

PENTATHLON GB⁺

PENTATHLON GB CONFLICT OF INTEREST POLICY

Policy Applies to: all persons involved with PGB business operations and decisions affecting Pentathlon GB, namely the Board, the Senior Advisory Panel, the Committees and Executive team.

1. Policy Statement

It is the PGB policy that Directors, committee members, employees, consultants and others acting on behalf of Pentathlon GB must be free from conflicts of interest that could adversely influence their judgement, objectivity or loyalty to the company in conducting Pentathlon GB business activities.

Pentathlon GB is committed to maintaining the highest standards of corporate governance and conducts its business in an open and transparent manner. The aim of this policy and process is to protect both PGB and the individuals concerned from any appearance of improper behaviour. Everyone identified within this policy documentation should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism. They should avoid situations where they, or PGB, could be open to suspicion of dishonesty and not put themselves in a position of conflict between their official duty and private interest.

Pentathlon GB accepts that people will take part in legitimate financial, business, charitable and other activities outside their PGB roles, but any potential conflict of interest raised by those activities must be disclosed promptly following the guidelines provided on the conflict of interest form and declared as relevant. All employees must obtain written permission from Pentathlon GB before taking on a paid or volunteer role in any other sports organisation. This policy explains what is viewed by Pentathlon GB as a conflict of interest and the processes in place to disclose and manage a conflict of interest. Implementation of this policy and procedure must be clear and transparent and not subject to any unfair discriminatory practices.

2. Scope and Definitions

This Policy applies to all of the following Pentathlon GB personnel: Directors, Committee members, Senior Advisory Panel, Full and Part time employees, consultants and any person appointed by Pentathlon GB to undertake work on its behalf. This Policy applies whenever a person identified above recognises, or should reasonably recognise, that he/she has a Conflict of Interest.

A Conflict of Interest is a situation in which a person has an Interest (defined below) which may compromise that person's obligations to Pentathlon GB or to any other person or body with which Pentathlon GB has a relationship. An Interest is a financial or non-financial interest involving the Person. A financial interest refers to anything of non-trivial monetary value including but not limited to salary, commission, consultancy fees, contractual interest, discounts, property and royalties. A non-financial interest refers to any non-financial benefit or advantage including but not limited to access to privileged information or services, property or intellectual property rights and enhancement of a career, education or professional reputation. In the sporting environment, this may include training and selection of athletes and coaches.

If an individual has a Conflict of Interest, they have a duty to disclose it under the procedure set out below. In the case of a Director of Pentathlon GB, disclosure is a requirement under Company Law.

3. Information Collection Process

The Company Secretary/Head Office Manager shall maintain a register of those individuals who will be required on appointment and annually to complete and sign the PGB Conflict of Interest form. It is the responsibility of the Company Secretary to ensure that individuals on the register are provided with a Conflict of Interest form and that the completed form is received and retained by PGB. It is the responsibility of individuals to whom this policy applies to declare and update their forms as and relevant. Processing of this data shall be undertaken in line with PGB data control processes.

Committee Chairs are required to provide every Committee Member with a copy of the Conflict of Interest form and advise the Company Secretary accordingly. The distribution of such forms is the responsibility of the Committee Chairs, the collection of the forms and data remains the responsibility of the Company Secretary/ Head Office Manager.

On receipt of the completed forms the Company Secretary will update the register with the information declared by each individual using the categories of Membership of other organisations and Commercial interests.

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4. Managing Conflict

The Finance and Governance Committee shall be responsible for reviewing the Conflict of Interest forms and Register and advising of any action required annually. If a conflict can be managed the agreed management process must be clear and reported in the register. Conflicts of Interest can arise in various scenarios; the most likely is in a Board situation, therefore Pentathlon GB has set up the following process to be followed at every meeting:-

The Chair of the meeting is required to ask those attending, to declare any interest(s) linked to any item on the agenda. All notifications must be reported in the minutes of the meeting along with the actions taken to manage the conflict.

Below are examples of how an individual may manage conflict themselves or how a Chair might manage a particular meeting situation:

- not taking part in discussions or decisions for certain matters
- either staying in the room or vacating the room until the particular item is finished;
- either staying in the room when the decision is made or vacating the room whilst the decision is made having stayed for the discussion;
- if the conflict relates to the Chair of the meeting, he/she must vacate the role of chair and the room, until the particular item is finished or a decision made;
- stepping aside from any involvement in a particular task;
- declaring an interest to a particular sponsor or third party

5. Managing stated conflicts of interest

Situations may arise where the Conflict of Interest Panel decides it is not possible to manage the conflict, in these circumstances the Chairman of the PGB Board or the Finance, Governance & Risk Committee will request a meeting with the individual concerned to discuss and agree the way forward. The register should be noted accordingly with the date of the agreement; the full details may or may not be included as determined by the agreement and level of confidentiality.

6. Data Protection and Publication of Declarations

The information collected for the purpose of managing conflict may in certain circumstances be deemed sensitive personal information and as such inappropriate for public circulation.

The PGB Chair, Finance, Governance & Risk Chair, CEO and Office Manager will have access to the conflict of interest register with the Committee Chairs having access to the registers relevant to their Committee members.

7. Further Information

For further information about any aspect of the PGB Conflict of Interest Policy, please contact:

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