



Conflict of Interest Policy Statement

This is the statement of general policy and arrangements for:	Made to Measure Mentoring Limited
Overall and final responsibility for the Whistleblowing Policy belongs to:	Peter Robinson [Chairman]
Day-to-day responsibility for ensuring this policy is put into practice is retained by:	Tony Robinson, Managing Director [Commercial]

1.0 STATEMENT

As a Company, Made to Measure Mentoring Limited [M2M2] starts from a position of trusting the professionalism of the people it uses to carry out its activities, and this trust underlies any attempt to handle questions which raise potential conflicts of interest. Yet the damage to the reputations of individuals and M2M2 caused by conflicts of interest could be considerable, *e.g. where the press cast doubt on the validity of research findings owing to the person being discovered to have had a financial interest with the sponsor.*

In order to protect individuals and M2M2 from compromise, it is both necessary and helpful to settle a policy to deal with Conflicts of Interest. M2M2 has therefore decided to issue two documents:

1. This short Conflicts of Interest Policy Statement
2. A Sub-Contractor's Agreement in which the legal aspects of this and other associated issues are addressed

Conflicts of interest could arise in many circumstances and it is not possible to provide a single definition to cover them all. A conflict of interest may be defined as including:

'a conflict between the official responsibilities of a person in a position of trust and any other interests the particular individual may have, e.g. where the individual could be seen to be influencing M2M2 matters for actual or potential personal benefit or seeking such a gain at the expense of M2M2'.

The press illustration, above, highlights another important issue. The definition is not restricted to those cases in which an individual *actually* betrays that trust; it can be just as damaging for the conflict to exist or *appear* to exist. It should be emphasised that M2M2's policy on conflicts of interest does not imply any lack of trust in, or loyalty of, colleagues. Rather, it is a mechanism for protecting M2M2 and its associated personnel against criticism or compromise by ensuring that they recognise and disclose such conflict situations and take steps to avoid and manage them.

Should any member of M2M2 or its associates feel they are in a position giving rise to an actual or potential conflict of interest, they must contact the Managing Director [Commercial] as a matter of urgency. Appropriate steps will then be taken to deal with the conflict of interest situation in line with this Conflicts of Interest Policy.

In summary, the Conflicts of Interest Policy provides for a three-fold approach:

- Disclose always
- Manage the conflict in most cases
- Prohibit the activity when necessary to protect the public interest or the interests of M2M2