

# **Conflict of Interest Policy of TI-Norway**

## **1. Purpose**

The global efforts of Transparency International (TI) to raise the ethical standards of government officials, business people and other individuals must not be compromised by ethical lapses on the part of individuals representing TI.

Conflicts of interest may arise from time to time in the course of such persons' activities and decisions. They may arise in their work for TI-Norway with regard to pecuniary or financial interests, or interests that impede them in their duty to act in the best interests of TI-Norway.

This policy will assist persons who act for, or on behalf of, TI-Norway to be highly sensitive to potential conflicts of interest.

## **2. Personal Scope of Policy**

The policy applies to persons who act for, or on behalf of, Transparency International Norway (TI-Norway), e.g. board members, staff members and resource<sup>1</sup> persons. The interests of such persons include the interests of people with whom they have a close personal relationship, including their close friends and colleagues, their spouse, life partner, children, parents, siblings or other close family members.

## **3. General Policy Matter**

a. Persons who act for, or on behalf of, TI-Norway, must avoid or manage potential, real or perceived conflicts of interest (inter alia by refraining from any decision-making or voting on matters subject to a potential conflict of interest), and openly acknowledge any potential or actual conflict of interest which arises through his/her association with TI.

b. Members of the board shall declare financial and non-financial interests which could potentially lead to or could conceivably be perceived as a conflict of interest. Such declaration shall be made by way of a register, which shall be open to the public. Where there is personal safety or similar serious concerns about full publicity, parts or the whole of the declaration should be submitted to the chair of TI-Norway – or when need be, to the chairperson of the TI International Board Ethics Committee - who shall hold it, and act upon it as appropriate, in confidence.

c. The International Board Ethics Committee provides advice on ethical questions to anybody who acts for, or on behalf of, TI. The Terms of Reference and contact details of the Board Ethics Committee are obtained through the TI-Secretariat in Berlin or the Internet.

## **4. Remunerated Work Contracts and Consultancies**

a. Staff members of TI-Norway may undertake paid work for other employers only when the superior has given permission.

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<sup>1</sup> Resource persons typically work for the secretariat on a short-term contract or on a voluntary basis.

b. Some of TI-Norway's work is done by individuals who are not employed by TI-Norway but who act for, or on behalf of, TI-Norway on a voluntary basis. This includes the members of the board and resource persons associated with the secretariat's activities. They may have business, professional and other affiliations as long as it does not conflict with the interests of TI-Norway.

c. Members of the board, or companies or other organisations with which such members are currently affiliated, may not perform remunerated work for TI Norway, except that members of the board may serve concurrently as paid staff of TI-Norway under a contract approved by the board. They will not exercise their board function to the extent it relates to the conditions of the contract or the selection or supervision of such contract.

d. (i) Members of the International Board of Directors, or companies or other organizations with which such members are currently affiliated, may apply and compete for remunerated work contracts with TI-Norway and (ii) members of the board of directors of TI-Norway, or companies or other organizations with which such individuals are currently affiliated, may apply and compete for remunerated work contracts with any of the other National Chapters or with the TI-Secretariat; provided however that they are not offered any advantages over any competitors with respect to being awarded or carrying out such work.

They must not utilize privileged information and do everything to contradict the perception of having utilized privileged information; in addition, they will not exercise their board function to the extent it relates to the conditions of the contract or the selection or supervision of such contract. In other words, they do not need to be disqualified in such cases because of their affiliation with TI, but neither may they be given the "inside track". When doing non-TI related work, board members or their companies shall not utilize privileged TI information, and shall also be sensitive to the perception that they might be utilizing such information.

e. Resource persons in TI, or companies or other organizations with which such individuals are affiliated, may apply and compete for remunerated work contracts with TI-Norway, provided they are not offered any advantages over any competitors with respect to being awarded or carrying out such work.

They must not utilize privileged information and do everything to contradict the perception of having utilized privileged information. In other words, they do not need to be disqualified because of their affiliation with TI, but neither may they be given the "inside track". When doing non-TI related work, resource persons shall not utilize privileged TI information, and shall also be sensitive to the perception that they might be utilizing such information.

f. TI-Norway will be transparent in its decision-making processes when commissioning paid work by persons who act for, or on behalf of, TI-Norway, and will follow transparent tender procedures.

## **5. Gifts and Other Personal Advantages**

No person who acts for, or on behalf of, TI-Norway shall accept any gift, entertainment, loan, contributions or anything else of value from any organisation or individual if it could be reasonably construed or perceived that the gift is motivated by a wish to influence TI.

## **6. How to Deal with a Possible or an Actual Conflict of Interest**

a. If problems are identified before commitments are made or questionable actions have occurred, alternatives can be explored. Potential conflicts of interest shall be identified and declared by the person in potential conflict, or reported by others who act for, or on behalf of, TI-Norway, as soon as they become aware of such potential conflict of interest.

b. Such disclosure or report should be made to the chair of TI-Norway, or, when need be, to another member of the board or to the Secretary-General. The evaluation of a potential conflict of interest shall be made by the board of TI-Norway or, when suitable, by the TI International Board's Ethics Committee.

c. The evaluation may determine the absence of a conflict of interest, or it may lead to the conclusion that (i) the respective person should not go ahead with the evaluated activity or that (ii) he/she should recuse him/herself from participating in decision-making by TI-Norway with reference to the matter in conflict.

d. In the event of an actual conflict of interest, the board of TI-Norway shall decide which appropriate measure should to be taken, alternatively that (i) the respective person should not go ahead with the activity, that (ii) he/she should recuse him/herself from participating in decision-making by TI-Norway with reference to the matter in conflict or that (iii) he/she no longer may serve as a board member, staff person or resource person.

e. The chair of TI-Norway is responsible for ensuring that all persons who act for, or on behalf of, TI-Norway, are made aware of this policy regarding conflict of interest. The policy is made available to the general membership on the website.

## **7. Disclosure of Payments to National Chapter or TI International Board Members**

If TI-Norway should make a payment - excluding approved expenses and per diems - to a member of the International Board of TI, to a member of the board of TI-Norway, or to a member of the board or a staff member of another national chapter, this should be declared in the annual Financial Statement and Annual Report of TI-Norway. Such reporting should also outline the procurement/tender procedures conducted that led to such payment.

*Approved by the Board of Transparency International Norway on 17 November 2005*