



CCS Conflicts of Interest Policy

CHANGE HISTORY

VERSION	STATUS	ISSUE DATE	AUTHOR	COMMENTS
0.1	Draft	24/04/2026	Alexandra Scott, CCS Secretariat	New version drafted
0.2	Draft	27/05/2026	Alexandra Scott & Abigail Hermon, CCS Secretariat	Amended following feedback from CCS Modification Panel
0.3	Draft	24/06/2026	Alexandra Scott & Abigail Hermon, CCS Secretariat	Amended following feedback from CCS Modification Panel
0.4	Draft	29/07/2026	Alexandra Scott & Abigail Hermon, CCS Secretariat	Amended following feedback from CCS Modification Panel
1.0	Final	05/08/2026	Alexandra Scott & Abigail Hermon, CCS Secretariat	Final version approved by CCS Modification Panel

DOCUMENT CONTROLS

REVIEWER	ROLE	RESPONSIBILITY	DATE
Abigail Hermon	CCS Secretariat - Strategic Account Manager	QA Review	29 July 2026
T&SCo & User members	CCS Modification Panel	Approval	5 August 2026

1. Purpose

The purpose of this policy is to promote integrity, transparency, and accountability across the CCS Modification Panel, its Workgroups, and any meeting held under the auspices of the CCS Network Code by ensuring that conflicts of interest are identified, declared, and effectively managed.

This policy complements the CCS Network Code. This Policy will be based around the principles of **self-declaration and self-recusal**.

2. Scope

This policy applies to:



- Chairs and Members of the CCS Modification Panel, and all Workgroups;
- The Secretary (currently Talan); and
- Any individual invited to participate in Workgroups or meetings where confidential information is shared.
- Third Party Participants and Designated Non-Code Parties.

3. Policy Principles

1. **Integrity and transparency** – all individuals must act in the best interests of the CCS Network Code.
2. **Disclosure and accountability** – Conflicts must be declared fully and promptly.
3. **Fair management** – Conflicts will be managed to ensure decisions are made without bias.
4. **Proportionality** – the management of Conflicts will be proportionate to the risk and significance of the Conflict.
5. **Record-keeping** – all declared Conflicts and decisions taken will be logged and auditable.

In fulfilling their role, Voting Members are expected to act in the interests as per B1.4 and B1.5. Given that Members may hold roles, appointments, or interests across multiple organisations or industry bodies, Conflicts of Interest may arise where such external affiliations could influence, or reasonably be perceived to influence, their judgement or decision-making.

4. Definitions

- **Conflict of Interest (COI) or Conflict:** A scenario in which an individual's personal, financial, professional, or other interests could, or could be perceived to, improperly influence their judgment or actions in performing their duties within the CCS Modification Panel.
- **Conflicting Appointment:** Where two or more Voting members are employed, engaged by, or represent the same organisation (B10.4).

5. Responsibilities

Role	Responsibilities
T&SCos & Users	Where proposing to appoint an individual who holds a Conflicting Appointment, the T&SCo or User must: - notify the Secretary and the Secretary must notify the Regulator - provide sufficient evidence of confidentiality and conflict management processes which are in place to prevent a COI arising - await Regulator approval in writing, before giving notice to Secretary of the appointment (B3.4, B4.4).



Regulator	Will consider Conflicting Appointments, and either approve, approve with conditions, or reject membership (B3.4 (c), B4.4 (c)).
Chairs of the Panel and Workgroups	Responsible for ensuring declarations are made and recorded in relevant meeting minutes. Chairs must uphold impartiality in all proceedings. Where a Chair has a Conflict of Interest in relation to a meeting or specific agenda item, they must immediately notify the Secretariat. The Deputy Chair will assume responsibility for managing the meeting or agenda item in question. The Panel Chairperson may determine that a Member holds a Conflicting Appointment (B10.1 (iii), B10.6) and that they should cease to be a Member. To investigate this, the Panel Chairperson may engage a suitably qualified third party (B10.7).
Members & Alternates	Prior to their first meeting, must notify the Secretary that they do not hold a Conflicting Appointment, or that the Regulator has approved their appointment (B8.2 (a)). Declare all Conflicts as soon as they are aware they may arise; refrain from informal discussion of conflicted matters outside formal meetings. Will cease to be a Member if they hold a Conflicting Appointment, until such as time as the Regulator has approved their appointment (B10.5, B10.6, B10.1).
Meeting Secretary	Responsible for maintaining minutes to reflect any declarations of Conflicts of Interest and mitigating actions taken. Must notify the Regulator if a T&SCo or User wishes to appoint a representative who holds a Conflicting Appointment (B3.4 (a), B4.4 (a)), and notify other Members and other relevant persons (B10.5).

6. Identifying Conflicts

Conflicts may arise from, but are not limited to:

- Holding financial or commercial interests in a Party or related entity that is being discussed in relation to an agenda item or accompanying meeting paper;
- Where Voting Members are involved in multiple industry bodies with potentially overlapping interests in terms of specific modifications or agenda items;
- Employment, consultancy, or advisory roles held by members that could influence decision-making;
- The receipt of gifts, hospitality, or other benefits.

6.1 Example Scenarios

Scenario 1:

A Panel Member participates in CCS Network Code governance as a representative as per Section 1.4 and 1.5. However, they are also employed by, or act as a consultant to, another organisation, or otherwise represent additional organisations or industry bodies, which may be directly affected by a Modification Proposal under discussion.



During a Panel meeting, a proposal is tabled that would introduce changes to the market arrangements which create a commercial advantage for that other organisation (e.g. reducing costs, creating a new revenue stream, or impacting competitors).

In this situation:

- While the Panel Member is appointed to represent the interests as per Section 1.4 and 1.5, their external roles or affiliations with other organisations may give rise to a Conflict of Interest.
- The Panel Member's professional or financial interests arising from those additional roles may conflict with their obligation to act impartially.
- There is a risk that their judgement could be influenced, or reasonably be perceived to be influenced, by their involvement with those other organisations.
- Even where the Member acts objectively in their capacity as a representative as per 1.4 and 1.5, the existence of such external affiliations represents a perceived conflict, which may undermine confidence in the integrity and impartiality of the Panel's decision-making.

Scenario 2:

A Panel Member has a close personal relationship (e.g. family member, partner, or close friend) with an employee or senior representative of a company that is directly impacted by a Modification Proposal under discussion.

For example, the proposal may affect a supplier their relative works for.

In this situation:

- The Panel Member may favour (or be perceived to favour) that organisation during discussions;
- Other stakeholders may question whether decisions are being made objectively and impartially; and
- Even without direct influence, this creates a perceived conflict, which can undermine trust.

7. Meeting Procedures

Stage	Procedural Step	Responsible Person(s)	Key Actions / Requirements	Record-Keeping
0. Chair Conflict Check	Confirm Chair independence before each meeting	Secretariat	• Verify the Chair has no Conflict relating to any agenda items. • If a Conflict is identified, appoint Deputy Chair to chair the meeting during discussion of the affected items on the agenda. • Record the above in the relevant meeting minutes.	Outcome noted in relevant meeting minutes.



1. Pre-meeting checks	Review agenda and papers	Members Secretariat	- Give opportunity to members to self-declare Conflicts. - If Conflict is identified by a Panel Member, agree with Member and Chair whether they will self-recuse from that particular agenda item.	Outcome noted in relevant meeting minutes.
3. Opening of meeting	Include generic Conflicts of Interest reminder slide	Secretariat Member	- Include COI reminder slide in meeting packs - If a Conflict is confirmed, agree management action (such as self-recusal, if required).	All declarations and actions recorded in meeting minutes.
4. During discussion	Manage Conflicts identified mid-meeting	Chair & Member concerned	- Member self-declares Conflict upon becoming aware. - Chair must pause the discussion, record the declaration, and Panel will determine mitigating actions.	Minute entry describing declaration and Panel's decision.
5. Post-Meeting Record	Release up-to-date meeting minutes and determinations	Secretariat	Ensure records align with Conflicts of Interest Policy.	Any incident is retained with official minutes.

8. Alternates

In the instance that a Panel Member self-recuses because they believe they have a Conflict-of-interest, their Alternates should be given adequate notice for them to be able to take their place (and Vote) at the meeting. This will ensure that the meeting will still be quorate.

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9. Management Actions

Depending on the nature of the Conflict, actions may include:

- Self-declaring a Conflict to ensure awareness during relevant discussions;
- Individuals self-recusing from an item, or being asked to absent themselves from relevant meetings or agenda items if the Panel deem this suitable;



- Transfer of responsibility for certain decisions from a conflicted individual to an Alternate who is not conflicted;
- Where a Chair is conflicted, they should leave the meeting for the duration of the relevant agenda items, and the Deputy Chair who is not conflicted, will preside. It may be appropriate for the Chair to not receive restricted materials, for items where they hold a conflict.

10. Awareness

- All new Panel representatives and Chairpersons will be made aware of this Conflicts of Interest Policy when they become part of the CCS Code.
- The Policy will be published on the CCS Network Code website.

11. Review and Updates

This policy will be:

- Reviewed annually by the Secretariat and approved by the Panel;
- Updated as required to reflect changes in law, Ofgem guidance, or the UK Corporate Governance Code.

Updates to this policy will be communicated to all Chairs, members, alternates and Secretariat staff promptly.



Annex A - Conflicts of Interest reminder statement

For inclusion in the covering email when papers are circulated:

Paragraph note: Conflicts of Interest Reminder

Before opening or reviewing the attached meeting papers, please consider whether you have any actual, potential, or perceived conflicts of interest relating to the agenda items.

If you are unclear whether an interest you have presents a conflict of interest, please consult the Panel Conflicts of Interest Policy.

If you identify a conflict, including one that arises after receiving these papers, please notify the Secretariat.

By opening these papers, you confirm that you have read this reminder and have declared any relevant conflicts in accordance with the Panel Conflicts of Interest Policy.

For inclusion on the front page of the meeting presentation:

Conflicts of Interest Declaration

1. Members are reminded of their obligation to act with integrity and transparency during this meeting.
2. Please declare any Conflicts of Interest before discussion begins or as soon as they arise.
3. Conflicted members may self-declare or self-recuse at any time.
4. If you have any questions in relation to Conflicts of Interest, please consult the Secretariat.



Annex B – Additional guidance for Chairs

A Chair must exercise particular care when any personal or professional interest they have (including any professional role they hold or commercial services they provide) overlap with the CCS's remit.

Even if consultancy work is not directly related to a current CCS decision, the perception of influence could be sufficient to require self-declaration and self-recusal.

Where an ongoing consultancy or commercial relationship creates repeated conflicts, the CCS Modification Panel may review the individual's continued suitability for the role.

Conflicts of Interest may arise in many ways. The following examples illustrate situations that are likely to give rise to Conflicts, particularly where they involve Chairs or Deputy Chairs:

Category	Example	Nature of Conflict
Commercial / Professional	A Chair provides consulting, advisory, or commercial services to organisations who may seek to benefit commercially from the CCS Network Code	The individual's commercial interests may be seen to influence their decision-making, agenda-setting, or access to non-public information
Commercial / Professional	A Chair who is also a consultant or director in a company that could gain a commercial advantage through CCS change proposals, tenders, or contracts	The financial interest and insider knowledge gained from their CCS work might improperly influence the exercise of their duties
Procurement / Tender Influence	Chair involved in any procurement or evaluation process while having past or current commercial relationships with bidding entities	Undue influence or privileged access to confidential material
Information Advantage	Chair using information obtained through CCS governance activities to advance their private business, consultancy, or another client's position	Misuse of privileged information
Personal / Relational	Chair has a close personal or familial relationship with an employee, director, or consultant of a CCS Party, or Supplier	Perceived bias or undue influence
Regulatory / Advisory Overlap	Chair sits on an Ofgem, DESNZ, or industry advisory group considering policies that could materially impact CCS operations	Perceived inability to act independently on CCS matters