



Banc Ceannais na hÉireann
Central Bank of Ireland

Eurosystem

Policy on Managing Staff Conflicts of Interest

September 2025

Introduction

The Central Bank of Ireland (the “**Bank**”) is committed to maintaining the highest standards of ethical conduct. In order to uphold these standards all staff members must comply with the requirements of the Code of Ethics (the “**Code**”) and any related policies. This Policy on Managing Staff Conflicts of Interest (the “**Policy**”) does not amend or alter the principles contained in the Code but sets out more detailed requirements for staff members to ensure that these principles are observed. Any breach of the Code or its ancillary policies may lead to disciplinary action, up to and including dismissal.

The Code is supplemented by more detailed policies covering a number of specific areas. The Bank’s suite of ethical and conduct policies may be represented as follows:



Purpose

The purpose of this Policy is to:

- Outline the approach to managing staff conflicts of interest, including the maintenance of the divisional registers of disclosed conflicts;
- Establish a mechanism for monitoring and reporting on conflict of interest management in the Bank; and,
- Describe the roles and responsibilities in relation to managing staff conflicts of interest within the Bank.

Scope

This Policy applies to all staff, including those on leave (but excluding those on career breaks). This Policy does not apply to staff on secondment, although they will be required to comply with any ethical and conduct rules implemented by the organisation which they are seconded to.

Policy Statement

This Policy is to outline the approach to managing staff conflicts of interest and outline the specific obligations of staff, management and the Ethics Compliance Function.

What is a conflict of interest?

An actual conflict of interest arises when a staff member's personal interests, connections or activities conflict with their duties in the Bank. A perceived conflict of interest arises when a staff member's personal interests, connections or activities may be perceived by a reasonable third party to conflict with their duties in the Bank. The Bank's framework for managing conflicts of interest applies to both actual and perceived conflicts.

It is not practical to avoid all conflicts of interest. Instead, the Bank's objective is to ensure that all actual and perceived conflicts are identified promptly and mitigated by measures which are proportionate to the severity of the conflict. Every staff member should maintain an ongoing awareness of the possibility of a conflict of interest arising. Should a set of circumstances be identified which may amount to a conflict then the staff member must seek the appropriate advice from their line manager or the Ethics Compliance Function and co-operate with the implementation of any mitigation measures. No staff member should make a unilateral decision about how to manage a conflict as their perception of the situation will inevitably be subjective.

Common situations that give rise to conflicts of interest

It is not possible to prescribe in advance a definitive list of situations which may give rise to conflict of interest concerns. Each and every situation must be considered on its own merits and the appropriate steps taken if a conflict of interest is considered to exist. However, in the context of the Bank's mandate, certain conflict of interest situations are more likely to arise than others. Further detail is provided below on some common causes of conflicts of interest:

- a) **Personal Connections.** The personal connections (family, friends etc.) maintained by staff members must not influence or be perceived to influence them in carrying out their role in the Bank;
- b) **Past Employment Positions.** Roles that staff members held prior to joining the Bank may create or be perceived to create a conflict of interest. As a general rule, the longer a staff member is with the Bank the less significant are the conflict of interest challenges presented by past employment positions. Accordingly each situation must be considered on its own merits. As a general rule conflicts of interest created by past employment positions should be retained on the conflict of interest register for a period of one year after joining the Bank. At the end of the one year period the conflict should expire and be

removed from the register unless there are special circumstances which warrant its extension;

- c) **Financial Interests.** A staff member's personal financial interests must not influence or be perceived to influence them in carrying out their role in the Bank. If a staff member's financial assets or liabilities create an actual or perceived conflict of interest then they must disclose it in accordance with the requirements of this Policy. All staff members should also be mindful of any separate obligations under the Policy on Staff Trading and Financial Assets.

The above list is provided to assist staff in managing the most common causes of conflicts of interest. It is not an exhaustive list. Conflicts may arise which do not fall into any of the categories set out above or which cover more than one category.

Assessing conflicts of interest

Each set of circumstances must be considered on its own merits but there are a number of key factors that divisional management will assess when a disclosure is made by a staff member:

- a) The extent and severity of the conflict between the staff member's role in the Bank and the set of circumstances they have disclosed;
- b) The reputational risk to the Bank created by the particular conflict;
- c) The role of the staff member in the Bank (as a general rule more senior positions give rise to greater conflict of interest concerns);
- d) In the case of conflicts created by personal connections the role of the person with whom the staff member has a personal connection (again, as a general rule more senior positions give rise to greater conflict of interest concerns);
- e) In the case of conflicts created by personal connections, the closeness of the personal connection between the staff member and the individual (as a general rule the closer the connection the greater the conflict of interest concerns);
- f) In the case of conflicts presented by past employment positions, the nature and duration of the role previously held, the length of time since the staff member left the role and the extent of any ongoing connection (personal or financial) with the former employer;
- g) The length of time the conflict is likely to persist for, with short-term conflicts generally requiring less significant mitigation measures.

Divisional registers

Each division must maintain a local register of conflicts of interest which have been disclosed by staff members. This register should include (at a minimum) the name of the staff member, a brief description of the nature of the conflict together with the details of any mitigating measures implemented to address the conflict. This register must be kept up to date and on an annual basis

staff members should be asked to confirm by Divisional Management whether they have any conflicts to disclose and whether any conflicts they have disclosed previously are still current.

Divisional management should use the register as a tool to manage conflicts of interest within their division and to assess conflicts when assigning tasks to staff members. The Ethics Compliance Function is entitled to receive upon request a copy of any divisional register.

Conflicts of interest during the employment lifecycle

Conflicts of interest present specific challenges at different stages of a staff member's career in the Bank. Staff should be particularly mindful of these issues:

- a) **Joining the Bank:** Staff members should ensure they make a full and accurate declaration of any conflicts of interest they may have. Staff members should declare conflicts of interest presented by past employment positions, even when these positions have been listed on their application for employment;
- b) **During a staff member's career:** Staff members should be aware that the obligation to declare conflicts of interest is an ongoing one. They should be mindful of any changes to their personal circumstances which create conflicts of interest which should be declared. Staff members who transfer within the Bank should be aware of the potential for a conflict of interest to exist in their new role which was not present in their previous one. If this occurs then the conflict of interest must be declared;
- c) **Leaving the Bank:** Staff members who intend to leave the Bank to take up alternative employment should notify the Bank as early as possible of any conflict of interest issues which may arise. The Bank may assign alternative tasks to a staff member while they are serving their notice period or may seek to place the staff member on paid leave.

Sanctions

Staff members are required to comply with the obligations set out in this Policy. Breaches of this Policy will be addressed in accordance with the Bank's Disciplinary Procedure.

Policy Review

This Policy is owned by the Ethics Compliance Function and is approved by the Risk Management Committee. The Policy will be subject to review every two years. Any substantive amendments must be approved by the Risk Management Committee. Non-substantive amendments may be approved by the Director of Strategy & Governance.

Roles and Responsibilities

The specific roles and responsibilities of staff, divisional management, the People Directorate, the Ethics Compliance Function and Procurement are set out below:

Staff Members:

- a) Promptly disclose any circumstances, which may amount to a conflict of interest (whether actual or perceived):
- b) Be mindful of any changes to their personal circumstances which may create a conflict of interest: and,
- c) Abide by any mitigating measures implemented to address a conflict of interest.

Divisional Management

- a) Consider disclosures from staff members to ascertain whether a conflict of interest exists and, if so, whether any mitigating measures are necessary:
- b) Ensure a register of conflicts of interest is maintained appropriately in their division and reviewed on an annual basis:
- c) Consult the register as necessary in order to manage conflicts of interest within their division: and,
- d) Seek advice or consult with the Ethics Compliance Function where appropriate.

Ethics Compliance Function

- a) Act as owner of this Policy and any related guidance notes or procedures;
- b) Provide advice and assistance to staff members and divisional management; and,
- c) Include information on the implementation of the Policy in the annual Code of Ethics Report.

People Directorate

- a) Ensure that staff members complete a declaration on conflicts of interest when joining the Bank and when transferring to a new role within the Bank;
- b) Carry out any mandated tasks in respect of staff leaving the Bank to take up a role which presents conflict of interest concerns; and,
- c) Manage potential breaches of this Policy in accordance with the Bank's Disciplinary Procedure.

Procurement

- a) Apply the conflict of interest provisions contained in the Corporate Procurement Policy when conflicts of interest arise during a procurement process; and,
- b) Assess potential/perceived conflicts of interest declared by staff members as part of a procurement process (actual conflicts of interest will result in the automatic removal of the staff member from the procurement process).

Policy Implementation and Compliance

This Policy is owned and implemented by the Ethics Compliance Function. An annual report on ethical and conduct issues (including the requirements of this Policy) will be submitted to the Commission.

Other Policy Obligations

Staff members should be aware that the obligations contained in this Policy supplement and do not replace any specific obligations concerning conflict of interest management contained in other Bank policies, procedures or guidance documents. For example, any staff member seeking to participate in a procurement process will need to ensure that they comply with the specific conflict of interest provisions contained in the Corporate Procurement Policy.

Contacts/Compliance

The Ethics Compliance Function is available to assist staff and managers with any queries they may have concerning their obligations under the Code and ancillary policies. Queries may be emailed to compliance@centralbank.ie.

Related documentation

Further information (including copies of the Code of Ethics and the other policies referenced therein) is available on [Plaza](#).

T: +353 (0)1 224 6000
E: xxx@centralbank.ie
www.centralbank.ie



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