

Athene Associates– Conflict of Interest Management

Athene Associates Ltd understands that as a RICS regulated firm it must at all times:

‘act with integrity and avoid conflicts of interest and avoid any actions or situations that are inconsistent with its professional obligations’.

Assessment of Risk

Presently the firm is modest in size and Athene Associates Ltd currently has one RICS registered member.

The directors of the firm are however cognisant they are working within a relatively constrained geographical area and as such the potential for a party conflict, an own interest conflict or a confidential information conflict to arise are reasonably high. The directors have determined these conflicts of interest should be managed by taking the following steps:

The Standard

As a RICS regulated firm all members of staff, and this includes the firms contracted staff, are expected to comply with the RICS Rules of Conduct irrespective of whether they are members of the RICS or not.

When engaged by the firm as an employee or contractor the individual will be asked to familiarise themselves with the Rules of Conduct for Members and Firms and with the RICS Practice Statement Conflicts of Interest 1st edition, March 2017 or its subsequent successors.

Ongoing Training

All directors / employees/ contractors will be asked to review the RICS Rules of Conduct and the RICS Practice Statement Conflicts of Interest annually. A reminder has been placed on the firms ‘Risk Register’ to prompt this action.

Accepting Instructions

When taking on new clients or accepting new instructions from existing clients it is incumbent on the directors to the firm to assess the risk of a conflict of interest arising. Until such time as the complexity of the firm demands it, this assessment need not be recorded where no conflict is considered to arise but must, as a minimum, be conducted verbally with another director.

Managing Conflicts of Interest

Where a conflict of interest is identified, or has the potential to arise, the directors agree it will be handled in accordance with the RICS Practice Statement Conflicts of Interest 1st edition, March 2017 or its subsequent successors.

Record Keeping

Where a conflict of interest has been identified it will be recorded in the format below:

Date	Description of matter	Nature of Conflict	Reviewers	Action agreed
05.01.20	Invitation to shoot with P de Vink	Party conflict	TDS/ EAGS	Withdraw acceptance of hospitality

Athene Associates 21.06.20