

## Conflicts of Interest Policy<sup>1</sup>

### Foreword

RUSI considers that the establishment and sustainment of links between its employees and outside bodies, including government departments, academia, commerce, industry, non-governmental organisations, or others, is essential to the Institute's purpose. It is possible however, that such links may give rise to potential conflicts of interest.

For this reason, RUSI has established the following guidelines and rules to assist its employees in assessing whether proposed activities have a potential for conflicts of interest, how these should be addressed and when and to whom they should be reported.

### Application

This policy is mandatory for all of RUSI's employees, contractors and subcontractors and should be abided by even if there are contractual obligations, policies or procedures which contradict the guidelines established herein. It applies to The Royal United Services Institute for Defence and Security Studies (registered charity no.210639, Whitehall, London SW1A 2ET), and its subsidiaries and affiliated companies or organisations controlled by the Royal United Services Institute for Defence and Security Studies (collectively, "RUSI") and therefore all those employed or engaged by RUSI.

### Management of Conflicts of Interest

A conflict of interest may be defined as a situation in which one of RUSI's employees, contractors or subcontractors can find themselves having an unfair advantage or conflicting interests with those of the organisation, either because they have access to certain information or because of their personal circumstances and it may be when their professional duties and personal interests diverge. When competing interests impair our ability to make objective, unbiased business decisions we have a conflict of interest.

The following are some examples of situations which can give rise to conflicts of interest. This list is not exhaustive.

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<sup>1</sup> This policy does not form part of any employee's contract of employment, and it may be amended at any time.

- a. The use of RUSI's research or administrative facilities to pursue personal business, commercial, or consulting activities.
- b. Any attempt to restrict rights governing the timing and content of publications. This will not apply to those circumstances properly approved by RUSI to protect privacy, commercially sensitive proprietary information, and patentable inventions.
- c. A financial interest held by an individual (or by his or her immediate relative/s or household member/s) in an external enterprise engaged in activities closely related to that of RUSI's research. Examples of such interests are paid consultancies, paid service on a board of directors or advisory board, equity holdings in or royalty income from the enterprise. The existence of such an interest does not necessarily generate a conflict, but is likely to give an appearance of conflict, and should therefore be declared, as established below.
- d. A personal involvement in any company or commercial enterprise which is in a contractual relationship with RUSI, or which is in the process of negotiating the terms and conditions of a contract with RUSI. Any employee who has a personal involvement in an entity with which RUSI has an ongoing contractual relationship or is in the process of negotiating a new relationship, will have to disclose it. In addition, the employee will not be able to participate in the negotiation of any contract with the entity they have personal involvement with.

## **Executive Directorships**

It is the policy of RUSI that no member of staff shall hold any executive directorship without the express approval of the Director General.

## **Conflicts of Interest in Recruitment**

Conflicts of interest in relation to recruitment have a specific procedure which is outlined in the recruitment policy.

## **Ethical Walls**

Conflicts of interest sourced in access to information in possession of RUSI will be dealt with according to the Ethical Walls Policy.

## Expectations

Staff are expected to:

- Maintain the highest possible standard of integrity in all their business relationships, both inside and outside the organisation in which they work.
- Reject any business practice which might reasonably be deemed improper (including improper practices which might benefit RUSI).
- Never use their authority or position for personal gain.
- At all times, act with impartiality, independence and integrity.
- Avoid being, or giving the appearance of being, in a position which may result in an actual or perceived detriment to RUSI's reputation and/or interests.

## Reporting of Conflicts of Interest

It is the duty of all employees to disclose any actual or potential conflicts of interest as soon as they are identified. A disclosure should be made in writing and should be directed to the HR Director. Failure to disclose an actual conflict of interest may result in disciplinary action and legal action being taken wherever appropriate.

If you wish to undertake other work while you are employed by RUSI then you must obtain prior written consent from the Director General.

A confidential record of all declarations shall be maintained centrally by the Human Resources Team. Once a potential or actual conflict of interest has been disclosed, the individual concerned shall discuss a possible resolution with the HR Director. Ideally, the conflicted employee will abstain from participating in any way in the project or relationship generating the conflict. If not possible, the need for an **ethical wall** will be assessed. Any unresolved matter shall be referred to the Director General for advice. In cases of particular difficulty, the Director General shall refer their recommendations to the Trustees.

Team Directors and above will be asked to complete and return to HR a conflict of interest form annually. This form should be completed when the Director joins and each subsequent April. The form template can be found in the Template Forms folder in the Risk and Compliance area of SharePoint.

## Version Control

<b>Author</b>	<b>First drafted</b>	<b>Approval date and approving body</b>	<b>Latest update</b>
Andrea Plazas	04/2022	04/05/2022 SMT	04/05/2023
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