



ARMS WIDE OPEN ASSOCIATION

Conflict of Interest Policy

APPROVED BY: BOARD OF DIRECTORS

EFFECTIVE DATE: 01.01.2026

REVIEW PERIOD: EVERY TWO YEARS OR AS REQUIRED.

1. Purpose

Arms Wide Open Association is committed to conducting its activities with integrity, transparency and accountability. This Conflict of Interest Policy establishes procedures to identify, disclose and manage actual, potential or perceived conflicts of interest in order to protect the organisation's reputation and ensure decisions are made solely in the best interests of the Association and its beneficiaries.

2. Scope

This policy applies to:

- Members of the Board;
- Employees;
- Consultants;
- Volunteers;
- Contractors;
- Interns;
- Any person acting on behalf of Arms Wide Open Association.

3. Definition of a Conflict of Interest

A conflict of interest exists when an individual's personal, professional or financial interests could influence, or appear to influence, their ability to act objectively in the best interests of the Association.

Examples include:

- Financial interests in suppliers or contractors.
- Employment or consultancy relationships with organisations seeking contracts or funding from the Association.
- Decisions involving close family members or close personal relationships.
- Receiving gifts, hospitality or benefits that could influence decision-making.
- Using confidential information or organisational resources for personal benefit.

4. Disclosure

All persons covered by this policy must promptly disclose any actual, potential or perceived conflict of interest to the Executive Director or, in the case of the Executive Director, to the Board of Directors.

Conflicts must be disclosed:

- upon appointment;
- annually;
- whenever circumstances change.

5. Management of Conflicts

When a conflict of interest is identified, the individual must:

- declare the conflict before discussion or decision-making;
- refrain from participating in discussions related to the matter;
- abstain from voting or influencing decisions;
- leave the meeting if requested by the Chair or Board.

The remaining authorised decision-makers will determine the appropriate course of action.

6. Procurement and Recruitment

Individuals involved in procurement, recruitment or grant-making must:

- act impartially;
- avoid favouritism;
- declare any relationship with applicants, suppliers or candidates;
- withdraw from the evaluation process whenever a conflict exists.

7. Gifts and Hospitality

Employees, Board members and volunteers shall not accept gifts, payments or hospitality that could reasonably be perceived as influencing their professional judgement.

Modest promotional items or customary hospitality may be accepted where permitted by law and organisational practice.

8. Confidentiality

All individuals must protect confidential information obtained through their work with the Association and may not use such information for personal gain or to benefit another organisation or individual.

9. Record Keeping

The Association shall maintain records of:

- disclosed conflicts of interest;
- actions taken to manage conflicts;
- recusals from discussions or decisions where applicable.

10. Breach of Policy

Failure to disclose or appropriately manage a conflict of interest may result in disciplinary action, termination of employment or volunteer engagement, removal from the Board, or termination of contractual relationships, as appropriate.

11. Responsibilities

The Board of Directors is responsible for overseeing compliance with this policy.

The Executive Director is responsible for implementing the policy and ensuring that conflicts are appropriately documented and managed.

All personnel are responsible for acting with honesty, transparency and integrity.

12. Review

This policy shall be reviewed at least every two years or sooner if required by changes in legislation, organisational structure or donor requirements.

Conflict of Interest Declaration

I DECLARE THAT:

☐ I have no actual, potential or perceived conflicts of interest.

☐ I disclose the following conflict(s):

I undertake to notify Arms Wide Open Association immediately should any conflict arise during my involvement with the organisation.

NAME

Anna Hakman

POSITION

Chairman and Member of the Management Board

SIGNATURE



DATE

01.01.2026