



Conflict of Interest Policy Croydon Community Energy Ltd. (CCE)

Purpose

The purpose of this policy is to protect the interests of Croydon Community Energy Ltd (CCE), the integrity of CCE's decision-making and the integrity and reputation of CCE's Directors, Employees, Independent Contractors and Volunteers ("Internal Stakeholders") by:

- (a) preventing the personal interests of such individuals from interfering with their duties to the organisation; and
- (b) avoiding any unethical financial, professional, or political gain on the part of such individuals.

The intent of this policy is to supplement, not replace, any applicable UK laws regarding conflicts of interest.

Internal Stakeholders are expected to respect the spirit of this policy as well as its wording.

Examples of conflicts of interest include, but are not limited to an Internal Stakeholder who:

- is related to a member of staff and is involved in a decision to be taken on staff pay or conditions;
- is also on the committee of another organisation that is competing for the same funding;
- has shares or other interests in a business that may be awarded a contract to do work or provide services for the organisation.

Persons Concerned

This statement applies to Internal Stakeholders (Directors, Employees, Independent Contractors and Volunteers) who are able, or potentially able, to influence the governance and actions of CCE. This includes anyone who makes financial decisions, might be referred to as "management personnel" or have proprietary information regarding CCE.

Procedures

1. Duty to Disclose

Each Internal Stakeholder and any other Interested Person is under an obligation to disclose the existence or potential existence of a Conflict of Interest as it arises.

All such people will strive to avoid any conflict of interest between the interests of the Organisation, and personal, professional, and business interests. This includes avoiding the perception of conflicts of interest as well as actual conflicts of interest.



During meetings or activities, Internal Stakeholders will disclose any interests in a transaction or decision where there may be a conflict between the organisation's best interests and the individual's best interests, or a conflict between the best interests of two organisations with which the individual is involved.

2. Investigating Conflicts

When a potential Conflict of Interest is disclosed, the Board will provide the individual with an opportunity to disclose all material facts. The Board will collect all pertinent information and question the involved parties. If it turns out that a conflict does not exist, the inquiry will be documented but no further action will be taken.

3. Addressing a Conflict of Interest

If the Board determines that a conflict of interest exists, they will take the appropriate actions to address the conflict. This may include (but not be limited to):

- (a) prohibiting any Interested Parties from voting on any matter related to said Conflict of Interest; or
- (b) terminating employment with CCE.

Affected parties both within and outside of CCE, including shareholders, directors, employees, volunteers and independent contractors, will be notified. If the Conflict of Interest in question involves a member of the Board, that individual will be excused from deliberations.

4. Disciplinary Action

All conflicts of interest will be reviewed on a case-by-case basis. The Board has full discretion to deem what disciplinary action is appropriate and necessary for disclosed conflicts of interest.

If the Board reasonably believes that an Internal Stakeholder failed to disclose an existing or possible Conflict of Interest, it shall inform the individual of the rationale for such belief and grant the individual an opportunity to explain the alleged failure to disclose the Conflict of Interest.

After hearing the individual's response and investigating further as warranted by the circumstances, the Board may take appropriate disciplinary action, including removal from the position at the organisation.



If a conflict of interest should arise during decision making:

“After disclosure, I understand that I will be asked to leave the room for the discussion and will not be able to take part in the decision. Any such disclosure and the subsequent actions taken will be noted in the minutes.”

Signed

Date

Please list any known or potential future conflicts of interest:



Policy Creation and Review Dates

Date of policy creation: 7th February 2022

Date policy reviewed: 31st January 2023

Date that next review is due: 31st January 2024

Date policy reviewed: 31st January 2024

Date that next review is due: 31st January 2025

Date policy reviewed: