



PIN Conflict of Interest Policy

Revised in April, 2017

Introduction

People In Need (PIN) recognizes that conflict of interest between PIN staff and associates on one side and PIN as organization on the other might negatively influence the organization's performance and reputation and might also lead to various forms of corruptive behaviour. The aim of this Policy is to minimize such risks through clear definitions and examples of conflicts of interest, description of the standards of conduct and related responsibilities.

Terminology

Conflict of interests is a situation in which an impartial and objective performance of working duties or decision making of a PIN staff or associate is jeopardized or challenged by conflict with his/her personal, family, political, economic or other interests.

In other words, conflict of interests is also a situation in which a PIN staff or associate may use her/his working position to achieve personal profit or benefit, in which his/her activities (both at and outside of work) may be in conflict with the interests of the organisation or may place him/her at a disproportional advantage which would be in contradiction to principles of free economic competition.

Standards of conduct in relation to conflict of interest

As stated in the *PIN Code of Conduct*, **PIN staff may not use his/her working position to achieve personal profit or benefit and have to avoid any situation where personal interests could be in conflict with the interests of PIN.** Same principle applies to PIN associates.

Conduct forbidden to PIN staff and associates

- ◆ Public political or religious activity in which PIN is used as a means of political/religious propaganda
- ◆ Participation in activities or membership in organizations, alliances and associations whose focus is in major conflict with the activities, values or good reputation of PIN
- ◆ External employment or other forms of activity outside PIN which is in contradiction to the activities, values or good reputation of PIN
- ◆ Accepting donations or other forms of benefits in value exceeding 1000 CZK (50 USD or 40 EUR) from partner organizations or business partners of PIN and keeping these for personal use
- ◆ Use of confidential information obtained under the working relation with PIN for personal benefit or for the benefit of third persons
- ◆ Use of function within PIN or referencing to the function for the purpose of personal benefit
- ◆ Preferring members of her/his own family if these are employees of PIN
- ◆ Entering sexual relationship with PIN beneficiaries

Forms of conduct or situations which need to be consulted

- ◆ Carrying out business activities in areas of PIN operation
- ◆ Intimate personal relationships with beneficiaries of PIN assistance or representatives of organizations which are in business relation with PIN
- ◆ Membership with organizations, management boards or evaluation committees of donor institutions from who PIN is attempting to apply for funding
- ◆ Participation in managing or control bodies of partner organizations
- ◆ Employing own family members
- ◆ Ownership, shareholding or membership in a company or business which has a business relationship with PIN (this point applies to family members or close relatives of PIN employees)
- ◆ Paid activity (lecturing, training, public speaking) during working hours of the PIN staff member resulting in income exceeding 3000 CZK (150 USD or 120 EUR) / month

Procedures for resolving conflict of interests

All PIN staff and associates have a duty to primarily avoid entering into any conflict of interest. In case such a situation is or might be likely to happen, every PIN staff or associate has to acknowledge this fact as soon as possible to his/her line manager (or focal person for PIN associates) for further consultation. Failing to do so may result in disciplinary or contractual measures.

Several options are available for mitigation of conflict of interests or mitigation of consequential risks. It is up to the decision of relevant line manager, Executive Committee or Executive Board to choose the adequate means of resolving the given situation.

- ◆ **Full removal of conflict of interests** – for example resigning from the managing board of a donor organization, giving up other public activities, not employing family members, etc. In this case, it is not necessary to resolve the situation in the framework of the *PIN Conflict of Interests Policy*.
- ◆ **Refrain from decision-making function** in situations of existing conflict of interests – for example abstaining from voting in a management board of a donor institution during vote related to PIN.
- ◆ **Consultation** – in case it is not possible to resolve the situation or condition by removing the conflict or by refraining from decision-making, every PIN staff or associate is obliged to announce such a situation to his/her line manager, who will jointly decide how to proceed in the case. If the conflict of interests is evaluated as serious, it must be reported to the director of the relevant department at PIN headquarters (HQ) who will consult with the Executive Board.
 - ▶ Conflict of interest involving national employees must be consulted with the Country Director.
 - ▶ Conflict of interest involving members of PIN departments at headquarters must be consulted with the department's director.
 - ▶ Conflict of interest involving members and deputy members of the PIN Executive Committee must be consulted with the PIN Director.
 - ▶ Conflict of interest involving the PIN Director must be consulted with the PIN Executive Committee and results reported to the PIN Executive Board.
 - ▶ If conflict of interests is discussed in the Executive Committee, minutes of the discussion must be recorded and archived as a classified attachment to the Executive Committee meeting minutes.

- ▶ Members of the Executive Committee, Country Directors and directors of PIN branch offices have to sign an annual declaration of the conflict of interest.
- ◆ In case a PIN staff member identifies a conflict of interest concerning another person from PIN staff or associates, it is his/her obligation to report this fact to the relevant department director or in urgent cases to apply the *PIN Whistleblowing Policy*.
- ◆ In case a PIN staff member is subject to **criminal prosecution**, he/she is obliged to inform her/his line manager immediately.