**CONFLICT OF INTEREST PREVENTION POLICY**

Document type - Policy

Applies -   to all programs and projects

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**General provisions**

The Policy of the CO"SOS Civil Defense Headquarters" (hereinafter referred to as the Organization) on prevention of Conflict of Interest (hereinafter referred to as the Policy) is developed to create a system in the Organization activities to avoid factors that lead to corruption or corruption-related offenses.

This Policy is aimed at establishing proper regulation and control over the process of identification, detection and management of potential and/or existing conflicts of interest; establishing standards and requirements that are mandatory for all employees and volunteers of the Organization.

Objectives of the Policy:

- Ensuring effective decision-making in the Organization;

- preventing financial and material losses of the Organization;

- preventing the Organization's employees and volunteers from being held legally for violation of the law;

- preventing actions that may negatively affect the reputation of the Organization.

**Terminology**

**Close persons** - persons who live together, are connected by a common household, including persons living together but not married, as well as - regardless of the above conditions - husband, wife, father, mother, stepfather, stepmother, son, daughter, stepson, stepdaughter, brother, sister nephew, niece, grandfather, grandmother, great-grandfather, great-grandmother, grandson, granddaughter, great-grandson, great-granddaughter, son-in-law, daughter-in-law, father-in-law, mother-in-law, adopter or adopted child, guardian ([custodial](https://context.reverso.net/%D0%BF%D0%B5%D1%80%D0%B5%D0%BA%D0%BB%D0%B0%D0%B4/%D0%B0%D0%BD%D0%B3%D0%BB%D1%96%D0%B9%D1%81%D1%8C%D0%BA%D0%B0-%D1%83%D0%BA%D1%80%D0%B0%D1%97%D0%BD%D1%81%D1%8C%D0%BA%D0%B0/custodial)) and a person placed under guardianship.

**Business gifts** - material value (anything of value) that is given to a business partner or other third party at the expense of the Organization. Material value that employees or volunteers receive from business partners or other third parties as part of their employment duties.

**Conflict of interest** - a direct or indirect conflict between the personal interest of an employee or volunteer and functional responsibilities in the Organization, which affects or may affect objectivity and impartiality in decision-making or the implementation/non-implementation of actions during the exercise of these powers.

**Subordination** is a relationship of organizational, functional or legal dependence of a subordinate from his/her supervisor, including through:

- solving (participation in solving) issues of hiring, transfer, dismissal from work;

- application of incentives, disciplinary sanctions;

- instructions, orders, etc., and control over their implementation;

- sending an employee for training/internship/professional development at the expense of the Organization;

- approval of vacations, working hours;

- determining job responsibilities and setting tasks;

- assessing the fulfillment of targets and other performance indicators.

**A potential conflict of interest** means that a person has a private interest in the area in which he or she fulfills his/her work duties, which may affect the objectivity or impartiality of his/her decision-making, or the performance or non-performance of actions in the fulfillment of these work duties.

**Private interest** is any interest of a person that implies a benefit of property or non-property nature, including those caused by relations of close persons, friendly or other relations with individuals or legal entities, including interest arising from membership or activities in public, political, religious or other organizations.

**Direct subordination** is a relationship of direct organizational or legal dependence of a subordinate person on his/her manager, including through the decision (participation in the decision) on hiring, dismissal, application of incentives, disciplinary sanctions, provision of instructions, orders, etc. and control over their implementation.

**A real conflict of interest** means that a person has a private interest in the area in which he or she fulfills his/her work duties, which affects the objectivity or impartiality of his/her decision-making, or the performance or non-performance of actions in the fulfillment of such work duties.

**Financial interest** means any cash, voucher, gift, service, advantage, benefit, discount, travel within the country or abroad, hospitality, entertainment, accommodation, sponsorship, or other incentive or valuable consideration other than ownership interests.

**Preventing and resolving conflicts of interest in the Organization**

1. In order to prevent conflicts of interest, employees of the Organization are obliged to comply with the provisions regarding Section V Prevention and Settlement of Conflicts of Interest of the Law of Ukraine "On Prevention of Corruption". Employees and volunteers of the Organization are obliged to:

- take measures to prevent the emergence of a real or potential conflict of interest;

- notify the Director no later than the next business day from the moment when the employee learned or should have learned about a real or potential conflict of interest;

- not to take actions or make decisions in conditions of a real or potential conflict of interest;

- take measures to resolve a real or potential conflict of interest.

2. Within two business days after receiving a notice of a real or potential conflict of interest of an employee, the Director, in accordance with the Law of Ukraine "On Prevention of Corruption", shall decide on the method of resolving the conflict of interest, and notify the employee or volunteer.

3. If an employee or volunteer of the Organization has a conflict of interest in the performing work duties, he/she shall be exempt from them in respect of which the conflict of interest has been identified.

4. If an employee or volunteer of the Organization becomes aware of a conflict of interest of other employees or volunteers of the Organization, he/she must inform the Director about it, indicating the circumstances under which he/she became aware of the conflict of interest.

**Measures to resolve conflicts of interest**

1. The external settlement of a conflict of interest is carried out by:

- removal of an employee or volunteer from performing a task, taking actions, making a decision or participation in decision-making in conditions of a real or potential conflict of interest;

- applying external control over the employee's performance of the relevant task, taking certain actions or making decisions;

- restricting an employee's access to certain information;

- reviewing the scope of the employee's official powers;

- transferring an employee to another position;

- dismissal of an employee.

2. Employees and volunteers of the Organization who have a real or potential conflict of interest, may independently take measures to resolve it by eliminating the relevant private interest with the provision of supporting documents to the immediate supervisor.

3. Removal of an employee or volunteer of the Organization from performing a task, taking actions, participation in decision-making in conditions of a real or potential conflict of interest is carried out by the decision of the Director. This refers to the cases where the conflict of interest is not permanent provided that it is possible to involve other employees or volunteers of the Organization in making such a decision or performing relevant actions.

4. Restricting access of an employee or volunteer of the Organization to certain information is carried out by the decision of the Director if the conflict of interest is related to such access and is permanent in nature. Also if it is possible to continue the proper performance of the person's powers in the position subject to such a restriction and the possibility of entrusting work with relevant information to another employee or volunteer of the Organization.

5. The scope of official powers of an employee of the Organization shall be reviewed by the decision of the Director if the conflict of interest in his/her activities is of a permanent nature related to specific powers of the person; as well as if it is possible to continue the proper performance of official tasks in case of such revision and the possibility of vesting with appropriate powers another employee or volunteer of the Organization.

6. Official powers are exercised by an employee or volunteer of the Organization under external control if the removal of a person from performing a task, taking actions, making decisions or participation in decision-making in conditions of a real or potential conflict of interest, restriction of their access to information or review of their powers to information is impossible and there are no grounds for their transfer to another position or dismissal.

**Obligations of the employee/volunteer of the CO "SOS Civil Defense Headquarters”**

* I will disclose any financial, personal or family (or close kinship) interests that may affect the work of the CO "SOS Civil Defense Headquarters".
* I will ask for permission from the CO "SOS Civil Defense Headquarters" to participate in other paid or unpaid voluntary activities to ensure that there is no conflict of interests, violation of working time rules or negative impact on my work.
* I will ask for permission from the CO "SOS Civil Defense Headquarters" before agreeing to be nominated as a potential candidate or in any other official role for any political party.
* I will disclose to my direct supervisor the facts of personal and sexual relations with any employee, volunteer, trustee, consultant, contractor or partner so that the risk of any unfair advantage by any party can be assessed.
* I will not accept or provide business gifts or remuneration of any kind from governments, communities with which the Organization works, donors, suppliers and others as a result of my work for the Organization.