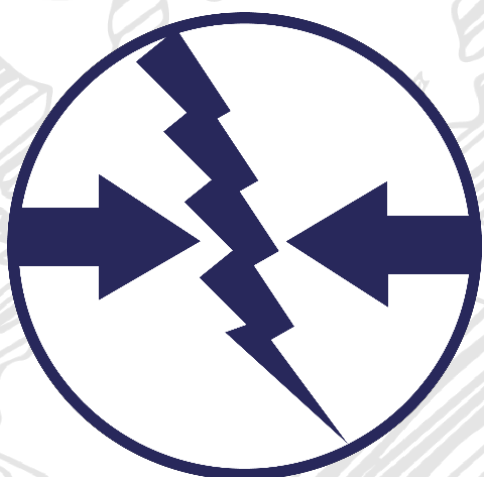




CONFLICT  
OF INTEREST  
PREVENTION  
POLICY

Version 2.2 | 2025

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# I. INTRODUCTION

Independent, private and non-profit, Acted respects a strict political and religious impartiality, and operates following principles of neutrality, non-discrimination, transparency, according to its core values: responsibility, impact, enterprising-spirit and inspiration.

Acted is committed to immediate humanitarian relief to support those in urgent need and protect people's dignity, while co-creating longer term opportunities for sustainable growth and fulfilling people's potential. Acted endeavours to respond to humanitarian crises and build resilience; promote inclusive and sustainable growth; co-construct effective governance and support the building of civil society worldwide by investing in people and their potential.

The commitment of Acted is guided by 4 core values:

- **Responsibility:** we ensure the efficient and responsible delivery of humanitarian aid with the means and the resources that have been entrusted to us.
- **Impact:** we are committed to having the most sustainable impact for the communities and the people with whom we engage.
- **Enterprising-spirit:** we are enterprising and engage in our work with a spirit that creates value and overcomes challenges.
- **Inspiration:** we strive to inspire all those around us through our vision, values, approaches, choices, practice, actions and advocacy.

## Policy Statement

Acted is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its activities. To this end, Acted's Conflict of Interest Prevention Policy:

- Encourages prevention;
- Promotes detection;
- Sets out a clear investigation procedure;
- Sets out a mechanism of sanctions.

The purpose of this policy is aimed at guiding Acted staff and partners, and must be considered together with:

- Acted's Code of Conduct;
- Acted's Child Protection Policy;
- Acted's Data Protection Policy;
- Acted's Grievance Policy;
- Acted's Anti-Fraud, Bribery and Corruption Policy;
- Acted's Policy on Protection from Sexual Exploitation, Abuse and Harassment;
- Acted's Anti-Terrorism and Anti-money laundering Policy;
- Acted's Environmental and Social Protection Policy;
- Acted's Gender Policy;
- Acted's procedures, manuals (e.g. Finance, Logistics, Administration & Human Resources, Security & Safety), handbooks (e.g. Transparency & Compliance, Appraisal, Monitoring & Evaluation, Project Management, Project Development) and charters (e.g. Use of Information Systems);
- Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, of which Acted is a signatory;
- U.N. Inter-Agency Standing Committee (IASC) Six core principles relating to Sexual Exploitation and Abuse.



## II. INTERPRETATION AND SCOPE

### Article 1 – Scope of application

1. This policy applies to all Acted staff and governance members.
2. The provisions of this policy may also be applied to any person employed by an entity that carries out missions for Acted.
3. In particular, this policy applies to consultants, suppliers, sub-grantees and implementing partners depending on specific clauses and conditions of the grant agreement.

### Article 2 – Definitions

#### **Conflict of interest:**

- A “conflict of interest” stems from a situation in which a staff of Acted and/or the other entities referred to in Article 1 of this policy has a personal interest likely to influence or appear to influence the impartial and objective exercise of their professional role.
- The personal interest of staff of Acted and the other entities referred to in Article 1 of this policy covers any benefit for themselves or for their relatives or organisations with which they have or have had business or political relations. It also includes any financial or civil obligation to which the staff of Acted and the other entities referred to in Article 1 of this policy are subject.

**Consultant:** Under the term of this policy, a “consultant” is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of consulting services to Acted and/or one of its sister organisations and/or one of the member organisations of the Acted network, whether for a fee or not.

**Supplier:** Under the term of this policy, a “supplier” is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of goods and/or services to Acted and/or one of its sister organisations and/or one of the member organisations of the Acted network, whether for a fee or not.

**Governance:** Under the terms of this policy, the term “governance” refers to any person elected by decision-making bodies to participate in the managerial and administrative bodies of Acted and/or one of its sister organisations and/or one of the member organisations of the Acted network. In particular, the members of boards of directors and supervisory boards are Governance members.

**Implementing partner:** Under the terms of this policy, an “implementing partner” is a partner to whom the implementation of one or more projects or activities has been delegated, and to whom a budget has been allocated for this purpose. In particular, this refers to international NGOs and/or national NGOs and/or public institutions.

**Stakeholders:** Under the terms of this policy, “stakeholders” are individuals or groups, with or without a legal personality, who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit, in any way, from the actions, programmes and activities of Acted and/or one of its sister organisations and/or one of the member organisations of the Acted network.

**Acted staff:** Under the terms of this policy, the term “Acted staff” refers to any person employed by Acted and/or one of its sister organisations and/or one of the member organisations of the Acted network. The interns of



Acted and/or one of its sister organisations and/or one of the member organisations of the Acted network are considered to fall within this category, for the purposes of this policy.

**Sub-grantee:** Under the terms of this policy, a “sub-grantee” is an individual or group, with or without a legal personality, who receives a budget to carry out a project or activity.

## Article 3 – Information and adherence to the policy

1. This policy is published under the authority of Acted. Acted staff, as well as the other entities referred to in Article 1 of this policy, are required to conduct themselves in accordance with this policy and must therefore be aware of and have understood its provisions and any changes. When they are unsure of how to proceed, they should seek the advice of a competent person, notably their line manager.
2. Acted staff, as well as the other entities referred to in Article 1 of this policy, who are responsible to negotiate the terms of conditions of employment of any Acted staff, must ensure that staff is aware of and commits to the full respect of this policy.
3. It is the responsibility of Acted staff with managerial responsibilities, as well as the other entities referred to in Article 1 of this policy, to ensure that staff under their supervision comply with this policy; and to take or propose appropriate disciplinary measures as sanction against any violations of its provisions.
4. This policy shall form part of the working conditions of Acted staff and the conditions for the performance of the missions of the other entities referred to in Article 1 of this policy from the moment they certify that they have read it.
5. Acted will review the provisions of this policy at regular intervals.

## Article 4 – Purpose of the Policy

The purpose of this policy is to:

1. Implement mechanisms to prevent and fight conflicts of interest applicable to Acted staff and the other entities referred to in Article 1 of this policy.
2. Specify the rules on integrity and conduct relating to the fight against conflicts of interest that Acted staff and the other entities referred to in Article 1 of this policy must observe.
3. Inform third parties of the conduct that they are entitled to expect from Acted staff and the other entities referred to in Article 1 of this policy.

# III. GENERAL PRINCIPLES

## Article 5 – Neutrality

Acted staff, as well as the other entities referred to in Article 1 of this policy, must fulfil their duties in a neutral and apolitical manner, in accordance with the law, legitimate instructions and ethical rules relating to their roles.



## Article 6 – Impartiality

In the context of their professional roles and/or their missions, Acted staff, as well as the other entities referred to in Article 1 of this policy, must act in accordance with the law and exercise their discretionary power in an impartial manner, taking into consideration only relevant circumstances into consideration.

## Article 7 – Confidence of stakeholders

Acted staff, as well as the other entities referred to in Article 1 of this policy, have a duty to conduct themselves at all times in a way that reflects and upholds Acted's values of integrity, impartiality and efficiency and contribute to strengthen the confidence of all stakeholders.

## Article 8 – Hierarchical responsibility

Acted staff report to their immediate line manager and/or the head of their functional department, unless otherwise provided for by law.

## Article 9 – Confidentiality

Duly considering the stakeholders' potential right to access information, Acted staff, as well as the other entities referred to in Article 1 of this policy, must process all the information and all the documents acquired during or as part of the exercise of their duties with the necessary confidentiality.

## Article 10 – Political or public activity

1. Subject to respect of fundamental and constitutional rights, Acted staff must ensure that their personal participation in political activities or their involvement in public or political debates does not alter the confidence of stakeholders, international, national or local authorities, or Acted, with regard to their ability to complete the mission fairly and impartially.
2. In the performance of their duties, Acted staff must not use the resources for partisan purposes.

## Article 11 – Protection of privacy

All the necessary measures must be taken to ensure that the privacy of Acted staff and of the other entities referred to in Article 1 of this policy, is appropriately respected; as a result, the declarations provided for this policy must remain confidential, unless otherwise provided for by law.

## Article 12 – Information held

1. Considering the general framework of international law regarding access to information held by private individuals, Acted staff and the other entities referred to in Article 1 of this policy should disclose information only in respect to the rules and requirements applicable to Acted.
2. Acted staff and the other entities referred to in Article 1 of this policy must take appropriate measures to guarantee the security and confidentiality of the information for which they are responsible or of which they are aware.



3. Acted staff and the other entities referred to in Article 1 of this policy must not seek access to information which would be inappropriate for them to have. Acted staff, as well as the other entities referred to in Article 1 of this policy, must not make inappropriate use of the information they may obtain in or as part of the exercise of their duties.
4. In the same way, Acted staff and the other entities referred to in Article 1 of this policy must not retain professional information that may or should be legitimately circulated, or circulate information they know, or have reasonable grounds to believe, is inaccurate or misleading.

## Article 13 – Professional resources

In the exercise of their discretionary power, Acted staff and the other entities referred to in Article 1 of this policy must ensure that the staff and the property, facilities, services and financial resources entrusted to them are managed and used in a useful, effective and economic manner. They must not be used for private purposes, unless this is authorized in writing.

## Article 14 – Responsibility of line managers

1. Acted staff in charge of managing or supervising other staff of Acted must do so in accordance with the policies and objectives of Acted. They must respond to the acts and omissions of their staff which violate these policies and objectives, if they have not taken the due diligence measures expected from a person in their position to prevent such acts or omissions.
2. Acted staff tasked with managing or supervising other staff of Acted must take the measures necessary to prevent their staff from engaging in acts related to conflict of interest in relation to their work. These measures may be: to draw attention to and implement the laws and regulations; to ensure adequate training against conflict of interest their staff may face; and to set an example of integrity through their personal conduct.

## Article 15 – Termination of professional duties

1. Acted staff must not take undue advantage of their role within Acted to obtain an employment opportunity outside of Acted.
2. Acted staff must not allow the prospect of another job to create an actual or potential conflict of interest, or a situation likely to appear as such. They must also inform their supervisor of their acceptance of any job offer.
3. Acted staff must not use or disclose confidential information obtained by them in their capacity as an Acted staff, unless they have been authorized to do so by Acted in writing, and in accordance with the law.

## Article 16 – Relations with former staff of Acted

Acted staff should not give former Acted staff preferential treatment or privileged access to Acted.



## IV. MECHANISMS TO FIGHT CONFLICTS OF INTEREST

### Article 17 – Prevention of conflicts of interest

1. Acted staff and the other entities referred to in Article 1 of this policy must prevent their private interests from conflicting with their duties. It is their responsibility to avoid such conflict, regardless of whether this conflict is actual, potential, or likely to appear as such.
2. Under no circumstances may Acted staff and the other entities referred to in Article 1 of this policy take unfair advantage of their professional position for their personal interest.

### Article 18 – Reporting

1. Acted staff and the other entities referred to in Article 1 of this policy, which believe that they are required to act unlawfully, improperly or unethically, which may be in violation of this policy or otherwise inconsistent with this policy, should report it to their line manager and/or personal contacts within Acted.
2. Acted staff and the other entities referred to in Article 1 of this policy who have reported an aforementioned case of misconduct in accordance with this policy, and who believe that the response provided is not satisfactory, may report this in writing on the Transparency Line platform (<https://transparency.acted.org/>) or via [transparency@acted.org](mailto:transparency@acted.org).
3. Acted staff and the other entities referred to in Article 1 of this policy must report to their line manager and/or through [grievance@acted.org](mailto:grievance@acted.org) and/or through the Transparency Line platform (<https://transparency.acted.org/>) of any evidence, allegation or suspicion of illegal or criminal activity concerning Acted of which they are aware in or as part of the exercise of their duties. The investigation of the reported facts is the responsibility of Acted.
4. Acted must ensure that Acted staff and the other entities referred to in Article 1 of this policy who report a case as described above on the basis of reasonable suspicions and in good faith does not suffer from any harm as a result.
5. Cases of misuse of complaint mechanisms may be subject to sanctions.

### Article 19 – Action to be taken in the event of a conflict of interest

1. Since Acted staff and the other entities referred to in Article 1 of this policy are generally the only ones who know if they are in position of possible or actual conflict of interest, they are personally required to:
  - be attentive to any actual or potential conflict of interest;
  - take measures to avoid such a conflict of interest;
  - inform their line manager of any conflict of interest as soon as they are aware of this, in accordance with Articles 8 or 18 of this policy;
  - comply with any final decision that requires them to resolve the situation, in particular by removing themselves from the situation, or renouncing the benefit from which the conflict stems.



2. When requested, Acted staff and the other entities referred to in Article 1 of this policy must declare whether or not they have a conflict of interest.

## Article 20 – Declaration of interests

In accordance with this policy, Acted staff and the other entities referred to in Article 1 of this policy who occupy a position and/or exercise a mission in which their personal or private interests are likely to be affected by their professional functions and/or mission must declare the nature and extent of their interests whenever they assume a position or at the time of each mission, and then at regular intervals and at the time of any change of situation.

## Article 21 – Incompatible external interests

1. Acted staff and governance members must not engage in any activity or transaction, or occupy any paid or unpaid position or role, that is incompatible with the correct exercise of their professional functions, or that harms this. If it is unclear whether an activity is compatible, they must request the opinion of their line manager.
2. Subject to the applicable legislation, Acted staff and governance members are required to inform and obtain the approval of Acted before performing certain paid or unpaid activities, or accepting any positions or roles, outside of their work for Acted.
3. Acted staff must declare their affiliation with or membership of organisations likely to harm their role or the correct performance of their duties at Acted.

## Article 22 – Gifts

1. Acted staff and the other entities referred to in Article 1 of this policy must not solicit or accept gifts, favours, invitations or any other benefit intended for them or their family, parents, close friends or persons or organisations with which Acted staff and the other entities referred to in Article 1 of this policy have or have had business or political relations, which may influence or appear to influence the impartiality with which they perform their duties and/or their mission or which may constitute or appear to constitute a reward for their duties or their mission. In accordance with the Acted's Code of Conduct, this does not include conventional hospitality or small gifts, which must be reported to the line manager.
2. If Acted staff are unsure whether or not they may accept a gift or hospitality, they must request the opinion of their line manager.

## Article 23 – Reaction to offers of unfair advantages

1. If Acted staff and the other entities referred to in Article 1 of this policy are offered an unfair advantage, they must take the following measures to protect themselves:
  - refuse the unfair advantage. It is not necessary to accept it with a view to using it as proof;
  - try to identify the person who made the offer;
  - avoid prolonged contact, although knowledge of the reason for the offer may be useful in a statement;
  - in the event that the gift cannot be refused or returned to the sender, it must be kept, and handled as little as possible;
  - try to have witnesses, for example colleagues working nearby;
  - draft a written report on this attempt and send it to the line manager and/or the Transparency Line platform (<https://transparency.acted.org/>) in a timely manner;



- report the attempt to their line manager and/or their functional management in a timely manner;
  - continue to work normally, particular on the contract in relation to which the unfair advantage was offered.
1. Any significant gift which could not be refused must be handed over to Acted with an explanatory note.

## Article 24 – Vulnerability to the influence of third parties

Acted staff and the other entities referred to in Article 1 of this policy must not place themselves or allow themselves to be placed in a situation that requires them to grant a favour to any person or entity in return. In the same way, their public and private conduct must not leave them vulnerable to the undue influence of third parties.

## Article 25 – Abuse of professional position

1. Acted staff and the other entities referred to in Article 1 of this policy must not offer advantages linked to their professional situation and/or their mission in any way, unless this has been duly authorized in writing.
2. Acted staff and the other entities referred to in Article 1 of this policy must not attempt to influence any person or entity (including other Acted staff and the other entities referred to in Article 1 of this policy) for any private purpose, by abusing their professional position or by offering personal benefits.

# V. IMPLEMENTATION OF THE POLICY

## Article 26 – Implementation date of the policy

This Conflict of Interest Prevention Policy comes into effect after approval by the Board of Acted on 3 October 2025.

## Article 27 – Adherence to the policy

Acted staff and the other entities referred to in Article 1 of this policy certify that they adhere to these principles by signing the Acted Policy Acceptance Form and/or by signing their employment contract.

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