CREST. Representing the technical information security industry

Conflict of Interest & Impartiality Policy

v9.0 [Issued | 29.07.2026]

Contents

1. CONFLICT OF INTEREST POLICY 3

1.1. Policy Definitions 3

1.2. Introduction 3

1.3. Examples of Conflicts of Interest 3

1.4. Responsibilities 4

1.5. Behaviour 4

1.6. The Process 4

2. IMPARTIALITY POLICY 6

2.1. INDIVIDUAL CERTIFICATION 6

2.2. CORPORATE MEMBERSHIP ACCREDITATION 9

Amendment List 12

1. CONFLICT OF INTEREST POLICY

A conflict of interest is typically defined as "a set of circumstances that creates a risk that professional judgement or actions regarding a primary interest will be unduly influenced by a secondary interest".

1.1. Policy Definitions

"**Council**" means a body elected by the member companies' nominated representatives.

"**CREST Assessor**" means an individual engaged by CREST from a CREST Member Company to deliver and manage CREST certifications (and "CREST Assessor Panel" shall be construed as being comprised accordingly).

"**CREST**" means CREST (International), with Company Registration number 09805375, and any or all of his global Chapters.

"**Employee**" means a person directly employed by CREST, or appointed or contracted by CREST to act on their behalf.

1.2. Introduction

A conflict may arise whenever an outside interest might influence, or be perceived to be capable of influencing, a person's judgement.

Some outside interests will create a clear conflict. Others will not do so but may nonetheless prompt the need to take some action on a prudential basis.

Potential conflicts may be identified at the outset of an activity, arbitration or investigation; others may only become apparent as the work develops, and circumstances change (eg. because of the involvement of a new party, or a change in personal circumstances). If any doubts arise as to the propriety of an outside interest, or as to the compatibility of a relationship, CREST should be informed of all relevant facts.

All Employees, Assessors and Directors of CREST will strive to avoid any conflict of interest between the interests of CREST on the one hand and personal, professional and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The objective of this Policy is to

(i) protect the integrity of CREST's services and decision-making process;
(ii) to enable stakeholders to have confidence in the organisation's integrity; and
(iii) to protect the integrity and reputation of CREST and its employees by means of effective measures.

CREST is committed to protecting itself from the harm that is caused by such situations.

This policy is meant to supplement good judgment, and Employees, Assessors and Directors should respect its spirit as well as its letter.

1.3. Examples of Conflicts of Interest

Examples of conflicts of interest include, but are not limited to:

(i) An Employee who is related to an employee and there is a decision to be taken on staff pay and/or conditions;
(ii) An Employee who is also on the board of another organisation that is competing for the same contract;
(iii) An Employee or Assessor who has shares in a business that may be awarded a contract to do work or provide services for CREST or is a director, partner or employee or related to someone who is.

Note that a relative may be a child, parent, grandchild, grandparent, brother, sister, spouse or civil partner of the Employee or any person living with the Employee or Assessor as his or her partner.

1.4. Responsibilities

All persons employed, directly or indirectly, by CREST owe a duty of fidelity to CREST and must never place themselves in a position where their self-interest may conflict with this duty.

Any Employee who breaches this policy is subject to disciplinary action, up to and including dismissal.

1.5. Behaviour

All Employees of CREST and Assessors are expected to comply with the following:

1.5.1 Duty of Fidelity

Employees owe a duty of loyalty and fidelity to CREST. Employees are expected to perform their duties on behalf of CREST faithfully, diligently and to the best of their abilities.

1.5.2 Conflict of Interest

Employees or Assessors must never allow themselves to be placed in a position where their personal interests are in conflict (or could be in conflict) with the interests or business of CREST. They must avoid any situation or activity that compromises, or may compromise, their judgement or ability to act in the best interest of CREST.

1.5.3 Harm to Business or Reputation

Employees and Assessors must refrain from engaging in conduct that could adversely affect CREST's business or reputation. Such conduct includes, but is not limited to:

(i) publicly criticising CREST, its management or its employees; or
(ii) engaging in criminal conduct or other behaviour that could harm CREST's business or reputation.

1.5.4 Outside Employment or Business Activity

During working hours, Employees are expected to devote their full time and attention to the business and the affairs of CREST.

If an Employee wishes to engage in employment or business activity outside his/her employment with CREST, the employee must first disclose to CREST the nature and extent of the proposed employment or business activity, and obtain CREST's written approval. Approval will only be withheld if CREST reasonably determines that the employee's proposed outside employment or business activity could conflict or compete with the interests of CREST, or could negatively affect the employee's job performance or attendance.

1.6. The Process

1.6.1 Disclosure of Potential Conflicts

Upon appointment Employees and Assessors make a full and written disclosure of interests, such as relationships, posts held, ownerships or business interests (other than non-controlling investments in publicly-traded corporations), whether direct or indirect, that the Employee or Assessors or a member of their immediate family has with any person, or in any business or enterprise and that could potentially result in a conflict of interest.

These written disclosures will be retained by the CREST's Head of Governance & Legal who will ensure their maintenance on an ongoing basis. The Register of Interests for CREST's Council Members will be updated quarterly at each meeting of a Council. Disclosures from the CREST Assessors will be updated at the regular meetings of the CREST Assessors' Panel. Further detailed procedures for Assessors is included in the CREST Certification Procedure.

In addition, during the course of meetings or activities, Employees and Assessors will disclose any interests in a transaction or decision where there may be a conflict between CREST's best interests and the Employee's best interests or a conflict between the best interests of two organisations that the Employee is involved with. If in doubt the potential conflict must be declared anyway and clarification sought.

1.6.2 Protective Steps

Upon disclosure of the information described at 1.6.1 above, CREST will take appropriate steps to protect against any actual or potential conflict of interest. Such steps may include:

(i) requiring the Employee or Assessor to refrain from being involved in any decisions made by CREST regarding its dealings with such person, business or enterprise; or
(ii) requiring the Employee to refrain from being involved in any dealings on behalf of CREST with such person, business or enterprise; or
(iii) requiring the Employee to dispose of their interest in such business or enterprise if they wish to remain in CREST's employ.

In the case of a conflict of interests arising for an Employee or Assessor because of a duty of loyalty owed to another organisation or person and the conflict is not authorised by virtue of any other provision, for example in Articles of Association, the unconflicted Employees may authorise such a conflict of interests where the following conditions apply:

(i) the Employee or Assessor who has declared the conflict of interest withdraws from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person;
(ii) the Employee or Assessor who has declared the conflict of interest withdraws from the activity affecting that other organisation or person;
(iii) the Employee or Assessor who has the conflict of interest does not vote on any such matter and is not to be counted when considering whether a quorum of Directors is present at the meeting;
(iv) the other Employees who have no conflict of interest in this matter consider it is in the interests of CREST to authorise the conflict of interest in the circumstances applying.

Any such disclosure and the subsequent actions taken will be noted in any meeting Minutes as appropriate.

2. IMPARTIALITY POLICY

Impartiality is typically defined as “not favouring one side over another”.

2.1. INDIVIDUAL CERTIFICATION

This policy should be read in conjunction with the CREST Conflict of Interest policy.

2.1.1 Policy Definitions

“**Certificant**”, in the context of individual certification, means candidates sitting a CREST examination

“**CREST**” with Company Registration number 09805375, and any or all of his global Chapters.

“**CREST Assessor**” means an individual engaged by CREST from a CREST Member Company to deliver and manage CREST certifications (and “CREST Assessor Panel” shall be construed as being comprised accordingly)

“**Member Company**” means a company who has passed the relevant CREST requirements, agreed to the CREST Code of Conduct and has paid any fees associated with membership.

“Senior Leadership Team” means the permanent employees of CREST that set the strategic direction, organisational priorities and major business decisions for CREST, and provide strategic oversight of organisational performance.

“**Senior Management Team**” for the purposes of this Policy, means the permanent employees of CREST designated by the Senior Leadership Team as responsible for the day-to-day cross-functional implementation of strategy and operational effectiveness.

“**Scheme** means bespoke accreditation program that requires trusted and accredited companies utilising skilled and competent individuals with specific skills.

2.1.2 The Policy

The CREST Senior Leadership Team recognises the importance of impartiality in its business operations and hereby confirms implementation and adherence to the following policies:

2.1.2.1. CREST will ensure that the value of certification is upheld, the services of CREST shall be available to all users of Certifications and such services shall be applied in a manner necessary to preserve impartiality, objectivity, independence, freedom from conflict of interest, freedom from bias, lack of prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment and balance.

2.1.2.2. CREST shall not participate in the designing, implementation or maintenance (including Internal Audit) of the management systems of its Member Companies and shall not have been engaged in such activities in the two years prior to their receipt of CREST’s certification services.

2.1.2.3. CREST undertakes to instil confidence in the delivery of its certification services to Certificants and parties that have an interest in certification. This shall be achieved by upholding the principles of impartiality (including taking action against threats, ie. from self-interest, self-review, familiarity, intimidation), competence, responsibility, openness, confidentiality and responsiveness to complaints.

2.1.2.4. In the management of impartiality, CREST recognises the possibilities for conflicts of interests arising from relationships of those persons or organisations having an interface with CREST. This includes staff, sub-contractors and licensees. Please also refer to the CREST Conflict of Interest policy for further guidance.

2.1.2.5. CREST undertakes to complete a thorough assessment of the risks to impartiality and to determine the action to be taken to eliminate or minimise those risks. The risk assessment process will be on-going and will be maintained through CREST's Senior Management Team and associated management review process.

2.1.2.6. CREST shall maintain up to date operating procedures including processes for individual certifications and appeals and will ensure that these procedures support impartiality. These procedures are contained in the Certification Procedure and the Certification Appeals Process.

2.1.2.7. CREST undertakes a full review of its various insurances with a specialised broker on an annual basis regarding the insurance cover that CREST may require in the conduct of its business as an accredited certification body operating domestic and overseas certification. The Directors of CREST have accepted that the following Insurance provision is necessary to maintain CREST with proper insurance cover*:* General Insurance, £2m; Professional Indemnity, £5m; Public Liability, £5m; Cyber Risk, £2m; Employers Liability, £10m. Such insurance cover requirements will continue to be reviewed on an on-going basis by CREST and adjusted accordingly.

2.1.2.8. From time-to-time CREST is required to evaluate its systems, procedures and practices to ensure that impartiality in its certification is maintained. Parties with an interest in the certification services of CREST are invited, by virtue of this policy, to submit any proposals, comments or relevant observations on the services of CREST, such that these may be considered by CREST as part of its evaluation process for continual improvement.

2.1.2.9. Parties with an interest in certification include:

- Applicants to a Scheme;
- CREST Member Companies;
- CREST Certificants;
- Clients of accredited companies;
- Governmental Authorities;
- Non-Governmental organisations and trade bodies;
- Consumers and members of the public.

2.1.2.10. Consultancy organisations are an established part of the certification implementation process. CREST will co-operate with outside organisations for the benefit of its members but will have no direct affiliation with management/product system consultancy organisations. CREST will take action to correct inappropriate claims of affiliation (stated or implied) by any consultancy or other organisation that suggests directly, or indirectly, that certification would be simpler, easier, faster or less expensive by virtue of their co-operation with CREST.

2.1.3 Impartiality Risk Assessment Process - Individual Certification

This process should be read in conjunction with the CREST Conflict of Interest policy.

2.1.3.1. The CREST Assessors Panel will meet regularly to evaluate the content and currency of the CREST examinations and receive any Conflict of Interest disclosures. They will implement the requisite changes and submit their report to the CREST Senior Management Team as necessary.

2.1.3.2. The CREST Senior Management Team will oversee and regularly evaluate all aspects of business activity to ensure operations are carried out responsibly, openly, independently and objectively and that all individuals, as well as those with previous certification(s), are treated alike. This will guarantee that CREST certification maintains its high standards and integrity.

2.1.3.3. The CREST Senior Management Team will engage with the Assessors where necessary to identify and analyse the possibilities of conflicts of interest arising from relationships and the delivery of assessments, verification and certification schemes.

2.1.3.4. Threats to impartiality that will be considered include, but are not limited to:

(i) Self-interest threats (those arising from a person or body acting in its own interest to benefit itself), such as: Companies assessing employees, Assessors assessing co-workers, crib sheets from examinations, repetition of examinations in order to achieve full set.

(ii) Subjectivity threats (those arising when personal bias overrules objective evidence), such as: Companies assessing competitors, Assessors assessing competitors or friends.

(iii) Familiarity threats (those arising from a person being familiar with or trusting of another person, eg. an examiner or certification body personnel developing a relationship with a candidate that affects the ability to reach an objective judgement), such as: Assessors coaching candidates or training potential candidates, coaching of co-workers.

(iv) Intimidation threats: such as those that prevent a certification body or its personnel from acting objectively due to fear of a candidate or other interested party;

(v) Financial threats: the source of revenue for a certification body can be a threat to impartiality.

2.1.3.5. Where threats of impartiality are identified, the provisions defined by the CREST Assessors' Panel to eliminate or minimise such threats will be documented along with data demonstrating their on-going effectiveness.

2.1.3.6. These will be made available to the Senior Management Team by the Assessors Panel for their agreement as part of the ongoing review of impartiality of the audit, certification and decision-making process of CREST.

2.2. CORPORATE MEMBERSHIP ACCREDITATION

This policy should be read in conjunction with the CREST Conflict of Interest policy.

2.2.1 Policy Definitions

"**Certificant**", in the context of individual certification, means candidates sitting a CREST examination

"**CREST**" means CREST (International) or any of its legal entities.

"**Member Company**" means a company who has passed the relevant CREST requirements, agreed to the CREST Code of Conduct and has paid any fees associated with membership.

"Senior Leadership Team" means the permanent employees of CREST that set the strategic direction, organisational priorities and major business decisions for CREST, and provide strategic oversight of organisational performance.

"**Senior Management Team**" for the purposes of this Policy, means the permanent employees of CREST designated by the Senior Leadership Team as responsible for the day-to-day cross-functional implementation of strategy and operational effectiveness.

"**Scheme** means bespoke accreditation program that requires trusted and accredited companies utilising skilled and competent individuals with specific skills.

2.2.2 The Policy

The CREST Senior Leadership Team recognises the importance of impartiality in its business operations and hereby confirms implementation and adherence to the following policies:

2.2.2.1. CREST will ensure that the value of corporate membership accreditation is upheld, that the services of CREST shall be available to all organisations that wish to apply and that such services shall be applied in a manner necessary to preserve impartiality, objectivity, independence, freedom from conflict of interest, freedom from bias, lack of prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment and balance.

2.2.2.2. CREST shall not participate in the design, implementation or maintenance (including Internal Audit) of the management systems of its Member Companies and shall not have been engaged in such activities in the two years prior to the customer's receipt of CREST's accreditation services.

2.2.2.3. CREST undertakes to instil confidence in the delivery of its corporate membership accreditation services to companies and parties that have an interest in such accreditation. This shall be achieved by upholding the principles of impartiality (including taking action against threats, ie. from self-interest, self-review, familiarity, intimidation), competence, responsibility, openness, confidentiality and responsiveness to complaints.

2.2.2.4. In the management of impartiality, CREST recognises the possibilities for conflicts of interests arising from relationships of those persons or organisations having an interface with CREST. This includes staff, sub-contractors and licensees. Please also refer to the CREST Conflict of Interest policy for further guidance.

2.2.2.5. CREST undertakes to complete a thorough assessment of the risks to impartiality and to determine the action to be taken to eliminate or minimise those risks. The risk assessment process will be on-going and will be maintained through CREST's Senior Management Team Management Review process.

2.2.2.6. CREST shall maintain up to date operating procedures including processes for corporate membership accreditation and appeals and will ensure that these procedures support impartiality. These procedures are contained in the Corporate Membership Application and Renewals Process and the Membership Appeals Process.

2.2.2.7. CREST undertakes a full review of its various insurances with a specialised broker on an annual basis regarding the insurance cover that CREST may require in the conduct of its business as a corporate membership accreditation body operating domestic and overseas accreditations. The Directors of CREST have accepted that the following Insurance provision is necessary to maintain CREST with proper insurance cover: General Insurance, £2m; Professional Indemnity, £5m; Public Liability, £5m; Cyber Risk, £2m; Employers Liability, £10m. Such insurance cover requirements will continue to be reviewed on an on-going basis by CREST and adjusted accordingly.

2.2.2.8. From time to time CREST is required to evaluate its systems, procedures and practices to ensure that impartiality in its corporate membership accreditation is maintained. Parties with an interest in the corporate membership accreditation services of CREST are invited, by virtue of this policy, to submit any proposals, comments or relevant observations on the services of CREST, such that these may be considered by CREST as part of its evaluation process for continual improvement.

2.2.2.9. Parties with an interest in certification include:

- Applicants to the Scheme;
- CREST Member Companies;
- Clients of accredited companies;
- Governmental Authorities;
- Non-Governmental organisations and trade bodies;
- Consumers and members of the public.

2.2.2.10. CREST will co-operate with outside organisations for the benefit of its members but will have no direct affiliation with management/product system consultancy organisations. CREST will take action to correct inappropriate claims of affiliation (stated or implied) by any consultancy or other organisation that suggests directly, or indirectly, that corporate membership accreditation would be simpler, easier, faster or less expensive by virtue of their co-operation with CREST.

2.2.3 Impartiality Risk Assessment Process – Corporate Membership Accreditation

This process should be read in conjunction with the CREST Conflict of Interest policy.

2.2.3.1. The CREST Senior Management Team have responsibility for the content and currency of the CREST corporate membership accreditation process. They will implement requisite changes and minute their findings as necessary and ensure consistent, impartial provision of accreditation activities where no single interest can predominate.

2.2.3.2. The CREST Senior Management Team will oversee and evaluate all aspects of business activity to ensure operations are carried out responsibly, openly, independently and objectively and that all applicant companies are treated alike. This will guarantee that CREST corporate membership accreditation maintains its high standards and integrity.

2.2.3.3. At quarterly Management Review meetings, the CREST Senior Management Team will identify and analyse the possibilities of any conflicts of interest arising from its relationships and the delivery of its corporate membership accreditation.

2.2.3.4. Threats to impartiality that will be considered include, but are not limited to:

(i) Self-interest threats (those arising from a person or body acting in its own interest to benefit itself), such as: commercial or other considerations preventing impartial accreditation activity.

(ii) Subjectivity threats (those arising when personal bias overrules objective evidence), such as: personal business interest in applicant company.

(iii)

(iv) Familiarity threats (those arising from a person being familiar with or trusting of another person, eg. accreditation body personnel developing a relationship with a company that affects the ability to reach an objective judgement), such as: relationship, business or personal, with individuals in applicant company.

(v) Intimidation threats: such as those that prevent an accreditation body or its personnel from acting objectively due to fear from the applicant company or other interested party;

(vi) Financial threats: the source of revenue for an accreditation body can be a threat to impartiality.

2.2.3.5. Where threats of impartiality are identified, the provisions defined to eliminate or minimise such threats will be documented along with data demonstrating their on-going effectiveness.

2.2.3.6. These will form part of their deliberations during the ongoing review of impartiality of the audit, accreditation and decision-making process of CREST to ensure no single interest predominates.

Amendment List

This document has been amended in the areas described below:

a. Section reference b. Clause Reference c. Date Issued	Description of Changes	Authorised by	Version No. issued
a. 2 b. 2.1.1.7 / 2.2.1.7 c. 04.09.2015	Update to CREST insurance cover	E.A. Luck	
a. 1 b. New section c. 15.09.2015	Conflict of Interest policy added	E.A. Luck	
a. 2.2 b. New section c. 15.09.2015	CREST Membership accreditation activities included	E.A. Luck	4.0
a. Throughout b. July 2018 c.	Updated to reference CREST International	E.A. Luck	4.0
a. Throughout b. April 2022 c.	Updated throughout to reflect new governance structure	E.A. Luck	5.0
a. N/A b. c.	Telephone number removed from back page	E.A. Luck	6.0
a. Throughout b. c. December 2025	Reference to Operating Executive amended to Senior Management Team	E.A. Luck	7.0
a. 2 b. Throughout c. 14.07.2026	Definition of Senior Management Team amended to reflect the assigned authority	Elaine A Luck	8.0
a. 2 b. 2.1.1/2.1.2/2.2.1/2.2.2 c. 29.07.2026	Definition of Senior Leadership Team added. Definition of Senior Management Team updated. Role of Senior Leadership Team clarified	Elaine A Luck	9.0
a. b. c.			
a. b. c.			
a. b. c.			

General enquiries: info@crest-approved.org
Membership: newmembers@crest-approved.org
Examinations: exambookings@crest-approved.org
Press / Public Relations: media@crest-approved.org