

National Rifle Association
General Council Conflicts of Interest Policy

Adopted by General Council on 11th June 2021

1. Scope

- 1.1 This Policy applies to all members of General Council, and to the NRA Secretary General or his representative when attending General Council meetings.
- 1.2 The application of this Policy is monitored and enforced by General Council.
- 1.3 The Policy will be reviewed annually by General Council and updated as required.

2. Purpose

- 2.1 Members of General Council have an obligation to act only in the best interests of the NRA and in accordance with its governing documents, and to avoid situations where there may be a potential conflict of interest.
- 2.2 Conflicts of interests may arise where an individual's personal or family interests or loyalties conflict with those of the NRA. They may also arise where decisions made, and advice and guidance given to Trustees could benefit, or be perceived by others as benefitting, the interests of a member of General Council or those people or entities connected to them, such as their family or friends or business, or could disadvantage, or be perceived as disadvantaging, a competitor or their business. Conflicts of interest may create problems including:
 - (a) inhibiting free discussion;
 - (b) affecting the trust between members of General Council;
 - (c) resulting in decisions, advice or guidance that are not in the interests of the NRA; and
 - (d) giving the impression that the NRA has acted improperly.
- 2.3 The aim of this Policy is to protect both the NRA and members of General Council from any appearance of impropriety.

3. What is a Conflict of Interest?

- 3.1 A conflict of interest is any situation in which a member of General Council's personal interests or loyalties could, or could be seen to, prevent the General Council from making a decision only in the best interests of the NRA.
- 3.2 A conflict of interest exists even wherever there is the possibility that a member of General Council's personal or wider interests could influence, or be perceived by others as influencing, the member's decision making.
- 3.3 Conflicts of interest include:
 - (a) direct financial gain or other benefit through property, goods or services;
 - (b) indirect financial gain or other indirect benefit; and
 - (c) conflicts of loyalties.
- 3.4 Gifts, preferential treatment or hospitality received from a person who, or entity which, might stand to gain from a decision that the General Council might make, could be perceived as influencing that decision.

- 3.5 Even the perception that there is a conflict of interest can be damaging. If the perception is not accurate because there is no conflict of interest, General Council should be able to respond appropriately to the situation by managing the risks to the NRA and being prepared to explain how they have made their decisions only in the best interests of the NRA.

4. Declarations of Interest

- 4.1 Members of General Council have a personal responsibility to declare conflicts of interest in order to fulfil their duty to act only in the best interests of the NRA.
- 4.2 Members of General Council must complete each year a Register of Interests, which will be retained by the Secretary General, and must update the Register through the year if there are any material changes.
- 4.3 At the start of each meeting of General Council, all members shall review their Register of Interests declaration and report any changes. All members must also declare any conflict of interest in any of the items on the meeting agenda at the start of the meeting and whenever any topic is discussed in which they could be perceived as having an interest, in accordance with section 6.
- 4.4 If a member of General Council is not sure whether a matter needs to be declared, the member should err on the side of caution and declare it.

5. Data Protection

The information provided under this Policy will be processed in accordance with data protection principles set out in the Data Protection Act 1998 and General Data Protection Regulations 2018. Data will be processed only to ensure that members of General Council act in the best interests of the NRA and discharge their duties in relation to conflicts of interest.

6. Managing Conflicts of interest in decision making

- 6.1 If a member of General Council has a perceived or real conflict of interest in relation to any matter being considered by General Council, that member should:
- (a) declare the interest or potential interest at the earliest opportunity;
 - (b) withdraw from discussions relating to the conflict, unless invited by the Meeting to remain. Before withdrawing, they may nevertheless be asked to provide any information necessary to help make a decision in the best interests of the NRA;
 - (c) withdraw from decision making on the conflicted item, unless invited by the Meeting to participate.
- 6.2 If a member of General Council is aware of an undeclared conflict of interest affecting another member, they should notify the other members or the chair.
- 6.3 Decisions to allow a person to remain in the meeting, participate in discussions and in decision-making will be made by the remaining members of General Council having regard to all the circumstances.
- 6.4 All decisions under a conflict of interest will be recorded by the Secretary General and reported in the minutes of the meeting. The report will record:
- (a) the nature and extent of the conflict;

- (b) which member or members of General Council were affected and whether they declared their interest in advance;
- (c) an outline of the discussion; and
- (d) the actions taken to manage the conflict, including whether anyone withdrew from the discussion and how the General Council took the decision in the best interests of the NRA.

6.5 Members of General Council must not use information obtained in their role as a member for their own benefit or that of another person or organisation if it has been obtained in confidence or has special value such as commercial sensitivity.