

# Conflict of Interest Policy

## Purpose

This policy is based on Section 4 of the Medair Code of Ethics, which requires all persons acting on behalf of Medair to perform their duties with the highest degree of integrity and good faith and to avoid situations that cause or that may appear to give rise to a conflict of interest. The purpose of this policy is to ensure that any conflicts of interest that do arise are promptly disclosed and properly managed.

## Scope

This policy applies to all Medair representatives regardless of their location. Medair representatives (“**Representatives**”) consist of the following: employees, Association members, Board members, affiliates, volunteers, contractors, consultants, and individuals or organisations under short- or long-term contractual obligations and any other persons acting on behalf of Medair.

## Context

Conflicts of interest may arise where the professional or personal interests of an individual conflict – or has the potential to conflict with – the interests or activities of Medair. Medair Representatives are required to complete and sign the enclosed conflict of interest disclosure statement and to disclose promptly any instances where a conflict of interest may have or has arisen. This policy does not prohibit all situations in which there may be a conflict of interest. Rather, its purpose is to ensure that such situations are disclosed and managed appropriately. It is also important to note that the existence of a conflict of interest does not, by itself, automatically imply any fraudulent or corrupt practices.

## Definitions and Examples

A conflict of interest exists if the personal or business interests of an individual who is a Representative of Medair interferes with – or has the potential to interfere with – their judgment or ability to act in the best interests of Medair. Examples of situations that could be considered as conflicts of interest include:

- Having a financial or ownership interest or decision-making influence in a company that provides goods or services to Medair;
- Receiving rebates or gifts from suppliers or other partners;
- Use of confidential information for personal gain;
- Employment outside of Medair in companies, organisations, or governmental bodies or other social or political commitments or activities; and
- Family members who may be or become actual suppliers, contractors, or other partners.

Here are specific examples of the above:

- *Personal interest.* An employee of a Medair field office tells the procurement manager to hire Company X to deliver goods. Company X is owned by the employee's brother.
- *Receipt of rebates or gifts.* The procurement manager of a Medair field office decides to grant a contract to Company Y because Company Y is known for giving very generous Christmas gifts to their customers.
- *Use of confidential information for self-benefit.* A Medair employee who is involved in a project that is about to be launched in a new area decides to invest in a particular trucking company as he knows that many shipments will have to be made to the area.
- *Outside employment.* An independent contractor that was hired by Medair as part of a relief operation is also employed by a government agency that provided a significant grant to fund the relief effort.
- *Use of Medair property.* An employee in a Medair field office occasionally uses without authorisation Medair vehicles on the weekends for family trips.
- *Property transactions.* Entering into a rental contract with someone who is related to a Medair employee.
- *Beneficiary selection.* An employee in a Medair field office who is involved in a shelter project puts herself or family members forward as candidates.
- *Outside commitments.* A Medair field office employee becomes involved in local politics and is involved in official decisions that may affect Medair.
- *Family relationship.* A Medair employee hires her sister even though there is another candidate who is more qualified for the position. Or, the employee recommends her sister for a new job in a different field office without disclosing the family relationship.

It is the responsibility of individuals to disclose any such situations so they can be managed effectively. Failure to notify instances of conflict of interest or a situation where a conflict of interest could arise may lead to disciplinary action. Any conflicts should be disclosed using the Medair Code of Ethics Acknowledgement and Conflict of Interest Disclosure Statement form and submitted to Human Resources.

### **Disclosure and Management of Conflicts of Interest**

When a conflict of interest has the potential to arise, or has arisen, the Representative must inform her or his supervisor/manager or, for contractors, their contact at Medair. The supervisor must then assess the situation and decide the appropriate measures to be taken. These may include ensuring that the Representative abstains from being directly involved in any decision-making relating to that matter. If this is not possible, or if the supervisor is uncertain as to how the situation should be handled, the supervisor should consult with her or his manager or contact the Executive Office Director at Medair HQ.

Whenever a Representative discovers an incident of corruption involving a potential conflict of interest, then she or he should proceed according to the Medair Fraud and Misconduct Reporting Guideline.