



IMRO Rwanda

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IMRO RWANDA CONFLICT OF INTEREST POLICY

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1. Introduction

Ihorere Munyarwanda (IMRO Rwanda) is a Non-Governmental Organization that was founded in 1999 and has been legally operating in Rwanda since 2002. With two decades of experience, IMRO Rwanda has been actively involved in addressing various societal challenges, including poverty alleviation, gender equality, nutrition, gender-based violence (GBV), HIV prevention, education, environmental conservation, peace building, health promotion, accountability, advocacy, and networking. Our primary goal is to enhance the well-being of Rwandan citizens at the individual, family, and community levels, ultimately contributing to sustainable socioeconomic development.

IMRO Rwanda (Ihorere Munyarwanda Organization) is a nationally recognized Non-Governmental Organization, holding legal personality No 03/11 in Rwanda. Our organization is dedicated to the promotion and protection of human rights, with a specific focus on sexual and reproductive health rights and HIV prevention. We adopt a human rights-based approach and prioritize justice strengthening as we work tirelessly toward our vision of achieving excellence in harmonizing policies and legislations for a healthier society.

Our efforts encompass a wide spectrum of interventions targeting the general population, women, youth, children, key populations, and vulnerable groups in Rwanda. IMRO Rwanda collaborates closely with various government departments, local institutions, and international partners to develop and implement strategies that safeguard the sexual and reproductive health and rights of all Rwandans.

Our multifaceted approach involves engagement with diverse stakeholders, including women's and youth organizations, health providers, educational institutions, religious bodies, and

community members. By doing so, we aim to empower individuals and communities with the information and services necessary to make informed decisions about their sexual and reproductive health.

IMRO Rwanda is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest.

2. Definition of Conflict of Interest

A "Conflict of Interest" arises when an IMRO Rwanda employee, immediate family member, or business associate stands to gain financially from IMRO Rwanda's business dealings, programs, or services. This includes any financial interests common to other employees.

3. Responsibilities

IMRO Rwanda's Executive Director is responsible for ensuring employees are aware of and adhere to this policy. All employees must respect this policy.

4. Purpose of the Policy

This Conflict-of-Interest Policy aims to help IMRO Rwanda's directors, officers, and employees identify potential conflicts of interest and provide a framework for addressing such conflicts. It ensures that transactions can proceed transparently even when a conflict of interest is present.

5. Types of Conflicts of Interest

5.1 Outside Interests

These include;

- Agreements or transactions involving IMRO Rwanda and a Responsible Person or Family Member.

5.2 Outside Activities

Agreement or transaction between IMRO Rwanda and an o entity where a Responsible Person or Family Member has a Material Financial Interest with such a person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator or other legal representative.

These shall consist of:

- A Responsible Person competing with IMRO Rwanda in the rendering of services or in
- any other Agreement or Transaction with a third party;
- A Responsible Person's having a Material Financial Interest in; or serving as a director, officer, employee, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator, or other legal representative of, or consultant to; an entity or individual that competes with IMRO Rwanda in the provision of services or in any other Agreement or Transaction with a third party.

5.3 Gifts, Gratuities, and Entertainment

A Responsible Person accepting gifts, entertainment, or other favors from any individual or entity that:

- Does or is seeking to do business with, or is a competitor of IMRO Rwanda; or

- Has received, is receiving, or is seeking to receive a loan or grant, or to secure other financial commitments from IMRO Rwanda;
- Is a charitable organization;
- Under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Responsible Person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value that are not related to any particular transaction or activity of IMRO Rwanda.

6. Procedures

Before IMRO Rwanda action on an agreement or transaction involving a conflict of interest, a director, officer or an employee having a conflict of interest and who is in attendance at the meeting shall disclose all facts material to the conflict of interest. Such disclosure shall be reflected in the minutes of the staff meeting.

Furthermore, a director, officer or an employee who plans not to attend a staff meeting at which he or she has reason to believe that IMRO Rwanda staff meeting will act on a matter in which the person has a conflict of interest shall disclose to IMRO Rwanda Executive Director all facts material to the said conflict of interest and shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the staff meeting. Furthermore, all other employees shall declare any conflicts of interest of which they become aware when a relevant issue arises. And the conflict of interest should also be documented in the Conflict of Interest Checklist.

Moreover, a person who has a conflict of interest shall not participate in or be permitted to hear IMRO Rwanda's Staff meeting discussion on the matter except to disclose material facts and to

respond to questions. Such person shall not attempt to exert his/her personal influence with respect to the matter, either at or outside the meeting.

However, Responsible Persons who are not employees of IMRO Rwanda, or who have a Conflict of Interest with respect to an Agreement or Transaction that is not the subject of IMRO Rwanda, shall disclose to the Chair or the Chair's designee any Conflict of Interest that such a Person has with respect to an Agreement or Transaction. Such disclosure shall be made as soon as the conflict of interest is known to the Responsible Person. The Responsible Person shall refrain from any action that may affect IMRO Rwanda's participation in such Agreement or Transaction.

And in the event, it is not entirely clear that a conflict of interest exists, the concerned individual with the potential conflict shall disclose the circumstances to the Chair or the Chair's designee, who shall determine whether there exists a conflict of interest that is subject to this policy.

7. Confidentiality

Each Responsible Person shall exercise care not to disclose confidential information acquired in connection with such status or information the disclosure of which might be adverse to the interests of IMRO Rwanda.

Furthermore, a Responsible Person shall not disclose or use information relating to the business of IMRO Rwanda for the personal profit or advantage of the Responsible Person or a Family Member or the Responsible Person's company.

8. Review of Policy

Each new employee shall be required to review a copy of this Policy and to acknowledge that he or she has done so. Each Responsible

Person shall annually complete a disclosure form identifying any relationships, positions, or circumstances in which the Responsible Person is involved that he or she believes could contribute to a conflict of interest arising. Such relationships, positions, or circumstances might include service as a director of or consultant to a not-for-profit organization, or ownership of a business that might provide goods or services to IMRO Rwanda.

Each Responsible Person should also disclose to the board of directors any potential conflict of interest that may arise during the co

Any such information regarding business interests of a Responsible Person or a Family Member shall be treated as confidential and shall generally be made available only to IMRO Rwanda national Coordinator, IMRO Rwanda Legal Representative, and any committee appointed to address conflicts of interest, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.

This policy shall be reviewed annually by each member of the board of directors. Any changes to the policy shall be communicated immediately to all Responsible persons.

9. IMRO Rwanda Conflict of Interest Declaration Form

Instructions:

Please complete this form if you believe you have a conflict of interest or have become aware of a potential conflict of interest.

Submit the completed form to the National Coordinator's office.

Section 1: Personal Information

Full Name:

Position/Title at IMRO Rwanda:

Department/Division:

Email Address:

Phone Number:

Section 2: Nature of Conflict

Please describe the nature of the conflict of interest or potential conflict of interest. Be specific and provide details, including any outside interests, outside activities, or Gifts, Gratuities & Entertainment that could give rise to a conflict.

Section 3: Declaration of Conflicts

Please indicate whether you are declaring an existing conflict of interest or a potential conflict of interest:

Existing Conflict of Interest []

Potential Conflict of Interest []

Section 4: Outside Interests

If your conflict arises from outside interest, please provide details, including these interests and explain how they may conflict with your role at IMRO Rwanda.

Section 5: Outside Activities

If your conflict of interest arises from outside activities, please describe these activities and explain how they may conflict with your role at IMRO Rwanda.

Section 6: Gifts, Gratuities and Entertainment

If your conflict of interest is related to Gifts, Gratuities and Entertainment please provide details about the individuals or entities involved and how these Gifts, Gratuities and Entertainment may give rise to a conflict.

Section 7: Acknowledgment

I acknowledge that the information provided in this Conflict of Interest Declaration Form is complete and accurate to the best of my knowledge. I understand my responsibility to promptly report any changes in my circumstances that may affect this declaration.

Signature: _____ **Date:** _____

Section 8: Review and Approval

This section will be completed by IMRO Rwanda Executive Director who is responsible for reviewing and managing conflicts of interest.

Reviewed by: _____ **Date:** _____

Decision: Approved Not Approved

Comments:

Section 9: Actions Taken

Please document any actions taken in response to this conflict of interest declaration.

Confidentiality Note:

The information provided on this form will be kept confidential to the extent permitted by law and used solely for the purpose of managing conflicts of interest within IMRO Rwanda.

Conflict of Interest Policy Approved by:

Aimable MWANANAWE

Flavienne NDAYISHIMIYE

IMRO Rwanda Executive Director

Legal Representative

