

**Ethiopian Orthodox Church Development and Inter- Church Aid
Commission (EOC-DICAC)**



Conflict of Interest Policy

**November, 2020
Addis Ababa**



I. INTRODUCTION

The Ethiopian Orthodox Church Development and Inter-Church Aid Commission (EOC-DICAC) is the development wing of The Ethiopian Orthodox Church, which is established to contribute to the Ethiopian government's effort towards minimizing if not completely controlling the humanitarian and development gaps of the country. EOC-DICAC is an independent, local non-government and non-profit organization. In view of the above, EOC-DICAC is committed to address the needs of vulnerable communities (citizens and refugees communities) through intervening in the development and humanitarian needs with due consideration of the environment.

The EOC-DICAC core value emanate from the values of the Church witnessed in the Gospel of our lord Jesus Christ and operates within the following principles: human dignity, partnership, accountability, transparency, evidence, research and professionalism, sustainability, integrated approach, do no harm, inclusiveness and community centred development.

In all its undertakings, EOC-DICAC respects sex, age, race, colour, social status, religious and political impartiality, and operates with the following principles of neutrality, non-discrimination, transparency. The aim of the EOC-DICAC Conflict of Interest Policy is to fight against conflict of interest by appropriately and timely identifying and addressing potential conflicts of interest.

Policy Statement

EOC-DICAC is committed to conduct its work in an honest, open and ethical manner and in compliance with applicable law and by respecting the highest standards in terms of efficiency, responsibility and transparency in its activities. It is also aimed to guide staff, board members, partners and those who work for or on behalf EOC-DICAC, should abide to this policy. In addition to this policy, all of the above mentioned entities need to operate inline with the following EOC-DICAC's policies: Staff Code of Conduct Policy; Gender Policy, Child Protection Policy, Health Safety and Security Policy, Image Policy, Anti-Terrorism and Money Laundry Policy, Anti-Fraud and Corruption Policy; Sexual Exploitation and Abuse Policy; Safeguarding Policy, Whistle Blowing Policy, and Fleet, Fixed Asset and Warehouse Policy as well as Communication Strategy.

This policy is designed to fight against conflict of interest by appropriately and timely identify and address potential conflicts of interest with ultimate goal of protecting the integrity and reputation of EOC-DICAC management, Board members and staff; and to ensure and reinforce stakeholder trust and confidence on EOC-DICAC. This policy encourages conflicts of interest and potential conflicts of interest are disclosed and managed correctly in accordance with this policy.

II. INTERPRATION AND SCOPE

Article 1 - Scope of application

The Conflict of Interest policy applies to all EOC-DICAC staff, governance members, paid and unpaid consultants, contractors, interns, volunteers, sub-grantees, suppliers, services providers of EOC-DICAC or promotes EOC-DICAC's work at any locations.

Article 2 - Approach

The approach adopted in this policy is to help entities listed under article one to disclose potential conflict of interest ahead of time rather automatic prohibition of transactions. On the other hand, this will help EOC-DICAC to consider the disclosed potential conflicts and take appropriate measure on a case by case basis to prevent it from conflict of interest.

Article 3 – Definition



Conflict of interest

EOC-DICAC understands that “conflict of interest” may happen when private interests compete, conflict with or influences or appears to influence the interests of EOC-DICAC.

“Private interests” may originate from EOC-DICAC’s staff, governance members or other entities mentioned under Article 1 of this policy, for their own benefit or for those of their immediate family or an organisation with which they have had business or political relations. On the other hand, it may occur when personal interest of EOC-DICAC staff, governance members or the other entities mentioned under Article 1 likely to influence or appear to influence the impartial and the professional role for the satisfaction of family, personal life, financial interests, or other interests outside of the interest of EOC-DICAC.

Below are some examples of conflicts of interest:

- A relative or an intimate friend directly or indirectly leases, rents, buys or sells property to or from EOC-DICAC.
- Employee of EOC-DICAC uses confidential information as a result of the position he/she holds within EOC-DICAC to further his/her private interest.
- An employee is a relative or intimate friend of a manager who makes decisions on job responsibilities, pay and promotions relating to that employee.
- A lawyer representing EOC-DICAC negotiating fee from litigants who hold the opposing point of view.
- An employee who is a member of EOC-DICAC employee selection committee fails to disclose that he is related to a job candidate whom the company team is considering for a position.
- The management body of EOC-DICAC in charge of compliant handling participating in an investigation of sexual harassment against a fellow whom he/she known and worked for years.

The above examples are not exhaustive, but the general idea here is to showcase in which an employee is torn between serving more than one person's or organization's best interests. To prevent any potential conflict of interest, the organization needs to continuously monitor and assess the operational systems and process of conflict of interest sensitive areas. If you're unsure whether there is a conflict of interest, you need to regularly monitor whether there are any competing loyalties. Moreover, to decide whether a potential conflict of interest should be disclosed, EOC-DICAC should review the case from the perspective of an outsider.

Article 4 - Points to be considered in the adherence to this policy

1. Staff and governance members of EOC-DICAC as well as the other entities referred under Article 1 of this policy, must understand this policy including provisions and any changes and perform their duties in accordance with this policy. If they unclear on whether the case/s possess potential conflict of interest or not, EOC-DICAC strongly advises to solicit advice from relevant body in EOC-DICAC.
2. While dealing with the terms of conditions, staff and governance members of EOC-DICAC as well as the other entities referred under Article 1 of this policy must ensure the commitment of new staff to act in accordance with this policy. Moreover, line-managers must make sure that staff under their supervision complies with this policy; and take or propose appropriate disciplinary measures as sanction against any violations.

III. GENERAL PRINCIPLES

Article 5 - Neutrality



Neutrality is one of the principles that all parties indicated under Article 1 of this policy, must perform their duties, responsibilities and roles as put in the terms of references, contract, memorandum of understanding, employment etc in an ethical, apolitical and legitimate manner.

Article 6 – Impartiality

EOC-DICAC staff and other parties indicated under Article 1 of this policy, must pursue and deliver their duties in the context of profession, role and mission and in an impartial manner and without any discrimination of sex, age, race, colour, social status, religious and political affiliation.

Article 7 – Confidence of Stakeholders

The core values and principles of EOC-DICAC are the basis for its mission and undertakings. Thus, EOC-DICAC staff and other parties indicated under Article 1 of this policy, must delivery their duties in line with the values and principles of the organization and contribute to strengthen the confidence of all stakeholders.

Article 8 – Protection of privacy

Declarations of EOC-DICAC staff and of the other entities mentioned under Article 1 of this policy must be respected and kept confidential.

Article 9 – Relations with formal EOC-DICAC staff

Staff and governance members should not give former EOC-DICAC staff preferential treatment or privileged access to EOC-DICAC.

IV. MECHANISMS TO FIGHT CONFLICT OF INTEREST

Article 10 - Prevention of conflicts of interest

1. Staff, governance members and other entities mentioned under Article 1 of this policy must prevent themselves from engaging in any form of private interests that is conflicting with their duties in and engagement with EOC-DICAC. All are responsible to avoid themselves from any actual and potential conflict of interests.
2. At the time of signing employment contract, staff should commit her/himself to devote full time and attention to her/his duties with EOC-DICAC. S/He should not in any way directly or indirectly either on own account or on behalf of any other person engage in another company, business entity or other organisation, or be concerned with, or provide services to any other business or accept any other engagement or office without the prior written consent of EOC-DICAC. Engagement in trustee or committee member, whether as a fiduciary or as an advisor of non-profit service outside of EOC-DICAC may be approved if the organisation or any of its affiliates has no current or prospective competition with EOC-DICAC.

Article 11 – Reporting

1. Staff, governance members and the other entities mentioned under Article 1 of this policy, who are sure that they are required to act in the violation of this policy, should report it to their line manager.



2. Those who have reported as an aforementioned case of misconduct (mentioned under 1 of this article) in accordance with this policy, believe did not receive satisfactory response should report in writing to the commissioner and head of compliance within EOC-DICAC.

Article 12 – Action to be taken in the event of a conflict of interest

1. Staff, governance members and the other entities mentioned under in Article 1 of this policy; are the first to know their position of possible, actual or potential conflict of interest. Hence, they have to be alert and take measure to avoid any actual or potential conflict of interest; report to their line manager of any conflict of interest as soon as they are aware of this; and they should also comply with any final decision that requires their involvement to resolve the situation like removing themselves from the conflict of interest rejecting the benefits from where it emanated.
2. Staff, governance members and the other entities mentioned under Article 1 of this policy must declare whether or not they have a conflict of interest as soon as they are requested.

Article 13 – Declaration of interests

Disclosure is one of the prevention strategies of conflict of interest and it needs to be recorded documented and kept at safe place. The register shall be maintained by the commissioner of EOC-DICAC and shall be accessible to the Board and head of Compliance. The information documented in the register will be processed in accordance with the EOC-DICAC data management principles and policy with the purpose of ensuring the management body and senior staff act in the best interests of the organization. On the other hand, this policy strongly recommends the information provided should not be used for any other purposes other than to the benefit of EOC-DICAC.

In line with the above, just before the interview, candidate applicants must complete & sign the Recruitment Conflict of Interest Disclosure Form at Appendix 1. At the time of the signing of employment/contract of staff or appointment of the governance members or other entities mentioned under Article 1 of this policy, each must disclose any conflict of interests fully such as relationships or posts held with other organization that could potentially result in a conflict of interest. To this effect, all have to complete & sign the Conflict of Interest Disclosure Form at Appendix 2 and at times of changes since joining EOC-DICAC; all have to complete the same form again without delay. The following are some important points that need adequate consideration.

As mentioned above, the signed disclosure shall be kept on file and when any other potential or actual conflicts of interest arise, it is the responsibility of the staff or governance members to report immediately new conflicts of interest to the responsible body of EOC-DICAC and to update the disclosure form.

If any employee, governance members have noticed unreported conflict of interest, s/he is required to immediately update the disclosure form and give it to his/her immediate supervisor or to the responsible body of EOC-DICAC. The issue will further be discussed at higher level to determine whether or not it will be taken as a conflict of interest. In case it is determined as a conflict of interest, the management will take the issue to the next level.



Each member of the tender committee will complete and sign the Declaration for Members of The Tender Evaluation Committees at Appendix 3 prior to commencing the evaluation process of the any tender that is put out to tender.

Similar to the above point 2 &3, all potential or actual conflicts of interest which involve the use of funds received from institutional donors will be seriously handled by the commissioner and the head of compliance and then reported to the Board.

Article 14 – Responsibilities after disclosure

If an employee and/or governance members disclosed a conflict of interest, that person must remove her/himself from participating in that specific activity/transaction by excusing her/himself from staff, management, Board and other meetings during consideration of that activity/transaction. Also, she/he should not discuss the transaction with any staff in the organization.

Pertinent meetings of staff, management, committee and/or Board meetings shall segregate matters which demand a person to be absent due to conflict of interest. The minutes shall describe why s/he is absent, disclose any related discussion and document compliance with these procedures. Though a quorum is mandatory to commence any meeting, in this case a person who has a conflict of interest will not be counted towards the quorum.

The major reason for excluding a person who disclosed conflict of interest is mainly because EOC-DICAC wants to pursue its undertakings with the matter in an impartial and objective manner. In most cases, EOC-DICAC will exclude such person who is affected by conflict of interest. But, in some circumstances, EOC-DICAC may go further steps to address a significant conflict of interest by recruiting and involving third party to assist EOC-DICAC in handling the matter, or removing the individual affected from relevant duties and in exceptional cases requiring an individual to resign.

Article 15 – Gifts

Gifts may influence or appear to influence the impartiality as it interferes with the duties and/or mission, staff, governance members and the other entities mentioned under Article 1 of this policy should not make any attempt to solicit or accept gifts, favours, invitations or any other benefit intended for them or their families, relatives, friends etc.

Article 16 - Abuse of professional Position

The staff, governance members and other entities indicated under Article 1 of this policy, at all times, must not make effort to influence one another for private benefit by using professional position s/he possess or by bribing the other.

In all circumstances, staff, governance members and the other entities mentioned under Article 1 of this policy, must not provide advantages pertinent to their profession and/or their mission unless authorized in writing by EOC-DICAC.



Article 17 – Approval in case of material benefit

In case a staff or a Board member will receive a material benefit as a matter of a conflict of interest the transaction will be effected only with the approval of the Auditor, Finance and head of compliance as well as the approval of the Board.

Article 18 - Sanctions

Anyone who directly or indirectly violated this policy will be subjected to disciplinary procedures of EOC-DICAC and will be penalized to extent of dismissal.

V. MONITORING AND REVISIONS

As for other policies, manuals and procedures of EOC-DICAC shall regularly monitor the implementation and applicability of this policy at least on yearly basis. Following the results of the monitoring or assessment of the implementation and approval of the Board, EOC-DICAC may update this policy.

VI. IMPLEMENTATION OF THE POLICY

Article 19 - Implementation date of the policy

This policy comes into effect after approval by the Board of EOC-DICAC on2020.

Article 20 - Adherence to the policy

Staff, governance members and the other entities mentioned under Article 1 of this policy; certify that they adhere to these principles by signing EOC-DICAC Policy Acceptance Form and/or by signing their employment contract.



APPENDIX 1

RECRUITMENT CONFLICT OF INTEREST DISCLOSURE FORM

Vacancy _____

Date: _____

Name: _____

Position (employee/volunteer/board member): _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest in relation to the recruitment of the above vacancy. _____ I have no conflict of interest to report _____ I have the following conflict of interest to report (please provide details and insert additional pages where necessary)

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge (having made reasonable enquiries).

I have reviewed, and agree to abide by, the Ethiopian Orthodox Church Development And Inter-Church Aid Commission (EOC-DICAC) Conflict of Interest Policy.

Signature: _____ Date: _____

Please return this form to HR prior to the commencement of interviews.



APPENDIX 2

CONFLICT OF INTEREST DISCLOSURE FORM

Date: _____

Name: _____

Position (employee/volunteer/board member): _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between the Ethiopian Orthodox Church Development And Inter-Church Aid Commission (EOC-DICAC) and your personal interests, financial or otherwise:

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report (please provide details and insert additional pages where necessary)

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge (having made reasonable enquiries).

I have reviewed, and agree to abide by, the EOC-DICAC Conflict of Interest Policy.

Signature: _____ Date: _____



APPENDIX 3

DECLARATION FOR MEMBERS OF THE TENDER EVALUATION COMMITTEE

I, the undersigned, hereby declare that I agree to participate in the evaluation of the abovementioned [procurement procedure].

By making this declaration, I confirm that I shall execute my responsibilities impartially and objectively.

I hereby also declare that I am independent of all parties who stand to gain from the outcome of the evaluation process.

To the best of my knowledge and belief, there are no facts or circumstances, past or present, or that could arise in the foreseeable future, which might place me in a situation of conflict of interest or otherwise call into question my independence in the eyes of any party; and, if I discover or should it become apparent during the course of the evaluation process that such a relationship exists or has been established, I will declare it immediately and cease to participate in the evaluation process.

I declare that I have not been employed by any of the [Candidates/Tenderers] within the past 3 years.

I agree to hold in trust and confidence any information or documents disclosed to me, discovered by me or prepared by me in the course of or as a result of the above-mentioned evaluation exercise and agree that it shall be used only for the purposes of this evaluation and shall not be disclosed to any third party. I also agree not to retain copies of any written information or prototypes supplied.

NAME		SIGNATURE		DATE	

