

CANSA - Conflict of Interest Policy

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The Climate Action Network South Asia (CANSA) works independently within the bounds of the tasks, responsibilities and organizational structure assigned to it by CANSA Board. It is registered as Stichting as per law of The Netherlands

The Director represents CANSA, is responsible for observing and analyzing policies and promotes networking.

CANSA is responsible for implementing regional programmes and projects, as determined in conjunction with the planning and approval procedures of the Board.

1. Purpose/General Rule

The purpose of this policy is to provide guidance in identifying and handling potential and actual conflicts of interest involving CANSA.

In most instances, conflicts of interest can be avoided simply by continuing to exercise good judgment. CANSA relies on the sound judgment of its employees to prevent many such conflict situations.

CANSA is committed to the highest levels of integrity. Employees of CANSA are expected to conduct their relationships with each other, the members of CANSA and outside organizations with objectivity and honesty.

The general rule is that: CANSA employees are obligated to avoid and disclose ethical, legal, financial, or other conflicts of interest involving CANSA, and remove themselves from a position of decision-making authority with respect to any conflict situation involving CANSA.

2. Identification and Management of Conflict Situations

a. Basic Definitions

Generally, a conflict of interest may occur if an endeavor or activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual's ability to perform his or her employment responsibilities in the best interests of CANSA.

An individual is considered to have a potential conflict of interest when: He/she or any family member receives a financial or other significant benefit as a result of the individual's position at the CANSA Secretariat; The individual has the opportunity to influence CANSA's programs, business, administrative, or other material decisions in a manner that leads to personal gain or advantage; or The individual has an existing or potential financial or other significant interest which impairs or might appear to impair the individual's judgment in carrying out their responsibilities towards CANSA.

b. Specific Relationships that may create conflict of interests

A variety of situations, affiliations and relationships may create potential conflicts of interest. An employee's former employment with a prospective or actual grantee, contractor, vendor or supplier, could raise an allegation of an apparent or actual conflict of interest. Therefore, if the former employment relationship is within the last six months, you must disclose the relationship and recuse yourself from managing the program activities or cooperation agreement with a CANSA member or any activity that involved financial dealings. In addition, if the former employment relationship is more than six months ago, but is still recent (within the past 12 months), you should disclose the relationship and be sensitive to the appearance of a conflict of interest or other impropriety.

For the purposes of the Conflict of Interest Policy, the term "family member" means spouse, parents, siblings, children, any other relative who resides in the *same household* and any other familial relationship that could create the appearance of a conflict.

Financial or other relationships (i.e., donors, governing board member, trustee, advisor, officer, consultant, or other position of influence) of an employee or their family with a prospective or actual grantee, contractor, vendor or supplier could create the appearance of impropriety or interfere with an employee's ability to perform their responsibilities on behalf of and in the best interests of the CANSA vision. Such relationships should be disclosed to the line manager or Board Members in case of Director.

When deciding which relationships should be disclosed, consider the situation from the perspective of an outsider and whether the relationship is of a nature that it could raise an allegation of an apparent or actual conflict of

interest, and then may impact transparency. Full disclosure helps to alleviate or avoid future misunderstandings.

c. Disclosure and Management of Conflicts of Interest

All positions of influence, financial benefits, financial interests, and other potential conflicts of interest must be disclosed to the line manager or your peers. If an appearance of impropriety or actual conflict of interest exist, appropriate actions must be taken by the line manager, which will vary depending upon the particular facts. The employee involved in the conflict situation must work cooperatively with their line manager to achieve a resolution of the conflict issues in the best interests of CANSA. Depending upon the nature of the conflict, this may include the employee being removed from a position of decision-making authority with respect to the conflict situation or other more serious actions.

3. Gifts and Entertainment

CANSA employees may not receive or offer gifts, entertainment or anything else of significant value (e.g. financial payments, awards, loans, services, fees, etc.) for the purpose of influencing the action of CANSA or of the recipient. Gifts and entertainment (except those generally valued at EUR 100 or less) received from vendors, suppliers, consultants, and partners as part of normal business practice, must be declined, given to CANSA or shared with the CANSA generally, and if acknowledgement is appropriate, acknowledged on behalf of the CANSA. This guideline is not intended to prohibit normal business practices, such as meetings over meals, corporate items given to participants in meetings and conferences, or token hosting gifts, as long as they are of nominal and reasonable value and promote the CANSA's legitimate business interests. If an employee believes there is an appropriate reason to make an exception to this policy for an individual situation, he or she should contact the line manager prior to giving or accepting the gift.

While it may sometimes be difficult to judge the value of gifts offered to CANSA employees, it is important to also consider the *appearance* of impropriety. CANSA staff should refrain from accepting gifts when the gifts give the appearance of impropriety. Please contact Director / HR if you are unsure about the appropriateness of accepting gifts or social invitations.

4. Director's Fees, Honorariums, Expense Reimbursements, and other Similar Payments

Staff members are encouraged to undertake speaking engagements, write articles, and engage in similar endeavors, provided the time spent does not interfere with the employee's professional responsibilities.

When participating in such activities as a CANSA representative or as a part of CANSA-sponsored board service, director's fees, author's royalties, honorariums, and payments for published articles or speaking engagements may not be accepted by full time staff and travel costs and expenses.

When participating in such activities as a member of a governing board or advisory board and as part of professional development, any director's fees may not be accepted and travel costs and expenses may be covered on actual basis by the inviting organisations in case there is no program budget with CANSA.

When participating in such activities on a personal basis, director's fees, author's royalties, honorariums, and payments for published articles or speaking engagements should only be accepted if: (1) the materials and all activities undertaken in connection with these endeavors are prepared or conducted on personal time, (2) the issues addressed are not related to the CANSA's work or mission, (3) CANSA resources are not utilized, and (4) the organization making the payment is not a CANSA program partner. Travel costs and expenses incurred in connection with any activities that are not CANSA related must be borne by the individual or the organization inviting them to participate, and must not be paid or reimbursed by CANSA. If an employee believes circumstances merit an exception to this policy, the employee should consult HR for advice.

5. Accepting Compensated Work Outside the CANSA

In an effort to prevent potential conflicts, understanding the scope and nature of outside business commitments by the CANSA management is necessary to ensure they do not infringe on work responsibilities required on behalf of the CANSA. Therefore, full time CANSA employees who hold the position of Program Officer or higher, or are otherwise at the level of manager, may not conduct outside business or other activities for which they receive remuneration if it is related to their expertise as a CANSA employee or the business of the CANSA, without prior approval from the Director / HR. In requesting permission, the employee should disclose the organization for which the work will be done, the nature of the work, the expected time commitment and remuneration to be received, as well as an evaluation of any potential conflicts of interest that could arise with CANSA as a result of the employee's engagement in such activity. All other CANSA employees may accept compensated work outside CANSA provided that such work is performed solely on personal time, without the use of CANSA resources, and provided that the time commitment required for such outside work does not impact the employee's ability to perform his or her work for CANSA.

6. Political Activities

The CANSA Staff is strictly prohibited from engaging in electoral politics or lobbying activities. Employees are free to engage in these types of political activities on a personal basis provided the activities do not conflict with their ability to carry out their professional responsibilities or create confusion between

positions or actions that are taken by them personally, versus as a CANSA representative. Before an employee becomes actively involved in a political campaign or activity, the employee should discuss appropriate actions with HR to avoid or minimize the risk of the employee's personal actions being attributed to CANSA, and also review any other unintended potential impacts such activity could have on the CANSA. Individual political activities should only occur during off-duty hours, at the employee's own expense, and without use of the CANSA name, resources, facilities, or equipment. If an employee is asked to sign political advertisements or endorsements that include employment, a generic description should be used such as "name of employee" rather than including the name of CANSA. Only the Board Co-Chairs of CANSA can authorize Director and Director can authorize CANSA Staff in the taking of any such position on legislation, referenda, or the like.

7. Competing for CANSA Individual Scholarships, Fellowships, or Awards

Employees of CANSA and their family members may not compete for CANSA supported scholarships, fellowships, or awards.

8. Interpretation

This policy cannot describe all conflicts of interest situations that may arise involving the staff of CANSA. Therefore, CANSA employees must use good judgment to avoid any appearance of impropriety. Appropriate circumstances may also justify exceptions to the application of the policy. If you have any questions about this policy or its application, please be on the side of caution and transparency and seek advice from HR prior to entering into such transaction.

9. Examples of Conflict of Interests

The following activities illustrate types of potential or actual conflicts of interest that should be avoided and disclosed, as applicable, in accordance with this policy. The list is not all inclusive and is intended only to provide guidance.

Self-benefit: Using your position or relationship within the CANSA to promote your own interests or those of your family, including use of confidential or privileged information acquired in the course of employment at the office for benefit or gain of yourself or your family members.

Influence peddling: Soliciting benefits for yourself or your family from outside organizations in exchange for using your influence to advance the interests of that organization within the CANSA.

Other business relationships and dealings: Approving grants or contracts with organizations in which you or your family have a significant financial or other interest or relationship, particularly if you are in a position to influence major decisions, are responsible for review, negotiation and approval of

the grants or contracts, or otherwise direct the CANSA's dealings with that business or entity.

Outside commitments: Participating in social or political activities is not restricted as long as you participate as an individual and not as a representative of CANSA.

Property transactions: Directly or indirectly leasing, renting, trading, or selling real or personal property to or from CANSA.

Use of the CANSA property for personal advantage: Using or taking CANSA resources, including facilities, equipment, personnel, and supplies, for private use or other unauthorized non-CANSA activities.

Recording or reporting false information: Misrepresenting, withholding, or falsifying relevant information required to be reported to external parties or used internally for decision-making purposes, in order to derive personal benefits.

Dealings with Members / Partners: Personally accepting anything of value from organizations or individuals that have program interests pending before CANSA.

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