



Purchases and Declaration of Interest Policy

Applicable to:

All persons within HBC

Effective from:

January 2026

Policy/Guidance Number:

Pol.4 (V1)

To be reviewed by:

February 2027

Linked documents:

Ethics policy

Anti-bribery and corruption policy

Associated guidelines

Versions:

Version 1 – January 2026

Overview

This policy aims to protect employees where situations arise which could lead to a conflict of interest, and to avoid accusations of improper conduct. It should be read in conjunction with our ethics policy. It sets out the requirements where an employee, their spouse, partner or close family member living with them has a commercial interest in a third party, or if any employee wishes to make use of a third party's services.

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1. Introduction

This policy applies to all employees and their spouse, partner or close family member (including civil partners, any person with whom they live in an enduring family relationship, children, step-children and parents) living with them in relation to purchases of materials or services through our employed suppliers, sub-contractors, consultants and solicitors (each of which is described as a “third party”), and the recording of any commercial interest in any third party (together known as “third parties”). It should be read in conjunction with our ethics policy.

The purpose of this policy is to protect our employees where situations arise where they could face a conflict of interest, and to avoid accusations of improper conduct. It sits alongside the law and our own guidance on director’s duties and conflicts of interest.

2. Declaration of interest

If an employee, their spouse, partner or close family member living with them has a commercial interest in a third party, they should record that interest on the register at Appendix A.

3. Employee use of third parties

Employees must take care to avoid any conflict with our commercial interests and to ensure that we adhere to the highest standards of honesty and transparency in all dealings with any such third parties. Should you wish to make personal use of a third party’s service, please record it on the declaration of interest register at Appendix A.

Two examples illustrate the point:

- Example 1: Brief & Co. Solicitors act extensively on our property acquisitions and disposals. An employee surveyor who works closely with Brief & Co. asks them if they have anyone who can handle their house conveyancing. They offer to do so for a nominal £100 fee “because of our close working relationship”. This is caught by this policy.
- Example 2: An employee needs plans drawing up for a garage at their house and because it’s a smallish job asks someone in our drawing office who agrees to do it at the weekend “for a few beers”. This is caught by this policy.

The price agreed for the goods or services must not be any more advantageous than the current market rate for the work being carried out, and payment for any goods or services must be made direct to the third party.

4. Returns

The registers should be returned to the managing director on a six-monthly basis.