

<b>Title:</b>	<b>Conflict of Interest Policy</b>
<b>Definitions</b>	<p><b>Conflict of Interest:</b> A conflict of interest is any situation in which an individual's personal interests (including receiving gifts) or loyalties could, or could be seen to, influence or constrain them from making a decision only in the best interests of the organisation.</p> <p><b>Conflict of Loyalty:</b> A conflict of interest, in which an individual's loyalty or duty to another person or organisation could influence or constrain the individual from making a decision only in the best interests of Tearfund.</p> <p><b>Personal Financial Interest:</b> A conflict of interest, in which the individual or a connected person may receive a financial benefit directly or indirectly from an arrangement with Tearfund or the prospect of which could influence or constrain the individual from making a decision only in the best interests of Tearfund.</p> <p><b>Connected Persons:</b> In broad terms this means family, relatives or business partners of an individual, as well as businesses in which an individual has an interest through ownership or influence.</p> <p>This term includes an individual's spouse or partner, children, parents, siblings, grandchildren and grandparents, as well as businesses where an individual or family member holds at least one-fifth of the shareholding or voting rights (ownership) or where an individual or family member holds a senior position in the organisation such as director, trustee or senior employee (influence).</p> <p><b>Actual Conflict:</b> a demonstrable conflict where someone's private interests and Tearfund's interests are either opposed or significantly at variance.</p> <p><b>Potential Conflict:</b> an actual conflict has not yet occurred, but it could arise in the future.</p> <p><b>Perceived Conflict:</b> a situation where other people might perceive there is a conflict regardless of whether one actually or might exist.</p>
<b>Policy statement:</b>	<p><b>Introduction</b></p> <p>All Tearfund staff and members of the Supervisory Council will perform their duties and conduct their private life in a manner that ensures possible conflicts of interest with their role in Tearfund are avoided or managed appropriately. Although not part of the organisation or decision-making structure ambassadors and office volunteers are also expected to do likewise.</p> <p>Conflict of interests that are undeclared or improperly managed result in risks to the work of Tearfund, including financial risks, legal risks, moral risks (conduct that would be considered unethical or illegal), reputational risks (conduct that may undermine donor or supporter confident in Tearfund) and compliance risks (conduct that may put us in breach of our regulatory duties to CBF, IF Donors, Companies, Foundations, private supporters or other third parties).</p>

## Your Responsibility

You are responsible for:

- avoiding conflicts of interest where possible;
- identifying and disclosing any conflicts of interest;
- carefully managing any conflicts of interest; and
- complying with this policy and reporting any breaches.

### 1. Avoiding Conflict of Interest

You should proactively avoid even the appearance of partiality and avoid, wherever possible, placing yourself in any situation where self-interest or favouritism could be perceived as being present.

If you, or a connected person, is offered a role or opportunity, which would be in direct conflict to Tearfund's interests you should decline this role or opportunity.

You should not engage in activities outside Tearfund that may adversely affect Tearfund's reputation, that make use of Tearfund's confidential information or that will, or are likely to, negatively influence the performance of your work for Tearfund.

### 2. Identify and Disclose Conflict of Interests

You should always be aware of how your personal interests, or the interests of a Connected Person, could constrain, influence or be in conflict with your duty to act in the best interests of Tearfund.

Where you identify an Actual, Potential or Perceived conflict of interest you should inform Tearfund as soon as possible through [conflictofinterest@tearfund.nl](mailto:conflictofinterest@tearfund.nl). Members of the Supervisory Council can reach out to [conflictofinterest@tearfund.nl](mailto:conflictofinterest@tearfund.nl) as well. The information provided will also be recorded on Tearfund's Register of Conflicts of Interest.

In addition, all staff, office volunteers, interns, and Supervisory Council members will be required to complete an annual declaration, either disclosing any conflict of interest or confirming that there is no conflict of interest that they are aware of. They will receive this annual declaration attached to the e-learning course. Moreover, conflicts of interest are discussed in the annual contribution talks. Next to that, HR sends out a yearly reminder and the Register of Conflicts of Interest is discussed yearly by the ET.

### 3. Managing Conflicts of Interest

Once the conflict has been considered, a decision will be made as to whether a conflict of interest will need to be removed or can be appropriately managed. You will be advised of any controls that are to be put into place to manage the conflict. Often this may involve no longer taking part in decisions where an actual, potential or perceived conflict exists but may also include removing responsibility for a particular area of work.

Some key principles that will be taken into consideration for how the conflict will be managed are:

- Individuals should never be the sole decision-maker.

	<p>(ii) The default position is that individuals will not take part in decisions or discussions unless it can be clearly demonstrated that they can do so objectively and without improper influence.</p> <p>(iii) Individuals should not receive confidential Tearfund information that may impact their ability to make decisions in the best interests of Tearfund unless a clear confidentiality commitment has been provided.</p> <p>(iv) Staff or Supervisory Council members or any member of their immediate family cannot receive a grant or payment for services or have a financial or other interest in an entity selected for a grant or payment for services without disclosing the conflict and following this procedure for mitigating the conflict. In addition, staff and Supervisory Council members must neither solicit nor accept gratuities, favours, or anything of monetary value from subgrantees or suppliers.</p> <p>It is the individual's responsibility to ensure that they follow any controls that have been put in place in connection with a conflict.</p> <p>If a conflict previously declared no longer exists, the individual should notify Tearfund via <a href="mailto:conflictofinterest@tearfund.nl">conflictofinterest@tearfund.nl</a> of this so that Tearfund's Register of Conflicts of Interest can be updated accordingly.</p> <p><b>4. Compliance and Reporting any breaches:</b></p> <p>If you become aware that either you, or another staff member, volunteer, intern or member of the Supervisory Council, is in breach of this policy you should notify the HR Director and Safeguarding Focal Point without delay via <a href="mailto:conflictofinterest@tearfund.nl">conflictofinterest@tearfund.nl</a>.</p> <p>If you are not comfortable with reporting a breach to the HR Director and Safeguarding Focal Point you may report concerns via Tearfund's Whistleblowing Procedure.</p> <p>All staff, office volunteers, interns, and Supervisory Council members must comply with this policy. Failure to comply will be treated as a misconduct issue for staff and may result in the removal of a staff member, office volunteer, intern or member of the Supervisory Council, depending upon the severity of any breach.</p> <p><b>Training:</b></p> <p>Compulsory e-learning is available for all staff, office volunteers, interns, and Supervisory Council members on Conflicts of Interests. This training provides examples and further information on conflicts of interests.</p> <p>All staff, office volunteers, interns and Trustees will be required to complete this e-learning annually and a reminder will be circulated.</p>
<p><b>Procedures which relate to this policy</b></p>	<ul style="list-style-type: none"> <li>• <a href="#">Tearfund's Code of Conduct</a></li> <li>• <a href="#">International Committee of the Red Cross Code of Conduct</a></li> <li>• <a href="#">Whistleblowing procedure</a> - An important aspect of accountability and transparency is a mechanism to enable staff and other people associated with Tearfund to voice concerns in a responsible and effective manner. This procedure should be used if staff or trustees are concerned about a conflict which has not been declared or is not being adequately managed.</li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="#">Procurement policy</a> - This policy ensures that any conflicts connected with procurement must be declared and documented and a decision should be taken as to whether the procurement process should be continued with an alternative staff member.</li> </ul>
<b>Why the policy is needed:</b>	To enable staff, volunteers, interns, consultants, ambassadors and Supervisory Council members to appropriately identify, manage and disclose conflicts of interests or loyalties that may impact Tearfund.
<b>Who must follow this policy:</b>	<p>All staff and Supervisory Council members and ambassadors, office volunteers, interns and consultants.</p> <p>Please be aware that consultants <b>do not</b> fall within the scope of this policy and any conflicts of interests with consultants should be dealt with at the point of engagement by the individual with responsibility for the contract.</p>
<b>Person responsible:</b>	HR Director
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<b>Approved by:</b>	ET
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