

CONFLICT OF INTEREST POLICY

- **Approved by:** The Board of Nordic Impact
- **Adoption Date:** 25 February 2026
- **Period of Validity:** Until Further Notice
- **Applies To:** Board members, employees, consultants, contractors, volunteers, and implementing partners
- **Geographical Scope:** All countries where Nordic Impact operates



1. Policy Statement

Nordic Impact is committed to the highest standards of integrity, transparency, accountability, and good governance.

All decisions must be made solely in the best interests of the Organization, its beneficiaries, and its donors. Personal, financial, family, clan, political, or business interests must not influence official duties.

The Organization adopts a **zero-tolerance approach** to undisclosed conflicts of interest.

2. Purpose

This Policy aims to:

- Protect the integrity and reputation of the Organization
- Prevent corruption, favoritism, and nepotism
- Ensure compliance with applicable national laws and donor regulations in countries where Nordic Impact operates.
- Promote transparency in decision-making
- Safeguard donor funds and public trust

3. Scope

This policy applies to:

- Board of Directors
- Executive Director
- Senior Management
- Employees
- Volunteers
- Consultants
- Implementing Partners
- Suppliers and Contractors (where applicable)

All covered individuals must comply fully and sign a Conflict-of-Interest Declaration.

4. Definitions

4.1 Conflict of Interest

A situation where personal interests interfere—or appear to interfere—with the ability to perform official duties objectively and in the best interests of the Organization.

4.2 Types of Conflicts

- **Actual Conflict** – A direct conflict exists
- **Potential Conflict** – A situation that may develop into a conflict
- **Perceived Conflict** – A situation that appears improper to others

Perceived conflicts must also be disclosed.

5. Common Conflict Risk Areas

5.1 Nepotism and Clan Influence

- Hiring relatives or clan members without transparent processes
- Influencing recruitment or procurement decisions

5.2 Procurement

- Awarding contracts to companies owned by relatives or associates
- Accepting gifts, commissions, or kickbacks

5.3 Financial Approvals

- Approving payments to family-owned businesses
- Self-authorization of expenses

5.4 Political Interests

- Using NGO resources for political activities
- Holding political office while influencing organizational decisions

5.5 External Employment

- Working for competing organizations
- Holding financial interests in partner companies

6. Disclosure Requirements

6.1 Initial Declaration

All board members, staff, and consultants must complete a **Conflict-of-Interest Declaration Form** upon appointment or employment.

6.2 Annual Declaration

An updated declaration must be submitted annually.

6.3 Ongoing Disclosure

Any new or emerging conflict of interest must be disclosed immediately in writing.

Failure to disclose constitutes a violation of this policy.

7. Management of Conflicts

When a conflict of interest is disclosed:

1. The individual must formally declare the conflict of interest.
2. The individual must withdraw from discussions and decisions related to the matter.
3. The conflict of interest must be recorded in meeting minutes.
4. An independent review may be conducted.
5. The Board or designated committee will determine mitigation measures.

Possible measures include:

- Recusal from decision-making
- Reassignment of duties
- Cancellation of the procurement process
- Termination of contract (if required)

8. Procurement Safeguards

To prevent conflicts of interest:

- All procurements shall follow competitive bidding procedures.
- Where feasible, a minimum of three quotations must be obtained for significant purchases.
- Procurement committee members are required to sign confidentiality and conflict of interest declarations.
- All evaluation processes must be documented in writing.

9. Recruitment Safeguards

- Positions must be publicly advertised where possible and appropriate.
- Selection must be merit-based.
- Interview panels must include more than one member.
- Documentation of scoring must be maintained.

10. Gifts and Hospitality

- Staff and board members must not accept cash gifts.
- Gifts of significant value are prohibited.
- Symbolic or culturally appropriate gifts of minimal value must be declared.

11. Confidentiality

Individuals must not use confidential information for personal benefit or disclose sensitive donor or beneficiary data improperly.

12. Reporting Violations

Any suspected undisclosed conflict of interest must be reported through one of the following channels:

- Executive Director
- Board Chairperson
- Whistleblowing mechanism

Serious cases involving donor-funded projects must be reported to the donor (e.g., Sida) within 7 days of discovery.

13. Investigation Procedures

Upon receiving a report:

1. A preliminary review shall be conducted.
2. An investigation committee may be appointed.
3. Evidence shall be documented securely.
4. The accused shall be given the opportunity to respond.
5. Findings shall be reported to the Board.

14. Disciplinary Measures

Violation of this policy may result in:

- Written warning
- Suspension
- Termination of employment
- Removal from Board
- Recovery of funds

- Reporting to donors
- Legal action

15. Record Keeping

The Organization shall maintain:

- Signed declarations
- Meeting minutes documenting recusals
- Investigation reports
- Procurement and recruitment documentation

Records must be retained according to donor and legal requirements.

16. Training and Awareness

- Annual training on conflict of interest
- Orientation for new staff and board members
- Signed acknowledgment of this policy

17. Monitoring and Review

This policy shall be reviewed:

- Every two years
- When required due to donor updates
- After major compliance incidents

The Board of Nordic Impact will approve any amendments to this policy.

18. Related Policies

Employees are encouraged to read this policy in conjunction with other relevant Organization policies, including:

- Nordic Impact Anti-Fraud and Anti-Corruption Policy
- Nordic Impact Whistleblowing Policy
- Nordic Impact Sexual Exploitation, Abuse, and Harassment (SEAH) Policy
- Nordic Impact Code of Conduct