



P O L I C Y 1 2 O F 1 6

Conflict of Interest Policy

Real partnership. Real expertise.

Document reference	SOMA-POL-12
Version	2.0
Issue date	March 2026
Next review	March 2027
Policy owner	Adam O'Neill, Director
Approved by	Stevie MacGregor
Classification	Public — available on request

SOMA Project Controls Ltdwww.somaprojectcontrols.com

1. Purpose

This policy sets out how SOMA Project Controls Ltd identifies, declares and manages conflicts of interest so that our professional judgement and our clients' interests are never compromised.

2. Scope

Applies to all directors, employees, associates and contractors acting on behalf of SOMA.

3. What Is a Conflict of Interest

A conflict of interest arises where personal, family, financial or other interests could — or could reasonably appear to — influence the performance of work for a SOMA client. Perceived conflicts matter as much as actual ones, because the professional reputation of the firm depends on trust.

4. Common Examples

- Working on projects where a family member holds a material role on the client or supplier side.
- Holding a financial interest in a supplier, competitor or client.
- Taking on work for two clients whose interests on the same project materially conflict.
- Personal relationships with client-side decision-makers, recruiters or procurement staff.
- Outside commitments that could compete for time, attention or loyalty.

5. Declaration & Management

1. All personnel must declare any actual or potential conflict at the earliest opportunity — at engagement, at project mobilisation, and whenever circumstances change.
2. Declarations are made to the Director in writing and logged in the conflicts register.
3. Each conflict is assessed on its facts. Management actions may include information barriers, reassignment, declining the work, or fully disclosing the conflict to the client and seeking their informed agreement to proceed.
4. Decisions are documented and kept under review.

6. Client-Competitor Work

Where SOMA is engaged by two parties whose interests could materially conflict on the same project, we will not act for both without explicit, written, informed agreement from both clients — and only where robust information barriers can be maintained.

7. Gifts, Hospitality & Outside Interests

Gifts, hospitality and outside interests are governed by the Anti-Bribery & Corruption Policy. Outside commercial activities of employees must be declared and approved to avoid competing-time or conflicted-loyalty issues.

8. Breach

Failure to declare a conflict of interest is a serious disciplinary matter and may also breach contract terms with the client.

9. Review & Governance

This policy is reviewed at least annually, and sooner if legislation, SOMA Project Controls Ltd's operating context or client requirements change materially. The Director is the accountable owner. Minor amendments are logged in the version-control table; material changes trigger a re-issue and fresh sign-off by the policy owner and approver named on the sign-off page.

S I G N E D & A P P R O V E D

Policy Adoption & Approval

This policy is formally adopted by SOMA Project Controls Ltd. It is communicated to all employees, associates and, where relevant, supply-chain partners, and is available on request to clients, prospective clients and other interested parties. The signatures below record its adoption and the date from which it takes effect.

P O L I C Y O W N E R

Adam O'Neill

Adam O'NeillDirector
SOMA Project Controls Ltd**Date: March 2026****A P P R O V E D B Y**

Stevie MacGregor

Stevie MacGregorDirector
SOMA Project Controls Ltd**Date: March 2026****N e x t s c h e d u l e d r e v i e w****March 2027**