

ARH ETHICS & GOVERNANCE HUB

Conflict Register Field Guide

A practical way to make structural tensions visible

SAMPLE GUIDE · EDUCATIONAL PREVIEW EDITION

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1 Why a conflict register matters

A [Conflict of interest \(conflict of interest\)](#) is not necessarily evidence of improper conduct. It is a condition that requires recognition, appropriate disclosure, and a considered response. A conflict register gives leaders, trustees, committees, and families a practical way to make those steps observable rather than relying on memory or informal assumptions.

The register is most useful when it is proportionate. Its job is not to record every difference of opinion. Its job is to capture conflicts that could affect—or reasonably appear to affect—judgment, trust, process, or outcome.

1.1 Use this guide when

- ☐ A decision may affect someone who also has a personal, business, family, or economic interest in the outcome.
- ☐ A committee member, advisor, or decision-maker has information, relationships, or compensation that could influence their judgment.
- ☐ A related-party transaction, transition, ownership question, or vendor selection is under consideration.
- ☐ A concern has been raised and the group wants to respond with a fair, documented process.

1.2 The four fields of a useful entry

Field	What to record
Situation	The decision, relationship, transaction, or circumstance that raised the concern. Write the relevant facts, not conclusions.
Connection	The role, interest, relationship, or benefit that could create a conflict or appearance of a conflict.
Response	The Disclosure protocol (disclosure protocol) , discussion, recusal, independent input, approval step, or other Mitigation (mitigation) considered appropriate.
Review	The decision owner, the date of review, the outcome, and any condition that would require the entry to be revisited.

2 A practical review sequence

2.1 1. Identify the actual issue

State the decision or circumstance in plain language. Avoid labels such as “minor” or “obvious” before the relevant facts have been recorded. The first goal is clarity.

2.2 2. Consider materiality

Ask whether the issue could affect the decision, the people affected, the process, or the confidence of a reasonable reviewer. [Materiality \(materiality\)](#) is contextual; when uncertainty is meaningful, greater transparency and appropriate professional input may be warranted.

2.3 3. Disclose to the right people

The right audience depends on the governance structure. It may include a committee chair, trustee, board, family council, compliance lead, or independent professional. The key is that disclosure is timely, directed, and recorded.

2.4 4. Choose a response that matches the issue

Possible responses may include a documented discussion, additional information, recusal, independent review, modification of the transaction, or declining to proceed. The appropriate response depends on the facts and should be considered with qualified advisors where needed.

2.5 5. Revisit the entry

A conflict can change as facts, roles, compensation, ownership, or decisions evolve. Set a review date and define the events that should trigger an earlier revisit.

3 A sample register entry

The following blank form is an educational conversation tool. It does not prescribe the disclosures, records, approvals, or legal standards that may apply in your jurisdiction or circumstance.

Date identified	
Matter or decision	
People and roles involved	
Relevant connection or interest	
Potential effect on judgment or appearance	
Disclosure made to	
Response or mitigation considered	
Decision, owner, and review date	

3.1 Quality check before closing an entry

- ☐ The entry describes facts clearly enough that a later reviewer can understand the issue.
- ☐ The people who needed to know were informed through the appropriate channel.
- ☐ The response is connected to the nature and significance of the issue.
- ☐ The record identifies when and why the matter should be revisited.

4 Key terms

conflict of interest – **Conflict of interest:** A situation in which personal, financial, family, professional, or role-based interests could influence—or reasonably appear to influence—judgment or action.

disclosure protocol – **Disclosure protocol:** An agreed process for communicating a relevant conflict to the appropriate people, in a timely and documented manner.

materiality – **Materiality:** The practical significance of an issue in relation to the decision, the people affected, and the reasonable judgment of an informed reviewer.

mitigation – **Mitigation:** A documented action intended to reduce the influence, impact, or appearance of a conflict; it may include recusal, independent review, additional disclosure, or a change in process.

5 Educational notice and references

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Selected references

1. [U.S. Securities and Exchange Commission, “Investment Adviser Codes of Ethics.”](#)
2. [ARH Global Advisors, “Fiduciary Governance.”](#)