

A Guide to Understanding Mercy Corps' Conflict of Interest Policy

A conflict of interest exists when you have a personal, professional, or business interest or relationship that can influence or interfere with your obligations to Mercy Corps. A conflict can be actual, potential, or perceived.

A family member includes spouses, domestic partners, parents, guardians, grandparents, children, siblings, and cousins. It can also include any other family member, romantic partner, or close friend if the relationship is such that the team member could personally benefit from a transaction between that person and Mercy Corps

Mercy Corps team members and partners are expected to promptly disclose all conflicts of interest and obtain approval before engaging in any activity that may pose a conflict. Disclosure forms are included in the [Conflict of Interest Policy](#).

If you hear about a possible conflict of interest that has not been disclosed to or approved by Mercy Corps, it is your obligation to report this to your supervisor, a trusted leader, or the Integrity Hotline.

HOW TO DISCLOSE A CONFLICT OF INTEREST:

- › **Team members under the oversight of a Country Director:** submit the disclosure form to your Country Director or the person designated by your Country Director to receive such disclosures.
- › **Team members not under the oversight of a Country Director:** submit the disclosure form to the Mercy Corps Executive Team member who oversees your function, or the person designated by your Executive Team member to receive such disclosures.
- › **Board Members and Executive Team Members:** submit the completed form to Mercy Corps' General Counsel.
- › **Subrecipient partners:** follow the disclosure requirements in Mercy Corps' Subaward Financial Management Manual.
- › **Partners (other than subrecipients):** submit the Conflict of Interest Declaration to the Mercy Corps team member responsible for engaging the partner, who must then provide the disclosure form to the Legal Department.
 - Mercy Corps must discuss the disclosure with the partner and develop a documented action plan to mitigate the conflict.

WHAT HAPPENS AFTER DISCLOSURE:

1. The team member and their supervisor will decide whether a conflict exists and, if so, develop an action plan to avoid, mitigate or resolve the conflict. The action plan must be documented.
2. The team member (or any other person assigned action under the action plan) is responsible for implementing the plan.
3. The team member must also send the disclosure form and documented action plan to the Legal Department for recordkeeping purposes via the [Conflict of Interest declaration page](#).

