

Conflicts of Interest Policy

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This policy will be subject to ongoing review and may be amended prior to the scheduled date of the next review to reflect changes in legislation, statutory guidance, or best practice (where appropriate).

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1. Introduction and aims

At The Eden Academy (the Trust), we want to ensure that the decisions taken by our governance community and senior leaders¹ are free from personal bias, and don't unfairly benefit any individual or company connected to the Trust or any of its schools, settings or satellites.

Trustees, Committees and Local Advisory Boards in our Trust must act in the best interests of the Trust and its schools, and in accordance with the Trust's Articles of Association, to avoid situations where there may be a conflict of interest.

The Board of Trustees (the Board) has a legal duty to manage conflicts of interest

This policy aims to ensure that everyone to whom this policy applies:

- Understands what a conflict of interest is.
- Understands their responsibility to identify and declare any conflicts of interest.
- What action will be taken if a conflict of interest is identified

At Eden, we will ensure that

- Every potentially relevant conflict of interest, or perceived conflict of interest, is identified, recorded and prevented.
- Decision-making isn't affected by conflicts of interest.
- There are clear procedures for managing conflicts of interest where these arise.

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2. Legislation and guidance

This policy is based on:

- [Companies Act 2006](#)
- Guidance from the Charity Commission which explains statutory requirements and good practice regarding [conflicts of interest for charity trustees](#)
- [The Academy Trust Handbook](#)
- [Academy Trust Governance Guide](#)
- [Model articles of association](#) for academy trusts

This policy complies with our funding agreement and articles of association.

3. Scope

This policy applies to:

- Members

¹ This means Executive Directors, Regional Directors and Cluster Leads, Headteachers and Heads of School/Satellite

- All members of the Board of Trustees
- Members of Local Advisory Boards
- Independent committee members
- Senior Trust Leaders
- All other members of school staff
- Volunteers working our schools

For the purposes of this policy, we refer to all of the above as “staff”, except where we refer to some specific roles.

4. Definitions

4.1. Conflict of interest

A conflict of interest is any situation in which a member of staff has a business or personal interest or loyalty which could, or could be perceived to, prevent them from making a decision only in the best interests of the Trust or any of its schools or satellites.

It is not possible to provide an exhaustive list of what constitutes a conflict of interest, but some examples include where a member of staff or of the governance community:

- Is related to a child within one of the Trust’s schools
- Has a connection or friendship with families at one of the Trust’s schools
- Is in a relationship with a member of staff or of the governance community.
- Undertakes paid or voluntary work outside of their position at the Trust that involves pupils from one of the Trust’s schools
- Is involved in invigilating examinations or assessing/submitting coursework for a pupil who is known to them outside of school
- A member of the governance community works for a company that provides or has the potential to provide, services to the Trust or one of its schools
- A member of the governance community owns their own business and sometimes does work for the Trust or one of its schools
- A member of the governance community is in a relationship with a member of staff
- A member of the governance community also sits on the governing board of another school or trust
- A class teacher of a member of the governance community’s child is subject to a disciplinary hearing.

The Trust’s Articles of Association state the following in relation to conflicts of interest:

97. Any Trustee who has or can have any direct or indirect duty or personal interest (including but not limited to any Personal Financial Interest) which conflicts or may conflict with their duties as a Trustee shall disclose that fact to the Trustees as soon as they become aware of it. A Trustee must be absent from any discussions of the Trustees in which it is possible that a conflict will arise between their duty to act solely in the interests of the Academy Trust and any duty or personal interest (including but not limited to any Personal Financial Interest).

98. For the purpose of Article 97, a Trustee has a Personal Financial Interest in the employment or remuneration of, or the provision of any other benefit to, that Trustee as permitted by and as defined by Articles 6.5-6.8A

4.2. Trustee benefit

A Trustee benefit is any instance where money, or other property, goods or services which have monetary value, are received by a Trustee from the Trust. This doesn't include where Trustees are compensated for proper out-of-pocket expenses.

Trustees can only benefit from the trust in such a way, either directly or indirectly, where there is an **explicit authority** in place before any decisions are made.

Examples of trustee benefits include where trustees decide to:

- Sell, loan or lease trust assets to a Trustee.
- Acquire, borrow or lease assets from a Trustee for the Trust.
- Pay a Trustee for carrying out a separate paid post within the trust, even if that Trustee has recently resigned as a Trustee.
- Pay a Trustee for carrying out a separate paid post as a director or employee of the Trust's subsidiary trading company.
- Pay a Trustee, or person or company closely connected to a Trustee, for providing a service to the Trust.
- Employ a Trustee's spouse, partner or other close relative at the Trust or its subsidiary trading company.
- Make a grant to a service user Trustee, or a service user who is a close relative of a Trustee.
- Allow a service user Trustee to influence trust activities to their exclusive advantage.

Explicit authority will come from either:

- Our Articles of Association
- A statutory provision (such as the power in the Charities Act which allows charities to pay trustees for additional services in some circumstances)
- The Charity Commission
- The court

5. Roles and responsibilities

5.1. Chair of the Board of Trustees

The Chair of the Board of Trustees will:

- Ensure that the register of interests is completed each year
- Make sure declarations of interest are made before each meeting²
- Arbitrate decisions about how to deal with conflicts of interest, where appropriate
- Monitor this policy, and seek advice on any necessary changes

5.2. Governance Professional

The Trust's Governance Professional will:

- Maintain the register of interests, and update it when members of the Trust's governance community or senior leader inform them of changes to their circumstances
- Advise the Board on how to deal with conflicts of interest

5.3. The Trust's governance community

All members of the governance community will:

- Declare their conflicts of interest before or during meetings, and complete the register of interests faithfully
- Make sure they inform the Chair and Clerk immediately of any changes to their circumstances³
- Take appropriate action to remove any conflict of interest, or seek advice on how to do so if necessary

5.4. Line managers

All line managers will:

- Communicate the conflict-of-interest policy to all relevant individuals within their areas of responsibility
- Review procedures annually to ensure that they anticipate and manage potential and actual conflicts of interest
- Ensure that all new staff receive conflict of interest information at induction

5.5. Members of staff

All members of staff will:

- Ensure they are familiar with the conflict-of-interest policy

² This responsibility also applies to Chairs of Board Committees, including Local Advisory Boards

³ Where the clerk is not the Trust's Governance Professional, the Chair and Clerk will ensure that the Governance Professional is informed at the earliest opportunity

- Read and understand the conflict-of-interest policy annually
- Disclose any activity or relationship that may give rise to a potential conflict of interest

6. What must be declared

6.1. What members of the governance community and senior leaders must declare

Members of the governance community and senior leaders must declare:

- Directorships, partnerships and employments with businesses
- Trusteeships and governorships at other educational institutions or charities
- Material interests arising from relationships with other Members, Trustees or LAB/committee members (including spouses, partners and close relatives)
- Material interests arising from relationships with Trust employees (including spouses, partners and close relatives)
- Business or personal interests of their spouses, partners and close relatives, where there's a possibility that the Trust or one of its schools or satellites will have dealings with that person

If an individual isn't sure whether something constitutes a conflict of interest, or needs to be declared, they should err on the side of caution and declare it.

Senior Trust employees, and members of the governance community who are staff members, must declare an interest in relation to matters of their own pay and appraisal, and must not participate in discussions or decisions about these.

6.2. What Trust/school staff should declare

Trust/school staff should declare:

- Any friendship or family relationship where there is a potential conflict of interest, for example a relationship between staff members, involvement in recruitment involving friends or family members etc.
- Any current business interest in a company that could stand to gain from their position as a member of the school staff
- Any relevant pecuniary interest in any contract the school holds or proposes to enter into
- Business interests of their spouses, partners and close relatives, where there is a possibility that the school will have dealings with that person
- Governance roles in other educational institutions

- Any friendship or family relationship where there is potential for a conflict of interest. Staff must be aware of potential conflicts of interest when recruiting

6.3. Conflicts of interest related to examinations

The school will manage any conflicts of interest related to examinations by informing the relevant awarding bodies about any members of staff who are teaching and preparing members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) for qualifications that include internally assessed elements.

The school will maintain clear records of all instances where staff have members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g. son/daughter) entered for examinations and assessments at the school.

Staff members who will need to declare potential conflicts of interest include:

- Teachers involved in the preparation of exam papers – i.e. teachers who see question papers before an exam is taken
- Teachers who mark public exams
- Staff involved in checking examination material prior to the exam (e.g. exams officers, lab technicians for practicals, etc.)
- Teachers involved in the marking and moderation of internally assessed coursework

The school will:

- Contact all members of staff to ascertain any conflict of interest
- Record any confirmed or suspected conflicts and any steps taken to mitigate will also be recorded
- Share with the relevant staff member any steps taken to mitigate conflicts of interest, so they are aware of actions in place and any additional requirements they need to adhere to
- Inform any awarding bodies of any relevant conflicts of interest

Any member of staff who needs to declare a conflict of interest relating to exams should do so in writing.

Whistle-blowing

Anyone concerned about the integrity of any aspect of the public exams process should raise their concerns with the relevant exam board. Concerns about the conduct of exams at the school should be raised with the Head⁴.

If a concern relates to the headteacher / exams officer, the chair of governors / board of trustees should be contacted. Concerns should be addressed in a

⁴ For the purposes of this policy Head refers to Headteacher or Head of School/Satellite as appropriate

reasonable and timely fashion; if they are not, the concern should be escalated in accordance with the school/trust's whistle-blowing policy.

7. Procedures

7.1. Register of interests

The Trust requires each member of the governance community and senior leader to complete a declaration of interests form at the beginning of each academic year (see appendix).

New members of the governance community or senior leader will be asked to complete a declaration of interests form when they join if this is after the start of the academic year.

Other members of staff must identify and declare potential conflicts of interest. Declarations should be made as soon as possible once they are identified.

The Trust/school will explore potential conflicts of interest when:

- Reviewing applications for any position in the Trust/school, including staff member, Trustee and LAB or committee appointments.
- Reviewing the register of interests for the governance community or senior leaders. This will take place on an annual basis. Everyone who is required to complete an annual declaration must do so each year, even if there are no conflicts of interest to register.
- Reviewing the agenda of Board, committee or Local Advisory Board meetings. Members of the governance community will be asked to declare any interest they have in any agenda item before it is discussed at the meeting.
- Establishing relationships with external contractors. All relationships of a business or private nature with external contractors, or potential contractors should be made known to the Head/CEO. In the case of the Head, any financial interests or relationships of a business or private nature must be declared to the Board of Trustees and CEO.
- A member of staff changes role or responsibility

The Trust will publish information about the interests of Members, Trustees, Local Advisory Board members, independent committee members, Executive Directors, Regional Directors and Cluster Leads and Heads.

Senior leaders, and members of the governance community who are staff members, aren't required to record their employment with the Trust on the register of interests.

If an individual's circumstances change after the register of interests is completed, they must immediately alert the Chair and the Trust's Governance Professional that they need to make amendments or further declarations.

7.2. Declaring conflicts of interest and taking action (governance community)

Agendas of meetings will be circulated in advance. Members of the governance community must review any agenda sent to them and alert the Chair and the Clerk as soon as possible if they have a conflict of interest related to any item on the agenda.

Each meeting will also include a standing agenda item to allow declarations to be made.

If a conflict becomes apparent during a meeting, and an attendee didn't declare these prior to or at the beginning of the meeting, they must declare these immediately.

Depending on the nature of the meeting or discussion, and the interest in question, the Board (or committee, including Local Advisory Boards) will decide whether the individual needs to:

- Withdraw from the meeting
- Refrain from contributing to the discussion
- Refrain from voting on a decision

The Board (or committee, including Local Advisory Boards) may also decide that having declared the interest, the individual is free to participate in the discussion or decision as normal.

When deciding which course of action to take, the Board (or committee, including Local Advisory Boards) must:

- Always make their decision in the best interests of the Trust, and be able to demonstrate this
- Act to protect the Trust's reputation
- Consider the impression that their actions and decisions may have on those outside of the Trust
- Consider the level of risk related to the decision in question, and the risk that the conflict will affect the individual's ability to be impartial, or to act only in the best interests of the Trust
- Be aware that the presence of a conflicted individual (even if they cannot participate in the decision or discussion) may inhibit free and open dialogue, and may affect the decision in some way

In cases of **serious conflict of interest**, the Board (or committee, including Local Advisory Boards) may also choose to avoid the conflict by:

- Not pursuing a particular course of action
- Proceeding with the issue in a different way
- Not appointing a particular governor or employee
- Securing a resignation from a conflicted governor

A serious conflict of interest includes situations where the conflict:

- Is so acute or extensive that the individual isn't able to make their decisions in the best interests of the Trust or could be seen to be unable to do so
- Is present in significant or high-risk decisions
- Means that effective decision-making is regularly undermined or cannot be managed in accordance with the required or best practice approach
- Is associated with inappropriate trustee benefit

Details of any conflicts declared, and relevant actions taken, will be recorded in the minutes.

7.3. Declaring conflicts of interest and taking action (members of staff)

Recruitment of family and friends:

- Staff will not be involved in recruitment and safer recruitment processes involving family and friends
- If a family member or friend is appointed to a role, it may be appropriate to put in place alternative line management structures to eliminate a conflict of interest

Confidential information obtained during work:

- Staff should not disclose confidential information to anyone, including family and friends
- If an employee is in doubt about what information can or can't be disclosed, they should speak with their line manager

Staff whose children attend the school:

- While at school, the staff member's relationship with their child should follow the normal expectations that would apply with any other pupil. This may need to be explained to their child to ensure appropriate boundaries are maintained
- The staff member will not be involved in any behaviour management matters relating to their child. If the staff member becomes aware of an issue, this should be discussed with their line manager
- Communication regarding a staff member's child should be carried out in the usual way. A staff member should not make use of the school's internal systems to gain additional information about their child

Undertaking paid or voluntary work with pupils outside school hours:

- Where paid work is undertaken, it should be disclosed to the school/trust
- Staff should ensure that confidentiality and appropriate demarcation are established

Contractors and suppliers:

- Staff should declare a relationship to any existing or potential contractor or supplier

Misuse of position:

- Staff should not use their position to gain an advantage or disadvantage with any person or organisation
- Staff must declare any personal interest that may affect their impartiality

7.3.1. Reporting of conflicts by staff

Reporting of conflicts by staff, not covered by the annual reporting arrangements⁵, will be by exception. Staff should inform their Head or Service Manager/Director, who will provide the member of staff with an online form to complete with the details of the potential conflict. The Head/Service Manager/Director will also copy the Trust's Governance Professional.

Once the staff member has completed and submitted the form, the Governance Professional will add the details to the staff register and notify the referring Head/Service Manager/Director of the details.

This register will not be published but maintained for internal use, unless requested for inspection as part of the Trust's external audit or internal assurance arrangements.

8. Failure to declare a conflict of interest

8.1. Members of the governance community

Failure to declare a conflict of interest is a breach of the Trust's Governance Code of Conduct.

If the Board becomes aware that a member of the governance community hasn't declared a relevant conflict of interest, it will immediately update the register of interests to ensure the record is complete and accurate.

Depending on the nature of the omission, the Board may also:

- Vote to suspend the Trustee, committee or LAB member
- Recommend the removal of the Trustee by Members
- Agree to remove the committee or LAB member from office⁶
- Follow any relevant disciplinary procedures

If a member of the governance community is aware of another member's undeclared interest, they should alert the Chair and the Clerk immediately.

⁵ i.e. Executive Directors, Regional Directors and Cluster Leads, Headteachers and Heads of School/Satellite

⁶ Using the relevant procedures set out in the Articles of Association and Trust procedure documents/code of conduct

8.2. Members of staff

Failure to declare a conflict of interest will be dealt with in line with the staff code of conduct.

9. Links to other policies

This policy links to the following policies and procedures:

- Staff code of conduct
- Governance code of conduct
- Schools' exams policies
- Registers of interests
- Whistle-blowing policy
- Gifts policy

10. Review

This policy will be reviewed every two years and approved by the Board of Trustees.

Appendix 1: Declaration of interests form – Governance community and senior leaders

The Trust is committed to acting with integrity and impartiality. To this end, we keep a register of the relevant business and pecuniary interests of all members of our governance community and senior leaders.

We're also required to publish these interests with respect to Members, Trustees, Local Advisory Board members and the Accounting Officer.

The Trust requires each member of the governance community to complete a declaration of interests form at the beginning of each academic year. New members will be asked to complete a declaration of interests form when they join if this is after the start of the academic year.

The current form is shown below and issued via Microsoft Forms for online completion. A similar form is used for the Trust's senior leaders.

Governance Community Register of Interests - Annual Declaration

I understand that it is my legal duty to declare on this form:

- My relevant business interests and pecuniary interests (direct or indirect, of myself and of members of my immediate family and close contacts)
- All governance roles or employment in other educational establishments, and
- Any material interests arising from relationships of those within the Academy (including spouses, partners and/or close relatives).

I also understand that it could be considered a criminal offence to:

- Omit information which should be included on this form;
- Provide information which is false or misleading; and
- Fail to notify the Clerk of any subsequent change in circumstances which might render this declaration invalid or out of date.

* Required

1. Full name *

2. I am a... (please check all relevant) *

- ☐ Member of The Eden Academy
- ☐ Trustee of The Eden Academy
- ☐ Alexandra School Local Advisory Board member
- ☐ Branthwaite Academy Local Advisory Board member
- ☐ George Hastwell School Local Advisory Board member
- ☐ Grand Union Village/Moorcroft School Local Advisory Board member

- ☐ Hexham Priory School Local Advisory Board member
- ☐ James Rennie School Local Advisory Board member
- ☐ Moorcroft School Local Advisory Board member
- ☐ Pentland Field School Local Advisory Board member
- ☐ Independent committee member
- ☐ Clerk to the Board of Trustees, Members, committee or Local Advisory Board

3. Current employment*

- ☐ I am retired/not currently in employment
- ☐ I am currently employed and have declared the details below

4. Details of my employer(s) and position(s) are as follows...

5. Businesses, company directorships, charity trusteeships or membership of professional bodies*

- ☐ I have no businesses, company directorships, charity trusteeships or membership of professional bodies with a position of general control or management
- ☐ I have businesses, company directorships, charity trusteeships or membership of professional bodies in which I have a position of general control or management which are declared below

6. I have the following businesses, company directorships, charity trusteeships or membership of professional bodies in which I have a position of general control or management

7. Gifts or hospitality offered by external bodies *

- ☐ I have received or been offered no gifts or hospitality by external bodies in the last 12 months whilst acting as a Member, Trustee, Committee or LAB member of The Eden Academy Trust or one of its schools.
- ☐ I have received or been offered gifts or hospitality by external bodies in the last 12 months whilst acting as a Member, Trustee, Committee or LAB member of The Eden Academy Trust or one of its schools which are declared below.

8. I have received or been offered the following gifts or hospitality by external bodies whilst acting as a Member, Trustee, Committee/LAB member of The Eden Academy Trust or one of its schools (please confirm for each whether it was either accepted or offered and declined)

9. Contracts offered by you for the supply of goods and/or services to The Eden Academy Trust or one of its schools *

- ☐ I have offered no contracts for the supply of goods and/or services to The Eden Academy Trust or one of its schools.

- ☐ I have offered contracts for the supply of goods and/or services to The Eden Academy Trust or one of its schools as declared below.

10. I have offered the following contracts for the supply of goods and/or services to The Eden Academy Trust or one of its schools. (Please confirm if the offer resulted in a contract)

11. Other positions as a Member, Trustee or Governor of any other school/academy. *

- ☐ I hold no positions as a Member, Trustee or Governor of another school/academy.
- ☐ I hold position(s) as a Member, Trustee or Governor of any other school/academy, as declared below

12. I hold the following position(s) as a Member, Trustee or Governor of any other school/academy (please state the name of the School/Academy/Trust, the position held and date of appointment)

13. Other potential conflicts of interest *

- ☐ I have no other potential conflicts of interest
- ☐ I have other potential conflicts as declared below

14. I have the following other potential conflicts

15. Immediate family/close connections within The Eden Academy Trust or one of its schools. *

- ☐ I have no immediate family/close connections within The Eden Academy Trust or one of its schools
- ☐ I have immediate family/close connections within The Eden Academy Trust or one of its schools as declared below

16. I have the following immediate family/close connections within The Eden Academy Trust or one of its schools (Please include their name(s), relationship(s) to you, and the school(s)/central team)

17. Company directorships or Trusteeships of family/close connections. *

- ☐ I have no family members or close connections who have any business interests
- ☐ I have family members or close connections who have a business interest but there is no possibility they would transact with the Trust
- ☐ I have family members or close connections who have a business interest which do or may transact with The Eden Academy Trust or one of its schools as declared below

18. I have the following family members or close connections who have a business interest which do or may transact with The Eden Academy Trust or one of its schools (Please include the name(s), relationship(s) to you, and details of the organisation(s).)

19. DECLARATION

To the best of my knowledge the information supplied is correct and complete. I understand that it is my responsibility to declare any conflict of interest/loyalty, business or personal that relates directly or indirectly to myself or any relation when present at an academy meeting where it comes under consideration. I understand that I must withdraw from any meeting during the discussion of such contract or matter and must not vote in respect of it.

I agree to review and update this declaration annually and give consent for the information provided to be used on the website.

I certify that:

- I have declared all interests which I or the members of my immediate family have with businesses or other organisations which may have dealings with the academy.
- I will inform the Clerk of any change in these business interests.
- If a matter arises at a meeting in which I have an interest, I shall at the meeting, and as soon as practicable after its commencement, disclose the fact and withdraw from the meeting during the consideration or discussion of the matter and shall not vote on any question with respect to it.
- I understand that my declarations of interest will be published on the Academy and/or school website in line with legal requirements. *

☐ **I acknowledge and confirm the above declaration**

Appendix 2: Declaration of interests form – All staff excluding senior leaders

Staff Register of Interests

I understand that it is my responsibility under the Trust's Conflicts of Interests Policy to declare on this form:

If any family member or friend is appointed to a role within the Trust and that I will not take part in any recruitment process involving such family member or friend.

If any child for whom I am a parent/carer is a pupil at one of the Trust's schools.

If I undertake paid or voluntary work with a pupil or pupils outside school hours.

Have a relationship with any existing or potential contractor or supplier- Any other circumstances set out in section 7.3 of the Trust's Conflicts of Interest Policy.

Guidance on what should be declared is set out in section 7.3 of the Trust's Conflicts of Interest Policy.

1. Full name

2. I am a member of staff at... (tick all relevant)

- ☐ Alexandra School
- ☐ Branthwaite Academy
- ☐ Eden Pinkwell Satellite
- ☐ George Hastwell School
- ☐ Grand Union Village School
- ☐ Hexham Priory School
- ☐ James Rennie School
- ☐ Moorcroft School
- ☐ Pentland Field School
- ☐ Pinn River School
- ☐ Trust Central Team, including therapists

3. My principal role is

4. Details of my declared conflict of interest

5. DECLARATION

To the best of my knowledge the information supplied is correct and complete. I understand that it is my responsibility to declare any actual or potential conflict of interest/as set out in the Trust's Conflicts of Interest Policy.

- ☐ I acknowledge and confirm the above declaration