

Policy on Conflicts of Interest and Commercial Conduct

Owner: Executive Committee

Approver: Executive Committee

Effective date: 14 May 2026 Next review: 13 May 2027

Version: 1.2

1. Purpose

The Jersey Chamber of Commerce ("Chamber") is founded on its reputation and trust of independence from the Government. The same is true of the trust held by Government of our independence from our commercial interests and overall, by our high standing within the commerce sectors and in public arenas for representing the interests of the business community and the island.

This policy exists to protect Chamber's integrity, independence and trust by:

- Preventing real or perceived conflicts of interest
- Ensuring individuals do not use their Chamber role for commercial advantage
- Reinforcing ethical, transparent decision-making

2. Scope

This policy applies to all individuals acting in an official Chamber capacity, including:

- President and Vice President
- Committee Chairs and Vice Chairs
- Executive Council members
- Members of the Executive - CEO & Officers
- Co-opted advisers acting on behalf of Chamber
- Any individual representing Chamber at meetings, events, or in communications

3. Conflicts of Interest Defined

A conflict of interest exists when personal or business interests could:

- Interfere, influence or appear to influence a person's ability to act objectively in Chamber's best interest
- Result in personal, financial or commercial gain from a Chamber activity, event, opportunity, or decision. Conflicts may be **actual, potential, or perceived**.

4. Prohibited Conduct

Individuals covered by this policy must not:

- Use their Chamber position to raise, promote, or solicit business opportunities for themselves, their clients, or associates
- Introduce their commercial services or business interests into Chamber discussions unless directly relevant and transparently declared in advance
- Use privileged Chamber information, access, or events for private or competitive gain
- Directly or indirectly influence decisions or policy that may benefit their own business
- Engage in commercial discussions unless:
 - The activity is transparently disclosed in advance
 - The potential opportunity is shared equitably across all relevant members or businesses
 - Other relevant businesses are invited or given the opportunity to contribute or respond
 - The Executive Council agrees it does not compromise impartiality

5. Business Interests in Meetings

Individuals must not use Chamber meetings to promote or discuss their own business interests.

However, if a matter of genuine commercial relevance arises:

- The individual must declare any relevant interest in advance to the meeting chair
- The declaration must be recorded in the meeting minutes
- The individual must withdraw from the discussion and any vote (where voting occurs)
- The meeting chair may require withdrawal if impartiality is in doubt
- Where relevant, other businesses with similar interests must be offered equal opportunity to contribute
- The discussion must be conducted with transparency and neutrality

6. Media and Communications

Where individuals represent Chamber publicly:

- They must use their Chamber title only when speaking on Chamber matters
- They must not reference their commercial role unless the interview relates specifically to their business
- Any comment on Chamber policy must align with the approved Executive Council position

Press interviews should follow the format:

First Name Surname, Chair of [Committee], Jersey Chamber of Commerce

7. Disclosure of Conflicts

Individuals covered by this policy must:

- Promptly declare any actual, potential, or perceived conflicts of interest to the Chamber CEO and/or the President, and to the Executive Council as appropriate
- Declare interest at the start of any formal meeting
- Ensure declarations are formally minuted
- Update their Register of Interests annually and as circumstances change

8. Register of Interests

- The Register of Interests is maintained by Chamber and is publicly available for transparency
- All individuals covered by this policy are required to submit and update their declarations annually (or as soon as practicable following a material change in circumstances)

9. Meeting Conduct and Withdrawal

At the start of any Chamber meetings or meetings representing Chamber:

- A standing item should request declarations of interest
- Individuals must proactively disclose if they have a conflict regarding any agenda item in the event of a conflict:
- The conflicted individual should withdraw from the discussion and any vote
- The meeting chair may instruct withdrawal if impartiality is in doubt
- The withdrawal and reason should be formally recorded in the minutes

10. Use of Chamber Branding and Resources

Individuals must not:

- Use Chamber mailing lists, events, or platforms to market, endorse, or promote their own businesses
- Sponsor or speak at Chamber events in a way that could be seen as self-serving, unless transparently agreed by the Executive Council and open to all members

11. Breaches of this Policy

Breaches of this policy may result in:

- Formal warning, censure, or disciplinary action
- Suspension or removal from position within Chamber
- Other actions permitted under Chamber constitution

12. Ethical Principles

- **Integrity** – Act in the best interest of Chamber
- **Transparency** – Declare and manage all conflicts of interest
- **Impartiality** – Refrain from advancing personal or business interests
- **Confidentiality** – Do not misuse inside information
- **Accountability** – Be prepared to step aside if impartiality is in question
- **Fairness** – If relevant commercial discussions occur, ensure equal platform and opportunity for all affected businesses

13. Gifts and Hospitality

- Members must not solicit gifts.
- Gifts or hospitality over £100 require preapproval from the CEO or President, as appropriate, and must be recorded in the Gift & Hospitality Register, held by the Chamber Executive office.
- Gifts/hospitality must not be accepted during live procurement, grant, policy decision or Government processes involving the giver.

14. Review and Distribution

This policy should be:

- Reviewed annually by the Executive Council
- Shared with all incoming officeholders and committee members as part of onboarding
- Formally acknowledged via signature or digital acceptance

15. Acknowledgement and Signature

I confirm that I have read, understood, and agree to comply with this policy.

Name: JIM HOPLET MBE
Role: SPECIAL ADVISOR
Signature: [Handwritten Signature]
Date: 15/05/26