

CORALPOINT CONFLICT OF INTEREST (COI) POLICY

1 Purpose and scope

This Conflict of Interest (COI) Policy sets out CoralPoint's commitment to identifying, disclosing and managing conflicts of interest, so that our professional advice and decisions remain objective and our clients' interests are protected at all times.

- The policy applies to all employees, directors, officers, contractors, secondees, agency workers, interns and any other person acting on CoralPoint's behalf, in any country.
- CoralPoint also expects and requires its business partners (including consultants, sub-consultants, suppliers and subcontractors) to uphold standards equivalent to those in this policy.

2 Commitment and regulatory alignment

CoralPoint is committed to ensuring that its personnel provide professional, objective and impartial advice at all times, holding client interests as paramount and never allowing personal, financial or other interests to improperly influence that advice.

- CoralPoint's approach to identifying and managing conflicts of interest is aligned with recognised international standards and best practice, including the IESBA International Code of Ethics conceptual framework and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and, where relevant to funded engagements, applicable World Bank and other international financial institution procurement and governance guidelines.
- Any failure to identify, disclose or manage a conflict of interest in line with this policy is treated as serious misconduct and may result in disciplinary action up to and including dismissal, as well as termination of contracts with third parties.

3 What is a conflict of interest?

A conflict of interest arises where a personal interest, an outside relationship, or a duty owed to another party could improperly influence, or reasonably appear to influence, the objective performance of a person's duties to CoralPoint or its clients.

- Conflicts may be actual, potential or perceived; a perceived conflict can be as damaging to trust and reputation as an actual one and must be identified and addressed in the same way.
- Common sources include self-interest (personal financial or other gain), self-review (assessing one's own prior work or decisions), advocacy (favouring one party's interests over another's), familiarity (close personal or family relationships), and undue influence or intimidation.

4 Prohibited and restricted conduct

CoralPoint personnel and associated persons must never allow an undisclosed conflict of interest to influence advice, decisions or actions taken on CoralPoint's behalf.

- Do not accept, continue or authorise an engagement, appointment, transaction or decision where an actual, potential or perceived conflict exists, without first disclosing it and obtaining the approval required under this policy.

- Do not use CoralPoint's confidential information, position or client relationships for personal gain, or to benefit another client, business or third party, at the expense of the interests of CoralPoint or its clients.

5 Client and engagement conflicts

Personal circumstances outside of an individual's role at CoralPoint can still give rise to a conflict of interest and must be considered and disclosed.

- Personnel must disclose any significant personal or financial interest, such as shareholdings, outside directorships, secondary employment or business ventures, that could reasonably be seen to influence, or conflict with, their duties to CoralPoint or its clients.
- Personal or family relationships with colleagues, clients, suppliers or competitors that could affect, or appear to affect, objectivity must also be disclosed, particularly where the individual has influence over recruitment, procurement, supervision, contract-award or performance decisions involving that person.

6 Third-party and subcontractor due diligence

CoralPoint recognises that conflicts of interest can also arise through the engagement of consultants, agents and other third parties acting on its behalf.

- Before engaging any consultant, sub-consultant, agent or other third party, CoralPoint will consider whether the engagement could create a conflict with an existing or prospective client relationship, and appropriate, risk-based due diligence must be conducted and documented.
- Contracts with such third parties must include obligations to disclose actual, potential or perceived conflicts of interest, and to comply with standards equivalent to this policy, as a condition of engagement.

7 Disclosure, assessment and management of conflicts

Timely and complete disclosure is the foundation of effective conflict management, and CoralPoint expects concerns to be raised at the earliest opportunity and monitored on an ongoing basis.

- All personnel must disclose any actual, potential or perceived conflict of interest as soon as they become aware of it, through CoralPoint's designated disclosure channels, and before accepting or continuing an engagement, appointment or transaction.
- Each disclosure will be assessed by an appropriately independent manager or committee, who will determine whether the conflict can be managed (for example, through information barriers, reassignment or client consent) or whether CoralPoint or the individual should decline or withdraw from the matter; the assessment and outcome must be documented and kept under review.

8 Register of interests and record-keeping

Accurate records of disclosed conflicts and the measures taken to manage them are essential to demonstrate compliance and to support ongoing monitoring.

- CoralPoint maintains a register of interests recording disclosed conflicts, the assessment made and any management measures adopted, which is reviewed periodically by senior management or the compliance function.

- Personnel are required to complete an annual declaration of interests, in addition to disclosing new or changed circumstances as they arise, and all related records are retained in accordance with CoralPoint's record-keeping requirements.

9 Responsibilities and training

Managing conflicts of interest is everyone's responsibility; leadership sets the tone, but all personnel must act with integrity.

- CoralPoint's senior management will demonstrate visible and consistent commitment to this policy, allocate appropriate resources and review its effectiveness regularly.
- All employees are expected to familiarise themselves with this policy, complete training as required, seek guidance where they are unsure how to apply it, and ensure that their day-to-day decisions and behaviours are consistent with CoralPoint's commitment to managing conflicts of interest.

10 Raising concerns (whistleblowing)

CoralPoint encourages employees and third parties to speak up promptly if they know of or suspect an undisclosed or unmanaged conflict of interest.

- Concerns can be raised through designated internal channels (such as a line manager or a member of the CoralPoint board of directors) and may be made anonymously where permitted by law.
- CoralPoint prohibits retaliation of any kind against anyone who raises a concern in good faith or who participates in an investigation, even if the concern turns out to be unfounded.

11 Raising concerns (whistleblowing)

CoralPoint encourages employees and third parties to speak up promptly if they know of or suspect any breach of this policy.

- Concerns can be raised through designated internal channels (such as a line manager or member of the CoralPoint board of directors) and may be made anonymously where permitted by law.
- CoralPoint prohibits retaliation of any kind against anyone who raises a concern in good faith or who participates in an investigation, even if the concern turns out to be unfounded.

12 Breach, investigation and remediation

Alleged breaches of this policy will be taken seriously and investigated promptly and impartially.

- CoralPoint may take disciplinary action, contractual remedies and other appropriate steps where violations are substantiated and will cooperate with competent authorities or clients as required.
- Lessons learned from investigations will inform improvements to CoralPoint's controls, training and risk assessments to strengthen its overall approach to managing conflicts of interest.

13 Review and ownership

This policy is owned by CoralPoint's senior management and will be reviewed at least annually and whenever there are significant changes in the business, its client base, or relevant standards.

- Updates will be communicated to all relevant personnel and business partners, and translated or localised where necessary to ensure understanding across CoralPoint's international operations.
- Questions about the interpretation or application of this policy should be directed to an appropriate line manager or member of the CoralPoint board of directors.

Approval and Implementation

This Conflict of Interest Policy is approved and adopted by CoralPoint with effect from the date below. All employees, contractors, and third parties engaged by CoralPoint are required to comply with this policy.

For and on behalf of CoralPoint International Limited



Emilie Reeve
Managing Partner,
Barnsgrove, 5 January 2026