

# Conflict of Interest Policy and Register of Interests

Wrexham BID Ltd | Company No. 16536873

Last Updated: February 2026

---

## 1. Purpose

This policy sets out how Wrexham BID Ltd identifies, manages, and records conflicts of interest affecting Board members, the BID Manager, and any other persons with decision-making authority. Maintaining the integrity of BID decision-making is essential to public trust and to our obligations as a company limited by guarantee.

## 2. What is a Conflict of Interest?

A conflict of interest arises when a person's private, financial, or professional interests could — or could appear to — influence their judgement or actions when acting on behalf of the BID. A conflict may be:

- **Direct / Financial:** A Board member stands to gain financially from a decision (e.g., a contract is awarded to their business).
- **Indirect:** A close family member, business partner, or associated organisation stands to benefit.
- **Non-financial / Personal:** A relationship or loyalty that could compromise impartiality (e.g., a close friendship with a supplier's owner).

Actual, potential, and perceived conflicts of interest must all be declared. Uncertainty about whether something constitutes a conflict should be resolved by declaring it.

## 3. Responsibilities

- Each Board member and the BID Manager is responsible for identifying and proactively declaring any conflicts of interest.
- The Chair is responsible for managing declared conflicts during Board meetings and for ensuring this policy is followed.
- The BID Manager is responsible for maintaining the Register of Interests and for bringing any undeclared conflicts to the attention of the Board.

## 4. Declaration Procedure

- All Board members must complete a Register of Interests declaration upon appointment and update it promptly whenever a new interest arises.
- At the start of each Board meeting, the Chair must ask whether any member has an interest in any matter on the agenda.
- Where a conflict is identified — whether at the start of a meeting or during discussion — the affected person must:
  - Disclose the nature and extent of the interest to the Board.
  - Withdraw from the meeting room (or virtual meeting breakout) for the relevant agenda item.

- Take no part in the discussion or vote on the matter.
- Have the declaration and withdrawal recorded in the meeting minutes.

## 5. Managing Conflicts in Practice

The Board may, by majority agreement of the non-conflicted members, resolve that a declared conflict is not material and allow the affected person to remain and participate. This resolution must be recorded in the minutes with reasons. This exception does not apply where the conflict involves a direct financial benefit to the Board member or their immediate family.

## 6. Gifts and Hospitality

Board members and staff must not accept gifts, hospitality, or benefits from suppliers or contractors that could reasonably be perceived to influence BID decision-making. Gifts of nominal value (below £25) such as promotional materials are acceptable. Any offer of hospitality or gifts above this threshold must be declared to the Chair and recorded in the Register of Interests.

## 7. Consequences of Non-Compliance

Failure to disclose a material conflict of interest is a serious breach of a Director's duties under the Companies Act 2006 and this policy. The Board reserves the right to require the resignation of a Director who has failed to declare a conflict of interest where that failure has resulted, or could have resulted, in financial or reputational harm to the BID.

## 8. Review

This policy will be reviewed annually by the Board. The Register of Interests will be reviewed at the first Board meeting of each financial year.

---

# Register of Interests

To be completed by all Board members and the BID Manager upon appointment and updated as required.

Name	Role / Business	Nature of Interest	Date Declared	Date Updated


*This register is maintained by the BID Manager and is available for inspection by any Board member upon request. It may be published in the BID's Annual Report in summarised form.*