

INTERNATIONAL CHARITABLE FOUNDATION
"CARITAS UKRAINE"

Approved:

/signed/

President of the Caritas Ukraine ICF

Tetiana Stavnychy

01.07.2024

(date)

Seal: INTERNATIONAL CHARITABLE FOUNDATION

"CARITAS UKRAINE"

Ukraine, No. 21695710

No.1

CONFLICT OF INTEREST PREVENTION POLICY
of the International Charitable Foundation "Caritas Ukraine"

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1. Purpose of the Policy

- 1.1. The International Charitable Foundation "Caritas Ukraine" (hereinafter referred to as **Caritas Ukraine**), which in its structure unites national offices in Kyiv city and Lviv city and a network of local organizations located in different regions of Ukraine (hereinafter referred to as **Organizations Members of the Caritas Ukraine network**), seeks to minimize any risks associated with conflicts of interest and establish appropriate procedures for identifying, preventing and resolving conflicts of interest in its activities.
- 1.2. Conflict of Interest Prevention Policy of the International Charitable Foundation "Caritas Ukraine" (hereinafter referred to as the "Policy") is developed with the aim of introducing an effective system of prevention and settlement of conflicts of interest, including:
 - identifying and defining situations that constitute a conflict of interest that may threaten (or harm) the interests of Caritas Ukraine;
 - establishing mandatory standards and requirements for conflicts of interest;
 - preventing conflicts of interest in Caritas Ukraine;
 - introducing appropriate procedures and mechanisms for determining, preventing, identifying and resolving conflicts of interest;
 - establishing proper regulation and control over these procedures.
- 1.3. The Policy has been developed in accordance with the Charter of Caritas Ukraine, policies and procedures of the Safeguarding System in the Caritas Ukraine network (including the Anti-Corruption and Anti-Fraud Policy), other internal documents, current legislation of Ukraine, in particular, but not exclusively, the Law of Ukraine "On Prevention of Corruption" and the Law of Ukraine "On Charitable Activities and Charitable Organizations".
- 1.4. Caritas Ukraine recognizes that conflicts of interest can in many cases be the root cause of corruption and other abuses, and therefore seeks to implement effective and transparent mechanisms to prevent and resolve conflicts of interest, while ensuring a balance between the need to address conflicts of interest and the need to guarantee individual and organizational freedom and flexibility.
- 1.5. Caritas Ukraine strives to apply an approach that is primarily focused on preventing situations of real and potential conflicts of interest. The absence of a conflict of interest of the Personnel is presumed in all cases until the moment of notification of the occurrence of both real and potential conflicts of interest.

2. Scope of application

- 2.1. The Policy applies directly to all employees of Caritas Ukraine, including all persons working in Caritas Ukraine under a regular employment contract, members of the Board, volunteers, interns and students on internship (hereinafter referred to as "**Personnel**").
- 2.2. Caritas Ukraine expects that all partner organizations and their personnel, project donors, consultants, contractors and/or any relatives, third individuals and/or legal entities¹ involved or likely to be involved in the procurement of works, goods and services for Caritas Ukraine (hereinafter referred to as **Affiliates**) will familiarize themselves with and comply with this Policy. Caritas Ukraine has the right to take all necessary actions to eliminate the influence of Affiliates in case of violation of this Policy.
- 2.3. The Organizations Members of the Caritas Ukraine network shall approve their own conflict of interest policies, which shall be consistent with this Policy. In the absence of their own conflict of

¹ Including legal entities in respect of which an official of Caritas Ukraine who makes relevant management decisions controls or has a decisive influence on the management and/or activities of such a legal entity by directly and/or indirectly owning, alone or jointly with other persons, a share in a legal entity.

interest prevention policy, when implementing programs and projects jointly with Caritas Ukraine, the member organizations of the Caritas Ukraine network undertake and guarantee to comply with this Policy.

- 2.4. If the agreement with the donor organization provides for higher standards for preventing conflicts of interest, the Personnel involved in the implementation of such a project/program shall comply with the conditions set forth in the relevant agreement.

3. Definition of the conflict of interest

- 3.1. **Conflict of interest** is a contradiction between a person's private interest and his/her official powers, the presence of which affects (*actual conflict of interest*) or may affect (*potential conflict of interest*) the objectivity and impartiality of decision-making, or the performance or non-performance of actions in the exercise of his/her official powers.
- 3.2. A person may have a conflict of interest in a situation where the following components² are present at the same time:
1. **Private interest**, i.e., any property or non-property interest of a person, including those arising from personal, family, friendly or other off-duty relations with individuals or legal entities, including those arising from membership or activities in public, political, religious or other organizations.
 2. Existence of **official powers**, in the exercise of which a person may, at his/her own discretion, take actions and make decisions on the issue in which he/she has a private interest.
 3. Such official powers are **discretionary in nature**³ (i.e., when a person can choose from several legally permissible actions and decisions at his/her own discretion).
- 3.3. It is the combination of these factors that gives grounds to assert that a person's private interest may affect objectivity and impartiality when performing an action or making a decision, and therefore, the person has a conflict of interest. In the absence of at least one of the components - official authority, discretionary nature and/or private interest - a conflict of interest does not arise.
- 3.4. Solving the issue on the existence of a private interest in the area of official powers as a component of a conflict of interest, in each case, the specific circumstances, relations and connections of the person, the scope of his/her official powers when making a decision should be taken into account.
- 3.5. Typical circumstances and situations that indicate the existence of a private interest or give rise to it:
- **Family and kinship relations**⁴. The desire to take care of family members and relatives is natural for every person, so relations with such persons are a prerequisite for the emergence of a private interest. In case of joint work with family members and relatives,

² Guidelines on the application of certain provisions of the Law of Ukraine "On Prevention of Corruption" regarding the prevention and settlement of conflicts of interest, compliance with restrictions on the prevention of corruption dated 12.01.2024 No. 2. National Agency for the Prevention of Corruption. URL: <https://wiki.nazk.gov.ua/category/konflikt-interesiv/>.

³ Discretion is the ability to act at one's own discretion, choosing from several possible options for actions or decisions, or vice versa - not to take an action, not to make a decision (i.e., to do nothing).

⁴ List of persons related to each other by family/kinship: husband, wife, father, mother, stepfather, stepmother, son, daughter, stepson, stepdaughter, sibling brother/cousin, sibling sister/cousin, wife's (husband's) sibling, nephew, niece, uncle/aunt, grandfather, grandmother, great-grandfather, great-grandmother, grandson, granddaughter, great-grandson, great-granddaughter, son-in-law, daughter-in-law, father-in-law, mother-in-law, father/mother of the wife (husband) of the son (daughter), adoptive parent or adoptee, guardian or trustee, person under the care or custody of the relevant person, as well as persons who live together, are connected by common life and have mutual rights and obligations (except for persons whose mutual rights and obligations are not of a family nature), including persons who live together but are not married.

attention should be paid to the existence, nature and content of official powers that can be exercised in relation to such persons.

- **Exercise of official powers in relation to oneself.** Such situations may include making (or participating in making) any discretionary decisions by a person in relation to himself/herself (for example, decisions on remuneration).
- **Combining.** A person's private interest may arise on the basis of additional paid or other activities, such as entrepreneurial activity, membership in public, political or other organizations.
- **Receiving a gift⁵.** In a situation where a person (or his/her close person) has directly received a gift and must then make a decision (take an action) regarding the donor, there is a private interest that is driven by the desire to thank for the gift.
- **Contractual relations.** This includes situations in which a person exercises official powers in relation to other persons with whom he or she has a contractual relationship (e.g., a lease, contract, etc.). The essence of private interest lies in the unwillingness to harm contractual relations that are beneficial to the person.
- **Service relations.** A private interest may arise due to a conflict between a supervisor and a subordinate or a negative perception of the actions of a subordinate by the supervisor.
- **Official activities.** A private interest will be present in a person whose official performance will be evaluated as part of an official investigation coordinated and controlled by the same person.
- **Relations of direct subordination⁶.** Subordinate employees tend to act in the interests of the manager. If a decision is made in favour of the manager, the subordinate can count on either his or her loyalty, additional financial incentives, or avoidance of the manager's negative reaction, disciplinary action/initiation of disciplinary action against the subordinate, etc. In turn, the manager will seek to thank the subordinate employee who has satisfied the manager's private interest.

3.6. A conflict of interest does not arise when actions or decisions are taken outside the scope of the official authority.

3.7. Caritas Ukraine recognizes that conflicts of interest may arise, inter alia, in cases where a person is a member of the Personnel:

- receives or may receive personal benefit in lieu of, contrary to, or in addition to the income and remuneration received directly from Caritas Ukraine;
- must simultaneously perform official duties and achieve his or her personal interests or the interests of another organization that he or she represents;
- may influence the activities of Caritas Ukraine in such a way that it may lead to direct or indirect financial gain for such person, family members/relatives, business partners or third parties, or to the provision of inappropriate/improper benefits to third parties to the detriment of Caritas Ukraine.

4. Liabilities

4.1. General liabilities

4.1.1. The Personnel of Caritas Ukraine is obliged to:

- avoid any situations and actions that may cause a real/potential conflict of interest, or may affect impartiality and independence in the performance of official duties;
- act only within the scope of their official powers and in a manner that does not damage the business reputation of Caritas Ukraine and other employees;

⁵ A gift is money or other property, benefits, privileges, services, intangible assets that are provided/received free of charge or at a price lower than the minimum market price (Article 1 of the Law of Ukraine "On Prevention of Corruption").

⁶ Direct subordination is a relationship of direct organizational or legal dependence of a subordinate on his/her supervisor, including through the decision (participation in the decision) of hiring, dismissal, application of incentives, disciplinary sanctions, provision of instructions, orders, etc., and control over their implementation.

- comply with all procedures for preventing, identifying, disclosing and resolving conflicts of interest established by this Policy;
- not to take actions or make decisions in conditions of real/potential conflict of interest.

4.1.2. In order to avoid conflicts of interest, the Personnel is not allowed to:

1. Use financial resources of Caritas Ukraine to obtain goods and services to meet their personal needs or the needs of family members and relatives/related persons⁷.
2. Use official authority to exert pressure on other persons or to gain an advantage (favour) to achieve private interests.
3. Order goods or services provided by the supplier in the presence of personal financial interest, financial interest of family members and relatives/related persons.
4. Receive income/benefit in addition to income and remuneration received directly from Caritas Ukraine from a project, program or any Caritas Ukraine event carried out within the framework of their official duties, including in favour of their family members and relatives/related persons.
5. Use any information obtained in the course of performing official duties for private interests.
6. Engage in active public political and social activities (not related to the performance of official duties), including the use of funds and resources of Caritas Ukraine, including working time, telephone lines, e-mail, etc. for personal participation in political or social events and their support.
7. Directly or indirectly induce subordinates in any way to make decisions, take actions or omit to act in violation of this Policy in favour of their private interests or private interests of third parties.
8. Use the name "Caritas" in the name of the social media account.
9. Independently reimburse their own expenses or expenses that have not been agreed upon in advance at the expense of Caritas Ukraine.

4.1.3. Personnel is prohibited from influencing the organization of Caritas Ukraine's activities in any way, including by influencing the adoption, change of approved decisions, orders, policies and procedures, other internal documents in order to promote private interests, creating preferences, advantages, benefits for third parties, both individuals and legal entities.

4.2. Gifts

4.2.1. The Personnel of Caritas Ukraine is allowed to accept/offer gifts that meet the generally accepted concepts of hospitality, if the value of such gifts does not exceed two subsistence minimums for able-bodied persons established on the day of acceptance of the gift, and the total value of such gifts received from one person (group of persons) during the year does not exceed four subsistence minimums for able-bodied persons established on January of the year in which the gifts were accepted.

4.2.2. It is prohibited to demand, ask for, receive gifts (regardless of their value) for oneself or one's family members/relatives from legal entities and individuals, as well as offer gifts to public officials and representatives of public authorities, donors, partners, their employees/representatives, as well as their close persons, including family members and relatives, in order to influence the decision-making process, simplify formalities, or with the expectation of receiving a service in return.

4.2.3. Personnel is prohibited from directly or indirectly demanding any gifts or accepting gifts that do not meet the conditions of clause 4.2.1. from other persons from among the Personnel of the

⁷ Related persons - (1) persons who have common business interests (profit and income) with a Personnel member; (2) persons who, together with a Personnel member, hold corporate rights (shareholders/co-founders/ultimate beneficial owners) in legal entities in which a Personnel member has a private interest; (3) persons who exercise control over a legal entity and have a decisive influence on the management and/or activities of a legal entity through direct and/or indirect ownership, either alone or jointly with other persons, of 50 percent or more of the shares in legal entities jointly with a person from the Personnel of Caritas Ukraine.

Member Organizations of the Caritas Ukraine network, Affiliates (including contractors, subcontractors, suppliers of goods or services) and beneficiaries.

4.2.4. Gifts whose value exceeds the amounts specified in clause 4.2.1. shall be transferred to Caritas Ukraine as a voluntary charitable donation.

4.3. Combining.

4.3.1. Individuals from among the Personnel may work on an internal part-time basis in different positions in Caritas Ukraine, provided that there is no direct subordination between the positions held, but not more than 8 hours per day, 40 hours per week.

4.3.2. Persons from among the Personnel who are simultaneously registered as individual entrepreneurs or engaged in independent professional activities may not be involved under civil contracts as contractors, partners, consultants in the implementation of Caritas Ukraine projects and programs to perform tasks/obligations identical to those of such an employee under an employment contract. If a person from among the Personnel has direct subordination of control or authority to engage a person in relation to himself/herself, engagement is not allowed.

4.3.3. Engagement of former Personnel under civil contracts as contractors, partners, consultants in the implementation of projects and programs of Caritas Ukraine is allowed after 1 year from the date of termination of the relevant activities in the Caritas Ukraine network or in exceptional cases with the consent of the President of Caritas Ukraine.

4.3.4. Ownership of corporate rights, management functions (or the existence of labour relations in other legal entities) by the Personnel, as well as their family members and relatives, close friends/partners, shall not constitute a conflict of interest, contradict the performance of official duties and the requirements of labour legislation.

4.3.5. The presence of a person from among the Personnel (including family members and relatives of such a person) directly or indirectly corporate rights, control and management functions, labour relations in legal entities that meet the definition of Affiliates or related parties of Caritas Ukraine (including bidders for tender procurement) indicates the existence of a conflict of interest that must be resolved in accordance with the procedures provided for in this Policy. The Personnel undertakes to disclose any existing ties (including ties of their family members and relatives, close friends/partners) with the Affiliates of Caritas Ukraine.

4.3.6. Membership and any form of participation of Personnel in associations, including public, charitable, religious and other associations, shall not contradict the ethical values, principles and standards of Caritas Ukraine, the requirements of labour legislation, the terms of employment contracts and job descriptions, and shall not create conditions for a conflict of interest, private benefit, or non-competitive advantage.

4.4. Family and kinship relationships, related persons

4.4.1. Employment of family members and relatives, as well as related persons of the Personnel in the Organizations Members of the Caritas Ukraine network, which will be directly subordinate to each other, is not allowed.

4.4.2. An exception to the rule of clause 4.4.1. is cases in which the employment of family members, relatives, related persons of the Personnel is justified by their exceptional professional competence and does not contribute to the material interest of the Personnel. This employment is allowed:

- with the written approval of the President/Director - regarding the employment of family members, relatives, related persons of the Personnel of the Organizations Members of the Caritas Ukraine network;



- by the decision of the General Meeting - on the employment of family members, relatives, and related persons of members of the governing bodies of the Organizations Members of the Caritas Ukraine network.

4.4.3. Family members and relatives, related persons of persons who are members of the Personnel of Caritas Ukraine may be beneficiaries of charitable assistance from Caritas Ukraine on a general basis, provided that they have a need and the appropriate category of vulnerability, and provided that the related person from the Personnel does not make a direct decision to provide charitable assistance or with the consent of the management. All cases of providing charitable assistance to family members and relatives of the Personnel shall be reported in accordance with clause 5.1.1. of this Policy.

4.4.4. When forming tender committees and other collegial bodies in the structure of Caritas Ukraine, any potential conflicts of interest, including those based on family ties and common business interests, should be taken into account.

4.5. Obligations of members of management bodies

4.5.1. Members of the governing bodies of Caritas Ukraine, as defined by the charter, do not participate in decision-making regarding:

- 1) contracts or other transactions between Caritas Ukraine and this person or a person related to him/her;
- 2) disputes between Caritas Ukraine and this person or a person related to him/her;
- 3) release of this person or a related person from property liability to Caritas Ukraine.

4.5.2. Members of the governing bodies of Caritas Ukraine or persons related to them are not entitled to receive loans or credits and security for such loans or credits (pledge, surety, etc.) from Caritas Ukraine.

4.6. Procurement procedures for goods and services

4.6.1. Caritas Ukraine is committed to preventing conflicts of interest and related risks that may arise in the procurement process in accordance with the Procurement regulation for goods and services ICF “Caritas Ukraine”

4.6.2. The Personnel involved in the procurement process (including the committees for disclosure and evaluation of proposals) shall be informed in advance of their tasks and undertake to disclose potential/actual conflicts of interest and disqualify related persons from the Personnel from the procurement process.

4.6.3. Membership in the tender committee should not create a conflict between the interests of the customer and the tenderer or between the interests of the participants in the procurement procedure, which may affect the objectivity and impartiality of decision-making on the selection of the winner of the procurement procedure.

5. Policy application

5.1. Procedures for identifying and disclosing conflicts of interest

5.1.1. In order to identify and disclose situations of potential /real conflict of interest, the following mechanism is envisaged:

- 1) Persons from among the Personnel who have a potential/actual conflict of interest shall declare it in writing to their immediate supervisor and to the employee whose official duties may be affected by it, and refrain from taking actions and making decisions related to the conflict of interest until the relevant decision is made by the management.
- 2) Persons who become aware of a potential/actual conflict of interest in accordance with the requirements of this Policy with someone else among the Personnel shall report it through the established feedback channels:



- ✓ by e-mail: feedback@caritas.ua;
- ✓ via the online form on the Caritas Ukraine website;
- ✓ by calling the Caritas Ukraine hotline;
- ✓ in person to the PRISS.

- 5.1.2.** Conflict of interest notifications must be submitted no later than the end of the next business day after the moment when the conflict of interest was known or should have been known.
- 5.1.3.** In cases where a person has doubts about the existence of a conflict of interest, the following conditions should be analysed:
- 1) Whether a person has a private interest in a particular situation, i.e. whether there is an interest in certain decisions or actions being taken in his or her favour or in favour of other individuals or legal entities. If there is no private interest, no conflict of interest arises.
 - 2) Determine whether a person can make decisions or take actions on a matter in which he/she has a private interest, i.e. whether he/she has official powers in the exercise of which he/she can make decisions or take actions on a matter in which he/she has a private interest. If the person does not have such powers, no conflict of interest arises.
 - 3) Check whether the existing conditions do not violate the obligations provided for in clause 4 of this Policy. Violations of the obligations set forth in the Policy indicate a conflict of interest.
- 5.1.4.** If a person is in doubt about the existence of a conflict of interest, he/she has the right and obligation to seek clarification from his/her immediate supervisor or the Person Responsible for Implementation of the Safeguarding System (hereinafter referred to as the "PRISS").
- 5.1.5.** The immediate supervisor is obliged to report through the feedback channels specified in clause 5.1.1. as well as the employee whose duties may be affected, situations of concealment of a conflict of interest by a subordinate, if information about this was received from other persons (not directly involved in the conflict of interest) or from public sources.
- 5.1.6.** The issue of real/potential conflicts of interest should be included in the algorithm for selecting candidates for vacant positions in Caritas Ukraine. All candidates, both external and internal, must report circumstances and situations that may affect the emergence of a potential/real conflict of interest, including existing family relationships, common business interests.
- 5.1.7.** Caritas Ukraine expects Affiliates to report all situations that may involve a conflict of interest through the channels specified in clause 5.1.1. of this Policy, including in all cases when Caritas Ukraine Personnel pursue private interests in their activities with Affiliates.
- 5.1.8.** Every report of a potential or actual conflict of interest must be documented in writing (written notice, written appeal).
- 5.1.9.** Caritas Ukraine prohibits retaliation against any person who has reported a conflict of interest. Discrimination, harassment or persecution of a person who has reported a conflict of interest in accordance with this Policy is strictly prohibited. Any person who has reported a conflict of interest and has been subjected to reprisals, discrimination, harassment or persecution must report a violation of the Safeguarding System through the feedback channels in accordance with clause 5.1.1. of this Policy.

5.2. Procedures for preventing conflicts of interest

- 5.2.1.** In order to prevent a conflict of interest and its possible negative consequences, the Personnel shall fully and faithfully perform their official duties, comply with the requirements provided for by this Policy, in particular, but not exclusively, clause 4 of this Policy.

- 5.2.2.** In order to prevent conflicts of interest, the Personnel shall exercise maximum caution and common sense in their working relations with Affiliates and beneficiaries, including in relation to receiving gifts, remuneration and services.
- 5.2.3.** Personnel are obliged to familiarize themselves with the provisions of this Policy, undergo mandatory training on Safeguarding and sign a statement of familiarization with the policies and procedures of the Safeguarding system in the Caritas Ukraine network in accordance with the Safeguarding Policy.
- 5.2.4.** The Personnel shall confirm their familiarization with the Policy by an official statement and signature at the time of employment or enrolment in the Personnel. In all cases where persons from among the Personnel of the Organizations Members of the Caritas Ukraine network have questions about the conflict of interest, they are obliged to seek clarification from the representative of the Human Resources Department (HR) of the immediate supervisor / PRISS.

5.3. Managing conflicts of interest

- 5.3.1.** Caritas Ukraine Personnel shall take reasonable and sufficient measures to protect themselves and Caritas Ukraine from possible negative consequences of real/potential conflicts of interest.
- 5.3.2.** Personnel should comply with the following conflict of interest guidelines:
- promptly report all situations of potential/real conflict of interest in accordance with clause 5.1.1. of this Policy;
 - all persons involved in the real/potential conflict of interest that has arisen shall refrain from any actions and decisions until the relevant decision is made by the direct supervisor or the commission for consideration of sensitive appeals;
 - direct supervisors / commission for consideration of sensitive appeals should consider each declared conflict of interest and respond appropriately;
 - the person affected by the conflict of interest should be excluded from the decision-making process;
 - decisions on conflicts of interest should be made by the direct supervisor / sensitive issues committee regardless of the real, potential or possible impact on the person affected by the conflict of interest.
- 5.3.3.** The immediate supervisor who has received notification of a potential/actual conflict of interest is obliged to make a decision on the settlement of the conflict of interest with a subordinate within 2 business days, and to provide a written decision to the person whose conflict of interest was considered.
- 5.3.4.** Disclosures of conflicts of interest, including conflicts of interest of members of the governing bodies of Caritas Ukraine, provided in accordance with clause 5.1.1. of the Policy, will be considered in accordance with the Procedure for handling sensitive appeals and providing feedback in the Caritas Ukraine network.
- 5.3.5.** The following measures may be taken to resolve conflicts of interest at the discretion of direct supervisors or a Commission for the Consideration of Sensitive Appeals:
- removal of a person from performing a task, taking actions, making a decision or participating in its adoption in conditions of a real or potential conflict of interest;
 - prohibition of cooperation with an Affiliated Person related to the Personnel;
 - restriction of access to certain information;
 - reviewing the scope of the person's official powers;
 - use of external control over the performance of a person's relevant task, certain actions or decision-making;

- transfer of a person to another position or termination of employment in accordance with labor law (in exceptional cases, if the conflict of interest cannot be resolved in any other way).

5.3.6. When choosing measures to resolve a conflict of interest, it is necessary to take into account all available circumstances and conditions of the situation, as well as the specifics of the application of each measure, including: (1) the type of conflict of interest (real/potential); (2) the duration of the conflict of interest (permanent/temporary); (3) the presence (absence) of alternative settlement measures; (4) the presence (absence) of the person's consent to the application of the measure (regarding transfer); (5) the possibility of involving other employees in decision-making (regarding removal from the task).

5.3.7. As a rule, any measure to resolve a conflict of interest is applied to the person who has a conflict of interest (usually the manager). In some cases, such measures may be applied to other persons with whom the conflict of interest arises, i.e. subordinates.

6. Responsibility and control

6.1. Violation of the Policy provisions

6.1.1. Caritas Ukraine is obliged to conduct an investigation into the extent to which a Personnel member has tried in good faith to comply with the provisions of the Policy and whether the violation of these provisions was conscious and intentional.

6.1.2. If the Commission for the Consideration of Sensitive Appeals decides that a Personnel member has knowingly and intentionally violated the Policy, this decision shall be grounds for disciplinary action.

6.2. Responsibility

6.2.1. Responsibility for compliance with the requirements of this Policy lies with the Staff. In case of violations of the requirements of the procedure for identifying, disclosing, preventing and resolving conflicts of interest, the Personnel shall be liable in accordance with the Charter, policies and procedures of the Safeguarding System, internal documents of Caritas Ukraine and the norms of the current legislation of Ukraine.

6.2.2. Losses and damages caused to Caritas Ukraine as a result of a deliberate and intentional violation of the requirements for preventing conflicts of interest shall be reimbursed by the person who committed the relevant violation in accordance with the procedure established by law.

6.3. Control over the Policy compliance

6.3.1. Compliance with this Policy and, in particular, the process of identifying, disclosing, preventing and resolving real/potential conflicts of interest shall be monitored:

- Heads of relevant structural units and the President - in respect of employees working in the Organizations Members of the Caritas Ukraine network on the terms of a regular employment contract, volunteers, interns and students undergoing internships;
- the General Meeting - for members of governing bodies.

7. Data protection and confidentiality

7.1. Caritas Ukraine is obliged to apply the highest level of protection when processing personal data. The information received in the notification of a potential/real conflict of interest, as well as during the consideration of sensitive appeals and investigations, must be processed in accordance with the requirements of the current legislation of Ukraine and the Policy of confidentiality and protection of personal data of beneficiaries.

8. Final provisions

8.1. This Policy is an updated version of the Policy on Prevention of Conflicts of Interest of Caritas Ukraine, approved on 03 February 2020.



- 8.2. All changes and additions to this Policy are made by setting it out in a new version.
- 8.3. After the approval of the new version of the Policy, the previous one becomes invalid. After approval, this Policy shall be provided for familiarization to all persons who are members of the Personnel as of the date of approval. In order to promote familiarization and awareness of all interested parties, the Policy is placed in open public access on the website of Caritas Ukraine.
- 8.4. The Policy is inextricably linked to other policies of Caritas Ukraine, in particular the Policies and Procedures of the Safeguarding System of Caritas Ukraine.
- 8.5. This Policy comes into force on the first day of the month following the month in which it was approved.

*Бюро перекладів Mova Club,
Україна, м. Київ, вул. Межигірська, 24-б оф 14
Тел.: +38 (098) 232-25-55
www.mova-club.kiev.ua e-mail mova.club@gmail.com*

*Translation Agency Mova Club
24-B Mezhyhirska Str., office 14, Kyiv 04071 Ukraine
Tel.: +38 (098) 232-25-55
www.mova-club.kiev.ua e-mail mova.club@gmail.com*

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