

CONFLICT OF INTEREST POLICY FOR SUB-CONTRACTORS

Adopted by the Board on 24 June 2025

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Purpose

This Conflict-of-Interest Policy sets out principles for minimising and managing potential conflicts of interest for Service Providers, including a Licenced Course Provider (LCP), providing services to or for Irish Association of Snowsports Instructors CLG (the “Association” or “IASI”).

The aim of the Association is to achieve effective management of conflicts of interests, without over-prescriptive regulation.

IASI relies on the input and participation of many stakeholders who interact with the Association. In trying to achieve breadth, depth and diversity, the Association may also encounter conflicting interests. Conflicts of interest and loyalty exist for every organisation. However, to ensure the integrity of the Association, undue influence or conflicts, requires acknowledgement and clarity of process.

All Service Providers including LCPs have an obligation to understand, declare and manage conflicts of interests and loyalties to protect and promote the Association’s reputation.

While the Association has endeavoured to identify the main conflicts of interest that may arise for Service Providers covered by the policy, it is impossible to foresee every eventuality. The Association relies on voluntary disclosure of potential conflicts of interest by a Service Provider. Service Providers covered by this policy, therefore, have a duty to disclose all potential conflicts of interest that arise in the course of performing their services for the Association, as well as to comply with specific requirement of the policy.

Objectives of the Policy

The Board of Directors aims to ensure that Service Providers covered by the policy are aware of their obligation to disclose conflicts of interest and conflicts of loyalty as the Association needs to be protected against conflicts of interest and conflicts of loyalty that may be detrimental to its activities.

To protect the Association and those Service Providers against impropriety or the appearance of impropriety, including reputation risk.

To earn and maintain confidence of the Snowsports community, regulatory bodies and the general public in the integrity, effectiveness and impartiality of the Association.

Scope of this specific Policy

The policy applies to Service Providers of the Association.

Definitions

- Conflict of Interest

A conflict of interest arises, may arise or can appear to arise where someone's personal, financial, business, political or family interest(s) and/or loyalty, conflicts with the interest of the Association. The Board understands that conflicts of interest can and do arise from time to time. The problem is not that conflicts arise, but more so that they are not declared and managed appropriately.

Not declaring interest could give rise to suspicion of improper motives, even where none exist. The importance of transparency of judgements and transactions is paramount. To help decide whether you have a conflict of interest, imagine you are explaining your actions and how it would appear to an external third party. The appearance of a conflict of interest has the potential to damage IASI's reputation.

- Conflict of Loyalty

A conflict of loyalty is where a Service Provider may be (or perceived to be) potentially influenced by considerations other than the best interest of IASI. This might happen when the LCP or a director or employee of the LCP has come onto the Board or is also an IASI Educator. This situation may possibly cause the Board Member to think that they should act in the interests of the LCP or the Educators. However, in all cases, regardless of how they got onto the Board of Directors, all Board Members should act in the interests solely of IASI. Conflicts of loyalty may be sufficiently serious to amount to conflicts of interest.

If in doubt, declare.

Examples of Possible Conflicts

The following are some examples of Conflicts of Interest and Conflicts of Loyalty; this is not an exhaustive list.

- A ski school encourages trainees to choose a specific pathway based on ease, cost, or pass rate, rather than suitability.

The ski school has formal relationships with multiple national instructor associations (e.g., BASI, IASI, NZSIA), and delivers certification courses on behalf of each.

- **Conflict of Interest:** The school is expected to act impartially and uphold the standards of **each** body, but may have **financial, operational, or reputational incentives** to promote one over the others.
- Service Provider Running a Competing Business while representing the association

An LCP is a Service Provider for IASI but also runs a **private training business** that competes with the association's official offerings.

- **Conflict of Interest:**
They may be tempted to steer candidates toward their own business or leverage their association role to promote their services — unfairly influencing members' choices.
- LCP encouraging an Educator to Pass Candidates

A course examiner or trainer assigned to an LCP is encouraged to have a high pass level as they feel that more people will book with their LCP if results are good.

- **Conflict of Loyalty:** The trainer may struggle to maintain the Associations standards of certification in face of this pressure as they are paid by the LCP, risking the fairness of the certification process or credibility of the association.

Policy

This policy has been developed because conflicts of interest and conflicts of loyalty commonly arise, and do not need to present a problem to the Association if they are openly and effectively managed. It is the policy of the

Association to ensure that ethical, legal, financial or other conflicts of interest or conflicts of loyalty be avoided, and that any such conflicts (where they do arise) do not conflict with obligations to IASI.

IASI will manage conflicts of interest by requiring Service Providers to:

- Avoid conflicts of interest where possible.
- Identify and record any conflicts of interest.
- Carefully manage any conflicts of interest.
- Adhere to this policy and respond to any breaches.

Where a reasonable person with knowledge of the relevant facts would question the impartiality of the Service Provider in the matter, the Service Provider should prepare a written statement describing the situation and any action taken to manage the conflict.

The LCP contract provides that the LCP may be engaged, employed or concerned in any other business, trade, profession or other activity which does not place the LCP in a conflict of interest with the Association.

In the event that a conflict of interest arises during the LCP contract, this **must be notified** to IASI immediately in writing together with the LCP's proposal of how the conflict can be mitigated or eliminated. In the event that the conflict cannot be mitigated to the satisfaction of IASI the LCP contract may be terminated with immediate effect by IASI.

Post-conflict disclosures

A conflict of interest that comes to light after the circumstance has passed, whether the conflict occurred through intent or inadvertent error, the LCP is required to bring the conflict to the attention of the Board.

Record of Reported Conflicts

A record will be maintained by the Honorary Secretary of the Board recording all information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

Confidentiality of disclosures

The Chairperson (unless conflicted), in consultation with the Honorary Secretary, shall consider any notified conflict of interest by a Service Provider and may request additional information from the Service Provider in relation to the conflict. If it is decided that there is a conflict of interest that the Chairperson is of the view may

not be capable of mitigation or elimination, the Chairperson will refer the matter to the Board for a final decision.

Any information provided will be restricted to the Board and any others directly involved in dealing with the matter, e.g. legal advisers and other advisers.

Action required for Management of Conflicts of Interest for Service Providers

- In the event that a conflict of interest arises during a contract, this must be notified to IASI immediately in writing together with the Service Provider's proposal of how the conflict can be mitigated or eliminated.
- In the event that the conflict cannot be mitigated to the satisfaction of the Association, the provisions of the termination clause in the Service Provider's contract or agreement will apply.

Compliance with this policy

If the Board has a reason to believe that a Service Provider subject to this policy has failed to comply with it, there will be an investigation into the circumstances.

If it is found that a Service Provider has failed to disclose a conflict of interest, the Board may take action against the Service Provider, e.g. termination of contract.

If a person suspects that a Service Provider has failed to disclose a conflict of interest, they must notify the Chairperson and/or Honorary Secretary of the Board as soon as is practicable.

Contacts

- For questions about this policy, contact the Chairperson of the Board at chair@iasisnowsports.ie
- To notify a conflict of interest, contact secretary@iasisnowsports.ie

Review of Policy

This Conflict-of-Interest policy will be reviewed every two years, or sooner if required.

Approving Authority

Approved by	Position	Date
Dáire O'Connell	Chairperson of the IASI Board	24.06.2025

Version Control History

Version No.	Valid from date	Updates to Previous Version
1.0	24 June 2025	New Document