conflict of interest.

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Employees must not set up or engage in private business or undertake other employment in direct or indirect competition with Horizon Capital Services using knowledge and/or materials gained during the course of employment with Horizon Capital Services.

Engaging in other business interests during work hours will result in disciplinary action.

Failure to declare a potential, actual or perceived conflict of interest or to take remedial action agreed with Horizon Capital Services, in a timely manner, may result in performance improvement proceedings including dismissal.