BASC Conflict of Interest Policy
(Incorporating gifts and hospitality)

1.0 Overview

1.1 This policy applies to all Council members (elected, co-opted and ex-officio) and all employees of the Association. The policy should be read in conjunction with the Declaration of Interests form.

1.2 All references to the "Association" mean all organisations and companies within the group (BASC and BDL).

1.3 All reference to "Council members" means elected, co-opted and ex-officio members of Council.

1.4 Under this policy a conflict of interest could be any interests which are related to shooting and/or conservation or FCA regulated activity, including but not limited to:

- Any current or previous employment which you still have a financial interest in
- Any appointments, trusteeships, directorships, offices held in organisations
- Membership of professional bodies, special interest groups or mutual support organisations
- Investments in unlisted companies, partnerships and other forms of business, major share holdings and beneficial interests
- Business or consultancy for which payment is received
- Services you provide to BASC for which payment is received
- Gifts or hospitality offered to you (over the value of £50) by external bodies connected with the business of the Association
- Any personal or family interests

1.5 If any council member and/or employee have any queries these should be raised with the Director of Finance or the Compliance Officer.

2.0 Why we have a conflict of interest policy

2.1 Council and all employees have an obligation to act in the best interests of the British Association for Shooting and Conservation (BASC) Ltd, and in accordance with BASC's Constitution, good governance and any related rules, objects, policies and procedures.

2.2 The Association is registered with the Financial Conduct Authority (FCA) as our membership includes insurance, which is an FCA regulated product. In addition, the Association also introduces our members to other regulated products via our membership benefits.

2.3 Under the FCA registration we are obligated to avoid, wherever possible, conflicts of interest which could result in client (our members) disadvantage or detriment but, where

these may be unavoidable, to manage these properly and fairly. We are also obliged to record any gifts and hospitality (whether accepted or not).

2.4 Conflicts of interests may arise where an individual's business, personal or family interests and/or loyalties could conflict with those of the Association. Such conflicts may create risks to the Association as they can:

- Inhibit free discussion
- Be perceived to, or could result in decisions or actions that are not in the interests of BASC
- Risk the impression that BASC has acted improperly
- Result in allegations of fraud and bribery.

2.5 The aim of this policy is to protect the integrity of the Association's decision-making process, meet our FCA obligations and to ensure all stakeholders have confidence in the integrity and reputation of all Council members and employees.

3.0 The declaration of interests – Your Responsibilities

3.1 Council members and employees must declare any interests they have which relate to business, personal or family interests, as well as any gifts or hospitality received, in connection with their role in the running of BASC. A declaration of interest form is provided for this purpose and lists the types of interest you should declare.

3.2 All Council members and employees are required to complete the declaration of interest form when they are initially appointed. They will also be asked to review and update the declaration on at least an annual basis.

3.3 All Council members and employees have a duty and are responsible for updating their declarations as and when a change occurs.

3.4 If you are not sure of what needs to be declared, or whether/when your declaration needs to be updated it is recommended that you are prudent. If you would like any advice or guidance on the acceptance and declaration of interests, please contact the Compliance Officer, Registered Society Secretary (currently the Director of Finance), the Chief Executive or the Chairman for confidential guidance.

3.5 Interests will be recorded on the Association's Register of Interests, which will be maintained by the Compliance Officer. The register will be accessible by the Registered Society Secretary, Council members, The Associations Auditors and any regulatory body which has the powers to review the register (for example the FCA).

3.6 If you fail to declare an interest that is known to the Registered Society Secretary, The Chief Executive and/or the Chairman, they will be required to declare that interest on your behalf.

4.0 Conflicts of Interest Guidance

4.1 Conflicts relating to business, personal or family interests: -

4.2 If you have a potentially conflicting interest as a supplier of services to BASC, or conduct business relating to shooting and/or conservation, you should not be involved in decisions that might directly affect the service that you provide, or the business you operate. You

should declare your interest at the earliest opportunity and withdraw from any subsequent discussion and decision-making process.

4.3 The same applies if you face a conflict for any other personal or family reasons. You may, however, participate in discussions and be party to decision making, if you indirectly benefit from it. For example, where the benefits are universal to all users, or where your benefit is minimal.

4.4 Where an unavoidable conflict of interest may exist between the Association, a Council member or employee and supplier of regulated products and services, this will be properly disclosed to our clients (members) in writing. Usually this will take the form of including the disclosure in the annual report or financial statements of the Association.

4.5 The Registered Society Secretary will be the final arbiter of all conflicts including business. In cases where the Registered Society Secretary has declared an interest or conflict, the Chairman or Chief Executive will act as the final arbiter.

5.0 Gifts & Hospitality

5.1 The receiving of gifts & hospitality has an important role in facilitating business practice. However, it is important to declare gifts & hospitality to enable transparency and ensure the gift is appropriate and not a bribe.

5.2 All Council members and employees must declare all gifts and hospitality (taken or declined) which are estimated to be above the value of £50 or where it could be considered that the gift or hospitality is an enticement/bribe. For example, a gift from a supplier while you are undertaking a procurement for a new supplier could be considered to be an enticement or bribe.

5.3 All gifts as outlined in section 5.2 must be included in the declarations register. This can be done via the declaration of interest form or by informing the Compliance Officer in writing (email is sufficient). The Compliance Officer will ensure the declaration is included in the register.

5.4 Cash gifts of any value are not acceptable under any circumstance as they are easy to conceal and are viewed as bribery rather than fair business practice. If you are offered a cash gift it is your responsibility to politely decline the gift. This does not include donations or fundraising for and on behalf of the Association.

5.5 Whether a gift or hospitality can be accepted is down to the discretion of your line manager or the Associations executives (Chief Executive and Executive Directors). The Association reserves the right to accept gifts and hospitality on behalf of the Association. Such gifts may be used in conjunction with the Association business or could be raffled to employees at the end of the year.

6.0 Decisions taken where a Council member or employee has an interest

6.1 In the event that a decision is required where a Council member or employee involved in the decision has an interest, the decisions will be made by a vote, with a simple majority required.

6.2 Conflicted or interested Council members and employees that will only indirectly benefit from the decision (for example where the benefits are universal to all users or the Association, or where your benefit is minimal) may be involved in a discussion and the final decision making.

7.0 Council decisions taken where a Council member has an interest

7.1 A quorum as set out in BASC's Constitution and Objects must be present for the discussion and decision. Conflicted or interested parties will not be counted when deciding whether the meeting is quorate. Conflicted or interested Council members may not vote on matters affecting their own interests unless; they only indirectly benefit from the decision, for example, where the benefits are universal to all users or the Association, or where benefit is minimal.

7.2 All decisions at Council where a conflict of interest has been declared will be recorded by the minute secretary and reported in the minutes of the meeting.

7.3 Where a Council member benefits from the decision to an extent judged as material by the Auditors, this will be reported in the annual report and accounts in accordance with Financial Reporting Standard No. 8 – Related Party Transactions.

8.0 FCA Business Conflicts

8.1 Where we used a preferred insurer or selected panel, the arrangement will be reviewed annually to ensure the scope of cover, the security of the insurer and the premium rates are competitive. Each year prior to renewal of our group policy we will review the arrangement to ensure it meets the best interests of the Association and its members.

8.2 All business conflicts will be recorded on the Conflicts of Interests register and managed by the Registered Society Secretary as stated in section 4.5. Any resulting business decisions from a conflict of interest will be recorded in the minutes of the Council or committee meeting or emailed to the Compliance Officer if the decision is made outside of a meeting.

9.0 Data Protection

9.1 The information provided will be processed in accordance with data protection principles as set out in the General Data Protection Regulations (GDPR), the Data Protection Act 2018 and the BASC data protection policy. Data will be collected, processed and stored to ensure that Council members and employee's act in the best interests of BASC and in conjunction with this policy.

9.2 The information provided will not be used or shared for any other purpose than already outlined in this policy.

9.3 Council members and employees can ask to see their own declarations and information in accordance with the ICO subject access request legislation. Please see the BASC data protection policy for further information.