

## HELPCODE Conflict of Interest Policy

Audited by	Approvato da
Program Admin and Internal Audit Unit (PAU)	Board of Director 16/ 05 / 2022
CROWE AS ITALY	

Review	Reason / Change in review	Entry into force
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## 1 – Introduction

HELPCODE recognizes that conflict of interest between HELPCODE staff and associates on one side and HELPCODE as organization on the other might negatively influence the organization's performance and reputation and might also lead to various forms of corruptive behaviour.

The aim of this Policy is to minimize such risks through clear definitions and examples of conflicts of interest, description of the standards of conduct and related responsibilities.

## 2 - Terminology

Conflict of interests is a situation in which an impartial and objective performance of working duties or decision making of a HELPCODE staff or associate is jeopardized or challenged by conflict with his/her personal, family, political, economic or other interests.

In other words, conflict of interests is also a situation in which a HELPCODE staff or associate may use her/his working position to achieve personal profit or benefit, in which his/her activities (both at and outside of work) may be in conflict with the interests of the organisation or may place him/her at a disproportional advantage which would be in contradiction to principles of free economic competition.

## 3 - Standards of conduct in relation to conflict of interest

As stated in the HELPCODE Code of Conduct, **HELPCODE staff may not use his/her working position to achieve personal profit or benefit and have to avoid any situation where personal interests could be in conflict with the interests of HELPCODE.** Same principle applies to HELPCODE associates.

### 3.1 Conduct forbidden to HELPCODE staff and associates

- Public political or religious activity in which HELPCODE is used as a means of political/religious propaganda
- Participation in activities or membership in organizations, alliances and associations whose focus is in major conflict with the activities, values or good reputation of HELPCODE
- External employment or other forms of activity outside HELPCODE which is in contradiction to the activities, values or good reputation of HELPCODE
- Accepting donations or other forms of benefits in value exceeding 100 euro from partner organizations or business partners of HELPCODE and keeping these for personal use
- Use of confidential information obtained under the working relation with HELPCODE for personal benefit or for the benefit of third persons
- Use of function within HELPCODE or referencing to the function for the purpose of personal benefit
- Preferring members of her/his own family if these are employees of HELPCODE
- Entering sexual relationship with HELPCODE beneficiaries

### 3.2 Forms of conduct or situations which need to be consulted

- Carrying out business activities in areas of HELPCODE operation
- Intimate personal relationships with beneficiaries of HELPCODE assistance or representatives of organizations which are in business relation with HELPCODE
- Membership with organizations, management boards or evaluation committees of donor institutions from who HELPCODE is attempting to apply for funding
- Participation in managing or control bodies of partner organizations
- Employing own family members
- Ownership, shareholding or membership in a company or business which has a business relationship with HELPCODE (this point applies to family members or close relatives of HELPCODE employees)

## 4 - Procedures for resolving conflict of interests

All HELPCODE staff and associates have a duty to primarily avoid entering into any conflict of interest. In case such a situation is or might be likely to happen, every HELPCODE staff or associate has to acknowledge this fact as soon as possible (within 10 working days) to his/her line manager (or focal person for HELPCODE associates) for further consultation. Failing to do so may result in disciplinary or contractual measures.

Several options are available for mitigation of conflict of interests or mitigation of consequential risks. It is up to the decision of relevant line manager, Executive Committee (composed by Director, Head of Organization Unit and HR Manager) or Board of Director to choose the adequate means of resolving the given situation.

- ✓ **Full removal of conflict of interests** – for example resigning from the managing board of a donor organization, giving up other public activities, not employing family members, etc. In this case, it is not necessary to resolve the situation in the framework of the Conflict of Interests Policy.
- ✓ **Refrain from decision-making function in situations of existing conflict of interests** – for example abstaining from voting in a management board of a donor institution during vote related to HELPCODE.
- ✓ **Consultation** – in case it is not possible to resolve the situation or condition by removing the conflict or by refraining from decision-making, every HELPCODE staff or associate is obliged to announce such a situation to his/her line manager, who will jointly decide how to proceed in the case. If the conflict of interests is evaluated as serious, it must be reported to the Head of the relevant department at headquarters (HQ) who will consult with the Board of Directors.
  - Conflict of interest involving national employees must be consulted with the Country Director.
  - Conflict of interest involving members of HELPCODE departments at headquarters must be consulted with the Head of department.

- Conflict of interest involving members and deputy members of the Executive Committee must be consulted with the Director.
- Conflict of interest involving the Director must be consulted with the Executive Committee and results reported to the Board of Directors.
- If conflict of interests is discussed in the Executive Committee, minutes of the discussion must be recorded and archived as a classified attachment to the Executive Committee meeting minutes.
- Members of the Executive Committee, Country Representative and Director of HELPCODE branch offices have to sign an annual declaration of the conflict of interest.
- In case a HELPCODE staff member identifies a conflict of interest concerning another person from HELPCODE staff or associates, it is his/her obligation to report this fact to the relevant head of department or in urgent cases to apply the HELPCODE Whistleblowing Policy.
- In case a HELPCODE staff member is subject to **criminal prosecution**, he/she is obliged to inform her/his line manager immediately.

## 5 – Reporting

The Director sends to the Board of Directors every year a report on the Conflict of Interest Policy.

Helpcode update a Register on the Policy of conflict of Interest (*Annex a – Declaration of Absence of conflict of Interest*) on annual basis.

## 5 - Control matrix

The minimum checks that the procedure must guarantee:

Scope	Control	Description	Frequency	Owner
<b>Standards of conduct in relation to conflict of interest</b>	<b>CTRL 1</b>	All Helpcode staff and stakeholders is aware of the Conflict of Interest Policy	Event	Director
<b>Reporting</b>	<b>CTRL 2</b>	The Director updates the Board on the implementation of the policy	Annual	Director