



RAAP Conflict of Interest Policy

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Approved by the Board: 19th March 2026

1. Purpose

This policy ensures that conflicts of interest are identified, disclosed, and managed transparently in line with the Companies Act 2014

2. Definition

A conflict of interest arises where a Director's personal, professional, financial, or other interests could:

- Influence, or appear to influence, their judgement
- Compromise their ability to act in the best interests of RAAP

Conflicts may be actual, potential, or perceived.

Conflicts may arise from roles, employment, directorships, shareholdings, contractual relationships, or close personal connections.

3. Disclosure

Directors must:

- Declare conflicts at the start of any meeting where relevant matters arise
- Complete an annual Declaration of Interests of other current Directorships
- Disclose any new or changed interests promptly

All interests shall be recorded in a Register of Interests maintained by the Company Secretary.

4. Industry Relationships

RAAP Directors may be members of, employed by, or associated with other industry organisations (including but not limited to IMRO, PPI, MCPS or similar bodies).

Such relationships do not automatically constitute a conflict.

However,

- Where a matter arises that directly relates to an organisation or interest with which a Director is connected, this must be declared and managed in accordance with this policy
- Where a Director is a current Director of another organisation and a matter directly relating to that organisation arises, this shall automatically constitute a conflict of interest

5. Management

Where a conflict arises, the Director shall:

- Withdraw from discussion of the matter
- Not receive Board papers relating to the matter where appropriate
- Not vote on the decision

The Chair (or Committee Chair when in Committee meetings) shall determine the appropriate management approach, which shall be recorded in the minutes.

In the case of a conflict involving the Chair, the remaining non-conflicted Directors shall determine the appropriate management approach.

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