

## PARTNERSHIP POLICY: Conflict of Interest



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|---------------------|--|--------------------|---------------------|
| APPROVED BY:        | WVI Board                              | RESPONSIBILITY:    | Stewardship         |
| POLICY OWNER:       | Chief Administrative & Finance Officer | POLICY DELEGATE:   | Chief Legal Officer |
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### I. OVERVIEW

#### I.1. Purpose

All World Vision employees and members of World Vision Boards and Advisory Councils have a responsibility to be good stewards of the resources which are entrusted to World Vision and to conduct the affairs of World Vision in an ethical manner, and thus to avoid conflicts between the interests of the organization and their personal financial and other interests.

#### I.2. Scope

All World Vision employees and members of World Vision Boards and Advisory Councils

#### I.3. Effective Date

The effective date of this revised policy is 19 April 2007

#### I.4. Retired/Related Policies

#### I.5. Contextualisation

Contextualisation of policies is addressed in the Contextualisation Guidelines available on [wvcentral](#) (Alternatively, please search for Contextualisation Guide on WV Central in the event that the direct link provided does not work)

### 2. POLICY

2.1. Every World Vision office shall adopt and maintain a written conflict of interest policy which:

- a. covers its Board or Advisory Council members (if any) and members of staff;
- b. requires a written disclosure of actual and potential conflicts of interest as they arise, and at least annually for all board and advisory council members, and appropriate staff;

- c. prohibits conflicts of interest (with limited exceptions for those deemed not to be material); and
  - d. Provides for disciplinary action for breaches of the policy.
- 2.2. Management shall develop and maintain a standard template policy and disclosure letter which satisfy the above requirements, and which can be adopted for use by each World Vision office

CONFLICT OF INTEREST DISCLOSURE LETTER

World Vision standard form

-- March 2016 version--

Having read the World Vision Conflict of Interest Policy, and examined my relationships with other organizations and persons to the best of my knowledge, and noting that if in doubt a relationship should be disclosed for further discussion, I have carefully reviewed each of the six statements below and marked either "yes" or "no" for each:

circle the appropriate  
answer for each:

1. Yes / No I have (or a relative of mine has) a financial interest in, or receive(s) income from, or am/is otherwise affiliated or involved with, an organization or person with which World Vision has business or ministry dealings (e.g., a vendor, a partner organization, a government ministry, etc.). (This would include such things as serving as a director, agent or employee of, owning shares in, or being a consultant to, such an organization, or being business partners with an individual who contracts with World Vision.) [Please provide details at the end of this form.]
2. Yes / No I (or a relative of mine) received, during the past 12 months, a gift or loan or other direct or indirect financial benefit from an organization or person as described in #1 above. [Please provide details at the end of this form.]
3. Yes / No I (or a relative of mine) receive(s) income from, or am/is otherwise affiliated or involved with, a not-for-profit organization other than World Vision, which publicly fundraises for and/or carries out ministry of a type which is carried out by the World Vision Partnership. [Please provide details at the end of this form.]
4. Yes / No A relative of mine received income from World Vision, during the past 12 months. Or I, if a board or advisory council member, have myself received income (other than reimbursement of expenses) from World Vision, during the past 12 months. [Please provide details at the end of this form.]
5. Yes / No I have received income from one or more World Vision employees, during the past 12 months. [Please provide details at the end of this form.]
6. Yes / No I hold a position in the government of my country. [Please briefly describe at the end of this form the department or branch of government, duties, and reporting relationships.]

Please describe below the details of any positive response for items 1 – 6 above, and/or any other potential conflicts of interest, or any comments you may wish to make on the matters disclosed above:

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→ I hereby certify that my answers to statements 1 – 6 above are accurate. If I have indicated “no” for all of statements 1- 6, I confirm that I have no relationships, business affiliations, involvements, associations, positions, financial interests, gifts, loans or other transactions requiring disclosure under the World Vision Conflict of Interest Policy.

Name (printed or typed): \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

→standard template, to be adopted by each WV office with items [in blue brackets] completed as appropriate for that office.

→ Last updated: 9 April 2007

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**WORLD VISION  
CONFLICT OF INTEREST POLICY**

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As directors, advisory council members or employees of a Christian organization, we all have a responsibility in carrying out our duties to be good stewards of what God has entrusted to World Vision and to conduct the affairs of World Vision in an ethical manner. Even the appearance of impropriety can be damaging to our ministry. This means that we must avoid conflicts—actual or potential—between the interests of the organization and our own personal financial or other interests.

This Conflict of Interest Policy is intended to remind us of this responsibility and to ensure that actual and potential conflicts of interest are disclosed, considered and handled appropriately.

## **REQUIREMENTS OF POLICY**

Each World Vision director, advisory council member and employee (each referred to as a “WV person”) will:

- A. In carrying out his or her duties on behalf of World Vision, or in dealing with others in the carrying out of their duties, put the interests of World Vision ahead of his or her own direct or indirect financial or other interests;
- B. Refrain or withdraw from any transaction or relationship, and (if a board or advisory council member) from any consideration (discussion and voting) by the board or advisory council, concerning any matter which is determined to constitute or involve a conflict of interest (actual or potential) under this policy; and
- C. Disclose actual and potential conflicts of interest as required under this policy.

The requirements of A. or B. above may affect the person’s World Vision duties, or his or her relationship with an outside firm or person. For example, a WV employee’s duties could be revised so the person has no involvement in decisions about whether to do business with a company owned by his/her relative. Or a WV person might be required to resign from the board of a donee organization, or divest himself or herself of stock in a supplier company, as a condition of continued World Vision employment or board or advisory council membership.

As noted above, indirect as well as direct interests are covered. An “indirect” interest of a WV person is one in which any of the following have an interest:

- Any individual related by blood or marriage to the WV person. (Such individual is hereinafter referred to as a “relative” of the WV person)
- An estate or trust of which the WV person or his or her relative is a beneficiary, personal representative or trustee.
- An organization (company, partnership, sole proprietorship or other form of organization) in which a relative of the WV person has an ownership interest, or of which a relative of the WV person is an officer, director or employee.

In the case of an indirect conflict of interest, the WV person may be required to seek to have the relative (or estate, trust or organization described above) refrain or withdraw from such participation.

## **EXAMPLES OF CONFLICTS OF INTEREST**

The following are examples of actual or potential conflicts of interest covered under this policy:

- A director receives a gift or loan from an existing or prospective supplier to World Vision.
- An employee (or her husband, son or daughter, or other relative) is on the board of directors of an organization which receives, or hopes to receive, benefits through a World Vision project. The person's position in World Vision is such that she may be able to influence the decision regarding the benefits to be received by such organization.
- A director's family member negotiates to sell or lease property to World Vision.

- An advisory council member's brother is part owner of a firm which carries out building maintenance services for World Vision.
- A director holds a senior level position in the government in which he or she can make or significantly influence policy decisions which could affect World Vision's ministry.

The above list is intended to illustrate examples of actual or potential conflicts of interest and is, of course, not exhaustive.

### **DISCLOSURE OF ACTUAL OR POTENTIAL CONFLICTS OF INTEREST**

- A. **Current and Prospective Disclosure.** It is the continuing responsibility of all WV persons to scrutinize their transactions and outside business interests and relationships, and to make immediate disclosure in writing of any transactions or relationships which may be considered to represent actual or potential conflicts. Disclosure is to be made as soon as the person becomes aware of the conflict, and if possible prior to entering into the transaction or relationship involved, or (if a director or advisory council member) prior to participating in any consideration of any related matter. **IF IN DOUBT ABOUT WHETHER SOMETHING IS A CONFLICT, PLEASE DISCLOSE, SO IT CAN BE FURTHER DISCUSSED.**
- B. **Annual Disclosure Statement.** In addition to any disclosures made under A. above, during September of every year each director or advisory council member, and each employee **[specify over a particular grade level, or all reporting to the senior executive, etc.]**, and any other employees designated by the senior executive (e.g., a purchasing manager if such person is not covered by the above designation), will submit a Disclosure Statement in the form attached. The Disclosure Statement is essentially a "snapshot" of business relationships as of the date of the Statement, and a summary of transactions during the preceding fiscal year, which might be considered to present issues of actual or potential conflicts of interest under this policy.
- C. **Who Receives Disclosures.** Disclosures are to be submitted, by staff to **[specify; normally the senior executive or a senior finance/administration person]**; and by board or advisory council members to **[specify; normally to the secretary of that body, or a senior staff member who services that body]**. The persons receiving the disclosures should each submit their own disclosures to **[specify some appropriate other person; e.g., the senior executive should submit to the board chair or Regional VP; the board secretary should submit to the board chair, etc.]**.
- D. **Confidentiality.** Disclosures submitted under this policy will be considered confidential and will only be communicated on a need to know basis.
- E. **Disciplinary action.** Any breach of this policy, including failure to make timely, complete, and accurate disclosure of an existing or potential conflict of interest, shall subject the person involved to appropriate disciplinary action, up to and including termination of employment, or dismissal from the board or advisory council.

### **INTERPRETATION OF POLICY**

The mere fact that a WV person is, for example, affiliated in some way with an organization which receives World Vision funding, does not necessarily result in a conflict of interest, depending on the person's specific roles/duties for WV and for the other organization. Similarly, the fact that a particular situation does not fit squarely within one of the examples listed above does not necessarily mean that no conflict of interest is present.

Accordingly, determinations may be necessary about whether any given situation in fact constitutes a conflict of interest, or whether a potential conflict may be permissible (on the basis that it will not affect the WV person's performance of his or her duties to World Vision and is therefore not material). In making such determinations, the objective is to ensure that actual conflicts are eliminated, and to err on the side of avoiding even the appearance of potential conflicts.

Such final determinations will be made, for staff, jointly by **[specify 2 senior persons; normally the senior executive of the office AND either the person to whom he/she reports or a senior admin or HR person]**, and for a board or advisory council member by **[specify 2 persons; normally the board secretary AND the senior executive or board chair]**. Determinations on any situations involving the above persons themselves will be made by **[specify alternates with appropriate positions, e.g., for senior executive it could be board chair, board secretary, Regional Vice President, etc.]**.