



CONFLICT OF INTEREST POLICY

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|------------------------------|-----------------------------------------------------|
| POLICY NAME: | CONFLICT OF INTEREST |
| POLICY NUMBER: | |
| DEPARTMENT: | |
| APPROVED BY: | INSERT NAME AND SIGNATURE |
| DATE APPROVED: | |
| EFFECTIVE DATE: | |
| REVISION PERIOD: | <input checked="" type="checkbox"/> EVERY TWO YEARS |
| CURRENT VERSION DATE: | |

PURPOSE

To ensure that those who represent MEDA maintain the highest level of integrity and conduct in all personal, public and business dealings; avoiding even the impression of impropriety. As representatives of MEDA, we share the organization's view that our daily work should reflect MEDA's core values and that all our daily activities should be viewed through that prism.

APPLICABILITY

This policy applies to MEDA worldwide staff, volunteers and contractors.

LEXICON

A conflict of interest arises where staff have, or could be seen to have, the opportunity to use authority, knowledge or influence derived from their position to improperly benefit themselves, another person or an organization.

POLICY

If any employee has reason to believe that a conflict of interest has occurred or is possible, it is their duty to report it to management. Examples of possible conflict of interest situations are described below.

Transaction of Business including Procurement and with Sub-recipients

Employees should avoid:

- Any interest, investment or association that creates a conflict of interest or that interferes with their ability to perform their duties with MEDA; and
- The creation of any personal direct or indirect interest or relationship with any company or individual that competes with or provides products or services to MEDA.
- Furthermore, if an employee is expected to do business or give services to a family member or acquaintance, this may create a genuine or apparent conflict of interest for both the organization and the employee in question.



- Unauthorized use of our resources (including property, equipment, and staff) may have a detrimental impact on our business and the company's reputation in the community. MEDA forbids the use of staff (including volunteers) and/or equipment for non-company purposes since such usage may be unlawful, illegal, or constitute a conflict of interest.

Outside Employment

A conflict of interest arises if an employee accepts outside employment or engages in outside activities which may interfere with the efficient performance of MEDA duties or use any portion of time that should be allocated to these assigned duties for other purposes. Employees are expected to disclose possible or perceived conflicts at the time of hiring. When situations of possible conflict arise in the course of employment with MEDA, the employee will initiate discussions with their immediate supervisor.

MEDA generally allows outside employment, where:

- The secondary employment causes no adverse effects on the employee's performance of job duties with us;
- The secondary work is performed after the employee's regularly scheduled working hours with us; and
- There is no conflict of interest.

Any employee that wishes to work part-time, or for any amount of time after their regularly scheduled work hours with us should discuss the matter with their manager prior to accepting the secondary employment. The employee may be required to disclose information pertaining to the proposed secondary employment to allow a full review. The review will simply ensure that there is no conflict of interest.

Situations where a MEDA employee is required to conduct business or provide services to a family member or associate may create a real or perceived conflict of interest for both the company and the employee in question. As such, MEDA requires any employee who feels they may have a conflict of interest to immediately notify their manager for review.

If any MEDA employee has reason to believe that a conflict of interest has occurred or is possible, it is their duty to report it to management. MEDA strictly prohibits any retaliation for fulfilling this obligation.

Use of MEDA Property, Personnel and/or Equipment for Non-Business Purposes

Where MEDA resources (including property, equipment and personnel) are used for unapproved purposes, they may create a negative impact on our business and the community's perception of the organization.

MEDA employees should be aware that all MEDA equipment and resources, including but not limited to, office machines, computer hardware/software, and Internet and e-mail communications are the property of MEDA, to be used for MEDA-related work.

- MEDA prohibits the use of personnel (including volunteer staff) and/or equipment for non-company business, as their use may be improper, illegal or create a conflict of interest.



Conflict of Interest in Hiring Practices

The appointment of a family member is one such case where the potential for a conflict of interest may exist. The policy is implemented to minimize the negative impact of nepotism and to help ensure objectivity in all matters involving staff, operations and finance. A family member is defined as a spouse, parent, in-law, sibling or child.

- MEDA shall accept applications from and consider a member of an employee's immediate family for employment if the candidate has all the requisite qualifications.
- Family members may not report directly or indirectly to each other.
- Family members may not report directly or indirectly to the same manager.
- Staff may not directly participate in the appointment or promotion of a family member.
- Staff employed in the Human Resources department may not have a family member working in MEDA.

Employee Relationships:

- MEDA employees involved in romantic relationships, or that become married or live in the same household shall not be perceived as presenting a conflict of interest, provided that there is neither a direct nor indirect managerial/subordinate relationship between the employees nor a conflict of interest, real or perceived, created as a result of the relationship.
- In the event that either a managerial/subordinate or conflict of interest issue arises, MEDA will work with the employees to accommodate them in a reasonable fashion. Possible resolutions resulting from a conflict of interest may require one of the employees to transfer to another department or position within the company. If this is not possible, one of the employees may be required to resign.

REPORTING A CONCERN

Employees who believe they have witnessed a conflict of interest, or where they reasonably believe that they may be engaged in any activity which could present a conflict of interest. MEDA must be made aware of all conflicts of interest in order to take the appropriate action. Employees are obligated to report any conflict of interest to their immediate supervisor, manager or Human Resources.

Supervisors and managers are directed to take all appropriate steps to prevent and stop conflicts of interest in their areas of responsibility. Any supervisor or manager who is subject to, witnesses, or is given written or verbal complaints of conflict of interest shall work to minimize or eliminate the issue at hand. In the event that this is not possible with the available resources, the supervisor/manager is required to report the conflict of interest to Human Resources.

Please review the [Reports of Misconduct](#) section of the handbook for information on reporting options.

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As long as a report was made in good faith, MEDA will not take any adverse employment action against the whistleblower, such as termination of employment or other disciplinary action.

These are the minimum standards that must be included in reporting a concern:

- **Urgent or egregious matters:** Declare the reporting options available for urgent/unsafe/egregious issues. Be careful with language and approach in reporting as you may be receiving reports from children and/or victims of abuse, etc.
- **To report a concern:** Direct the employees to a form, a process, an outside entity, or any other tool, template or guideline which provides detailed instructions for reporting on this particular policy. Think about multiple formats for reporting.
- **To whom to report:** Who will receive the report? Be transparent about how many people will actually have access.
- **Confidentiality:** MEDA will do everything it can to protect the privacy of the individuals involved and to ensure that the Complainant and the Respondent are treated fairly and respectfully. MEDA will protect this privacy so long as doing so remains consistent with the enforcement of the Whistleblower Policy and adherence to the law.

FOLLOW-ON PROCESS

It is important that reporters know their concerns are taken seriously. The employee providing the report needs to understand what action will be taken now that the report has been made. A brief reference to the whistleblower policy that no employee, partner and/or other stakeholders will be discharged, demoted, or otherwise discriminated against as a reprisal for reporting violations ([link to Whistleblowing policy](#)).

INVESTIGATIVE PROCESS

MEDA seeks to resolve claims of conflicts of interest as expediently as possible. Investigations shall be conducted, and appropriate actions taken following the filing of a complaint.

In all cases, the VP of People & Culture shall retain the findings report for as long as any administrative or legal action arising out of the complaint is pending.

CONSEQUENCES OF POLICY VIOLATIONS

Any complaint made in bad faith, if demonstrated as being such through convincing evidence, will result in disciplinary action being taken against the individual lodging the fraudulent or malicious complaint.

SUPPORTING DOCUMENTS

[Conflict of Interest Declaration Form](#)



SYSTEMS

Provide the employees with information on any automated systems and tools that may assist them in implementing these policies. If none exists, simply state: Not Applicable.

RELATED POLICIES AND PROCEDURES

Additional Information and Resources can be found at:

- 1) XYX...
- 2) Websites
- 3) ETC...