

## CONFLICT OF INTEREST POLICY

Policy number	IGOV-5	Version	002
Policy accountability	CEO	First approved by Board on	29 <sup>th</sup> April 2019
Last Revision	28 <sup>th</sup> March 2024	Next revision:	March 2025
Responsible Manager		Administration Manager	

### 1. INTRODUCTION

A conflict of interest is a clash between a representative of the Alliance’s personal, professional or financial interests and work interests that gives, or may be perceived to give, advantage to that representative or to others associated with that representative, thereby affecting their ability to make fair and impartial decisions on behalf of the Alliance.

### 2. PURPOSE

The purpose of this Policy is to ensure that board members, contractors and employees of the Alliance are aware of their obligation to disclose any conflicts of interest that they may have and to enable them to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of the Alliance and manage risk.

### 3. SCOPE

This policy applies to board members, contractors and employees of the Alliance. It is extended to implementing partners through Programme Implementation Agreements.

### 4. DEFINITION OF CONFLICTS OF INTEREST

A conflict of interest occurs when a person’s personal interests conflict with their responsibility to act in the best interests of the organisation. Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in.

There may also be a conflict between a board member’s duty to the Alliance and another duty that the board member has (for example, to another organisation). A conflict of interest may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the organisation. Therefore, these situations must be managed to reduce risk.

## 5. POLICY

The Alliance commits to avoiding or appropriately managing any real, potential or perceived conflicts of interest, to maintain public confidence in the agency's integrity. All Alliance Board members and employees must sign a conflict-of-interest disclosure upon engagement, review their disclosure annually and provide notification of conflicts of interest which arise at a later date.

It is the policy of the Alliance, as well as a responsibility of all parties at the Alliance; that ethical, legal, financial or other conflicts of interest be avoided as far as is reasonably possible and that any such conflicts (where they do arise) do not conflict with their obligations to the Alliance.

A Register of Interests is maintained. It records the relevant interests of Board Directors and the steps taken, to manage them.

Where a conflict of interest occurs involving a member of the governing body, an office-holder or an employee, the Alliance's 'Conflict of Interest Procedures' should be followed.

This policy should be read in conjunction with the Alliance's Ethical Procurement Policy and Anti-Bribery and Corruption Policy and Procedures.

## 6. RELATED DOCUMENTS

GEA Conflict of Interest Procedures

GEA Ethical Procurement policy

GEA Anti-Bribery and Corruption Policy and Procedures

## 7. REVISION HISTORY

Revision Date	Revision no:	Summary description of revision(s) made	Section(s) changed:
18 December 2019	1	Development of Policy	
February 2024	2	Policy updated and cross-referenced with the Anti-Bribery and Corruption Policy and Procedures	Version Control Box Scope Policy and Related Documents

## 8. AUTHORISATION



Signature of Board Secretary

Date: 28<sup>th</sup> March 2024

Global EverGreening Alliance Ltd

## CONFLICT OF INTEREST PROCEDURES

Responsible person:	Chris Armitage	Version	001
		Approved by the CEO on	28 <sup>th</sup> March 2024

1. A full and frank disclosure of any conflict of interest should be disclosed so that appropriate measures can be adopted to overcome the conflict.
2. Board members will be required to complete a Conflicts of Interest Declaration form when appointed and will be asked to update it if their circumstances change.
3. Members of the governing body should absent themselves from proceedings at meetings where decisions are taken which benefit themselves or their close friend or family member (including family companies).
- 4.
5. Where goods or services are provided by a Board Member, an employee, or a family member or friend of one of these representatives, a proper tendering process should be established which includes obtaining at least three competitive quotations.
6. Staff and Board members should not be involved in the final decision-making process where decisions being taken may benefit themselves, or their family member or friend.
7. The Alliance's Ethical Procurement Policy and Anti-Bribery and Corruption Policy and Procedures must be adhered to by All Parties when conducting business.
8. A person should not accept the office of auditor, solicitor etc. where he or she serves on the governing body of the organisation or is directly related to a member of the governing body or an office-bearer of the Alliance.
9. Where an auditor acts on behalf of two clients (one of which is the Alliance) involved in a common transaction of a significant the auditor should:
  - a. Provide frank and full disclosure of that conflict to both clients
  - b. Disclose that conflict in the audit report of the Alliance.
10. If any member of the governing body or staff receive or are offered any material gifts from partners, suppliers, or contractors, they need to be disclosed. They are prohibited from accepting any valuable or otherwise inappropriate gifts (any gift with a market value of over \$100 is considered valuable). If there is any question about whether it should be accepted it should be declined or referred to the CEO or the Board Chair. The Travel Policy and Procedures should be followed, in relation to gifts when staff or directors are travelling.

Situations where a conflict of interest has arisen but not been reported to the Alliance may be considered misconduct and the representative involved will be disciplined up to and including dismissal from their role/employment.

## 9. REVISION HISTORY

Revision Date	Revision no:	Summary description of revision(s) made	Section(s) changed:
18 December 2019	1	Development of Procedures	All
February 2024	2	Minor changes to wording and format. Added reference to the 'Ethical Procurement Policy' and 'Anti-Bribery and Corruption Policy and Procedures'. Added requirement for Board members to complete a 'Conflicts of Interest Declaration' when appointed.	Version Control Box, Several additions to the procedure

## 10. AUTHORISATION



Chief Executive Officer

28<sup>th</sup> March 2024

Global EverGreening Alliance Ltd