CONFLICT OF INTERESTS POLICY

1. POLICY STATEMENT

1.1 The purpose of this policy is to protect the integrity of Europia's decision-making process, so stakeholders can have confidence in the organisation's integrity, and to protect both Europia and individuals involved in its work from any impropriety or appearance of impropriety.

2. WHO IS COVERED BY THIS POLICY?

2.1 This policy applies to all current employees, freelancers and volunteers, and Trustees.

3. WHO IS RESPONSIBLE FOR THIS POLICY?

3.1 While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you. Please take the time to read and understand it and to go back to your manager with any questions you may have.

4. BACKGROUND / CONTEXT

4.1 Conflicts of interest may inhibit free discussion or result in decisions or actions that are not in the interest of Europia. Even the appearance of a conflict of interest can damage Europia's reputation.

4.2 The trustees of Europia, as its directors, have a legal duty to avoid conflicts of interest under section 175 of the Companies Act 2006. The Charity Commission provides guidance on conflicts of interest, including a recommendation that charities have a policy on how they will deal with any conflicts. As best practice, Europia follows Charity Commission guidance.

4.3 Europia also expects staff and volunteers to act in the best interests of the organisation. It is accepted that staff and volunteers may legitimately have roles, interests and contacts outside Europia, which are beneficial to the organisation. The intention of this policy is not to

discourage such outside interests, but to bring potential conflicts into the open and manage them appropriately

5. IDENTIFYING CONFLICTS OF INTEREST

5.1 A conflict of interest is any situation in which an individual's personal interests and / or loyalties, or interests that they owe to another body, may (or may appear to) influence or affect their decision making in their role with Europia.

5.2 Conflict of interests may include:

- Direct financial gain or benefit, such as payment for services provided to Europia; or the award by Europia of a contract to another organisation in which an individual has an interest and from which they will receive a financial benefit;
- Indirect financial gain, such as employment by Europia of a spouse or partner;
- Non-financial gain, such as when a user of Europia's services is also a trustee, member of staff or volunteer;
- Conflict of loyalties, such as where a friend of a trustee is employed by Europia.

6. DECLARATION OF INTERESTS

6.1 In order to manage potential conflicts of interest, staff, trustees and other volunteers are asked to declare any interest which may conflict with their Europia role. They are asked to do so when they join Europia and when relevant changes occur. In addition, staff and trustees are asked to make an annual declaration, even if no change has occurred.

6.2 If trustees, members of staff and volunteers are not sure what to declare, or whether/when their declaration needs to be updated, they are asked to be as open as possible.

6.3 Interests will be recorded in Europia's register of interests, which will be maintained by an individual designated by the CEO and will be accessible to all trustees.

7. GIFTS AND HOSPITALITY

7.1 Staff and trustees are also asked to declare any gifts or hospitality

worth more than £10 received in connection with their role at Europia. They should do so as soon as possible after the gift or hospitality has been received by notifying the person designated to maintain Europia's register of interests.

8. MANAGING A CONFLICT OF INTEREST

8.1 Anyone taking a decision in which they face a conflict of interest should declare that interest at the earliest opportunity and manage the conflict by withdrawing from any subsequent discussion.

8.2 On occasion the trustees or CEO may decide that despite the conflict of interest, it would be in the best interest of Europia to include an individual in discussions. In such cases the nature of the conflict must be explained at the start of the discussion, and any decision making must exclude the individual who has a conflict of interest.

8.3 In the event of the trustees having to decide a question in which a trustee or closely connected party has an interest, the matter will be dealt with as prescribed in the Articles of Association.

8.4 Where a trustee benefits from a decision, or there is a related party transaction, this will be reported in the Annual Report and Accounts in accordance with the latest version of the Charities Statement of Recommended Practice (SORP).

8.5 If the matter is raised at a Board meeting, the interest should be declared at the earliest opportunity and be recorded in the minutes. If the matter is raised other than at a Board meeting, the interest should be declared at the time, restated at the start of the next Board meeting and recorded in the minutes.

8.6 Trustees, members of staff or volunteers may, however, participate in discussions from which they (or other parties they are associated with) may indirectly benefit, for example where the benefits are universal to all users or where the benefit is minimal.

9. MANAGING CONTRACTS

9.1 Trustees, members of staff and volunteers must not be involved in specifying, letting, managing or monitoring a contract in which they have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contracts if the relationship is unsatisfactory.

10. APPLIED PROCEDURES AND GOVERNING DOCUMENTS

- Declaration of interests form
- Register of interests
- Section 175 of the Companies Act 2006
- Charity Commission guidance on conflicts of interest
- Articles of Association
- Charities Statement of Recommended Practice (SORP)

11. MONITORING AND REVIEW OF THE POLICY

11.1 We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

Reviewed: June 2025
Approved:
Due for review: June 2026