Institutional Policy

Conflict of Interest
### Revision history

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Name</th>
<th>Description</th>
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<tr>
<td>1</td>
<td>January 2021</td>
<td>CSO</td>
<td>Redeveloped policy</td>
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Owner: CSO
Approved/revised date: January 2021
Category:
1. What is the purpose and scope of this policy?

IMS staff members and members of the IMS Board must declare their adherence to this Conflict of Interest Policy by filling out, signing, and returning the enclosed statement (Appendix A).

This Conflict of Interest Policy covers all activities of IMS. The purpose of this Policy is to timely and adequately identify, manage, and mitigate actual and potential conflicts of interests and their (potential) consequences.

This Conflict of Interest Policy is principle-based and does not describe all possible situations in detail. Each person involved with IMS or acting on behalf of IMS is expected to avoid conflicts of interest and act in accordance with the spirit of this Policy and the prescribed procedures when a conflict of interest arises.

2. What is a conflict of interest?

A conflict of interest may exist in case a person involved with IMS or acting on behalf of IMS has a direct or indirect personal, financial, or business interest in a decision or action by IMS.

Some examples include:

<table>
<thead>
<tr>
<th>Situation</th>
<th>Conflict example</th>
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<tbody>
<tr>
<td>A request for a grant</td>
<td>A staff member deciding on a grant request is also a board member of the applicant. Therefore, the staff member has a financial interest in the grant being awarded to a particular applicant.</td>
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<tr>
<td>Procurement of services</td>
<td>IMS wants to engage a third-party to provide services. An IMS board member offers her services. The board member has a financial interest in securing the contract.</td>
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<tr>
<td>Recruitment</td>
<td>A staff member participates in a hiring committee and discovers that a close friend (or relative) has applied for the position. The staff member has a personal interest in the job being awarded to a particular applicant.</td>
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3. Exceptions related to the structure of the IMS Board

a. The IMS Board enjoys the representation of multiple civil society organizations, who share IMS’ general objectives. The shared objectives are the very foundation of the structure of the IMS Board. Therefore, situations are likely to occur, where Organization A, represented on the IMS Board, stands to benefit indirectly from a decision by the IMS Board, because that decision may further both the objectives of IMS and the objectives of Organization A. While this policy acknowledges that potential conflicts of interest should be evaluated on a case by case basis, the situation involving Organization A generally does not constitute a conflict of interest, because the IMS board member representing Organization A only stand to benefit indirectly, he/she does not stand to gain direct material benefits.

b. In line with the above reasoning in 3a, this policy should not exclude IMS from drawing upon the competences of IMS board members, as these competences are the basis for their individual involvement in IMS. This includes engagements, where IMS board members may gain direct material benefits (monetary or otherwise). However, IMS must disclose such engagements following the procedures in this policy. The IMS board member(s) who make themselves available for such
engagements must not exert any undue influence on the IMS staff member(s) deciding on the acceptance and contents of the engagement.

4. What should you do if a (potential) conflict of interest arises?
If you become aware of a potential or actual conflict of interest, you should take the following actions:
Report the conflict to the appropriate person within IMS in accordance with the chart below:

<table>
<thead>
<tr>
<th>Person reporting</th>
<th>Reporting to</th>
</tr>
</thead>
<tbody>
<tr>
<td>IMS staff member</td>
<td>IMS member of Senior Management</td>
</tr>
<tr>
<td>IMS member of Senior Management</td>
<td>IMS Board</td>
</tr>
<tr>
<td>IMS Board Member</td>
<td>IMS Chair</td>
</tr>
<tr>
<td>IMS Chair</td>
<td>IMS member of Senior Management</td>
</tr>
</tbody>
</table>

Do not proceed with the decision or action unless and until you have received confirmation that you are allowed to do so.

5. What should the person receiving the report do?
The person receiving the report will consider all circumstances of the case.

If it is concluded that a conflict of interest exists, the person reporting will no longer be involved in the decision-making process. The person who received and evaluated the report will then either take the decision or delegate to a person who does not have a conflict of interest.

If it is concluded that there is no way to mitigate the conflict and the potential adverse effects for IMS are significant, the person receiving the report should not proceed with the relevant decision of action (e.g., they should deny the grant request or not engage the third party in relation to which the conflict of interests exists).

6. Register
All reported conflicts of interest, the report and the decision made (including the reasons thereof) will be documented and retained for a period of ten years. IMS Senior Management is responsible for the maintenance of this register.
APPENDIX A: Declaration

I promise that, within the limits of the position I hold or role I fulfil at any time in relation to IMS, I will:

− Execute my function ethically and with care;
− Comply with the laws, regulations and codes of conduct that apply to me, including the Conflict of Interest Policy;
− Keep confidential that which has been entrusted to me;
− Not abuse my knowledge;
− Act openly and accountably.

______________________
Signature
By: [print name]
Date: