

**IUCN National Committee UK Peatland
Programme (IUCN UK PP UK PP)
c/o Royal Society of Wildlife Trusts**

Conflict of Interest policy

This policy has been adopted by the Programme Executive Board on 5th December 2023 and reviewed January 2026.

1. Introduction

The IUCN is a democratic membership union which brings together various organisations in a combined effort to conserve nature and accelerate the transition to sustainable development. The IUCN UK Peatland Programme (**IUCN UK PP**) is a project, governed by the IUCN UK National Committee, and currently hosted by the Royal Society of Wildlife Trusts, intended to promote peatland restoration in the UK.

The Peatland Code is a voluntary standard for UK peatland restoration projects wishing to market the climate benefit of peatland restoration. It is produced (along with associated guidance) by the IUCN UK PP and managed by an Executive Board. It sets out a series of good practice requirements, including a standard method of greenhouse gas ("**GHG**") quantification, which when validated and verified by an independent body will give assurance to buyers that their purchase will return verifiable climate benefits over the project duration.

The Peatland Code Executive Board makes all management decisions regarding the Peatland Code on behalf of the IUCN UK PP and is responsible for strategic development of the Peatland Code in line with the objectives of the IUCN UK PP. The Executive Board are supported by a Technical Advisory Board who support any changes to the Peatland Code and provide technical oversight and recommendations to the Executive Board.

The Programme Executive board are responsible for making all the final decisions for the running of the programme and deciding on the policy and strategic direction of the programme.

2. Policy Statement:

The aim of this policy is to ensure independence and minimise bias to maintain the integrity of, ICUN UK PP which includes the Peatland Code.

The IUCN UK PP recognises the importance of ensuring that decisions relating to the Peatland Code are, and are perceived to be, objective and independent. The IUCN UK PP strives to ensure that potential conflicts of interest are identified at the earliest possible time, and actual conflicts of interest are subsequently avoided or appropriately managed.

3. Scope

This policy applies to the following people:

- (a) members of the Executive Board.
- (b) members of the Technical Advisory Board.
- (c) members of the Programme Steering Group
- (d) members of the Programme Executive Board
- (e) Employees of the IUCN UK PP (together the “**Members of staff**”).

The conflict-of-interest policy will operate to ensure that potential conflicts of interest are identified, communicated to the IUCN UK PP, and managed to avoid any adverse impact on the independence of the Peatland Code, thereby protecting the person or persons concerned, IUCN UK PP and the public interest.

4. Definitions

This policy defines a conflict of interest as a situation in which an individual’s ability to exercise judgement or act in one role is, could be, or is seen to be impaired or otherwise influenced by their involvement in another role or relationship.

Generally, conflicts might occur if individuals have,

- a direct or indirect financial interest.
- non-financial or personal interest.
- Balancing conflicting loyalties between an organization to which they have a primary obligation and another individual or entity.

It is, therefore, essential that all members of staff are fully aware of their duties and responsibilities and that when acting as a member on the Executive Board or Technical Advisory Board they must act in the best interests of the IUCN UK PP alone. This includes any access that members of staff may gain to confidential or privileged information. To guard against any conflict of interest or bias in the decision-making process, our Technical Advisory Board have a term of reference which states that any member with financial interests in the Peatland Code is not able to sit on the Technical Advisory Board: instead, we have a dedicated Market and Investment Forum where updates, events and discussions take place, including insight in the Technical Advisory Board papers and the possibility to comment on these, which is then taken into account during the Technical Advisory Board meetings.

5. Declaring conflicts of interest

A key means of preventing conflicts of interest from affecting decision-making is to identify potential conflicts in advance. This allows the IUCN UK PP to consider the implications and to respond appropriately:

- All employees shall complete a conflict-of-interest declaration form upon joining the IUCN UK PP which is kept on file.

- Line managers shall regularly check in performance development reviews (PDRs) that there has been no change to the conflict-of-interest policy.
- All members of the Technical Advisory Board shall agree to the terms of reference and declare any conflict of interest when joining the board to the Peatland Code team and annually either declare any changes or confirm no changes.
- All members of the Executive Board shall agree to the terms of reference and declare any conflict of interest when joining the board and annually either declare any changes or confirm no changes.
- All members of the IUCN UK PP Steering Group shall declare any conflict of interest and annually either declare any changes or confirm no changes.

6. Managing conflict of interests:

Many board members both for the Technical Advisory Board and Executive Board are likely to have a multiplicity of interests, personal, domestic and professional that may, on occasion, compete, or be perceived to compete, with the IUCN UK PP aims and objectives. It is therefore almost impossible to avoid conflicts altogether. However, depending on the nature of any conflict declared, the board member could be removed from the board or be removed from meetings concerning the project, organisation or subject where there is a conflict of interest.

The IUCN UK PP shall strive to manage conflicts in a consistent and transparent way:

- Members of the Technical Advisory Board should not hold any financial interest in the Peatland Code.
- A Market and Investment Forum has been created to discuss matters relating to the interpretation of the standard and any upcoming changes to make sure that there is a clear and transparent route to receive feedback from all market players. The Forum is also used to share information is to everyone at the same time.
- The IUCN UK PP Steering Group does get involved in the decision-making process of the Peatland Code.
- Validation and Verification bodies will have their own conflict of interest policies that will be checked during their United Kingdom Accreditation Service audit as part of conformity to ISO 17209.
- Should any conflicts of interest be declared by the Executive Board members responsible for overseeing this policy the decision on how to manage the conflict of interest will lie with the Programme Director.

7. Responsibilities:

Members of staff are responsible for

- Upholding the spirit of this policy to ensure good governance and transparency and to allow for effective decision making.
- Declaring their interests in an accurate and timely manner.

- Acting on conflicts of interest in accordance with this policy.

8. Potential risk this document mitigates against:

- A lack of objectivity when interested parties have personal interests that conflict with their professional responsibilities, their objectivity may be compromised.
- Lack of trust and transparency
- Compromised Decision-Making for the Peatland Code, a policy ensures that decisions align with the Peatland Code and the scientific evidence.