

## Green Inc (eu) Conflict of Interest Policy

This policy applies to all staff and should be read in conjunction with the attached declaration of Conflict-of-interest form.

Why we have a policy: Green Inc (eu) has adopted a policy to address conflicts of interest so as to ensure that its activities and those of its staff and students, are and are seen to be conducted to the highest standards of ethics and integrity. Green Inc (eu) have a legal obligation to act in the best interests of the company. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of Green Inc (eu). Such conflicts may create problems; they can:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of the Green Inc (eu)
- Risk the impression that Green Inc (eu) has acted improperly and damage reputation

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety. The declaration of interests accordingly, Green Inc (eu) requires all staff to declare their interests and any gifts or hospitality received in connection with their role in Green Inc (eu). A declaration of interest's form is provided for this purpose, listing the types of interest you should declare. To be effective, the declaration of interests needs to be updated at least every 3 years and when any changes occur. If you are not sure what to declare, or whether / when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact your line manager for guidance. Interests will be recorded on Green Inc (eu)'s register of interests, which will be maintained by HR. The register will be accessible to senior members of staff.

## **Data Protection**

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998 and GDPR. Data will be processed only to ensure that all staff act in the best interests of Green Inc (eu). The information provided will not be used for any other purpose. You should declare your interest at the earliest opportunity.

If you fail to declare an interest that is known to Green Inc (eu), the MD will declare that interest. All decisions under a conflict of interest will be recorded in the minutes of the SLT meeting. The report will record:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict.

Managing contracts

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts

Version	Document No	Date	Author	Distribution	Review Date
V3	QM1	15/09/2022	DHobbs	All employees	<mark>31/12/2025</mark>



will include provisions for an independent challenge of bills and invoices and termination of the contract if the relationship is unsatisfactory.

If an individual is uncertain about how this Policy might affect his or her activities or has any questions about its application, he or she should discuss the potential conflict of interest with their line manager.

## **Declaration of Interests Form**

I \_\_\_\_\_\_ in my capacity as an employee of Green Inc (eu) have set out below my interests in accordance with the organisation's Conflict of Interest Policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family or some other close personal connection
Any other employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g. trustee, director, councillor, tribunal panel member, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months.	
Any other conflict of interest.	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

Version	Document No	Date	Author	Distribution	Review Date
V3	QM1	15/09/2022	DHobbs	All employees	31/12/2025