

Versions Issued

Version No.	Date	Description of Amendment	Approved by:
1.0	30 October 2020	Creation of policy	A. Kerr, Chair of Board
V2.0	23 June 2023	Updates for compatibility with other parts of the SEG system; including the SEG Standard Development and Revision procedure	SEG Board

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1. Purpose

SEG is an intentionally dynamic organisation seeking to work across boundaries and deliver positive outcomes for the European eel and those who are interested in it. This inherently creates competing interests that can develop into multiple, competing and even conflicting interests. This policy sets out how the Sustainable Eel Group (SEG) manages conflicts of interests related to its activities, in order to safeguard its staff, board members, members, clients and other stakeholders and to deliver its objectives.

2. Scope

This policy shall apply to all areas of SEG's business, that we might predict, having completed a risk assessment. Risks will be reviewed annually (see 4. Review). It will also apply to conflicts as they arise that were unpredicted, and learning applied to those for future risk management and review of this policy.

3. Risk Management

3.1 Assessment

Having completed an initial risk assessment, there is the potential for conflicts of interest in the following areas of our operations:-

3.1.1 Decisions by the SEG Board. With Board members having interests from across the eel sector in Europe, deciding on SEG's strategies, plans, policies and procedures, there is a potential risk of individuals' opinions and decision making being influenced by their commercial or political interest.

3.1.1 Certification of the SEG standard. Certification under the SEG standard has the potential to lead to a commercial advantage. There is a potential risk that the interests of SEG staff or Board members or the relationships between them and clients seeking certification, could influence the outcome of decisions on certification.

3.2 Mitigation

The following mitigations measures are in place to manage the conflict of interest risks outlined above.

3.2.1 Decisions by the SEG Board

- a) Each SEG Board Member shall complete an Interests form (see Annex 1).
- b) These shall be kept and published on the SEG website in www.sustainableeelgroup.org/governance/
- c) These shall be reviewed annually and re-published by the end of January in each year.
- d) At the beginning of every SEG Board meeting there shall be an agenda item on 'Conflicts of Interest'. The Board shall be asked to declare any potential conflict each of them has with any item on the agenda. Those shall be recorded. Those members shall be excluded from comment on those items and/or the Chairman shall not take any account of comments made by that member on those items.

3.2.2 Development and Revision of the SEG Standard

3.2.2.1 When the SEG standard is revised according to the relevant procedure, the SEG Board shall appoint a 'SEG Standard team' to conduct the review. That team, after consultation with multiple stakeholders, recommends the changes to the standard and its associated assurance processes to the SEG Board.

3.2.2.2 Due to the nature of having multiple stakeholders on the SEG Standard team, to ensure good representation of views, it is possible that some members of the team will have conflicts of interest. The SEG Standard team shall therefore be appointed as carefully as possible by the SEG Board to minimise those conflicts of interest. SEG Standard team members shall also be required to complete a Conflict of Interests declaration, that SEG shall publish at the time of revision of the SEG Standard.

3.2.3 Certification to the SEG standard

SEG operates a third-party certification system. This means that SEG does not assess or certify clients directly. Third party systems offer the highest level of assurance that the outcomes of assessments are unbiased. SEG, in consultation with stakeholders, sets the standard and processes for assessment of clients and award of certificates.

3.2.3.1 Certification and assessment

- a) The certification process is normally managed by an independent 'Conformity Assessment Body' (CAB) under contract to SEG.
- b) Clients wishing to become SEG certified make a contract with the CAB. The CAB appoints an auditor to conduct the assessment. Auditors may be employees of the CAB or independently contracted.
- c) Assessments are therefore carried out by auditors who are independent of SEG and of the client, but are accredited and trained to conduct assessments under the SEG Standard.
- d) The auditor presents their assessment report to the CAB with a recommendation about the outcome of the assessment. The CAB reviews the report and recommendation of the auditor, makes the decision on the outcome of the award, and communicates that decision.

3.2.3.2 Contingency plan

In the event that there is not a contract in place with a CAB, the following contingency process shall apply:

- a) SEG shall be the awarding and certification body, but continue to operate an independent third party system as follows:
- b) SEG shall maintain a register of independent auditors. That register shall be made available to clients. Clients shall appoint an auditor under contract to conduct the audit.
- c) SEG shall operate a separate, independent 'SEG Standard Panel' to fulfil the role of the CAB. The Panel shall consist of 5 – 6 independent people who have expertise in a combination of certification processes and scientific and conservation knowledge of the European eel. Those people shall not be employees or Board members of SEG. The Panel shall be chaired by SEG's Director of Conservation Operations, who has the best detailed understanding and overview of the SEG standard.
- d) The SEG Standard Panel shall consider and review the assessment reports presented by auditors, make the final decision and communicate and present the award.

3.2.3.3 Risk and reputation management

It is possible that the SEG Board has knowledge or intelligence about clients that are unknown to the auditor or CAB, that might compromise the outcome of the assessment or might cause reputational risk to SEG. For example, they might have information that a client is being investigated for alleged illegal activity that has not been declared to the auditor.


- a) In such circumstances the Board shall make the information available to the auditor, CAB or SEG Standard Panel for them to consider.
- b) To manage reputational risk, the SEG Board shall have the ultimate decision on certification and in extreme circumstances have the ability to overrule the decision of the CAB or the Panel.

4. Review

- 4.1 The risks that should be subject to this Conflict of Interest policy shall be reviewed annually at the final SEG Board meeting of the calendar year. This will be based on a new risk assessment and learning from conflicts experienced during the previous 12 months.
- 4.2 This procedure will be reviewed at a minimum of every 5 years or sooner if the annual review process deems it necessary.

ANNEX 1. Conflicts of Interest Declaration form

As required in section 3.1, the following form shall be used by Board Members and SEG Standard Team members to record their interests that might cause conflict with SEG business.

	
Conflict of Interest Declaration	
Use this form to declare your role with SEG, what other positions you hold, and what personal or professional interests you have that might have a conflict with SEG's business, objectives, policies or procedures, or revision of the SEG standard system.	
Name	
Position with SEG	
Other positions held	1.
	2.
	3.
	4.
Potential conflicts of Interest	1.
	2.
	3.
	4.