



## **ACTS CONFLICT OF INTEREST POLICY**

ACTS is committed to maintaining the public trust and requires all its employees to conduct their work with the highest standards of integrity. Occasionally, the interests of employees will involve them in other organizations, causes and endeavors that intersect with the work of ACTS. Employees are expected to comply with the ACTS' conflict of interest policy in order to avoid actual, potential or perceived conflict of interest and to maintain a culture of honest and ethical conduct.

## **Definition of Conflict of Interest**

A potential or actual conflict of interest occurs whenever an employee is in a position to influence a decision that may result in any direct or indirect personal gain for him or herself, any other employee, or an immediate family member. An employee may not engage in activities that create a conflict between the interests of ACTS and those of himself or herself.

Conflict of interest may result from the close involvement with a vendor, service provider, partner, or grantee. This includes, but is not limited to, serving as a trustee, employee, or consultant to a current or potential grantee, service provider, partner or vendor. ACTS also encourages avoiding the appearance of a conflict of interest, even if no actual conflict has occurred.

## **Disclosure**

Employees are committed to making a prompt, full and frank disclosure of his or her interests to ACTS regarding any relationship or commitment that could affect the impartial fulfillment of their roles in the work of ACTS. Antecedent affiliations and indirect associations must be disclosed. Such disclosure shall include all relevant and material facts known to such person about the contract or transaction that might reasonably be construed to be adverse to ACTS's interest.

All disclosures of potential conflicts of interest should be made to the Executive Director who shall then appoint a body to determine whether a conflict of interest exists or can reasonably be construed to exist.

## **Abstention from Decision-making**

The body to which such disclosure is made shall thereupon determine, by majority vote, whether the disclosure shows that a conflict of interest exists or can reasonably be construed to exist. If a conflict is deemed to exist, such person should abstain from decision-making actions, including not voting on, nor using personal influence on, nor being present during the discussion or deliberations with respect to, such contract or transaction (other than to present factual information or to respond to questions prior

to the discussion). If such an instance occurs, the minutes of the meeting shall reflect the disclosure made, the vote thereon and, where applicable, the abstention from voting and participation.

## **Failure to Disclose Potential Conflict of Interest**

Where an employee fails to disclose a conflict of interest or a potential conflict of interest which is subsequently shown to exist by a body constituted to determine the existence of a conflict of interest, the employee shall be deemed to have failed the standards of ethical conduct and integrity expected of ACTS employees and shall be subject to disciplinary action.

Signed: 

Dr. Cosmas Ochieng  
*Executive Director*

This day of: 25/2/2015