

## Premier League Equality, Diversity and Inclusion Standard

### PLEDIS Panel Conflict of Interest Policy

To be read in conjunction with the PLEDIS Panel Membership Description and Terms of Reference.

This policy applies to all Panel Members and the appointed Panel Chair.

'Members' and 'Membership' includes the appointed Panel Chair.

### Overview

The Premier League Equality, Diversity and Inclusion Standard is committed to objective decision making and to ensuring that awards are made, and are seen to be made, free from personal bias and do not unfairly favour particular outcomes as a result of an individual, family, organisational or business relationship between a Panel Member and a Club or other relevant bodies.

A conflict of interest is a situation in which a Panel Member's personal and/or business interests or loyalties could prevent, or could be seen to prevent, an individual Panel Member from making an objective decision in relation to a Club's Equality, Diversity and Inclusion Standard submission.

### Policy

Members of the PLEDIS Panel have a duty to act in the best interests of the Premier League and the PLEDIS framework. In particular, they must not place themselves in a position where they have, or may have, a direct or indirect interest that conflicts with their duties as an independent Panel Member.

As a guiding principle the Panel's Conflict of Interest register, and any additional arrangements to manage conflicts – real or perceived – will be available to all participating Clubs on the PLEDIS Portal.

### Procedure for potential Conflict of Interest declarations

1. Newly appointed Panel Members are required to declare any potential conflicts of interest at the time of their appointment;
2. Current Panel Members who were appointed prior to this policy being implemented are required to make an initial declaration;
3. Appointed Panel Members are required to make an annual declaration of potential conflict thereafter;
4. In addition, outside of this initial and annual procedure, if a Panel Member believes a conflict of interest has developed or a matter may need to be declared, they should contact the Premier League for guidance as soon as possible;
5. Declarations will be entered into the PLEDIS Conflict of Interest Register which is maintained by the Secretariat. Conflicts will be recorded as ongoing, time-limited or recent;

6. Potential conflicts which may exclude a Panel Member from considering a specific Club's submission include but are not be restricted to:
  - Recent paid employment (including consultancy or a commercial contract) with a Club;
  - Ongoing or recent direct relationship with a business/organisation/charity which has a financial or organisational relationship with a Club;
  - A close family relationship or friendship with an employee of a Club;
7. Panel Members who are Season Ticket Holders of a Club engaged in the PLEDIS process must record this in the register;
8. Panel Members who receive hospitality from a Club (including their CCO) engaged in the PLEDIS process must record this in the register.

### Exclusions to Panel Membership

Guidance will be given by the Premier League on a case-by-case basis but would include:

- Permanent Premier League and EFL Club employees;
- Trustees of Club CCOs/Foundations;
- Permanent employees of the Premier League and the EFL;
- Permanent employees of the FA;
- Permanent employees of Kick It Out and the PFA;
- Members of the IFO Advisory Panel.

### Definitions

- 'Club' includes a Football Club, holding company or other related parties and its Club Community Organisation (CCO)/Foundation which is engaged in the PLEDIS process;
- 'Recent' is defined as within the last twelve months;
- 'Employee' also includes Directors, Non-Executive Board Members and CCO staff;
- 'Members' and 'membership' of the PLEDIS Panel includes the Panel Chair.

### Clubs engaged in the Standard (Season 2021-2022)

- Twenty current members of the Premier League;
- AFC Bournemouth;
- Fulham FC;
- Huddersfield Town AFC;
- Middlesbrough FC;
- Sheffield United FC;
- West Bromwich Albion FC.

### For internal use:

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