Conflict of Interest Policy

Atheer Organization for Development and Innovation

Atheer is committed to making decisions that serve its objectives and the interests of the people it works with, and to managing its resources with integrity and fairness. This policy aims to prevent personal, family or professional interests from influencing the organisation's decisions and explains how to address them when they arise.

1. Scope of the Policy

This policy applies to board members, employees, volunteers, interns, consultants and anyone involved in making a decision on behalf of Atheer.

It covers recruitment, contracting, procurement, the selection of partners and participants, the allocation of resources, and other decisions connected with the organisation's work.

2. What Is a Conflict of Interest?

A conflict of interest arises when a person has an interest or relationship that may affect their impartiality in carrying out their role in the organisation, or may reasonably lead others to question the integrity of a decision. The interest may be financial or non-financial, existing or potential.

Examples include:

- Taking part in selecting a supplier or company that the person or one of their relatives owns, or in which they have a business interest.
- Taking part in recruiting or contracting a relative, or determining the payment that the relative will receive.
- Making a decision about the person's own remuneration or expenses.
- Representing another organisation whose interests are connected with a decision made by Atheer, in a way that may affect the person's independence.
- Receiving a gift or benefit from a party with an interest in a decision the person is involved in making.

These situations may arise even where a person acts in good faith. They must therefore be disclosed and addressed before they influence the decision.

3. Disclosing Interests

Everyone must inform their direct supervisor or the Board of Directors of any interest or relationship relevant to a decision as soon as they become aware of it, and before taking part in discussing, assessing or approving it.

If a conflict arises during work or a meeting, it must be disclosed immediately. Where there is uncertainty, the matter must be referred to a responsible person who is not involved in the case to determine the appropriate action.

The disclosure must be documented in writing or in the meeting minutes, using only the information necessary to understand and address the conflict, while respecting the privacy of the people concerned.

4. Managing Conflicts of Interest

A person with a conflict of interest must not assess the matter, make or vote on the decision, or attempt to influence others about it. They may be asked to provide factual information before the decision is discussed, without taking part in selection or approval.

People without conflicting interests must review the matter and make the decision within their authority. The organisation's governing rules on decision-making and the required number of members must be followed. If an independent decision cannot be made, the matter must be postponed until an appropriate solution is available under the applicable rules.

A person or supplier is not automatically excluded simply because of a connection with someone working for Atheer. However, any arrangement with them must be permitted by applicable law, the organisation's governing rules and funding conditions. It must be based on a genuine need and fair criteria, with the reasons for selection documented and approval given by an authority without conflicting interests.

Using a position or information that is not publicly available to obtain a personal benefit or give another party an unfair advantage is prohibited.

5. Responsibilities and Decision Records

The Board of Directors oversees the implementation of this policy and follows up on the handling of cases referred to it.

Activity and committee leads must ensure that any conflict is addressed before decisions under their oversight are made.

The organisation keeps an appropriate record of the nature of the conflict, when it was disclosed, who withdrew from participation, how the decision was made and the reasons for its approval. This information is kept confidential and made available for review when needed and in accordance with applicable obligations.

6. Reporting Misconduct

Anyone may report an undisclosed interest or an attempt to improperly influence a decision through:

info@adi.org.ly

Reports may be submitted without providing a name, and complete evidence is not required before reporting reasonable concerns.

If a report concerns the person receiving it or one of the organisation's officials, it may be submitted directly to a board member who is not involved in the complaint.

Reports are reviewed fairly by people who are not implicated in the case, and the person concerned is given an opportunity to explain their position. A breach may require reconsidering the decision or taking appropriate action, depending on its nature and the applicable rules.

Atheer prohibits retaliation against anyone who reports in good faith or cooperates in reviewing a case.

7. Adoption and Review

This policy takes effect from the date of its adoption by the authorised body under Atheer's governing rules. It will be communicated to those responsible for applying it and reviewed at least annually, and whenever needed based on practical experience or changes in the organisation's work.