



Future Association For Development and Environment

جمعية المستقبل للتنمية والبيئة

Future Association for Development and
Environment (FADE)

FADE-CONFLICT OF INTEREST POLICIES

Content:

Introduction:	3
Policy Statement	3
Second: Interpretation and Scope Article 1 – Scope of Application	4
Article 2 – Definitions	4
Article 3 – Communication and Commitment to the Policy	6
Article 4 – Purpose of the Policy	6
Section Three: General Principles	6
Article 5 – Neutrality	6
Article 6 – Impartiality	7
Article 7 – Stakeholder Trust	7
Article 8 – Hierarchical Responsibility	7
Article 9 – Confidentiality	7
Article 10 – Political or Public Activity	7
Article 11 – Privacy Protection	7
Article 12 – Retained Information	8
Article 13 – Professional Resources	8
Article 14 – Responsibility of Direct Supervisors	8
Article 15 – Termination of Professional Duties	8
Article 16 – Relations with Former FADE Employees	9
Fourth: Mechanisms for Preventing Conflicts of Interest	9
Article 17 – Preventing Conflicts of Interest	9
Article 18 – Reporting	10
Article 19 – Actions in Case of a Conflict of Interest	10
Article 20 – Declaration of Interests	11
Article 21 – Incompatible Outside Interests	11
Article 22 – Gifts	11
Article 23 – Dealing with Offers of Undue Advantages	11
Article 24 – Exposure to Third-Party Influence	12
Article 25 – Misuse of Professional Position	12
Policy Implementation	12
Article 26 – Effective Date	12
Article 27 – Policy Commitment	12

Introduction:

The Future Association for Development and Environment (FADE) enjoys autonomy and confidentiality and operates as a non-profit entity, committed to strict political and religious neutrality. All of its work is based on the principles of neutrality, non-discrimination, and transparency, rooted in a set of core values that include: responsibility, impact, initiative, and inspiration.

FADE dedicates its efforts to providing urgent humanitarian aid to support the most vulnerable groups, in a way that preserves human dignity. At the same time, it seeks to create sustainable development opportunities that empower individuals to achieve their full potential.

FADE works to respond to humanitarian crises, enhance resilience, drive comprehensive and sustainable development, and support the establishment of effective governance systems and the strengthening of civil society—through investing in people and their capacities.

FADE's mission is guided by four core values:

- **Responsibility:** We are committed to delivering aid efficiently and effectively, using the resources entrusted to us with the highest sense of responsibility.
- **Impact:** We strive to create a positive and sustainable impact in the lives of the communities we serve.
- **Initiative:** We rely on entrepreneurial thinking and innovation to overcome challenges and add value in everything we do.
- **Inspiration:** We inspire those around us through our vision, values, and practices, and we fully commit to advocating for the causes we believe in.

Policy Statement

FADE affirms its unwavering commitment to applying the highest standards of efficiency, integrity, and transparency across all its activities and areas of work. In this context, FADE's Conflict of Interest Prevention Policy is based on the following key pillars:

- Promoting a culture of prevention;
- Encouraging reporting and disclosure;
- Establishing clear mechanisms for investigation;
- Defining appropriate procedures for accountability and sanctions.

This policy aims to provide a guiding framework for FADE's staff and partners, and it should be considered part of a broader system of policies and procedures, including:

- FADE's Code of Conduct;
- Child Protection Policy;
- Data Protection Policy;
- Grievance Policy;
- Anti-Fraud, Bribery, and Corruption Policy;

- Policy on the Prevention of Exploitation, Abuse, and Sexual Harassment;
- Counter-Terrorism and Anti-Money Laundering Policy;
- Environmental and Social Policy;
- Gender Policy;
- Operational manuals and procedures (e.g., Finance, Logistics, Human Resources, Safety and Security);
- Guidance documents (e.g., Transparency, Evaluation, Monitoring, Project Management, Project Development);
- Organizational charters, such as the Information Systems Usage Guide;
- The Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, which FADE is a signatory to;
- The six core principles issued by the Inter-Agency Standing Committee (IASC) of the United Nations regarding the prevention of sexual exploitation and abuse.

Second: Interpretation and Scope

Article 1 – Scope of Application

This policy applies to all individuals associated with FADE who may have the ability to influence or personally benefit from the organization's decisions. This includes, but is not limited to:

- **Board Members:** All members of the organization's governing body.
- **Employees:** All permanent and temporary staff, whether full-time or part-time, across all levels.
- **Volunteers:** All individuals participating in volunteer activities.
- **Consultants and Contractors:** Any individual or external entity contracted by the organization to provide services or carry out tasks.
- **Implementing Partners:** Other organizations that collaborate with FADE to implement programs.

Article 2 – Definitions

• **Conflict of Interest**

Refers to any situation in which a personal interest of a FADE employee, or of any party covered under Article 1, may affect or is likely to affect their professional performance with integrity and objectivity.

Personal interest includes any direct or indirect benefit to the employee, a relative, or an organization with which they have professional or political ties, as well as any financial or legal obligations they may be under.

Examples of conflict of interest include:

- An employee involved in purchasing decisions for services or goods from a company they or a family member own.
- A board member voting on a decision to grant a project to another organization where they hold a position or financial interest.
- An employee hiring or supervising a direct relative.
- Receiving gifts, services, or personal advantages from a vendor or partner in

exchange for preferential treatment.

- Using confidential or non-public information acquired through their position at the organization for personal gain.
- An employee providing paid services to a donor or current partner outside the scope of their official duties without prior approval.

4. Conflict of Interest Responsibilities

- **Board of Directors and Senior Management:**

- o Responsible for developing, implementing, and overseeing this policy.
- o Review and approve conflict of interest disclosures.
- o Ensure any actual or potential conflicts are properly addressed.

- **All individuals covered by this policy:**

- o **Disclosure Obligation:** Each individual is responsible for identifying and immediately disclosing any actual or potential conflict of interest to their direct supervisor, the HR department, or the Executive Director (depending on the situation and sensitivity).
- o **Recusal:** Refrain from participating in any discussion, vote, or decision related to a disclosed conflict of interest.
- o **Policy Adherence:** Understand and comply with all provisions of this policy.

- **Consultant:**

Any third party (individual or entity, whether legal or not) that provides consulting services directly or indirectly to FADE or any of its sister or affiliated organizations, whether paid or voluntary.

- **Vendor:**

Any third party (individual or entity, whether legal or not) supplying FADE or any of its sister or affiliated organizations with any kind of goods or services, whether for a fee or free of charge.

- **Governing Bodies:**

Includes any person elected by decision-making bodies to take part in administrative or oversight duties at FADE or its sister or affiliated organizations. This category includes board members and supervisory bodies.

- **Implementing Partner:**

An entity entrusted with executing one or more projects or sets of activities, with specific allocated funding. This may include international or local NGOs or public institutions.

- **Stakeholders:**

Individuals or entities (legal or not) who contribute voluntarily or under specific arrangements to the implementation of FADE's programs, or who benefit from them directly or indirectly.

• **FADE Employees:**

All individuals employed by FADE or its sister or affiliated organizations, including trainees working with these entities for the purposes of this policy.

• **Sub-Recipient:**

An individual or entity (legal or not) allocated a budget by FADE to implement a specific project or activity under a partnership or contract framework.

Article 3 – Communication and Commitment to the Policy

1. This policy is issued under the authority of the Future Association for Development and Environment (FADE). FADE employees and the other entities referred to in Article 1 must act in accordance with this policy and be aware of and understand its provisions and any changes. When in doubt about how to proceed, they must seek guidance from the appropriate person, especially their direct manager.
2. FADE employees and the other entities referred to in Article 1 who are involved in negotiating the employment terms of any FADE employee must ensure that the employee is fully aware of and committed to complying with this policy.
3. FADE employees in managerial roles, as well as other entities referred to in Article 1, are responsible for ensuring that the staff under their supervision adhere to this policy and for taking or recommending appropriate disciplinary measures for any violations.
4. This policy forms part of the employment terms for FADE staff and of the terms of task performance for other entities referred to in Article 1, starting from the date they sign to acknowledge having read it.
5. FADE will review the provisions of this policy periodically.

Article 4 – Purpose of the Policy

This policy aims to:

1. Implement mechanisms to prevent and combat conflicts of interest applicable to FADE employees and other entities referred to in Article 1.
2. Define rules of integrity and conduct to be followed to prevent conflicts of interest, which must be adhered to by FADE employees and the other entities referred to in Article 1.
3. Inform third parties of the expected behavior of FADE employees and the other entities referred to in Article 1.

Section Three: General Principles

Article 5 – Neutrality

FADE employees and the other entities referred to in Article (1) must perform their

duties in a neutral and non-political manner, in accordance with the law, legitimate instructions, and the ethical rules related to their roles.

Article 6 – Impartiality

In the context of their professional roles and/or tasks, FADE employees and the other entities referred to in Article (1) must act in accordance with the law and exercise their discretion fairly, considering only relevant circumstances.

Article 7 – Stakeholder Trust

FADE employees and the other entities referred to in Article (1) must always act in a manner that reflects and upholds FADE's values of integrity, impartiality, and competence, contributing to the reinforcement of trust among all stakeholders.

Article 8 – Hierarchical Responsibility

FADE employees are subject to their direct management and/or their functional department head unless otherwise stipulated by law.

Article 9 – Confidentiality

While taking into account the potential right of stakeholders to access information, FADE employees and the other entities referred to in Article (1) must handle all information and documents obtained during, or as part of, their duties with a high degree of confidentiality.

Article 10 – Political or Public Activity

1. While respecting fundamental and constitutional rights, FADE employees must ensure that their personal participation in political activities or involvement in public or political discussions does not affect stakeholders' or national/international/local authorities' trust in their ability to carry out their duties fairly and with integrity.
2. In performing their duties, FADE employees must not use resources for partisan purposes.

Article 11 – Privacy Protection

All necessary measures must be taken to ensure the privacy of FADE employees and the other entities referred to in Article (1) is respected. Accordingly, declarations made under this policy must remain confidential unless otherwise required by law.

Article 12 – Retained Information

1. Taking into consideration the broader framework of international law on the right of access to information held by individuals, FADE employees and the other entities referred to in Article (1) must only disclose information in accordance with the applicable rules and requirements of the organization.
2. Employees must take necessary measures to ensure the security and confidentiality of the information they are responsible for or aware of.
3. Employees must not seek access to information they are not authorized to know, nor use information obtained during their duties inappropriately.
4. Employees must not retain professional information that should be disclosed, nor circulate information they know or have reasonable grounds to believe is inaccurate or misleading.

Article 13 – Professional Resources

In exercising their discretionary authority, FADE employees and the other entities referred to in Article (1) must ensure that staff, property, facilities, services, and financial resources entrusted to them are managed and used efficiently, effectively, and economically. These resources must not be used for personal purposes unless authorized in writing.

Article 14 – Responsibility of Direct Supervisors

1. FADE employees responsible for managing or supervising other employees must do so in accordance with the organization's policies and objectives.
2. Direct supervisors are accountable for the acts or omissions of their employees that violate these policies if they fail to take the necessary and expected measures to prevent such acts or omissions.
3. FADE employees tasked with managing or supervising staff must take appropriate measures to prevent their employees from engaging in conflict of interest activities within the scope of their work. These measures may include raising awareness of laws and regulations, ensuring adequate training on conflict of interest, and setting a personal example of integrity through their own conduct.

Article 15 – Termination of Professional Duties

1. FADE employees are prohibited from exploiting their positions to obtain external job opportunities in an unjustified manner.
2. Employees must not allow any external job opportunity to result in an actual, potential, or apparent conflict of interest and must report any job offer immediately upon acceptance to their direct supervisor.
3. Employees may not use or disclose any confidential information obtained during their employment at FADE unless authorized in writing by the organization and in accordance with the law.

Article 16 – Relations with Former FADE Employees

FADE employees must refrain from granting any preferential treatment, special privileges, or privileged access to the organization for former employees.

Fourth: Mechanisms for Preventing Conflicts of Interest

Article 17 – Preventing Conflicts of Interest

1. It is the responsibility of FADE employees, as well as the other entities referred to in Article (1), to prevent any conflict between their personal interests and the performance of their job duties, whether the conflict is actual, potential, or reasonably perceived as such.
2. Under no circumstances may employees of the organization or the concerned entities exploit their professional positions to gain unfair personal benefits or private interests.

A. Disclosure of Conflicts of Interest:

3. Initial Disclosure (Upon Hiring/Appointment): All new employees, board members, volunteers, and consultants must sign a disclosure form at the beginning of their relationship with the organization, acknowledging that they have read and understood the conflict of interest policy and disclosing any current conflicts.

4. Ongoing Disclosure (Upon Change): Individuals must disclose any new or potential conflicts of interest that arise during the course of their employment or relationship with the organization as soon as they occur.

5. Disclosure Channels: Conflicts of interest are typically disclosed to:

1. For employees: their direct supervisor or the HR manager.
2. For board members: the Chairperson or the Governance Committee.
3. If the conflict involves the direct supervisor or HR manager: disclosure is made to a higher-level authority (e.g., the Executive Director or Chairperson).
4. In case of uncertainty: individuals may consult with the HR department or the Executive Director to determine whether a conflict of interest exists.

B. Review and Assessment of Disclosure:

1. The responsible review entity (e.g., Executive Director, Governance Committee, or designated committee) shall review the submitted disclosure.
2. The nature and extent of the conflict of interest will be assessed to determine whether it is real or potential, and how severe it is.

C. Managing the Conflict of Interest:

Following the review, the organization shall take appropriate steps to manage or resolve the conflict. These steps may include, but are not limited to:

- **Recusal:** Removing the individual from any decision-making process or discussion related to the conflict.

- **Monitoring:** Establishing monitoring arrangements to ensure decisions are not influenced by the conflict.
- **Adjustment:** Reassigning duties or responsibilities to avoid the conflict.
- **Termination:** In some cases, the only solution may be to terminate the employment or contract if the conflict cannot be effectively managed.
- **Documentation:** Recording all disclosures and actions taken to address the conflict of interest.

D. Gifts and Hospitality:

- Employees and contractors must not solicit or accept any gifts, services, or hospitality from third parties (suppliers, donors, beneficiaries) that could influence or appear to influence professional judgment or lead to a conflict of interest.
- Symbolic gifts of low value (within a pre-approved threshold set by the organization) must be disclosed and documented.
- Cash gifts are strictly prohibited under any circumstances.

Article 18 – Reporting

1. FADE employees and other entities referred to in Article (1) who believe they have been asked to take illegal, unethical, or policy-violating actions must report this to their direct manager and/or designated FADE contacts.
2. If not satisfied with the response, a written report may be submitted via the Transparency Platform: <https://transparency.FADE.org> or via email: transparency@FADE.org.
3. Employees and related entities must report any evidence, allegations, or suspicions of illegal or criminal activity related to FADE to their direct manager and/or via email: grievance@FADE.org and/or the Transparency Platform. FADE commits to investigating these reports.
4. FADE guarantees full protection from retaliation or harm for anyone reporting in good faith and based on reasonable suspicion.
5. Abuse of reporting mechanisms may result in disciplinary action.

Article 19 – Actions in Case of a Conflict of Interest

1. As FADE employees and entities referred to in Article (1) are most familiar with their own circumstances, they are expected to:
 - Be alert to any actual or potential conflicts of interest;
 - Take necessary steps to avoid them;
 - Notify their direct supervisor upon discovering the conflict, as per Articles (8) and (18) of this policy;
 - Comply with any final decision regarding resolution of the situation, including recusal or relinquishment of the benefit causing the conflict.
2. Upon request, all employees and relevant entities must explicitly declare whether a conflict of interest exists or not.

Article 20 – Declaration of Interests

All FADE employees and other entities referred to in Article (1) who hold positions or perform tasks that may be affected by personal or private interests must disclose the nature and extent of such interests upon taking office, periodically thereafter, and whenever there is a change in the situation.

Article 21 – Incompatible Outside Interests

1. FADE employees and governing body members are prohibited from engaging in any activity, transaction, or holding any position, paid or unpaid, that may negatively affect their professional performance. In case of doubt, the direct supervisor must be consulted.
2. Under applicable laws, prior approval from FADE is required before engaging in any professional or non-professional activities outside the organization, whether paid or unpaid, or assuming any external positions.
3. Employees must also declare any affiliation or membership in organizations that may negatively impact their performance at FADE.

Article 22 – Gifts

1. FADE employees and entities referred to in Article (1) are prohibited from soliciting or accepting gifts, favors, invitations, or any other benefits directed to them, their families, relatives, close friends, or individuals/organizations they have business or political relationships with, if such benefits may influence or appear to influence their impartiality, or constitute a reward for their duties. This does not include customary hospitality or small gifts, which must be reported to the direct supervisor as outlined in FADE's Code of Conduct.
2. If it is unclear whether a gift or hospitality is acceptable, the employee must consult their direct supervisor.

Article 23 – Dealing with Offers of Undue Advantages

1. When an undue advantage is offered to FADE employees or the entities referred to in Article (1), they must take the following steps to protect themselves:
 - Refuse and not accept the benefit, even as a courtesy;
 - Attempt to identify the source of the offer;
 - Avoid prolonged interaction with the offeror, unless necessary to determine intent;
 - If the gift cannot be refused or returned, retain it with minimal use;
 - Try to have witnesses present, such as nearby coworkers;

- Prepare a written report of the incident and send it to the direct supervisor and/or the Transparency Platform in a timely manner;
 - Immediately inform their direct supervisor or relevant department;
 - Continue performing tasks as normal, especially those related to any contract connected to the offered benefit.
2. Any high-value gift that could not be refused must be handed over to FADE with a clarifying memo.

Article 24 – Exposure to Third-Party Influence

FADE employees and other entities referred to in Article (1) are prohibited from placing themselves or allowing themselves to be placed in situations where they are expected to grant favors to any individual or entity in return for preferential treatment. They must maintain both public and private conduct in a manner that avoids undue influence by third parties.

Article 25 – Misuse of Professional Position

1. FADE employees and other entities referred to in Article (1) are prohibited from granting any benefits linked to their professional position or duties unless explicitly authorized in writing.
2. They are also prohibited from attempting to influence any individual or entity (including other employees) for personal purposes by exploiting their professional position or offering personal benefits.

Policy Implementation

Article 26 – Effective Date

This Conflict of Interest Policy comes into effect upon its approval by FADE's Board of Directors on March 5, 2021.

Article 27 – Policy Commitment

FADE employees and other entities referred to in Article (1) confirm their commitment to this policy by signing FADE's Policy Acceptance Form and/or the employment contract.
