



## **WORLD FOR WORLD ORGANIZATION (WFWO)**

### **POLICY ON ETHICS AND CONFLICT OF INTEREST FOR WFWO TEAM**

#### **1. General Principles**

a) The WFWO's mission is to overcome poverty by enabling the world's poorest people to gain the hope for better future and improve their quality of life through the access to food security, drinking water, health, education, poverty, HIV-AIDS programs, micro credit, using local skills and practical, sustainable technologies to support development humanitarian projects on relief and rehabilitations programs, to secure the empowerment of indigenous peoples, local communities, women, groups and individuals in developing countries. To achieve these goals, the WFWO recognizes the need to involve many interested stakeholders, donor states, private sector and financial institutions through EBDRMT to attract, manage and disburse additional resources through an innovative public-private partnership to make a sustainable and significant contribution to foster the enabling environment in which WFWO will successfully mobilize the resources required achieving its mandate.

b) Due to this diversity of interests and perspectives represented by these stakeholders partners and supporters, it is particularly important that the WFWO operate in a balanced, ethical, collaborative, transparent, and open manner. This policy of the WFWO – provides guidance in identifying and addressing actual or potential conflicts of interest. It is based on clear definitions of potential areas of concern, a duty to disclose, and outlines procedures for managing these conflicts as they arise.

c) The purpose of this policy is to ensure fairness and a high standard of ethical conduct in the WFWO's decision-making to protect the reputation and integrity of the WFWO and its interests, and to ensure broad public trust and confidence in the WFWO's decision-making donation co financing programs or grant- making activities. Where provisions of this policy conflict with law or regulation applicable to a Covered Individual such provisions shall not apply. When possible, however, this policy shall be interpreted to be consistent with applicable law or regulation of the WFWO policy.

d) The WFWO recognizes that the representative nature of its governing Executive Board Directors (EBD) and its subsidiary units results in inherent conflicts when the Executive Board Directors (EBD) or its EP and other

governing units must consider matters that have a direct result on the interest of governments, corporations, or NGO's , CBO's or international institutions that hold governance positions in the WFWO. The WFWO recognizes that these institutional conflicts of interest must be managed with the highest degree of integrity to safeguard against any perception that participation by a government, corporation or NGO's ,CBO's or other international institutions in any position at the WFWO confers an undue advantage for such entities in WFWO decisions.

## **2. Definitions**

(a) Covered individual means a member of the EBD of the WFWO (EBD), an alternate, a member of any committee, task force, the Technical Review Panel, Advocacy Team Networks or any other subsidiary body of the WFWO, and professional and general staff team of the Executive Secretariat.

(b) *Associated Person* means a Covered Individual's (i) spouse, minor child, or domestic.

(c) Associated Institution means (i) any organization, corporation or government, NGO's, CBO, advocacy team networks in which a Covered Individual is serving as an officer or country representatives, director, trustee, partner or employee, volunteers that receives or may receive funding or travel expenses or per diem from the WFWO or with which the WFWO has an agreement, contract, grant or relationship; or (ii) any person, organization, corporation, government or similar institution with whom a Covered Individual is negotiating or has an arrangement concerning prospective employment or partnership.

(d) Personally and substantially. To participate personally means to participate directly or to attempt to influence the outcome of a decision-making process, including, for example, consideration of a matter at a EBD meeting, or direct and active supervision of a subordinate in a matter. To participate substantially means that the Covered Individual's involvement is of significance to the matter.

(e) Gift means any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, honorarium, or other item having monetary value. These include services as well as gifts of training, transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

(f) Ethics Committee Team (ECT) means the standing Committee, composed of four Board Members, to be established to assist with the implementation of the Policy on Ethics and Conflict of Interest and to prevent situations that might affect the reputation and integrity of the WFWO when is needed.

(g) Ethics Official means the Executive Secretariat team designated by the EP/EBD of the WFWO ES will assist the ECT team in its work.

### **3. Conflicts of Interest**

a) A conflict of interest arises when a Covered Individual participates personally and substantially in any particular WFWO operations or activities matter in which, to his or her knowledge, he or she or an Associated Person or Associated Institution has a financial interest, if the particular matter may have a direct and predictable effect on that interest. In general, and without limitation, conflicts may be deemed to exist in the following situations:

b) Where a Covered Individual's financial interests, or the interests of an Associated Person or Institution could affect the conduct of his or her duties and responsibilities with respect to the WFWO or result in a reasonable perception that such a conflict exists;

c) Where a Covered Individual's actions compromise or undermine the trust that the public places in the WFWO; and

d) Where the Covered Individual's actions create the perception that the Covered Individual is using his or her position at the WFWO for personal benefit or for the direct financial benefit of an Associated Institution.

Specific examples of such conflicts include:

e) EBD/EP Members advocating for approval of a particular grant in which his or her government, entity, or organization will serve as principal recipient, implementing agency, or government, local NGO, CBO, Communities or play some other direct co financing project implementation role or realize some other direct financial benefit;

f) EBD/EP Board Members advocating for approval of a particular policy from which his or her government, entity, or organization will realize some direct financial benefit;

g) EBD/EP Board Members using their position on the EBD/EP Board to advocate for or otherwise seek approval of any service contract between the WFWO and an Associated Institution; or

h) TRPT members who are employees of a government, international institutions, private sectors, corporation, or organization, NGO's, CBO's participating in the assessment of a funding proposal in which an Associated Institution has any substantial interest.

i) Conflicts do not in principle arise when a Covered Individual or Associated Person or Institution stands to receive a diffuse benefit from the action in question. For example, a EBD Member does not have a conflict of interest

based on his or her consideration of a proposal if his or her country would realize general recommendations to support she/he country or population benefits, or in which non-governmental organizations (NGO), or Community based organizations (CBO) or entities incorporated in his or her country would receive diffuse benefits as a result of the grant or program, but in which the government or its entities would not directly participate in its implementation.

j) These lists are only illustrative, and are not intended to set out all instances where an actual or potential conflict of interest exists, but rather to articulate the principles the WFWO will follow in addressing such conflicts as they arise. Each situation will be assessed based upon its particular facts and circumstances, but decisions will be governed by the guidelines set out in this policy, which applies to all activities sponsored or supported by the WFWO, public and private, for-profit and not-for-profit entity.

#### **4. Transparency and disclosure**

a) All Covered Individuals have a duty to disclose the existence of any actual or potential conflict of interest, including those that derive from Associated Persons or Institutions, NGO, CBO and the nature of such conflict, whenever he or she becomes aware that a conflict exists or that a conflict is reasonably likely to occur or that there is the appearance of a conflict.

b) All Covered Individuals must complete and submit the attached "Declaration of Interest" to the Ethics Official.[3]

c) Disclosure statements shall be updated annually and whenever there is a material change in the information they contain, and shall be maintained by the Ethics Official and made available for inspection by the ECT/EBD/EP, and, only as deemed appropriate by the ECR, by the EBD/EP Board. Except as outlined above, these statements shall be maintained confidential.

d) An employee shall request authorization of the EP/EBD before accepting an office or occupation outside his or her employment duties at the WFWO or accepting an honor or decoration provided by an outside party if the proposed action may give rise to an actual or potential conflict of interest or the appearance thereof. Such requests shall be treated in accordance with the procedure set out in Section 5/b of this Policy.

#### **5. Procedure when a Conflict of Interest Arises**

a) All actual or potential conflicts of interest or the appearance thereof shall be immediately disclosed in writing to the WFWO's ECT through the Ethics Official. Individuals are encouraged to consult with the Ethics Official or members of the ECT for guidance if questions arise in the application of this policy.

b) It is the duty of the ECT, with the assistance of the Ethics Official, to review these disclosures and to decide whether an actual or potential conflict of interest exists and, if so, whether to issue a waiver defining the extent to which such Covered Individual may participate in any discussion of the issue that has given rise to the conflict. The ECT may also, at its discretion, bring any conflicts issue to the entire EBD/EP (excluding the individual or individuals with potential conflicts) for discussion and determination.

c) When it is determined that an actual or potential conflict of interest exists, the Covered Individual shall not participate in the matter that has given rise to the conflict absent a waiver from the ECT. With respect to the EBD, this means that the Covered Individual shall not vote or speak on the matter, and shall absent himself/herself without comment before any discussion or final decision on the matter, unless a waiver has been granted by the ECT. The waiver may be designed to allow for any level of participation the ECT deems appropriate. For example, it may permit the Covered Individual to present information of a technical nature, but not recommendations. Or, it may permit the Covered Individual to attend the meeting in order to fulfill his or her terms of responsibilities, but not to participate in any discussion on issues that have given rise to the conflict of interest. The names of Covered Individuals with actual or potential conflicts of interest who participate in a particular meeting, and the issue on which there is a conflict, shall be recorded in the minutes for that meeting.

d) The EP/EBD may, in consultation with the ECT, authorize a WFWO employee to accept or hold an office or occupation outside of his or her employment duties at the WFWO, or to accept an honor or decoration provided by an outside party. When requested, the ECT shall state whether such authorization would result in an actual or potential conflict of interest.

e) When the EP/EBD considers groups of proposals for approval, a EBD participation in the consideration shall generally not be considered to be a conflict of interest even though his or her country or entity that he or she represents may have a direct interest in a proposal in the group. When the EBD considers specific proposals, the Covered Individual or any other person shall alert the EBD of any actual or potential conflict of interest and follow the procedures outlined in this policy.

f) Should a Covered Individual be found to have an actual or potential conflict of interest that has not been disclosed as required above, or the ECT has reasonable cause to believe that a Covered Individual has failed to disclose an actual or potential conflict of interest, it will inform the Covered Individual of the basis for such belief and provide him or her with the opportunity to explain the alleged failure to disclose. If, after hearing the response and making further investigations as may be warranted, the ECT determines that the interested person has in fact failed to disclose an actual or potential conflict of interest, it shall notify the EP/EBD.

## **6. Awards and Gifts**

All Covered Individuals and Associated Persons are prohibited from accepting Gifts or Awards under circumstances where it could reasonably be construed that the Gift or Awards is motivated by the position of the Covered Individual and interests that could be substantially affected by the WFWO. All Covered Individuals and Associated Persons are prohibited from giving gifts or Awards where it could be reasonably construed that the gift or Awards is intended to affect the policies or practices of the WFWO or any of the programs it WFWO. The ECT may waive this provision as appropriate.

## **7. Exceptions.**

a) A Covered Individual may accept unsolicited gifts or Awards on behalf of the WFWO when refusal to do so would not be in the interest of the WFWO. Gifts or Awards accepted on behalf of the WFWO will be turned over to the ES/EBD and handled under procedures developed by the ES/EBD.

b) Widely attended gatherings and other events.

c) When a Covered Individual is asked to present information on behalf of the WFWO at a conference or other event, an offer of free attendance at the event is not covered under this policy when provided by the sponsor of the event.

e) Widely attended gatherings. The ES/EBD may approve the free attendance of individuals at widely-attended gatherings on a case-by-case basis, and may develop procedures for such attendance in lieu of individual approvals. In determining whether such approval is appropriate, the ES/EBD should consider widely-attended gatherings to be those at which it is expected that a large number of persons will attend and that persons with a diversity of views or interests will be present, such that the actual and apparent degree of influence over the Covered Individual is sufficiently diluted.

## **8. Position within ES/EBD of WFWO**

a) Any individual who has served as a EBD, alternate, a member of a Board Committee, or as Chair or Vice Chair of the Technical Review Panel shall not be eligible to apply for any vacancies positions available within the WFWO ES until one year following their last date of service in such a position. The ECT may waive this provision as appropriate. A request for such a waiver must be submitted by the concerned individual to the ECT before he or she applies for employment by the ES. The ES/EBD shall not take action on or accept an application for employment from such an individual unless a waiver has been granted by the ECT and approved by the EP/EBD.

## **9. Uncompensated Involvement of an Associated Person**

a) An Associated Person involved with the WFWO advocacy networks of the ES or EBD shall not be engaged to carry out work without authorization or compensation either on or outside the WFWO premises with out any approval by EP/ES/EBD.

## **10. Country Advocacy Representatives Partner (CARP)**

a) The transparent operation of CARP is necessary for the effective implementation the activities of programs financed by the WFWO, and for the integrity of proposal development and approval. Covered Individuals shall, as appropriate, individually and through Associated Institutions use their best efforts to ensure that Country Coordinating Mechanisms operate in a transparent manner and actively safeguard against conflicts of interest as per WFWO terms of conditions and guidelines.

## **11. Dissemination and Review of Policy**

a) The WFWO Executive Secretariat (ES) shall distribute a copy of this policy, Terms of Conditions and Guidelines to all Covered Individuals annually, along with a copy of the Declaration of Interest form upon their involvements or participation to WFWO activities.

b) Copies of this policy and the Declaration of Interest form shall be posted on the WFWO website.

c) Professional team are those who have significant decision-making authority, as opposed to support staff positions. The ES/EBD and EP/EBD will determine whether a particular individual is covered in circumstances where there is uncertainty.

d) With respect to those EP/EBD and other Covered Individuals who serve on the WFWO as representatives of national governments or NGO's, CBO's or other entities, nothing in this document will be construed as to prohibit such person's participation in matters under consideration that will directly or indirectly affect the financial interests of such national government or entity, except that no EBD or other Covered Individual shall participate in the consideration of a specific funding request that has been submitted by that government or entity, or any decision through which the government or entity may receive a direct financial benefit (e.g., a grant or a contract or policy), unless such participation has been authorized by the EP/EBDRMT/EBD.

e) Covered Individuals who are already subject to a code of ethics or standards

of conduct regulation, and who, under such code or regulation, are required to complete and file a disclosure form that includes the information requested in the attached Declaration of Interest, may submit such form in lieu of the attached Declaration of Interest.

f) For Covered Individuals who serve on the WFWO as country advocacy representatives partners of governments, corporations, or organizations, NGO, CBO, and where such individual is subject to a code of ethics or standards of conduct regulation as a result of such position, such individual may accept complimentary invitations to widely- attended gatherings otherwise prohibited by this policy where attendance is permitted under the code of ethics or standards of conduct to which the individual is subject.