



POLICY



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JP Global Governance and Development Foundation (JPGGADF)

Conflict of Interest Policy

1. Purpose

The purpose of this Conflict of Interest Policy is to uphold the highest standards of integrity, transparency and accountability in all decision-making processes of JP Global Governance and Development Foundation (JPGGADF).

This policy aims to:

- Ensure that all decisions are made impartially and in the best interests of the organization;
- Safeguard the reputation, credibility and ethical standing of JPGGADF;
- Prevent situations where personal, financial or professional interests could improperly influence organizational decisions; and
- Foster public trust and confidence in the operations, governance and programs of JPGGADF.

2. Guiding Principles

JPGGADF is committed to conducting its operations in accordance with the following principles:

- **Integrity and Ethics:** All individuals associated with JPGGADF shall act with honesty, fairness and ethical responsibility in all matters.
- **Transparency and Accountability:** Decisions and actions shall be open to scrutiny and clearly documented to ensure accountability.
- **Impartiality:** Organizational decisions shall be made objectively, free from undue influence arising from personal or financial interests.
- **Collaboration and Openness:** JPGGADF promotes an inclusive and respectful environment that encourages dialogue while maintaining ethical safeguards.
- **Prevention of Misuse of Position:** Individuals must not use their position within JPGGADF for personal gain or to benefit associated persons or institutions.

3. Policy Statement

All JPGGADF persons are required to avoid situations that may give rise to a conflict of interest.

Where such situations arise, individuals must promptly disclose the conflict and refrain from participating in any decision-making process related to the matter.

No individual shall be involved in any transaction, assessment or decision where their personal interests or those of associated persons or institutions, may compromise or appear to compromise their objectivity.

4. Definitions

4.1 Conflict of Interest

A conflict of interest arises when a JPGGADF person participates, directly or indirectly, in any official matter where they or an associated person or institution, have a financial or other vested interest that could influence or reasonably appear to influence, their judgment.

Such conflicts may be **actual, potential or perceived** and all three must be treated with equal seriousness.

4.2 JPGGADF Person

A JPGGADF person includes:

- All staff members;
- Individuals acting on behalf of JPGGADF; and
- Members of any JPGGADF panel, including Executive Board Members, Directors, consultants and subject-matter experts.

4.3 Associated Person

An associated person includes, but is not limited to:

- Immediate and extended family members (parents, spouse, children, siblings);
- Domestic partners;
- Close relatives, friends or personal associates;
- Business partners; and
- Any individual with whom the JPGGADF person has or is negotiating, an employment or financial relationship.

4.4 Associated Institution

An associated institution refers to:

- Any organization where a JPGGADF person serves in a governance, employment or consultancy role;
- Any entity that receives or may receive funding from JPGGADF;
- Any organization that has a contractual or legal relationship with JPGGADF;
- Any entity with which the JPGGADF person is negotiating future employment or collaboration.

4.5 Panel and Panel Member

- A **panel** refers to any committee, board or group constituted by JPGGADF for decision-making, including grant approvals, procurement or advisory functions.
- A **panel member** is any individual serving on such a panel in any capacity.

5. Nepotism and Favouritism

JPGGADF strictly prohibits nepotism and favouritism in all its operations, including recruitment, procurement, funding decisions and program implementation.

Nepotism refers to the practice of favoring relatives, friends or personal associates by offering them undue advantages such as employment, contracts or financial benefits, regardless of merit.

JPGGADF is committed to:

- Ensuring merit-based recruitment and selection processes;
- Maintaining fairness and competitiveness in procurement and contracting;
- Preventing preferential treatment in aid distribution and program benefits.

However, in exceptional cases where collaboration with known individuals is unavoidable, such engagements must:

- Be transparently disclosed;
- Follow due process; and
- Be subject to strict conflict-of-interest management procedures.

6. Procedures for Disclosure and Management of Conflicts of Interest

6.1 Staff Members

a. Duty to Disclose

All staff members are obligated to promptly disclose:

- Any actual conflict of interest;
- Any potential or perceived conflict of interest;
- The nature and extent of such conflict.

Disclosure must be made as soon as the individual becomes aware of the situation.

b. Reporting Authority

Conflicts of interest must be reported to the **Designated Person**.

If the Designated Person is themselves conflicted, the matter shall be referred to the **Designated Alternate (Secretary)**.

c. Management of Conflict

The Designated Person or Alternate shall:

- Assess the nature and severity of the conflict;
- Determine appropriate mitigation measures;
- Provide clear instructions regarding the individual's role in the matter.

In all cases, the conflicted individual shall **recuse themselves** from related discussions and decisions.

d. Non-Disclosure and Disciplinary Action

Failure to disclose a conflict of interest will result in:

- A formal review process where the individual is given an opportunity to explain;
- An investigation into the materiality and intent of non-disclosure;

If a violation is confirmed, disciplinary action may be taken in accordance with JPGGADF's policies, which may include warnings, suspension or termination, depending on severity.

6.2 Panel Members

All panel members must adhere to the following procedures:

1. **Declaration:** At the first meeting, each panel member shall read this policy and sign a Conflict of Interest Declaration.
2. **Ongoing Disclosure:** Any conflict must be disclosed immediately upon awareness.
3. **Third-Party Reporting:** Any participant aware of a conflict must report it to the panel.
4. **Panel Review:** The panel (excluding the concerned member) shall:
 - Evaluate the conflict;
 - Decide on its validity;
 - Determine whether limited participation or full recusal is required.
5. **Failure to Disclose:** Non-disclosure by a panel member will result in mandatory withdrawal from the panel.
6. **Voting Restrictions:** Conflicted members shall not:
 - Be counted in quorum;
 - Participate in discussions;
 - Vote on the matter.

7. Reporting to Donors

Where required by legal or contractual obligations, JPGGADF shall disclose conflicts of interest to donors after completing due review and decision-making processes.

8. Post-Decision Conflict Identification

If a conflict is identified after a decision has been made:

- The Chair may declare the decision null and void if reconvening is not feasible;
- Where possible, the panel shall reconvene to reassess the decision;

If a conflict is confirmed:

- Members shall evaluate whether the conflicted vote influenced the outcome;
- If influence is established, the decision shall be reconsidered and re-voted.

7. Illustrative Examples of Conflicts of Interest

In the event of a Panel becoming aware of a potential conflict of interest only after a decision has been made, the Chair of the Panel may, if reconvening the Panel is not practical, declare the decision null and void. However, where possible the Panel shall reconvene to consider the potential conflict in accordance with this Policy. If the Panel determines that a conflict exists, the members of the Panel shall further determine whether the decision of the conflicted member would have affected each of their votes. If each panel member determines that his or her vote would not have been affected, the initial decision will stand. However, if any member states that their vote would have been affected, the vote will be retaken with each affected vote being reversed.

Conflicts of interest may arise in a variety of situations where personal, financial or professional considerations have the potential to compromise or appear to compromise, the objectivity and integrity of decision-making within JPGGADF. The following examples are intended to guide understanding and are not exhaustive:

1. Policy Influence for Personal or Institutional Gain

A representative or member of JPGGADF advocates for the approval, modification, or continuation of a policy, programme or initiative from which they or an associated individual or institution, may derive direct or indirect financial or material benefit. This includes situations where such advocacy could influence funding allocation or organisational priorities.

2. Participation in Evaluation of Associated Entities

A JPGGADF representative is involved in the appraisal, assessment, or decision-making process concerning an organisation or institution with which they have an existing or prior association (professional, financial, or personal), particularly where that entity is seeking grants, partnerships or other forms of support from JPGGADF.

3. Influence in Grant or Contract Approval Processes

A panel member or decision-maker promotes or supports the approval of a grant, contract, or funding proposal where an associated person or institution stands to benefit, either as a direct recipient of funds or through involvement in project implementation, consultancy, or service delivery.

4. Biased Technical or Expert Review

JPGGADF appoints an external expert or consultant to review technical specifications, proposals or tenders, and that expert has an existing employment relationship, consultancy role or financial interest in one or more of the potential bidders, thereby compromising impartiality.

5. Institutional Relationships Affecting Decision-Making

A decision-maker is affiliated with an institution that has an existing collaboration, partnership or cooperation agreement with an applicant organisation participating in a JPGGADF call for proposals, which may influence the fairness of evaluation or selection.

6. Financial Interest in Bidding Organisations

An associated individual (including staff, board members, or their immediate family members) holds shares, ownership stakes or other financial interests in an organisation that has submitted a bid or tender to provide goods or services to JPGGADF.

7. Professional Engagement with Applicants

A panel member or evaluator has an ongoing or recent professional relationship with an applicant organization - such as providing consultancy, freelance services, research, writing, media engagement or other intellectual contributions - which may affect their independence in reviewing funding applications.

CONFLICT OF INTEREST STATEMENT FOR PANEL MEMBERS
(For completion by all Panel members)

I have read and understood JPGGADF's Conflict of Interest Policy and declare that I will abide by the procedures outlined in that policy.

Signed

Date:

Name

Title

Organisation

Address

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By filing this form you agree to JPGGADF, retaining this declaration for as long as it is relevant and necessary for it to do so.