



Severn Group

# Conflicts of Interest Policy

JUNE 2025

We value the sense of belonging and family spirit across our operations. Everyone at Severn Group contributes to our success – we are incentivised and empowered to positively impact business achievements, environmental sustainability and high performance in safety.

# The Approach

## Introduction

Severn Group (meaning, collectively, Contour Technologies Limited and its subsidiaries, including but not limited to Severn Glocon UK Valves Limited, LB Bentley Limited, MCE Group Limited, Severn Glocon Valves Private Limited, ValvTechnologies LLC) values its reputation and is committed to maintaining the highest possible ethical standards in all its business activities. When competing interests impair our ability to make objective, unbiased business decisions we have a conflict of interest. You may face a conflict of interest when your professional duties as an employee of Severn Group, and your personal interests, are incompatible or competing. They may take the form of financial interests in a supplier's or customer's business, recruiting a close family member or engaging in employment outside the Severn Group.

## Who does this Policy apply to?

This Policy applies to all employees, officers, consultants, self-employed contractors, workers, volunteers and interns of the Company, its subsidiaries and associated companies worldwide and joint ventures.

## Our Policy's purpose

- To communicate our requirements in respect of conflicts of interest.
- To advise you of your obligation to disclose conflicts of interest and maintain high ethical standards.
- To ensure that all business decisions are made in the best interests of the Company.

## Expectations

You are expected to:

- Maintain the highest possible standard of integrity in all your business relationships, both inside and outside the organisation.
- Reject any business practice which might reasonably be deemed improper (including improper practices which might benefit the Company).
- Never use your authority or position for personal gain.
- At all times, act with impartiality, independence and integrity.
- Avoid being, or giving the appearance of being, in a position which may result in an actual or perceived detriment to the Company's reputation and/or interests.

# The Approach

## Disclosure

You must disclose or seek direction on any issues which may potentially conflict with your responsibilities to the Company.

## Restrictions

You will not be permitted to engage in transactions on behalf of the Company with organisations or individuals in which you have an interest. All decision making and transactions with the organisation concerned will be handled and managed independently.

## Procedure

### When do I make a disclosure?

It is not possible to define all situations or relationships which may create a conflict of interest, so each situation must be evaluated individually. However, some of the more obvious conflicts include:

- Having any interest, dealings or shareholdings in any business which either is a competitor, customer, supplier or the Company's partner or is seeking to become one.
- A close family member (including children, in-laws, partner or spouse) having any interest, dealings or shareholdings in any business which either is a competitor, customer, supplier or the Company's partner, or is seeking to become one.
- Having a close or longstanding relationship/friendship with a business which either is a competitor, customer, supplier or the Company's partner, or is seeking to become one.

In all cases, you have a responsibility to assess the potential conflict. Actual or perceived conflicts of interest must be disclosed.

### Where do I record my disclosure?

Disclosures should be made via the Conflicts of Interest - Disclosure Form on the HR System and you must alert your line manager. If you make a positive disclosure, you will be asked on an annual basis to review conflicts of interest.

# The Approach

## **Responsibilities**

Actual conflicts of interest must be avoided and potential conflicts of interests carefully managed. Line managers must review the disclosed interest, discuss it openly and manage it with you, so that you do not become involved in or influence situations where actual conflicts of interest occur.

## **Other employment**

If you wish to undertake other work while you are employed by the Company then you must obtain prior written consent from your line manager.

## **Further advice**

If you are in any doubt as to whether a conflict of interest exists, discuss the situation with your line manager, General Counsel or the Group HR Director.

If you have any problems recording your conflict of interest, please inform your line manager.

## **Exceptions**

If you are on the Board of Directors: Disclosures must be made in accordance with the UK Companies Act 2006 and all other relevant legislation.

If you are on the Executive Committee: Disclosures must be made to the General Counsel in accordance with this Policy.

## **Consequences**

Failure to comply with the above procedures may result in disciplinary action and legal action being taken wherever appropriate.

# The Approach

## **Data Protection**

For information about our processing of personal data under this Policy, including details of our legal grounds for doing so, how long we retain such personal data, who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns, please see our Employee Data Protection Policy and Employee Privacy Notice, which can be accessed on the Group Policy Hub.

## **Agreement to follow this Policy**

This Conflicts of Interest Policy is fully supported by The Board and Executive Committee. This Policy is non-contractual and may be amended at any time. This Policy should be read in conjunction with the Anti- Bribery & Corruption Policy, Code of Conduct, Disciplinary Policy, Employee Data Protection Policy, Employee Privacy Notice, Equality, Diversity and Inclusion Policy and Relationships at Work Policy. All Severn Group policies can be accessed on the Group Policy Hub.





At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.



**Customer**



**Integrity**



**Excellence**



**Accountability**



**SEVERN**  
Superior Valve Engineering