

STOPPING CONFLICTS OF INTEREST IN THE WORKPLACE

A Guide to Understanding Mercy Corps' Conflict of Interest Policy

This document provides additional guidance around Mercy Corps' policy concerning conflict of interest in the workplace. This guide is not a replacement for the stated policy but instead highlights key issues that team members may encounter in their roles and steps to seeking assistance.

Mercy Corps is committed to a work environment in which everyone acts with the highest level of ethical conduct. Our organization will not tolerate conflicts of interest by its team members.



View the **Conflict of Interest** policy in the Digital Library.



View the eLearning course in Talent Development at Talent.MercyCorps.org



Everyone has the right and obligation, per Mercy Corps' policy, to tell someone about possible conflicts of interest. If you hear about or are aware of such conditions, you should **report** this to your **supervisor**, a **trusted leader**, or the **Integrity Hotline**. You may choose to remain anonymous with any of these reporting options.



Remember if you see or hear about conflicts of interest, help address the problem by reporting so everyone can have an ethical working environment and ensure resources go to those we are there to help. As a reporter, witness and/or victim, **your role is not to investigate**; that will be done through an established confidential process.



Power dynamics, gender roles, historic inequalities, and cultural norms can contribute to unethical activities. Regardless of cultural practices and social norms, **Mercy Corps will not tolerate conflicts of interest as defined in the policy.**



There are various reasons why someone might be hesitant to speak out or seek assistance if they see or hear about conflicts of interest. These reasons might include fear of retaliation, not being believed, or not being taken seriously. **Know that Mercy Corps will take all allegations seriously. Retaliation will not be tolerated for reports made in good faith, even if not unsubstantiated.**



It is important for everyone to respect the seriousness of these types of allegations. If a team member tells you about a suspected conflicts of interest, **LISTEN** and **ASSIST** them with reporting.

THE FOLLOWING KEY TERMS ARE IMPORTANT TO UNDERSTAND:

Conflict of Interest is when a Team Member's personal, professional, or business interest interferes with the Team Member acting in Mercy Corps' best interest.

Family Member includes Team Member's parents, siblings, spouses, partners, and children or anyone who resides with the Team Member. In some circumstances it can include other family members or close friends.

Related Party includes a Team Member, close family member, or any entity in which the Team Member or family member has a financial interest.

Undue benefits can include benefits to a team member that Mercy Corps would not normally offer in the normal course of business, including engaging in transactions Mercy Corps would not engage in without the given team member relationship, or sharing confidential information with a related party competing for an opportunity with Mercy Corps.

REMEMBER!

mercycorps.org/integrityhotline
or
integrityhotline@mercycorps.org



Policy Talk

QUESTIONS

Do I have to give my name when making a report about possible **conflict of interest**?

If I tell my manager about a suspected **conflict of interest**, but they don't report it to the Ethics Team, what can I do?

What happens once I report an allegation or suspicion of a **conflict of interest**?

I have a relative who would like to be a vendor for Mercy Corps because they provide a service related to one of our programs. Is this a **conflict of interest**?

What do I have to do to make sure a scenario that is a potential conflict of interest is verified and approved by Mercy Corps and not in violation of our Conflict of Interest Policy?

My aunt and her family are very poor; my uncle died 2 years ago and my aunt cannot work. Since our food distribution program is meant to help those in need can I put my aunt's name on the list? Is it okay if she shares those benefits with me as a way to say thank you?

In my culture, it is expected that one will help his family members. My brother has a shop that sells items which Mercy Corps will need for its projects. Why can't I tell my brother in advance that we will be buying these things and how much we have to spend?

...AND ANSWERS

Mercy Corps accepts **anonymous reports** through the **Integrity Hotline**.

All managers are required to report suspected conflicts of interest to the Ethics Team. **By reporting to your manager, you have met your responsibility**; however you may also report your concerns to the Integrity Hotline or Ethics Team directly.

Mercy Corps takes all reports seriously and will act upon the report. The allegation will be investigated through a process that is thorough and objective. Serious allegations of a conflict of interest may result in the subject of the allegations being suspended while the investigation is conducted.

This scenario has the potential to be a conflict of interest because your personal interests or a relative are involved in a vendor acquisition. However, following Mercy Corps procurement policies and ensuring that all relations to you are disclosed through that process, will help to ensure no fraudulent activities or conflict of interest policy violations occur.

To ensure you and others are not in violation of Mercy Corps' Conflict of Interest Policy, remember: to **Disclose** the potential case, **Recuse** yourself from involvement and **Report** cases you may witness. See our full Conflict of Interest Policy for more details.

This example illustrates a Conflict of Interest. Adding your aunt's name would be considered fraud and receiving a share of the proceeds would be considered a kickback. All country programs have pre-determined eligibility criteria and only individuals who have been properly screened by those responsible should have their names included. **Team members should NEVER receive a payment from a recipient.**

It is only natural to want to assist a family member. However, Mercy Corps conducts business under the policy of fairness and transparency. **Sharing confidential Mercy Corps information in an attempt to help someone gain an unfair advantage is fraud. This example is also a Conflict of Interest** and violates our Conflict of Interest policy. Taking these actions would likely result in your employment with Mercy Corps ending and your brother losing the ability to ever do business with Mercy Corps.

SPEAK

OUT!

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