



ICAR Conflict of Interest Policy for Members of ICAR Groups (22nd October 2019)

Conflict of interest arises when a person has (or could have) divided loyalties. Members of the ICAR Board, its sub-committees, working groups and task forces (**ICAR Groups**) owe the organization their undivided loyalty. Therefore, they need to be conscious of the potential for conflict of interest, and they need to act with candour and care in those situations.

Avoiding conflict of interest does not mean that an ICAR Group will never be in a conflict of interest position. It means that when the person is (or could be) in a conflict of interest position, the situation is recognized and properly handled. Conflicts of interest only become problematic if the person fails to recognize the conflict of interest or fails to deal with the situation properly. Avoiding conflict of interest, in the narrow sense, means putting the duty to ICAR ahead of any other interest or duty. This means that the person must assess their views and proposals in light of their benefit to ICAR. Every person should contribute their unique skills and perspective, and their honest views, to any ICAR Group discussion. However, when it comes to decision-making, the person's actions will be judged in terms of the benefit to ICAR as a whole.

There is also the need to avoid both actual and perceived conflicts of Interest. A conflict of interest may be actual and obvious. Most commonly, this will arise when the person has a material interest in a proposed activity under discussion to which ICAR may be involved. This material interest may arise directly because the person is directly involved with the activity, or it may arise more indirectly because the person has an employment or other similar relationship with the entity dealing with ICAR.

Sometimes, even though there may be no legal conflict of interest, there is still potential for the reasonable perception of a conflict of interest, when viewed from the perspective of an objective outside observer. In that case, even if the person in fact has no actual bias, there is a potential for the perception of a conflict of interest.

For all of these reasons, the general policy below set out the guidelines for awareness, disclosure and options for handling any actual or perceived conflict of interest specific to members of an ICAR Group.

All ICAR Group members must have the awareness of their situation and be vigilant to identify:

- a) Whether they have any material interest in the activity or discussion topic on the agenda of any meeting of the ICAR Group ("direct conflict of interest").
- b) Whether, even if there is no direct or obvious conflict of interest, there is some other factor which does, or could, prevent them from exercising objective judgment ("potential conflict of interest").
- c) Whether, even if there is no potential conflict of interest, there is some other factor which might give an objective outside observer a reasonable basis to perceive that the person might not exercise objective judgment ("reasonably perceived conflict of interest").

In the event that an ICAR Group member identifies any of the above situations, they must disclose it as soon as possible to the Chairman and/or Executive Director of ICAR. Where an ICAR Group member has a potential conflict of interest, or there is some basis for a perceived conflict of interest, the person must at least disclose that interest to the ICAR Group Chairperson, in sufficient detail to allow the Chairperson, and potentially other ICAR Group members, to understand what the interest is and how far it goes.

Upon knowledge of any ICAR Group member's disclosure of direct, potential or perceived conflict of interest, the ICAR Group Chairperson may handle the situation in one or more of the following ways:

- a) The member may contribute to the topic discussion and exercise their right to vote, as usual.
- b) The member may contribute to the topic discussion but not vote on any decision.
- c) The member may not contribute to the topic discussion or vote on any decision.
- d) The member will be excused from the meeting during all discussion on the topic.