



**Accountable  
Now**

GLOBAL STANDARDS LOCAL TRUST

# Conflict of Interest Policy



## 1. Applicability

This policy applies, unless otherwise stated, to every person associated with the International NGO Charter of Accountability Ltd (**Accountable Now**) or its Secretariat as a Trustee, officer, employee or staff member.

## 2. General Policy

### 2.1 Every person associated with Accountable Now must:

- (a) in carrying out his or her duties on behalf of Accountable Now, or in dealing with others in the carrying out of their duties, put the interests of Accountable Now ahead of his or her own direct or indirect financial or other interests;
- (b) refrain or withdraw from any transaction or relationship, and (if a Trustee) from any consideration by Accountable Now's Board of Trustees (**Accountable Now Board**) (discussion and voting), concerning any matter which is determined to constitute or involve an actual or potential, direct or indirect conflict of interest; and
- (c) disclose in writing, any actual or potential, direct or indirect conflict of interest.

## 3. Examples of Conflicts of Interest

3.1 The following are examples of conflicts of interest covered under this policy:

- (a) A Trustee receives a gift or loan from an existing or prospective supplier to Accountable Now.
- (b) A person associated with Accountable Now (or his/her spouse, son/daughter or other relative) is on the board of an organisation which receives, or hopes to receive, benefits through an Accountable Now project and the person's position in Accountable Now is such that he/she may be able to influence the decision regarding the benefits to be received by such organisation.
- (c) A Trustee (or his/her spouse, son/daughter or other relative) is an employee of or on the board of an organisation which is applying for Membership of Accountable Now, or of an organisation whose Membership is under consideration for termination by the Accountable Now Board.
- (d) A Trustee holds a senior level position in the government in which he or she can make or significantly influence policy decisions which could affect Accountable Now's ministry.

3.2 The above list is intended to illustrate examples of conflicts of interest and is not exhaustive.

*Last updated and approved by the Board on 21 September 2012*

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## 4. How to Deal with a Potential Conflict of Interest

4.1 Potential conflicts of interest should be identified and declared by the person in potential conflict as soon as such person becomes aware of a potential conflict of interest.

4.2 A written disclosure or report should be made to the Chair of the Accountable Now Board or another suitable senior officer or Trustee setting out details of the potential conflict of interest.

4.3 The evaluation of a potential conflict of interest must be made by the Accountable Now Board who may delegate the evaluation to the Independent Review Panel as they see fit. For the avoidance of doubt, the person in potential conflict shall not participate in the evaluation of the potential conflict of interest. The evaluation may determine that there is no conflict of interest or may lead to the conclusion that (i) the person should not go ahead with the evaluated activity or that (ii) in the case of a Trustee, he/she should excuse him/herself from participating in decision making with reference to the matter in conflict unless he/she (in accordance with article 8.8 of Accountable Now's articles of association) is expressly invited to remain by the other Trustees present at the Board meeting, acting unanimously. This clause is subject always to the Accountable Now Board's power to authorise a Trustee's conflict of interest under article 8.9 of Accountable Now's articles of association.

4.4 The Accountable Now Secretariat is responsible for ensuring that all persons associated with the activities of Accountable Now are made aware of the policy and procedures regarding conflict of interest.

## 5. Gifts and Entertainment

No person associated with Accountable Now shall accept any gift, entertainment, loan or anything else of value from any organisation or individual if it could reasonably be construed or perceived that the gift is motivated by a wish to influence Accountable Now.

## 6. Disciplinary Policy

Any breach of this policy, including failure to make timely, complete, and accurate disclosure or report of an existing or potential conflict of interest, may result in appropriate disciplinary action being taken against the person involved, up to and including the termination of employment, or dismissal from the Accountable Now Board.

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