



Conflict of Interest Policy

The policy amended below is the policy approved and updated by Transparency International at its annual membership meeting in Panama in 2016. It has been translated into Arabic and adapted to the needs of the Aman Coalition and approved by the Board of Directors at its meeting on 10 September 2018.

1- Introduction and Applicability

The efforts of the Aman Coalition to establish ethical standards among government officials, businesspeople and other individuals may be undermined by ethical lapses on the part of individuals representing the Coalition. It is essential that every person affiliated with the Aman Coalition be mindful of the potential for conflicts of interest to the greatest extent possible .

For the purposes of this policy, a conflict of interest refers to **a situation in which a person affiliated with the Aman Coalition is faced with a choice between the duties and demands of their position on the one hand and their personal interests on the other**. In this context, this policy applies to every person affiliated with the Aman Coalition in its general assembly and board of directors, or as an official or person with expertise working with or employed by the coalition. The interests of any person affiliated with the Aman Coalition include the interests of any person with whom they have a close personal relationship, including a spouse, partner, children, parents, or siblings.

Conflicts of interest may arise from time to time in the course of the activities carried out by these persons and the decisions they make, and may arise in the course of their work for the coalition in relation to monetary or financial interests, or interests that hinder them in the performance of their duties. They are required to act in the best interests of the Aman Coalition.

2- General Policy

- a) For the purposes of implementing this policy, the term "private interest" refers to personal benefits or benefits for the party, region, religion, gender, or ethnicity to which the employee in the coalition or its equivalent belongs. It also includes material interests such as financial or

- in-kind privileges, as well as moral interests such as enhancing the status of the party, region, ethnicity, family, religion or gender to which the employee belongs.
- b) Every person affiliated with the Aman Coalition (as defined in paragraph 1 above) shall avoid and not place themselves in any potential, actual or perceived conflict of interest (by any means, such as refraining from taking any decision or voting on matters that constitute a potential conflict of interest). and shall publicly disclose any potential or actual conflict of interest arising in the context of their affiliation with the Coalition.
 - c) Members of the coalition's board of directors, senior management and employees of the Aman Coalition shall declare all financial and non-financial interests other than those that are unlikely to give rise to a conflict of interest or that cannot be reasonably considered to give rise to a conflict of interest. This declaration shall be made through an electronic register that is accessible to the public.

3- Employment contracts and paid consulting

- a) Employees (including administrative staff) are sometimes employed by the Aman Coalition on a paid basis. This work is performed only with the express approval of their immediate superiors.
- b) A significant portion of Aman Coalition's work is carried out by individuals who are not employees of the coalition, but who work for or on behalf of the coalition on a voluntary basis. These include: individuals, board members, experts and volunteers who participate in the activities of the Aman Coalition. Many of these individuals have their own jobs and professional and other commitments that should be taken into account.
- c) Members of the Board of Directors, companies or other organisations to which these individuals currently belong and which form part of the Aman Coalition may not perform paid work for the Aman Coalition. As an exception, senior employees who work for Amanah Coalition in a paid capacity may, by virtue of their position, hold membership in Amanah Coalition's General Assembly at the same time, if the internal regulations so provide.
- d) Members of the Board of Directors or companies or other organisations to which these members currently belong and which form part of the Aman Coalition may not apply for or compete for paid work contracts with the Aman Coalition, nor may the Aman Coalition grant them any advantages over competitors in the award or execution of such work. They

must not use confidential information. In other words, the relevant board members who have disclosed a conflict of interest must not be given access to "confidential details and information relating to matters that are the subject of the conflict of interest" so that the board members or their companies do not use confidential information belonging to the Aman Coalition.

- e) Experts and volunteers active in the Aman Coalition or companies or other organizations to which these individuals belong and represent part of the Aman Coalition, to apply for and compete for paid work contracts with the Aman Coalition, provided that they do not, give them any advantage over any competitors in relation to the award or performance of that work. They must not use confidential information and must not do anything that conflicts with their use of confidential information.
- f) The Consortium shall observe transparent procedures in tendering and in all matters relating to the award of paid work.
- g) The consortium shall not employ or enter into any working relationship with immediate family members, meaning spouse, parent, child, brother or sister, of any of its employees or members of its Board of Directors without specific authorisation by a unanimous decision of the Board of Directors, which may only consider this possibility after taking the appropriate legal steps to ensure that competition is open and that procedures guaranteeing equal opportunities have been exhausted.

4- Gifts and honors

No person affiliated with the Aman Coalition shall accept any gift, honor or anything else worth more than 10 Jordanian dinars from any individual or organization if it is possible, in a reasonable manner, to interpret that gift or honor as an attempt to influence the Aman Coalition.

5- How to deal with potential conflicts of interest

- a) A person facing a potential conflict of interest must disclose and declare that potential conflict, and other coalition members must report it as soon as they become aware of it.
- b) The disclosure or report should be escalated to the highest level of responsibility, with the employee reporting to their immediate supervisor, the immediate supervisor reporting to the executive director of the coalition, and the executive director reporting to the chair of the board of directors. The chair and members of the board of directors shall report to the board of directors or the general assembly.

- c) An assessment of the potential conflict of interest shall be prepared by the board of directors of the coalition, its executive management or the general assembly. This assessment may determine that there is no conflict of interest, or it may lead to the conclusion that:
 - .(1) the person concerned must not continue to hold the position that was subject to the assessment.
 - .(2) The person concerned must withdraw from participation in decision-making procedures adopted by the Coalition in relation to the matter in question.
- d) The Executive Director and the immediate unit managers are responsible for ensuring that all persons associated with the activities carried out by the Coalition are aware of the policy and procedures relating to conflicts of interest. In addition, this policy and these procedures shall be made available to all by posting them on the websites.

6- Disclosure of payments

All financial information must be disclosed in the annual financial report and audit report issued by the Aman Coalition. These reports must also identify the procurement/tendering procedures that led to these payments and the relevant information..

The Coalition for Integrity and Accountability (Aman) - A Palestinian organisation accredited by Transparency International since 2006 - was founded in 2000 by a group of civil society organisations active in the fields of democracy, good governance and human rights, with the aim of achieving its vision of a "corruption-free Palestinian society".

The coalition currently seeks to create and lead a cross-sectoral social movement against corruption, contribute to the production, transfer and localisation of knowledge about corruption, and combat it at the national, regional and international levels.

The Aman Coalition is keen to play its watchdog role over the national integrity system, focusing on community participation, activating the role of civil society institutions and the media in monitoring and accountability, creating a secure environment, and contributing to the detection of corruption crimes and limiting their spread.

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