



Conflict of Interest Policy

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1. Background

Donau Soja¹ is committed to advocating for a sustainable, safe and European protein supply. Donau Soja supports its partners and members in progressing change to address social, environmental, and economic challenges in soya production and consumption. As a multi-stakeholder initiative, it is essential for Donau Soja to pursue a common goal and define rules for dealing with potential or perceived conflicts of interest.

Scope of validity

This policy applies to persons with the following roles within the Donau Soja:

- Donau Soja staff;
- Persons who are active in the decision-making bodies of the Donau Soja Association;
- Persons who are in a permanent contractual relationship with Donau Soja.

Persons shall not engage in any activities that conflict with the interests and objectives of Donau Soja or are detrimental to Donau Soja. Their behaviour should avoid conflicts of interest in any form and thus enable them to fulfil their duty of loyalty and due diligence.

Conflict of interest

Conflicts of interest are defined as circumstances, which create a risk that professional judgement or actions relating to a primary interest of Donau Soja may be improperly influenced by a secondary interest (e.g. personal gain, disclosure of information to the detriment of Donau Soja).

In addition, circumstances may arise in which the appearance of a conflict of interest exists, even if no conflict of interest is present.

The obligation to consider and disclose a possible conflict applies to both an apparent and an actual conflict of interest.

2. Requirements

Donau Soja staff, as well as persons, who are active in the decision-making bodies of the Donau Soja Association, or in a permanent contractual relationship with Donau Soja undertake to

- independently provide proactive and comprehensive information to Donau Soja about potential or actual conflicts of interest;
- seek advice with regard to ambiguities concerning potential or actual conflicts of interest and, if necessary, to seek consultation with Donau Soja;
- provide clear information as to whether an activity is carried out on behalf of their own organisation, Donau Soja or privately;
- ensure that the interests of Donau Soja are properly safeguarded;

¹ In the following, the term Donau Soja refers to the Donau Soja Association and any of its non-profit limited liability daughter companies.

- act in accordance with the objectives of Donau Soja and not to engage in activities that could be harmful to Donau Soja;
- act confidentially and loyally.

In any case, national and EU legal provisions must be complied with. In addition, depending on the role within the Donau Soja, the respective agreements made with Donau Soja apply, in accordance with the statutes of the Donau Soja Association, the respective valid Donau Soja staff guidelines and corresponding bilateral contracts.

3. What should be done in the event of a potential or actual conflict of interest?

The following sections outlines the three steps of managing conflict of interests, including the 1) concrete identification, 2) resolution and 3) documentation of the conflict of interest.

Step 1: Concrete identification

In the event of a conflict or as a preventive measure to clarify any uncertainty, an authorised representative of Donau Soja shall be contacted.

Donau Soja staff:

In the event of a potential or actual conflict of interest, initially the relevant line manager and subsequently the Director *People & Organisation (P&O)* shall be contacted to ensure correct handling.

Contact: Director of People & Organisation

Persons active in the decision-making bodies of the Donau Soja Association:

In the event of a potential or actual conflict of interest, the committee chairperson (association chairman) shall be contacted in order to ensure correct processing.

Contact: President of Donau Soja Organisation

Persons who are in a permanent contractual relationship with Donau Soja:

In the event of a potential or actual conflict of interest, the relevant Donau Soja representative, with whom the contract has been signed shall be contacted in order to ensure correct processing. The Executive Director Association needs to be informed.

Step 2: Resolution

If a potential conflict of interest has been identified, the conflict shall be dealt with proactively without delay.

The appropriate measures for resolving the conflict of interest (e.g. exclusion from decisions, processes, positions, the organisation) shall be taken in accordance with the respective role within Donau Soja and taking into account the applicable agreements made with Donau Soja (see "requirements").

The respective contact persons shall provide support in the handling and decision-making process for any solutions.

Step 3: Documentation

The relevant contact person or an authorised person shall ensure that the documentation in the internal filing system is complete.

Information to be documented:

- The conflict of interest that has arisen (completed document "*Identification of a conflict of interest and measures taken*", see Annex 1)
- Any relevant email communication and/or file notes on telephone calls and/or personal conversations (date, persons, content of the telephone call/conversation, any agreements)
- Documentation on the conclusion and resolution of the conflict (also within the document "*Identification of a conflict of interest and measures taken*", see Annex 1)

Annex 1: Template "Identification of a conflict of interest and measures taken"

Identification of a conflict of interest and measures taken	
The conflict was identified by (name, date):	
The conflict concerns (person/role and function):	
Description:	
Who was informed internally and in what order?	
Further steps that have been taken: (with date, email/telephone/..., short description)	
How was the conflict of interest resolved?	
Consequences: yes/no - if yes, which?	