



Conflict of Interest – Policy Statement

A conflict of interest is defined as an actual or perceived interest by a Board member, officer, employee, or subcontractor of Scottish Quality Crops (“SQC”), or any Board member, officer, employee, or subcontractor of the Certification Body (being the third party who undertakes the day-to-day running of the SQC’s Crop Assurance Scheme (“the Scheme”), in an action that results in, or has the appearance of resulting in, personal, organisational, or professional gain. Board members, officers, employees, and subcontractors of SQC, are obligated to always act in the best interest of SQC. This obligation requires that any Board member, officer, employee, or subcontractor of SQC, in the performance of SQC duties, seek only the furtherance of the work of SQC. At all times, Board members, officers, employees, and subcontractors of SQC are prohibited from using their job title or SQC’s name or property, for private profit or benefit.

As part of its internal auditing and monitoring systems, SQC will regularly review any conflicts of interest and subsequent actions.

1. SQC Board members

- a. Should any members of the SQC Board believe there to be a conflict of interest in respect of any matters being discussed, or any work being undertaken by SQC, this should immediately be raised with the SQC Managing Director.
- b. A standard item will be added to all SQC Board meeting agendas to ensure any conflict of interest is raised. Where a conflict of interest is identified, the Board member or members affected will leave the meeting when the matter giving rise to the conflict is to be discussed and shall not participate in any vote in respect of that matter.

- c. All conflicts of interest will be duly recorded, with responsibility for any work affected by the conflict passed to another Board member, as allocated by the SQC Managing Director.

2. SQC officers / employees / subcontractors

- a. Should any SQC officer, employee, or subcontractor believe there to be a conflict of interest in any work they are undertaking on behalf of SQC, this should immediately be raised with the SQC Chair.
- b. All conflicts of interest will be duly recorded, with responsibility for any work affected by the conflict passed to another SQC officer, employee, subcontractor, or an SQC Board member, as allocated by the SQC Chair.

3. Certification Body employees and subcontractors

- a. The Certification Body must have established its own Conflict of Interest Policy to include the following: Employees and personnel subcontracted by the Certification Body to deliver the Scheme requirements must adhere to a Code of Conduct which includes the following: Ensure that there are no conflicts of interest that could impact on the outcome of an assessment/certification decision.
 - (i) Certification Officer (“CO”) – COs are required to complete confidentiality declarations and declarations of conflict of interest in relation to any applicants or members with whom they have a commercial interest. Where a conflict of interest has been identified, the certification assessment and decision will be conducted by another CO, as allocated by the Assessment Planner.
 - (ii) Assessment Planner - The Assessment Planner must ensure that recorded conflicts of interest are adhered to and must not assign assessments to a CO who has raised a conflict.
 - (iii) A manager nominated by the Certification Body will keep a record of conflicts of interest.

This conflict of interest policy statement may be amended by the SQC Board from time to time.