

CONFLICT OF INTEREST POLICY

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AMENDMENT/ REVIEW	
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1. Introduction and Applicability

TM's efforts to raise the ethical standards of government officials, business people and other individuals could be compromised by any ethical lapses on the part of individuals representing TM. It is essential that everyone associated with TM be highly sensitive to potential conflicts of interest.

For the purpose of this policy, a conflict of interest is a situation where anybody associated with TM is confronted with choosing between the duties at TM and demands of their position and their own private interests. As such, this policy applies, except as otherwise stated, to every person associated with TM as a board member, staff member or intern. The "interests of any person associated with TM" include the interests of any person with whom they have a close personal relationship, including their spouse, children, parents or siblings.

Conflicts of interest may arise from time to time in the course of such persons' activities and decisions. They may arise in their work for TM with regard to pecuniary or financial interests, or interests that impede them in their duty to act in the best interests of TM

2. General Policy

- a) Every person associated with TM (according to Section 1) must avoid or manage any potential, real or perceived conflict of interest (inter alia by refraining from any

decision making or voting on matters subject to a potential conflict of interest), and openly acknowledge any potential or actual conflict of interest which arises through his/her association with TM.

- b) Members of the board of directors or any similar governance body of TM, shall declare all their financial and non-financial interests apart from those which could not potentially lead to or could not conceivably be perceived as a conflict of interest. Such declaration shall be made by way of an online register, which shall be open to the public. Where there are personal safety or similar serious concerns about full publicity, parts or even the whole of the declaration should be submitted to the Chairperson of the Transparency International - Board Ethics Committee who shall hold it, and act upon it as appropriate, in confidence, while TM should then demonstrate that due processes are in place in TM for robust conflict of interests management.

3. Remunerated Work Contracts and Consultancies

- a) Staff members (including management) of TM sometimes are employed by, or paid work for, other organisations. Such work may be undertaken where the work is related to the work TM does, only with the express permission of their superior;
- b) Much of TM's work is done by individuals who are not employees of TM but who act for or on behalf of TM on a voluntary basis. This includes, among others, the resource persons, facilitators, observers and enlisted volunteers. Many of such individuals will have business, professional and other affiliations.
- c) Members of Board of Directors, or companies or other organisations with which such Members are currently affiliated, may not perform remunerated work for the TM.
- d) Resource persons and volunteers active in the TM movement, or companies or other organizations with which such individuals are affiliated, may apply and compete for remunerated work contracts with TM, provided they are not offered any advantages over any competitors with respect to being awarded or carrying out such work. They must not utilize privileged information and do everything to contradict the perception of having utilized privileged information. In other words,



they do not need to be disqualified because of their affiliation with TM, but neither may they be given the “inside track”. When doing non-TM related work, resource persons shall not utilize privileged TM information, and shall also be sensitive to the perception that they might be utilizing such information.

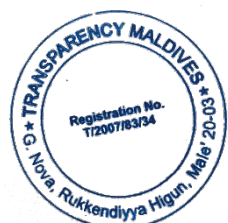
- e) TM will be transparent in their decision-making processes when commissioning paid work, and will follow transparent tender procedures.
- f) TM will not hire or undertake any business relation with members of immediate family, i.e., a spouse, parent, child, or sibling of any of its staff or of its Board members without specific authorization through unanimous decision of the respective Board which may consider such possibility only after the due process ensuring open competition and level playing field has been exhausted.
- g) TM will not hire or undertake any business relation with heads and senior officials of the executive, legislative, military and judicial branches, in elected or appointed roles, senior officials appointed to roles in major political parties, individuals serving in senior executive roles, such as directors or board members, in government-owned commercial enterprises or those enterprises where the government has a significant share.
- h) All members of Board of Directors and employees of TM shall disclose if they have any relationships with any Politically Exposed Persons (PEPs) which shall include those stated in (g) above and their spouses.

4. Gifts and Entertainment

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

5. How to Deal with a Possible Conflict of Interest

- a) Potential conflicts of interest should be identified and declared by the person in potential conflict, or reported by other members of the Association, as soon as they become aware of such potential conflict of interest.



- b) Such disclosure or report should be made to the Chairperson (in case of a member of Board of Directors) or to the Executive Director (in case of an employee of TM).
- c) The evaluation of a potential conflict of interest must be made by the TM Board of Directors or by un-involved individuals, or the ethics committee of TM. The evaluation may determine the absence of a conflict of interest, or it may lead to the conclusion that:
 - (i) the respective person should not go ahead with the evaluated activity, or that;
 - (ii) he/she should recuse him/herself from participating in decision making by TM with reference to the matter in conflict.
- d) The Chairperson and Executive Director of TM are responsible for ensuring that all persons associated with the activities of TM are made aware of the policy and procedures regarding conflict of interest. In addition, these policy and procedures should be made available to the general membership through publication, for example, on the website or in a newsletter.

6. Disclosure of Payments

When TM makes payments including allowances– but excluding approved expenses and per diems – to a member of the Board or a staff member of TM – this should be declared in full in the annual Financial Statement and Annual Report of TM. Such reporting should also outline the procurement/tender procedures conducted that led to such payment.

7. Ethics Committee

TM's Board shall establish an Ethics Committee for the purpose of providing advice on ethical questions to anybody associated with TM.

