



END POVERTY
creating sustainable livelihoods

CONFLICT OF INTEREST POLICY

(PREVIOUSLY KNOWN AS CONFLICT OF INTEREST OF DONOR POLICY)

PRESENTED IN THE 71ST BOARD MEETING

3RD JANUARY 2026

CONFLICT OF INTEREST POLICY

1. PURPOSE AND OBJECTIVE

End Poverty is committed to the highest standards of ethical conduct, transparency, accountability, and good governance.

This Conflict-of-Interest Policy ("Policy") establishes principles, procedures, and safeguards to identify, disclose, review, and manage conflicts of interest in a fair and lawful manner.

The objective of this Policy is to:

Protect End Poverty's mission, credibility, and independence

Prevent personal interests from improperly influencing organizational decisions

Ensure compliance with applicable laws, donor requirements, and governance best practices

Maintain public trust and confidence in End Poverty's operations

This Policy does not prohibit all related transactions; rather, it ensures that any potential conflict is disclosed, assessed, and managed transparently.

2. DEFINITIONS

2.1 Conflict of Interest

A situation in which a person's personal, professional, or financial interests could influence, or reasonably appear to influence, their objectivity, judgment, or decision-making on behalf of End Poverty.

2.2 Types of Conflict

Actual Conflict: A real and existing conflict that directly affects decision-making

Potential Conflict: Circumstances that could reasonably develop into a conflict

Perceived Conflict: A situation that may appear to be a conflict and could damage credibility, even if no actual conflict exists

2.3 Interested Person

Any Board Member, officer, employee, volunteer, donor, consultant, vendor, or third-party representative who has or may have a conflict of interest.

2.4 Disinterested Person

A person who has no financial, personal, or professional interest in the matter under consideration.



2.5 Related Party Transaction

Any contract, payment, transfer, or arrangement between End Poverty and an interested person or related entity where the terms are not.

3. SCOPE AND APPLICABILITY

This Policy applies to:

- Members of the Board of Directors
- All employees (permanent, temporary, contractual)
- Volunteers and interns
- Donors, including individuals, corporates, and foundations
- Service providers, consultants, suppliers, and vendors
- Third-party representatives acting on behalf of End Poverty

Compliance with this Policy is mandatory for all covered persons.

4. IDENTIFICATION OF CONFLICTS OF INTEREST

Conflicts of interest may arise from, but are not limited to, the following situations:

4.1 Financial Interests

- Ownership, investments, or financial interests in entities dealing with End Poverty
- Receiving compensation, benefits, or preferential treatment from vendors or partners

4.2 Family and Personal Relationships

- Immediate or extended family relationships
- Close personal, romantic, or domestic relationships that may affect impartiality

4.3 Professional and Organizational Roles

- Employment, consultancy, or board membership in similar or competing organizations
- Advisory roles that overlap with End Poverty's activities

4.4 Authority and Decision-Making

- Influence over recruitment, promotions, procurement, or funding decisions involving related parties
- Control over allocation of resources that may benefit personal interests

4.5 Gifts, Hospitality, and Benefits

- Acceptance of gifts, hospitality, or favors exceeding USD 50 (or equivalent)
- Any gift or benefit that could influence professional judgment

4.6 Confidential Information and Intellectual Property

- Use of End Poverty's confidential information for personal gain
- Unauthorized disclosure of donor, beneficiary, or proprietary data



5. DISCLOSURE REQUIREMENTS

All interested persons must submit a Conflict-of-Interest Disclosure Form annually, normally within.

5.1 Ongoing Disclosure

Any new or changed conflict must be disclosed:

- Immediately upon becoming aware
- In writing to the CEO, Board Chair, or Compliance Officer -Within 5 working days

5.2 Donor Disclosure

Donors must disclose:

- Any relationship with Board members or senior staff
- Any financial interest in programs, vendors, or implementing partners

5.3 Non-Retaliation

End Poverty strictly prohibits retaliation against any person making a disclosure in good faith. Confidentiality will be maintained to the extent legally possible.

5.4 Assessment Criteria

- Nature and extent of interest
- Likelihood of influence
- Financial and reputational risk
- Availability of alternatives
- Public and donor perception



5.5 Determination

A written decision will specify:

- Whether a conflict exists
- Management measures
- Participation restrictions
- Review timeline

6. MANAGEMENT OF CONFLICTS

Management measures may include:

- Recusal from discussion and voting
- Independent review and approval
- Reassignment of roles or reporting lines
- Competitive bidding and fair-value verification
- Conditional acceptance or refusal of donations
- Training, restrictions, or monitoring
- Termination or legal action in serious cases

7. RECORD-KEEPING

End Poverty shall maintain:

- Disclosure forms
- Review and determination records
- Meeting minutes
- Conflict register
- Training and enforcement records

Records shall be retained for at least 7 years or as required by law or donors.



8. TRAINING AND ENFORCEMENT

- Mandatory induction and annual training
- Investigations conducted fairly and confidentially
- Proportionate disciplinary action for violations
- Legal reporting where required

9. CONTACT FOR DISCLOSURE

Primary Contact: Compliance Officer

Alternate Contact: CEO

Non-retaliatory reporting mechanisms are available.

APPENDICES

Appendix A: Conflict of Interest Disclosure Form

Appendix B: Policy Acknowledgment Form



APPENDIX A

ANNUAL CONFLICT OF INTEREST DISCLOSURE FORM END POVERTY

A. PERSONAL INFORMATION

Name: _____

Position / Role: _____

Department / Project (if applicable): _____

Relationship with End Poverty:

Board Member Employee Volunteer Donor Consultant Vendor Other:

Date of Disclosure: _____

B. POLICY ACKNOWLEDGMENT

Please tick all that apply:

I have received a copy of End Poverty's Conflict of Interest Policy

I have read and understood the Policy

I agree to comply fully with the Policy

I understand that disclosure is mandatory and ongoing

C. FINANCIAL INTERESTS

Do you, directly or indirectly, have any financial interest that may create a conflict?

Yes No

If yes, please provide details:

Entity Name	Nature of Interest	Relationship to End Poverty	Approx. Value



D. FAMILY AND PERSONAL RELATIONSHIPS

Are you related to or have a close personal relationship with any Board member, employee, donor, or vendor of End Poverty?

Yes No

If yes, specify:

Name of related person: _____

Relationship: _____

Role/Position: _____

E. PROFESSIONAL AND ORGANISATIONAL ROLES

Do you hold any position (employment, consultancy, board membership) in another organization that may overlap or conflict with End Poverty's work?

Yes No

If yes, provide details:

Organization Name	Position Held	Nature of Overlap

F. GIFTS, HOSPITALITY, OR BENEFITS

Have you received any gifts, hospitality, or benefits from donors, vendors, or related parties exceeding USD 50 (or equivalent)?

Yes No

If yes, specify:

Gift/Benefit: _____

From Whom: _____

Approximate Value: _____

Date: _____

G. CONFIDENTIAL INFORMATION & INTELLECTUAL PROPERTY

Have you used or do you intend to use End Poverty's confidential information or intellectual property for personal or external purposes?

Yes No



If yes, provide details:

H. AUTHORITY AND INFLUENCE

Do you have decision-making authority that could financially or otherwise benefit you or related parties?

Yes No

If yes, describe the nature of authority and decisions involved:

I. PREVIOUS DISCLOSURES

Have you previously disclosed any conflicts to End Poverty?

Yes No

If yes, are any still ongoing?

Yes No

Details (if applicable):

J. CERTIFICATION AND DECLARATION

I hereby certify that:

The information provided above is true, complete, and accurate

I understand that failure to disclose may result in disciplinary action

I commit to promptly disclosing any future conflicts

Yes

Signature: _____

Name: _____

Date: _____

FOR OFFICIAL USE ONLY

Received by: _____ Date: _____

Reviewed by: _____ Date: _____

Conflict Identified: Yes No

Action Required: Yes No

Next Review Date: _____



APPENDIX B

CONFLICT OF INTEREST POLICY ACKNOWLEDGMENT AND AGREEMENT

I, _____, in my capacity as _____ with
End Poverty, hereby acknowledge and agree as follows:

1. POLICY RECEIPT AND UNDERSTANDING

- I have received a copy of End Poverty's Conflict of Interest Policy
- I have read the Policy in full
- I understand the definitions, disclosure obligations, and procedures
- I have had the opportunity to seek clarification

2. COMMITMENT TO COMPLIANCE

- I will comply with all provisions of the Policy
- I will disclose all actual, potential, or perceived conflicts promptly
- I will provide accurate and complete information
- I will recuse myself from discussions and decisions where conflicts exist
- I will comply with management measures imposed

3. TRAINING AND COOPERATION

- I agree to participate in mandatory conflict of interest training
- I will cooperate fully with any review or investigation

4. CONSEQUENCES AND FAIR PROCESS

- I understand that non-compliance may result in disciplinary action
- I understand serious violations may lead to termination of association
- I understand there will be no retaliation for good-faith disclosure

5. ANNUAL RENEWAL

- I understand this acknowledgment must be renewed annually
- Continued association with End Poverty is conditional upon compliance

Signature: _____

Name: _____

Position/Title: _____

Date: _____

