



CONFLICT OF INTEREST POLICY

The purpose of this policy is to protect the interests of Comercial Escolà S.L. as an approved program provider (hereinafter also referred to as the APP) of WSET, Comercial Escolà S.L. is required to identify, monitor and manage actual, potential and perceived conflicts of interest ('Conflicts of Interest'). This is essential to safeguard the integrity of WSET qualifications and promote confidence in WSET processes.

In the regular course of business, Comercial Escolà S.L. team, sponsors and/or partners may have the opportunity to advance their own personal interests with or against the interests of Comercial Escolà S.L. Acting in such a manner is unacceptable and any party who acts outside of Comercial Escolà S.L.'s best interest may be subject to disciplinary action.

This policy applies to all the APP staff and to any individual acting on behalf of the APP in any action involving WSET processes.

DEFINITION OF CONFLICT OF INTEREST

A Conflict of Interest exists where an individual has interests or loyalties that could adversely influence their judgement, objectivity or loyalty to Comercial Escolà S.L. when conducting activities associated its educational programs.

In case of Conflict of Interest, please contact the APP Main Contact. The APP team is at disposal to resolve the conflict in the most convenient way for all parts involved.

DEFINITIONS

- a) **Employee** – any person who is namely part of Comercial Escolà S.L. team in a part or full-time capacity and in accordance with the labour laws of Spain.
- b) **Student/Sponsor/Partner** – an owner, director, stakeholder, contractor or other third-party that is in the position to act on behalf of Comercial Escolà S.L.



SPIRIT ESSENCE

- c) **WSET processes:** any activity related to educational programs delivered by the APP on behalf of WSET
- d) **Financial Interest** – The interest that any individual may have in the monetary transactions of Comercial Escolà S.L. In particular, any interest that could have a direct bearing on the financial gain/loss of said individual.

EXAMPLES OF CONFLICTS OF INTEREST

IN THE SPECIFIC CONTEXT OF THE COMERCIAL ESCOLÀ S.L. WSET APP, MAY INCLUDE:

- The undertaking of any assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned;
- The undertaking of any moderation of assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned;
- The tutoring of candidates by an individual involved in the assessment process;
- The undertaking of a WSET qualification by any individual employed by an APP;
- The invigilation of a WSET assessment by any individual involved in the delivery of training leading to the assessment;
- The coaching of candidates by any individual involved in the assessment of candidate scripts or the authoring of exam questions;
- The employment by an APP of individuals engaged in the delivery of taught programmes or in the role of Internal Assessor in another APP;
- The investigation of a non-compliance incident by someone who is unable to act impartially.

Some of these Conflicts of Interest can be managed and are therefore acceptable. For example, where an employee of one of its APPs undertakes a WSET qualification, measures can be put in place to maintain the integrity of the assessment, provided this has been notified to WSET in advance.



Some Conflicts of Interest cannot be managed and are not acceptable. For example, it would be inappropriate for an individual involved in the authoring of exam questions or the compilation of exam papers to teach or coach students.

IDENTIFICATION OF CONFLICTS OF INTEREST

DUTY TO DISCLOSE

Any employee/student/sponsor/partner of Comercial Escolà S.L. is obligated to disclose any known or potential conflicts of interest as soon as they arise. Failure to do so could result in termination of employment/contractual relationship/disqualification. Most precisely, in initiatives related to the delivery of WSET qualifications, any APP staff who becomes aware of a Conflict of Interest must inform the APP Main Contact in writing immediately.

When a possible conflict of interest arises, the Comercial Escolà S.L. organisation team will collect all pertinent information and may question any concerned parties. If the organisation team determines that a conflict exists, Conflict of Interest declarations will be recorded by Comercial Escolà S.L. on the Conflicts of Interest Register.

When an actual conflict of interest is found, any transactions and or processes that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business, including students, directors, employees, sponsors, partners and contractors will be notified. An investigation will also be conducted by the Comercial Escolà S.L. organisation team to determine the extent of the conflict and the intentions of the parties involved.

If the conflict in question involves a member or members of the board of directors, such a member will be excused from the deliberations.

Where a Conflict of Interest is identified by WSET rather than the APP staff, the HQA will take steps to mitigate the effect of the Conflict of Interest and may apply



sanctions to an APP in accordance with the Malpractice and Maladministration Policy.

If no conflict exists, the inquiry may be documented but no further action will be taken.

MANAGEMENT OF CONFLICTS OF INTEREST

Comercial Escolà S.L. has procedures in place to manage specific Conflicts of Interest. These include the exclusive involvement of the APP staff in the creation of all assessment materials, moderation of all internal assessments conducted by APPs and moderation of all written exams not marked by optical mark readers. Other Conflicts of Interest will be managed on a case-by-case basis. Thus, a review may result in disciplinary action. The Comercial Escolà S.L. organisation team has full discretion to deem what disciplinary action is both fitting and necessary, including suspension and/or termination of employment/contractual relationship/disqualification.

The HQA has responsibility for the management of Conflicts of Interest relating to the work of WSET. The members of the WSET Senior Management Group have responsibility for the management of conflicts of interest relating to functions of the Wine and Spirit Education Trust's functions as a whole.

The HQA will consult with the CAPO to agree how to mitigate any Conflict of Interest. The CAPO will decide when and how Conflicts of Interest and the steps taken to mitigate them should be escalated within the Wine & Spirit Education Trust, to the Board of Trustees or to the Regulator.

ACKNOWLEDGEMENT

The APP employees understand the procedure for conflicts of interest with Comercial Escolà S.L., including their duty to disclose any known or potential conflicts.

Furthermore, the employees agree to abide by the procedures outlined in this policy for the duration of their professional relationship with Comercial Escolà S.L.