

CONFLICTS OF INTEREST POLICY

1. Introduction

This document sets out the conflicts of interest policy for Trustees of Dublin Maccabi Association (“the Trust”) and seeks to ensure that the personal conflicts of Individuals do not impact on their fiduciary obligations towards the Trust. A conflict of interest emerges when there is a divergence (real or apparent) between an individual’s ability to make decisions or take actions which are in the best interests of the Company and or their own professional or private gain.

2. Purpose

1. To identify any potential circumstances which may give rise to conflicts of interest.
2. To establish appropriate systems to manage conflicts.
3. To outline ongoing maintenance of system.

3. Conflict of Interest Identification

The following list the most likely situations where conflicts may exist within the Trust, this list is not exhaustive and it is incumbent on each Individual to exercise sound judgment on what constitutes a conflict.

1. Situations where a Trustee or an employee receives inducements by a transacting party.
2. Situations where a Trustee or employee or director has personal dealings with an individual service provider when that person also provides services to the Trust.
3. Where personal relationships exist between service providers/transacting parties and Trustees.
4. Where business relationships, shareholdings, common directorships exist between service providers/transacting parties and Trustees.
5. Any apparent conflict of Interest existing within contracts/agreements.

4. Systems to Manage Conflicts

- I. Annually each Trustee should declare to the Secretary for the forthcoming year any conflicts which fall within the parameters of 3 above.
- II. The Secretary will review the disclosure with the Chairman and will authorize or prohibit further involvement in the transaction/agreement or any future decision making at Board level.
- III. A Conflicts of Interest Register will be maintained by the Secretary for all declared conflicts.
- IV. Any declarations will form part of the Compliance Report for the Trustees.
- V. Any subsequent conflicts which arise during the following 12 months should be declared by Individuals to the Secretary as soon as possible.
- VI. Should any individual Trustee be in doubt as to whether a conflict applies they should discuss this matter with the Secretary or Chairman.

VII. Any conflicts which arise during Trust meetings which the Individual did not declare in (i) above may be declared before the relevant item is discussed, this declaration shall be duly noted in the minutes of the meeting. That Individual shall take no part in the subsequent deliberations in respect of that contract/transaction.

5. Ongoing Maintenance

1. Register of Conflicts to be reviewed by the Trustees annually.
2. All individual Trustees will be provided with the Conflicts of Interest policy at least annually, each individual Trustee must confirm that they have read the policy and understood it, if training or additional explanation is required it will be provided.
3. Situations where conflicts may arise may evolve and this policy will be reviewed at least annually to ensure it is in line with the Trust's needs.