

PSMG LIMITED CONFLICT OF INTEREST POLICY STATEMENT

Employees and Contractors are expected to perform their duties for PSMG effectively and objectively. It is crucial that any and all business decisions are taken only in the interest of the company.

We respect the privacy of everyone who works for and on behalf of PSMG and are not normally concerned with what people do outside of work. However, a conflict of interest can arise if your personal, social or financial activities (or relationships) influence your business decisions and/or conduct, or when such activities or relationships appear to influence your business decisions or conduct. This endangers the relationship PSMG has with its business customers; it may harm the competitiveness of PSMG and even lead to loss of business.

Any conflict may damage the company's reputation as well as your personal reputation.

Sometimes it is hard to establish whether a conflict of interest exists and, if so, how you should act as an employee or contractor. This policy aims to offer guidance on this subject. A policy cannot describe all circumstances and rules, so every employee and contractor is obliged to use his or her common sense and professional judgement at all times.

Jason Silcox



Business Director
January 2025

General:

We expect you to take your business-related decisions in an objective and transparent manner and always in the interest of PSMG. This means that you:

Avoid situations where your personal interests - or the interests of your family members, friends or (business) partners - may conflict with the interest of PSMG.

Always disclose any conflicts of interests or potential conflicts of interest to the Director. Inform your Director as soon as there are circumstances where decision-making may be affected by your personal interest or the interest of your family members, friends or (business) partners.

Keep a record of any conflicts of interest that you have notified and any agreed actions;

Never use your position within PSMG for personal benefit or to benefit your family members, friends or (business) partners. This means that you must not engage in an activity which may provide unauthorised personal benefits as a result of your position or relationship in the company.

Withdraw from any decision-making that creates or could be perceived to create a conflict of interest. Remember that the mere existence of a personal connection may lead others to doubt your objectivity and credibility.

Even the appearance of a conflict of interest can be damaging to your reputation and the reputation of PSMG and needs to be addressed.

Gifts and entertainments:

Please be aware that gifts, entertainment and hospitality can create a conflict of interest. They can also be perceived as a means to exercise improper influence. The Company and employees should not accept gifts.

Donations and sponsoring:

There are circumstances in which donation and sponsorship are viewed as an indication of a conflict of interest or even improper influencing. Be alert in situations in which making such a contribution and comply with the PSMG Anti Bribery & Corruption Policy before taking a decision in such a situation.

Sanctions:

Non-compliance with this Policy on Conflict of Interest may result in disciplinary measures being taken (see our Policy on Disciplinary Measures).

In case stricter requirements in relation to conflict of interest apply to you - e.g. rules contained in an employment contract, business contract or applicable local law – such stricter requirements prevail over those laid down in this policy.