

Infrastructure and Ecology Network Europe (IENE)

Conflict of Interest (Col) Policy and Procedures

V2 September 2025

Article 1: Purpose, Scope and Principles

1.1. This Conflict of Interest Policy and Procedures ("Policy") is established to protect the integrity, and to ensure transparency and credibility of the Infrastructure and Ecology Network Europe (IENE), by identifying, disclosing, managing, and, when necessary, mitigating actual, potential, or perceived conflicts of interest.

1.2. This Policy applies to all members (individuals and organisations) of IENE, and to non-member like employees, working group leads or project coordinators.

1.3. IENE expects all the above to:

- Act in the best interests of IENE and its mission.
- Disclose any actual, potential, or perceived Col in a timely manner.
- Avoid actions or statements that might compromise IENE's integrity, credibility, or reputation.
- Recuse themselves from decisions or roles where Col cannot be mitigated.

Article 2: Definitions

2.1. For the purposes of this document, the following definition shall apply:

- Conflict of Interest: Situations in which an individual's or organization's personal, professional, or financial interests impacts with, or appear to impact with the interests, values, or mission of IENE.

2.2. Conflicts may be:

- Actual – a direct conflict exists.
- Potential – a conflict could reasonably arise in the future.
- Perceived – a third party might reasonably believe there is a conflict.

2.3. Conflicts may be caused by:

- a. Financial Interest: Monetary benefits tied to members that may impact their objectivity or be perceived as such, and therefore may affect IENE's credibility.
- b. Personal Interest: Non-financial benefits, such as relationships or reputational concerns, that could affect IENE's reputation.
- c. Related Parties: Individuals or organizations closely associated with members, or employees that may affect IENE's reputation or credibility.

Article 3: Disclosure Requirements

3.1. Depending on their roles within IENE, the following are required to disclose any potential conflicts of interest via:

- a. Annual Declaration - All individual members in formal roles (e.g., Governance Board members, Scientific and Expert Committee members, working group leads, project coordinators), staff of the Executive Secretariat, Col reviewer and employees with decision-making roles must complete a Conflict of Interest Declaration Form immediately upon being assigned with a role or position described above, and to update it as soon as a new potential or actual conflict arises, not later than 30 days;
- b. Situational Disclosure - Any individual members and representatives of organizational members must disclose a potential or actual conflict as soon as it arises, but not later than 30 days, by submitting a Conflict of Interest Situational Disclosure Form.

Article 4: Identification of Conflict-Prone Situations

4.1. Col examples include (but are not limited to):

- a. Using IENE membership or leadership/formal roles to promote personal, organisational, or commercial/financial interests conflicting with IENE's general interests/values;
- b. Favouring one's own organisation in project proposals, calls for funding, or selection of partners under IENE initiatives;

- c. Representing IENE publicly while simultaneously promoting competing interests.
- d. Participating in IENE decision-making while having a vested interest in the outcome.

Article 5: Preventive Procedure

5.1. To proactively address potential conflicts of interest, the following measures shall be implemented:

- a. Development and maintenance of a comprehensive written Conflict of Interest policy and procedures;
- b. Create a section on IENE's website dedicated to inform / educate members and employees about conflict-related issues, including a IENE Code of Conduct / Conflict of Interest Summary;
- c. Implementation of Annual Declarations and Situational Disclosures and of a Central Register of Interests;
- d. Implement an anonymously reporting option for susceptible Col situations on IENE's website;
- e. Designate and instruct a Conflict of Interest Reviewer ("Col Reviewer");
- f. Develop, update and implement the transparency & disclaimer measures for identified internal, external and mixed conflict-prone situations;
- g. Establishment of guidelines for impartial decision-making.

Article 6: Management and Resolution Procedure

6.1. Until resolution, the individual self-disclosing the conflict or those notified by COI Reviewer as being reported must refrain from related activities.

6.2. Upon disclosure of a Conflict of Interest or upon receiving a report, the designated Conflict of Interest Reviewer ("Col Reviewer") will review the Annual Declarations and Situational Disclosures and/or the reported situation to assess severity and necessary action. The Col Reviewer's disclosure of reports will be reviewed by the GB.

6.3. Within 10 days, action/s shall be proposed by the Col Reviewer for Governance Board (GB) to adopt a resolution within 21 days of disclosure/report, subject to extensions under certain circumstances i.e. verification of reported situations.

6.4. Possible resolutions:

- a. No action needed, if the assessment shows no Col exists;
- b. Permission to continue the activity with modifications, such as
 - b1. Disclosure / Full transparency to the wider membership or project team, or
 - b2. Modification or reassignment of responsibilities;
- c. Directive to abstain from the activity, or
- d. Temporary or permanent removal from a formal role, eliminating the Col.

6.5. Upon adoption by GB, the resolution shall be communicated via e-mail to the concerned individual or organisation, with a 10 days deadline notification for confirming adherence to the resolution or to challenge it by submitting explanations.

6.6. In the case the concerned individual or organisation will confirm the adherence or will not respond within the 10 days period, the resolution will be considered final.

6.7. In the case the concerned individual or organisation will challenge the resolution and will submit explanations supporting its position, the Col Reviewer will assess them within 10 days and will resubmit proposed action for a GB resolution adoption.

6.8. The GB will adopt a final resolution within 21 days, and may request further clarifications to the Col Reviewer and the concerned individual or organisation during this period.

Article 7: Breach of Policy

7.1. Failure to disclose a Conflict of Interest, to refrain from related activities until resolution, and not implementing a final resolution constitutes a policy breach.

7.2. Breaches of this Policy may lead to:

- a. Formal warnings;
- b. Suspension from IENE activities;
- c. Revocation of leadership, representational or decision-making roles;
- d. In extreme cases, termination of membership or contracts (following due processes).

Article 8: Recording and Reporting Procedure

8.1. All resolutions shall be documented in the Central Register of Interests, maintained by the IENE Executive Secretariat.

8.2. An annual report on Conflicts of Interest shall be presented during the General Assembly Meeting, complying with the GDPR requirements.

Article 9: Policy Review and Updates

9.1. This Policy shall undergo periodic reviews to ensure its continued relevance and alignment with organizational priorities.

Article 10: Transparency and Implementation

10.1. IENE shall foster transparency by encouraging members to report suspected conflicts and seek clarifications.

10.2. The implementation and oversight of the Policy shall be the responsibility of designated committees, including:

- a. The CoI Reviewer, who shall evaluate disclosures and reports, and shall recommend actions;
- b. The Governance Board, which shall evaluate the recommend actions, adopt and ensure adherence to the resolutions.

Article 11: Governance and Oversight

11.1. The IENE GB is responsible for:

- a. Ensuring awareness, implementation, reviewing of this policy and for updating it every 3 years or as needed;
- b. Ensuring all disclosures will be treated with confidentiality, fairness, and due process;
- c. Ensuring potential reports or accusations of Col must be based on demonstrable facts and not used to harass or discredit members;
- d. Ensuring that members susceptible of Col will have the right to respond before final resolutions are taken.

Article 12: Related documents

12.1. The annexed documents are integral part of the Policy.

12.2. The related documents will be regularly reviewed and, whenever the case, will be updated by the GB.

12.3. A Log of Related documents / Annexes to the Policy will be kept by the Col Reviewer, mentioning the date and the changes made, if the case.

12.4. Log of Related documents / Annexes to the Policy will be made available on IENE's website.

Article 13: Effective Date

13.1. This Policy shall become effective immediately upon its adoption by the General Assembly of IENE.

ANNEXES

1. Col Annual Declaration Form
2. Col Situational Disclosure Form