
Dated:

2024

- (1) University of Bolton
- (2) Bolton College

Conflict of Interest Policy

DRAFT

CONFLICT OF INTEREST POLICY

This policy has been approved by **The University of Bolton**, a charitable higher education corporation whose principal place of business is at University Of Bolton, Deane Road, Bolton, United Kingdom, BL3 5AB (the "**University**") and **Bolton College**, a charitable company limited by guarantee (company registered number 11198091) whose registered office is at University Of Bolton, Deane Road, Bolton, United Kingdom, BL3 5AB (the "**Company**") on [X] April 2024.

In this policy, "conflicts" or "conflicts of interest" include actual and/or potential or perceived conflicts of interest and/or duty and conflict of loyalty, where there is no commonality of interest between the University and the Company.

BACKGROUND

- (a) The University is the sole member of the Company.
- (b) The Clerk of the Company (the "**Company Clerk**") reports to the Clerk of the University (the "**University Clerk**") (each a "**Clerk**", together, the "**Clerks**") and the board of directors of the Company, providing advice on governance and compliance and ensuring the effective operation of formal decision-making processes. It is intended that he or she will also act as clerk of any future subsidiary of the University.
- (c) This policy sets out the procedure to follow specifically where there is a conflict of interest which arises from this reporting line and which prevents the Company Clerk from reporting to the University Clerk.
- (d) This policy applies in addition to any conflict of interest provisions which apply to the Company Clerk and the University Clerk in the Articles of Association of the Company, the Instrument and Articles of the University and any other policy or regulation of the Company or University.

POLICY

- 1. From the date of adoption of this policy, in a particular matter during the course of the activities of the Company where the Company Clerk is prevented from carrying out his or her role to fulfil his or her duty towards both of the University Clerk and the board of directors of the Company, the Company Clerk should be line managed by the Chair of the Company for the duration of that matter.
- 2. Any person who becomes aware of a breach of this policy must report it to the Chair of the University as soon as possible.
- 3. The University and Company have implemented this policy in order to monitor and manage conflicts of interest. Any failure to comply with the terms of this policy will not, in itself, result in a decision of the board of directors of the Company being invalidated.
- 4. This policy must be reviewed annually, or sooner if required.

Signed for and on behalf of)
The University of Bolton)
by	
Name:	
Title:.....	
	Signature

Signed for and on behalf of)
Bolton College)
by	
Name:	
Title:.....	
	Signature

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