



DICON International
Empowerment Through Cooperation

Conflict of Interest

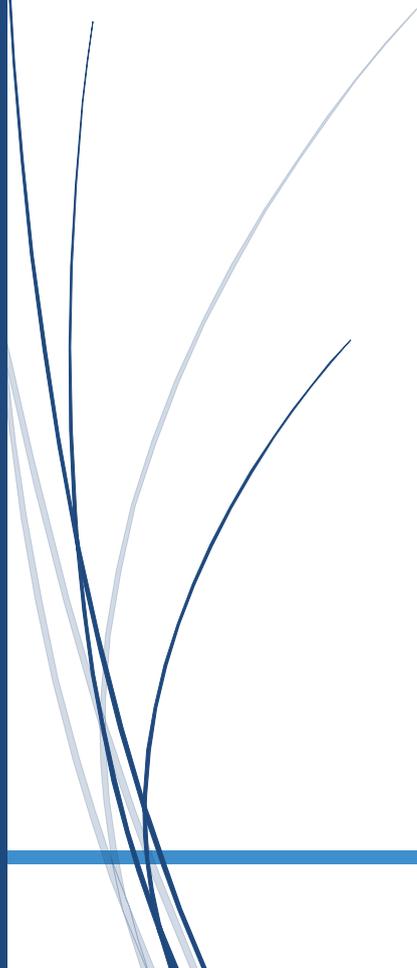


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1. Introduction

Development Inter-Cooperation International (hereinafter referred as DICON International) is a Netherland based solidarity non-for-profit and non-government organization committed to delivering emergency relief, rehabilitation, development assistance, and programmatic services to vulnerable communities. The organization is dedicated to alleviating human suffering and operates with a strictly non-political and non-sectarian mandate, guided by humanitarian principles and a commitment to impartial service. DICON International fully complies with current legislation and regulations, as well as with the values upheld by the UNO, ICRC, CHS and the ECHO framework agreement (Directorate-General for European Civil Protection and Humanitarian Aid Operations). Our mission is to:

- a. Provide assistance to the most vulnerable populations, particularly women and children, victims of natural disasters and civil conflicts, and those living in extreme poverty with special attention to neglected groups and overlooked humanitarian needs.
- b. Design and implement holistic, multi-sectoral, and sustainable programs that are pro-poor in focus and effectively bridge immediate humanitarian relief with long-term development at the community level.
- c. Empower communities through meaningful participation, strengthening local capacities, and maximizing the use of local knowledge and resources in both program design and implementation.
- d. Promote peaceful coexistence, social cohesion, and the reintegration of marginalized groups into society.
- e. Protect and preserve lives during times of disasters, armed conflict, civil unrest, epidemics, and climate-related crises.
- f. Uphold the highest professional and ethical standards in program delivery, ensuring accountability and transparency to beneficiaries, donors, partners, and relevant local authorities.

DICON International strongly believes in the power of collaboration and teamwork, recognizing that the organization's success depends greatly on the integrity, decisions, and conduct of its governing board, staff members, associates, and volunteers. As a humanitarian and development organization working to assist the most vulnerable populations, it is essential that all personnel read, understand, and adhere to DICON International's policies and principles. This commitment ensures that services are delivered to beneficiaries with dignity, efficiency, accountability, and professionalism.

2. Scope and Purpose

The purpose of this conflict of interest policy is to protect DICON International's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of a board member, committee (s), adviser (s) or employee of the organization or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state laws governing conflict of interest applicable to nonprofit and charitable organizations. All members of the Board of Directors, advisers, committee members and employees of DICON International have the responsibility to be good administrators of the resources which are entrusted to DICON International and to conduct the affairs of DICON International in an ethical manner, and thus to avoid conflicts between the interests of the organization and their personal financial and other interests.

The Conflict-of-Interest Policy will enable the board, committee (s) and staff to identify and avoid conflicts of interest and report if it occurs. Its existence makes a clear statement that decisions taken on any basis other than what is best for DICON International constitute corruption and undermine program quality. Such a policy helps staff resist improper approaches, protecting them and DICON INTERNATIONAL from any appearance of harboring corruption.

3. Amendment And Review:

This policy, approved by the board, will be reviewed every 3 years by the Audit committee or any other committee/person/consultant (s) as deemed appropriate by the board.

4. Applicability

This policy applies to all individuals i.e. board members, governing body, committee (s) and employees by, or acting as a representative of DICON International, both national and International, including all full-time, part-time and Project based contract employees, board members, supporters, interns, volunteers, and consultants/contractors.

5. Policy Statement

DICON International expects all representative of DICON International, both national and International, including all full-time, part-time and Project based contract employees, board members, governing body, committee (s) and employees supporters, interns, volunteers, and consultants/contractors, staff Members to adhere to the highest standards of accountability, which requires honest and ethical conduct. This requires that any potential conflicts of interest between a full-time, part-time and Project based contract employees, board members, governing body, committee (s) and employees supporters, interns, volunteers, and consultants/contractors, staff Member's personal interests and the best interests of DICON International or its beneficiaries do not give rise to undue personal benefit, are disclosed, and are independently reviewed and approved before they arise.

Conflicts of interest arise when any member or staff's outside interests affect (or are perceived to affect) his or her ability to act fairly and impartially at work. Opportunities for personal gain, or for family or close associates to benefit (nepotism or cronyism), may influence an individual's behaviour or decision-making to the detriment of the organization's mission. Being in a conflict-of-interest situation is not in itself a form of corruption, but can lead to it, especially if this is hidden.

Other people's perceptions of conflict of interest are also important, as they can damage the organization's reputation for zero tolerance towards corruption. Only by eliminating conflicts of interest in the decision-making process can ensure staff behaviour that's fair, impartial, and driven only by what's best for the organization.

5.1. Examples Of Conflicts Of Interest At Work

Examples of when conflicts of interest arise include, but are not limited to:

- I. DICON International engaging in any transaction with or providing anything of value to a board members or staff member related party.
- II. DICON International making board membership, committee (s) membership, contract, employment decisions involving family members, including, but not limited to, whether to hire, promote or terminate the contract of a family member.
- III. An entity that a board member, committee (s), staff member has a Financial or Control Interest in competing with DICON International for donor funding or financial, programmatic, or other opportunities.
- IV. Hiring a relative to provide services to DICON International needs.
- V. Starting a company/NGO that provides services similar to DICON International.
- VI. Failing to disclose that you are related to a job candidate DICON International is considering hiring.
- VII. Posting to social media about DICON International's weaknesses
- VIII. Accepting payment from another company for information about DICON International
- IX. Failing to report a subordinate or co-worker's wrongdoing.
- X. Sharing confidential information about DICON International with a competitor.
- XI. Dating or having a romantic relationship with a supervisor or subordinate
- XII. Making a purchase or business choice to boost a business that you have a stake in
- XIII. Accepting any gift or offer of hospitality, any offer of holidays or other recreational trips.
- XIV. Owning part of a business that sells goods or services to DICON International.
- XV. Reporting to a supervisor who is also a close friend or family member.
- XVI. Accepting consulting fees and providing advice to another company/supplier/ NGO for

personal gain (occasionally teaching for a University/ private or public school is not a Conflict of interest if disclosed and agreed with the supervisor)

XVII. Sharing information in an interview about DICON International's activities or plans

XVIII. Taking advantage of confidential information learned on the job for your own benefit.

6. Prevention Measures

6.1. Oblige staff to avoid conflict of interest situations

It must be clear that employees may not engage in conduct where the potential for personal or professional gain might affect their activities on behalf of the organization. Staff should avoid actual or apparent conflict between work and private interests by disposing of the private interest or withdrawing from all related decisions at work.

6.2. Ensure all staff sign an annual disclosure statement

Staff should sign a yearly statement acknowledging their awareness of the policy and disclosing any actual or potential conflicts of interest. Ensure that staff check with their supervisor regarding outside activities and associations that could cause or be perceived as a conflict of interest. Provide a form listing specific types of interest. Make the declaration of interests a contractual obligation for employees; be diligent in collecting annual declarations and remind staff to update them if circumstances change. Inform staff of and apply sanctions for the non-declaration of interests.

6.3. Create an open environment conducive to discussion

Communicate the policy widely and ensure staff aren't afraid to disclose conflicts of interest. Be clear that having a conflict of interest isn't wrong, but that not declaring it or remaining involved in decisions affected by it is unacceptable.

6.4. Pursue diversity in situations of entrenched interests

Pursue intentionally diversifying staff backgrounds in contexts where DICON International faces deeply entrenched regionalism or tribalism.

7. Prevention Measures in the Procurement Process

7.1. All officials involved in the procurement should declare any conflict of interest with bidders before the initiation of a bidding process and evaluation of tenders.

7.2. Before any meeting regarding any evaluation, adjudication, or award of a contract, all persons must acknowledge in writing that they have no conflict of interest regarding the tender being considered.

7.3. Vendors who assist in developing specifications for procurement and/or purchased items delivery monitoring (i.e., Consultants developing Scope of Work, BoQ, or performing works monitoring in the absence of their own qualified technical staff) must be excluded from competition due to conflict of interest. This is different from market research. Vendors who participated in market research or have submitted reference bid are allowed to bid on a future procurement.

8. How to deal with a potential Conflict of Interest

In order to consider a conflict of interest shall properly be approved and free from corruption, it must:

Not involve undue personal benefit; and (b) the potentially conflicted members, associate and staff Member must do all of the following:

Disclose – At the earliest opportunity and prior to the conflict arising, disclose in writing the full details of the potential conflict of interest to both (a) the board, committee (s), adviser (s) responsible for reviewing and making decisions related to the transaction and (b) to the Staff Members.

Recuse - recuse themselves and not participate in any decision, approval, or ongoing administration related to the transaction or conflict of interest. Recusal must begin at the moment when the Staff Member is aware that a potential conflict of interest might arise and must last for the duration of the potential conflict of interest (for examples, a Staff Member cannot participate in a decision to procure a certain item knowing that the likely sole source of the item is a company the Staff Member has a financial interest in; and a conflicted Staff Member cannot be engaged in overseeing the work or making decisions related to payment to a related party); and

Report - ensure that the transaction is reported on the Staff Member's Annual Conflict of Interest Questionnaire form.

Any breach of this policy, including failure to make timely, complete, and accurate disclosure or report of an existing or potential conflict of interest, is a serious misconduct that may lead to the termination of the contract.