Registration System 5.1 - February 2024

Conflict of Interest Policy

Anyone carrying out proAction registration activities is responsible to ensure that they are not in a conflict of interest, and if they are, they are responsible to find a solution and/or report it to the most appropriate person, who will then find a solution. In some cases, conflict of interest situations may be assessed at the beginning of a person's role and the solutions arranged ahead of time.

All proAction personnel who make registration decisions personnel who evaluate and assign validators, internal auditors and assessors in addition to validators, assessors and internal auditors must sign a Code of Ethics, which states that they must inform DFC and/or the PC of any potential or real conflicts of interest. Re-evaluation of any conflicts of interest must be completed annually and the conflict of interest form must be signed and submitted annually to DFC and/or the PC.

Internal audits and management reviews (e.g. review of complaints) evaluate adherence to the codes of ethics.

The following policies apply to each group of people:

<u>Validators must</u>:

- Not validate production unit in which they have direct or indirect ownership or other financial interest, stand to gain or lose financially from the outcome of the validation, are close friends (e.g. have special dinners with, travel with) or have any immediate family relationship with the ownership or management;
- Notify the PC of any potential conflict of interest or possibility of compromised impartiality;
- Notify the PC if they have coached, advised, or consulted with a production unit regarding the proAction program that they are being requested to validate. The PC will determine if appropriate time has passed to mitigate any potential conflict of interest;
- Not directly assist a production unit in addressing corrective action requests;
- Adhere to the procedures for critical control point verification and presenting opportunities for improvement;
- Carry out validations without bias; and,
- Make only recommendations and not decisions on registration.

<u>Assessors must:</u>

- Not conduct a cattle assessment in a production unit in which they have direct or indirect ownership or other financial interest, stand to gain or lose financially from the outcome of the assessment, are close friends within the community (i.e. have special dinners with or travel with), or have any immediate family relationship with the ownership or management;

- Have coached, advised, or consulted with the farm regarding animal-based measures or any matter that may potentially impact the outcome of the cattle assessments. If an assessor has been involved in consulting activities previously, the service provider should notify DFC and DFC will determine if sufficient time has passed to mitigate any potential conflict of interest;
- Only conduct assessments, and not consult with farmers on animal care issues or solutions, in order to maintain the assessor's independence from the farm;
- Notify the PC of any potential conflict of interest or possibility of compromised impartiality;
- Not directly assist a production unit in addressing corrective action requests; and,
- Carry out assessments without bias.

<u>Internal Auditors must:</u>

- Not audit activities for which they are directly responsible. The National Program Coordinator assigns internal auditors to ensure conflict of interest situations do not arise.

<u>PCs should</u>:

- Not stand to gain or lose financially as a result of evaluating, monitoring, and/or assigning validators.
- Not stand to gain or lose financially because of a registration decision and should be able to make registration decisions without bias.

Please note: some exceptions may apply. Exceptions are negotiated with the National Program Coordinator and appropriate measures are put in place to mitigate any conflict.