Conflict of Interest

FSC Remedy Framework

Definition

According to PRO-01-004 and PRO-01-007, Conflict of Interest (COI) is a: situation in which a party has an actual or perceived interest that gives or could have the appearance of giving, that party an incentive for personal, organizational or professional gain, such that the party's interest could conflict, or be perceived to conflict with, the conduct of an impartial and objective certification process.



Scope of Personal, Organizational or Professional Gains



- · Prioritizing familial or intimate relationship over professional obligations
- · Appointment of or gainful employment based on familial, intimate or beneficiary relationships
- · Employment history or previous involvement in an investigation
- · Entering, establishing or presence of transactional arrangement
- · Public endorsement, financial contribution or support to political campaign
- · Participation in public statements or campaigns
- · Direct payment, gift, in-kind support or services
- · Reimbursement, loan, monetary benefits or assets
- · Compensation or rewards based on decision outcomes

Commitments embedded in contractual agreements

- Declaration by external provider that they are not subject to the authority, influence or control of Remedy client.
- Reporting to FSC Global Development any changes, doubts or upcoming conflict of interests.
- Provide resolution(s) of actual conflicts or information on how conflict of interests are to be
- Provide list of names, positions of individual experts or team of experts delivering services.



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Overview of conflict-of-interest screening process

First Stage

Setting up the Provider

STEP 1: FSC reviews the eligibility and aualifications of the Provider & their staff.

STEP 2: Provider & staff complete and submit FSC Conflict of Interest forms to FSC Remedy Team.

STEP 3: Remedy Team reviews forms, noting possible COI related to specific Remedy Case.

STEP 4: Provider joins the pool of Independent Assessors or Third Party Verifiers.

Second Stage

Assignment of a Remedy Case

STEP 5: FSC Procurement sends Request for Proposals to Providers listed in the pool.

STEP 6: Procurement & Remedy Team review submissions and evaluate proposals based on qualifications and methodology provided.

STEP 7: Prior to assigning a Remedy Case, Provider is advised of Remedy Client & their affiliates. Second round of COI forms are required.

STEP 8: Remedy Team evaluates second COI submissions for actual or perceived conflicts of interest risks

FSC Global Development maintains the right to raise objections to additions of individual experts with perceived Conflict of Interests or suspend/resign from services until conflicts are managed.

Key takeaways

- Conflict of interest checks can be ongoing as a project develops. Information is collected and reviewed on a rolling basis throughout a Remedy Case.
- Remedy Team screens for actual and perceived conflicts.
- Stipulations are in place for providers to communicate potential and current conflict of interests and solutions for mitigating or removing the risk.

