



NATIONAL CONTACT POINT

FOR RESPONSIBLE BUSINESS CONDUCT

Conflict of Interest Policy

1. Introduction

This Conflict-of-Interest Policy for the Expert Panel of the National Contact Point for Responsible Business Conduct (NCP) is being issued under Regulations 8(d) and 15(c) of the Economic Development Board (National Contact Point) Regulations 2023 (the ‘2023 Regulations’). Members of the Expert Panel are required, in the discharge of their functions, to adhere to this policy.

This policy must be read in conjunction with any applicable laws, regulations or guidelines. Words not defined herein shall have the same meaning as in the 2023 Regulations.

2. Conflicts of Interest

A member of an Expert Panel must withdraw whenever there is a conflict of interest with regards to a complaint that he is called upon to handle. It shall be up to the member to determine whether or not a conflict of interest exists.

A conflict of interest may arise if the member of the Expert Panel:

- previously had, currently has or intends to have direct involvement in a complaint prior to it being submitted to the NCP;
- represents, or is employed by, organisations with financial or contractual links or affiliations to a party to a complaint;
- has a close personal relationship (e.g. spouse, domestic partner or immediate family member) with someone employed by a party to a complaint;
- holds an account, or major shareholdings with a party to a complaint; and
- has a close personal relationship with those who may have the above interests.

These are not exhaustive circumstances and it is up to the members of the Expert Panel to disclose interests relating to other situations that may relate to the functions of the NCP.

Professional associations with a party to a complaint will not generally be assessed as a conflict of interest except in circumstances where they have been directly involved in the preparation or lodging of a complaint to the NCP.

The members of the Expert Panel must regularly assess whether they have a conflict of interest and withdraw from the Expert Panel whenever such conflict arises.

3. Review of policy

The policy will be reviewed as and when required.