

Conflict of interest declaration Access to Seeds Foundation

Version number:	Def 1.2
Version date:	2015-03-23
Document number:	GOV-004
Owner:	Established by board decision on March 23, 2015

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1. Introduction

- a) The Access to Seeds Foundation ('the Foundation'), through the Access to Seeds Index ('the Index') manages and promotes, aims to independently, impartially and reliably measure, monitor, review and publish the performance of individual companies with respect to their 'access to seeds'-efforts as defined in multi-stakeholder dialogue.
- b) The Foundation does not directly nor indirectly recommend the purchase or sale of equity securities, nor does it hold such assets.

2. Risks associated with conflicts of interest

- a) Transparent management and criteria of the Index, as well as full transparency about and management of (potential) conflicts of interest, are crucial to the credibility of the Index and that of the Foundation;
- b) A material conflict of interest is an interest which, in view of all the circumstances, could reasonably be expected to affect the independence or impartiality of the person or party with the interest;
- c) Material conflicts of interests of individuals related to the Index or the Foundation could lead to:
 1. biases in measurements, monitoring or reviews;
 2. biases in the publication of measurements, monitoring or reviews;
 3. misuse of privileged and confidential knowledge;
 4. damage to the credibility and may compromise the integrity of the Index and the Foundation.
- d) Any person exercising direct influence on Index methodology, Index measurement or Index publication, including Board (=Supervisory and Executive) members, staff and contractors, shall have no material conflict between their respective personal, professional or business interests and the integrity of the Index or the Foundation, in any and all actions taken by them on behalf of or for the Foundation in their respective capacities.
- e) For the quality and effectiveness of the index it is essential that in developing the methodology, business experts are involved with inside knowledge of the industry. For reasons of impartiality, experts in an active responsibility within one of the measured companies are excluded. Others, for example retired officials or experts in a limited advisory role to companies, can be involved but only in roles with an indirect influence on the methodology, for instance in an advisory role to Board and staff or membership of a multi-stakeholder committee. The Board evaluates the involvement of each business expert, their role and potential conflict of interest. Their role and link to the industry are published on the website of the Access to Seeds Index.

3. Potential conflicts of interest include

- a) having a direct sizeable business interest in a company that is measured by the Index;
- b) having direct possession, purchase or sale of equity securities in a company that is measured by the Index;
- c) providing Foundation's privileged or confidential information or advice to third parties which can be used to decide on such purchase or sale;
- d) receiving financial compensation or other favors from a company that is measured by the Index to influence its performance on the Index, or from a company that has itself a conflict of interest; financial compensation includes direct and indirect remuneration as well as gifts or favors worth USD 50 or more;
- e) having a close family member (e.g. spouse, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister) with such interests;
- f) other interests that have been deemed potentially conflicting by the Board.

4. Management of potential conflicts of interest

- a) *Disclosure*: Any person exercising influence on Index methodology, Index measurement or Index publication, whether as a Board member, Committee member, advisor or staff member, and who has a potential interest as defined under item (3), shall disclose such interest, or a change in such interest, to the Board through the agreed Potential Conflict of Interest Declaration process within one month after the potential conflict arises;
- b) The Board shall publish all disclosed potential conflicts of interest at least once per year;
- c) The Board shall evaluate all disclosed potential conflicts of interest and assess whether they are 'material conflicts of interest';
- d) *Certification*: Any individual within the Foundation who has the means to directly influence Index measurements or scores shall certify that he or she does not have potential conflicts of interest as defined under item (3);
- e) *Confidentiality*: Index outcomes are confidential until their formal time of release. Any individual within the Foundation who has advance knowledge of Index outcomes shall not disclose any part of such outcomes to third parties before the formal time of release;
- f) Any outside contractor shall certify the independence, impartiality and reliability of its work; the existence of internal controls; compliance with legal requirements for having adopted a code of ethics or conflict of interest policy; and honor the confidentiality of Index outcomes;
- g) The Board shall review this Policy at least once per year and apply all changes necessary to maintain the impartiality and credibility of the Index and the Foundation.

5. Corrective actions

- a) Any material conflict of interest or any violation of the rules set forth in this Policy shall prompt disciplinary and/or corrective action by the Board;
- b) A charge of incompletely or inaccurately disclosed conflicts of interest shall be directed to the Chair of the Board;
- c) The Board shall take no action until it has given the person charged with the alleged conflict of interest the opportunity to fully represent him/herself;
- d) The Board may appoint a disinterested person or committee to investigate the alleged conflict of interest;
- e) The person with the alleged conflict of interest shall not take part in any vote on the nature of the interest or any related decision.

6. Related documents

Form 'potential conflict of interest declaration' (GOV-100).