

## **CONFLICT OF INTEREST POLICY**

### **NOTIFICATION OF CONFLICT OF INTEREST POLICY**

BMS Thunderbird Management & Lifestyle Consulting, Ltd. adopts the following conflict of interest policy. Review of this conflict of interest policy by any individual or entity indicates acceptance of this conflict of interest policy.

### **COMMITMENTS**

BMS Thunderbird Management & Lifestyle Consulting, Ltd. accepts an obligation to disclose and mitigate conflicts of interest, whether apparent or real; and to abide without prejudice by the terms and conditions of any conflict of interest policies or guidelines deemed to be in force throughout the duration of any applicable consulting contract once negotiated and entered into.

BMS Thunderbird Management & Lifestyle Consulting, Ltd. also accepts an obligation to disclose and minimize any real or potential conflicts of commitment that would breach the terms and conditions of the consultant's obligations to any individual or entity as outlined in contracts binding BMS Thunderbird Management & Lifestyle Consulting, Ltd.

BMS Thunderbird Management & Lifestyle Consulting, Ltd. refrains from entering into situations in which financial or other personal considerations may compromise, or have the appearance of compromising professional judgment or create conflicting loyalties in professional activities.

BMS Thunderbird Management & Lifestyle Consulting, Ltd. refrains from entering into situations that would be in violation of any law or ethical guidelines applicable to our professional activities and associations.

The policy is intended to be consistent with applicable legislation.

### **MEETING THESE COMMITMENTS**

BMS Thunderbird Management & Lifestyle Consulting, Ltd. meets the obligations and expectations of this policy by the following methods:

- Evaluating the nature and acceptability of a situation being considered and which might be entered into contractually;
- Ensuring full disclosure, monitoring of relevant information and establishment of public record which while full disclosure may not necessarily restrict or preclude the consultant's activities except where upon due consideration an activity would be deemed unacceptable and not permissible for reasons of conflict of interest and/or conflict of commitment;
- Demonstrating good faith and due diligence in protecting the consultant's reputation and that of any individuals or entities which upon entering into a negotiated contract with the consultant once rendered become the clients of the consultant;
- Seeking expert advice where a consideration or a decision around real or apparent conflict of interest or conflict of commitment indicates a need for advice beyond the consultant's own knowledge and credentials as evaluated by the consultant;
- Severance of relationships that pose conflicts which would if not severed render the consultant or a client to be in a situation of real or apparent bias or a situation that entails working on projects simultaneously for competing business entities or an activity that could not withstand public scrutiny.

## **PROCEDURE FOR DISCLOSURE**

Disclosure of conflict of interest or conflict of commitment shall be made verbally or in writing as may be deemed necessary and reasonable.

Disclosure of a conflict of interest or conflict of commitment shall include the following:

- The type of potential conflict (conflict of interest or conflict of commitment);
- The nature of the activity;
- A description of all parties involved;
- The potential financial interests and rewards;
- Possible violations of applicable agreements, contracts, policies or legislation; and
- Any other information which may be necessary to evaluate the disclosure.

## **ACCOUNTABILITY FOR IMPLEMENTING & ENFORCING THE POLICY**

BMS Thunderbird Management & Lifestyle Consulting, Ltd. takes responsibility for implementation and enforcement of this policy including for amending this policy as required.