



## WBR's Conflict of Interest Policy & Procedures

Effective date:	November 2020
Approved by:	Dave Neiswander, CEO

### Background & Purpose

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As a charitable organization, World Bicycle Relief receives its funding from government and private sources. Donors provide this funding to World Bicycle Relief mobilizes people through The Power of Bicycles. We are committed to helping people conquer the challenge of distance, achieve independence and thrive. Each of us—whether employee, volunteer, board member, or consultant—must anticipate potential conflicts of interest and take action to ensure that we act in the best interests of World Bicycle Relief

Integrity is one of our core values and is fundamental to our work and to achieving results for our organization and those it serves. Following World Bicycle Relief's Conflict of Interest Policy is one way to ensure that we act with integrity.

### Policy

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#### Definition

A conflict of interest arises when, during our work for WBR, there are competing interests between our personal interests or the interests of our family and friends and those of WBR or its business partners. For example, it is considered a conflict of interest when WBR enters into a contract with a firm that is owned in whole or in part by an employee, volunteer, board member, or consultant or any of our family members or friends. The existence or even the perception of a conflict of interest can damage our reputation, effectiveness, and relationships with each other and our stakeholders.

#### Requirement to Disclosure

If, during our work for WBR there is a conflict of interest, WBR's best interests must come first. Employees are required to immediately disclose all circumstances that result in the existence or perception of a conflict of interest, and then act on advice provided by WBR.

#### Specific Guidance

##### *Doing Business with Friends and Family*

If a family member or close friend or the business that person represents wants to do business with WBR, this could create the impression of unfairness in the selection process, regardless of the business factors involved or how impartial we believe we can be. We must disclose the conflict immediately and exclude ourselves from

any decision related to the selection process. Similarly, if an employee, board member, consultant, volunteer, or such individual's family member could benefit from a proposed or existing business relationship between WBR and another company, the employee, board member, consultant, or volunteer must provide WBR with full disclosure of the relationship. In some cases, board approval may also be necessary to ensure that the terms of such business relationships are fair, reasonable, and good value for WBR.

#### ***Working with Friends and Family***

Supervising anyone with whom we have a family relationship or close friendship could create an impression of favoritism. Therefore, if we find we are in a position to supervise or otherwise make employment decisions regarding a family member or close friend, or if we are going to be supervised by a family member or close friend, we must disclose the situation immediately and exclude ourselves from employment decisions.

#### ***Being Involved in a Romantic Relationship***

Being involved in a romantic relationship with an individual we are supervising makes it difficult to be impartial. The best way to avoid this conflict is to avoid any situation where a romantic relationship is also a reporting relationship. Therefore, if we find we are in a position to supervise or otherwise make employment decisions regarding a romantic partner, we must disclose the situation and exclude ourselves from decisions regarding this individual.

#### ***Taking another Job***

Receiving pay or other benefits for work for another organization or volunteering for another organization could create a conflict with our work for WBR. We should only accept such a role if we first disclose it and obtain approval. If the proposed work is found likely to interfere, we must decline the other role.

#### ***Serving on a Board of Directors***

At times, we may be asked to sit on a board of directors for another organization. WBR encourages us to help our communities, including serving on a board of directors, as long as that service does not impact our ability to do our WBR work and still allows us to put the best interests of WBR first. Before accepting such a position, we must first disclose it and obtain approval.

#### ***Using WBR Resources***

WBR has limited resources and we must use them wisely. We are expected to use our time on the job to work towards WBR's goals and not for personal interest or conducting outside business. We may not use WBR's property, equipment, or information for another business.

#### ***Confidential Information***

We may not use or disclose any confidential information that we learn during our work with WBR, whether the information belongs to WBR or another person or entity, for any purpose other than the performance of our work for WBR.

#### ***Seeing Business Opportunities***

If we learn of a business opportunity through our employment, we may not take personal advantage of it or refer it outside WBR unless WBR has evaluated the prospect in accordance with policy and decided not to pursue it.

#### ***Using our Position Outside***

We must not use our position with WBR to earn income or other benefits, even indirectly, from other organizations.

### *Investing in our Industry*

While WBR does not control our personal financial decisions, certain financial interests could improperly influence, or appear to influence, the decisions we make for WBR. As a result, before any member of our household makes a significant investment in a competitor, customer, prospective business partner, supplier, or other business partner who works in the same field as WBR, we must disclose the proposed investment and seek approval to proceed. If we discover such an investment was made by a household member without our knowledge, we must immediately disclose it.

### *Financial Activities in Countries in which We Work*

If we are working in another country, as an expatriate or third-country national employee, our government contracts frequently prohibit us from directly or indirectly engaging in any business or investments in that country, unless we are citizens or legal residents of such country.

### *Conflict of Interests and Gifts*

We operate our business according to strict ethical standards. Employees are required to disclose in writing to their manager any personal interest or any relative that has an interest in a supplier, customer or competitor with whom World Bicycle Relief does business. Employees may not receive items or services of significant material value from any supplier, customer or competitor for any reason. Gifts below US \$50.00 must be disclosed to your manager. If a gift is offered with a value higher than US \$50.00, employees must first receive approval from their manager before accepting the gift. Depending on the gift's value and nature, your manager may require it to be returned or disposed of in another way (e.g. donated to charity, raffled off to employees, etc.).

USAID funds cannot be used to purchase meals at any level for potential or current suppliers.

Some examples of what gifts may look like are: tickets to events, travel, professional services, clothing, or accessories. This is not an exhaustive list, so when in doubt, bring it up to your manager. Gifts given to customers may not exceed US \$50.00 in value, and they must be disclosed to your manager.

Employees may purchase or receive meals for/from suppliers, customers or competitors based on normal business conventions.

Employees may not barter World Bicycle Relief components in exchange for personal services or products. In certain circumstances we may decide it is appropriate as a business decision; however, it is only allowed with management consultation and approval in advance.

If you have any questions regarding this policy, please reach out to a member of the Senior Leadership Team.

## **Responsibilities**

### *All WBR Employees*

All WBR Employees have the responsibility to report any actual or potential conflicts of interest immediately. Further, employees are expected to report any actual or suspected violations of this policy by others in accordance with the WBR's Code of Conduct and Hotline. Willful blindness, ignorance, or conscious disregard for suspicious violations may be viewed as a violation of this policy and treated accordingly.

### *Head of Human Resources*

The Head of Human Resources will coordinate with Country Directors to:

1. Provide period education to staff about this policy.
2. Oversee determinations regarding conflicts of interest.
3. Administer the annual conflict of interest certification process.

## Procedures

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### **Making a Disclosure**

Below are the steps we should follow if we become aware of a potential conflict of interest.

1. Promptly contact the appropriate person to make the disclosure by email or otherwise in writing.
  - a. For employees, consultants, or volunteers, our supervisor is usually the best person to notify. However, if our supervisor is involved or we otherwise prefer, we may also contact another supervisor, a representative of Human Resources, or the Country Director.
  - b. For board members, please notify the CEO.
2. Provide all the relevant information about the situation, including who is involved, relationships between the parties, decisions in process or that have been made, and other factors that may help in determining the right course of action.
3. Take the steps recommended by WBR to address the conflict or potential conflict as promptly as possible. Never make any decisions related to a potential conflict of interest nor proceed with an unresolved potential conflict situation without consulting the appropriate person.
4. The individual who received the disclosure, whether supervisor, Head of Human Resources, or Country Director should document the resolution and include the fact that the disclosure was made in the records. Any documentation should be sent to HR. In certain circumstances, the disclosure may be sent to the board of directors for resolution.

### **Annual Conflict Review Process**

To help ensure that conflicts are identified and addressed, each year WBR provides its employees, volunteers, board members, and consultants with a copy or link to the latest version of the policy and requires each person to sign a statement to make sure they received it, they have read and understand it, and they know what they are expected to do. In addition, the annual process asks each employee, volunteer, board member, and consultant to re-assess any potential or actual conflicts of interest, make any needed disclosures, and sign that there are no conflicts that have not been disclosed. WBR will review the annual disclosures and forms and take further steps as necessary.

### **What Happens if a Conflict is not Disclosed**

If WBR has reason to believe that an employee, volunteer, or consultant has not disclosed an actual or possible conflict of interest, WBR will follow up and will consider disciplinary action, up to and including termination.