



Conflict of Interest Statement

- General -

Introduction. This Conflict of Interest Statement describes the policy of CARE with respect to conflicts of interest and supplements the CARE *Employee Manual*.

All CARE employees who are authorized under CARE's Signature Authorization Policy Guidelines to approve the expenditure of funds, all procurement staff, and all employees who regularly requisition goods and services are required to execute a Conflict of Interest Statement.

Policy. CARE staff must scrupulously avoid any conflict between their own individual interests and the interests of CARE (a "conflict of interest").

Definition of "Conflict of Interest." A conflict of interest can arise in a variety of situations. A clear conflict of interest arises when a CARE employee or a member of the employee's family:

Participates in the evaluation, selection, award, or administration of a contract or other order for the purchase of goods or services that will directly or indirectly benefit the employee or the employee's family.

Has a direct or indirect financial or other commercial interest in any party doing business with CARE.

Stands to gain personally or individually from any transaction in which CARE is a party. Accepts gifts, favors, or anything of monetary value from vendors, including contractors, (except for unsolicited gifts of a nominal value, training, travel, materials, or other items provided for the benefit of CARE with supervisor approval).

Of course there are many other conflict of interest situations in addition to those described above. If an employee has a question about a potential conflict of interest situation, the employee should consult a supervisor.

Definition of "Employee's Family." For the purposes of this Conflict of Interest Statement, an employee's family includes a spouse, brother or sister, parent, child or domestic partner.

Avoiding Perceived Conflicts of Interest. In addition to avoiding actual conflicts of interest, CARE employees must avoid giving the appearance of a conflict of interest to all people inside and outside of CARE.

Disclosure in Conflict Situations. All situations where there is a conflict of interest or perceived conflict of interest must be disclosed to an employee's immediate supervisor.

Approvals of Certain Conflicts. In certain, limited circumstances, an employee may be approved to remain in a conflict or perceived conflict of interest situation. Only the President, Senior Vice President of Finance, and Director of Financial Services are authorized to grant such approvals.

Signing this Conflict of Interest Statement. By signing where indicated below, you acknowledge that you have read and understand the contents of this Conflict of Interest Statement.



Conflict of Interest Statement

- Fundraiser -

Introduction: This Conflict of Interest Statement describes CARE's policy with respect to conflicts of interest and supplements the CARE *Employee Manual*. This statement incorporates all aspects of CARE's general Conflict of Interest statement with specific reference to fundraisers. All CARE fundraisers are required to execute this Conflict of Interest Statement.

Policy: CARE staff must scrupulously avoid any conflict between their own individual interests and the interests of CARE (a "conflict of interest").

Definition of "Conflict of Interest":

Fundraising: A clear conflict of interest arises when, in the course of a fundraiser's work for CARE, the fundraiser influences a CARE donor in order to personally benefit.

In General: A clear conflict of interest arises when a CARE employee or a member of the employee's family (to include spouse, sibling, parent, child, or domestic partner):

Participates in the evaluation, selection, award, or administration of a contract or other order for the purchase of goods or services that will directly or indirectly benefit the employee or the employee's family.

Has a direct or indirect financial or other commercial interest in any party doing business with CARE.

Stands to gain personally or individually from any transaction in which CARE is a party. (This provision does not apply to unsolicited gifts of a nominal value, training, travel, materials, or other items provided for the benefit of CARE with supervisor approval).

Of course there are many other conflict of interest situations in addition to those described above. If an employee has a question about a potential conflict of interest situation, the employee should consult a supervisor.

Avoiding perceived conflict of interest: In addition to avoiding actual conflicts CARE fundraisers must avoid giving the appearance of a conflict of interest outside of CARE ("perceived conflict of interest"). Perceived conflicts of interest (i) a CARE fundraiser personally benefits from a gift that results from his and (ii) the fundraiser was in a position to influence the gift. This can happen, CARE fundraiser is named in a CARE donor's Will solely because of his donor on behalf of CARE. These instances place both CARE and the fundraiser position. Neither wants to appear to have influenced a CARE donor for the gain.

If a donor informs a fundraiser in advance that the donor plans to give them instead to make the gift to CARE.

Definition of perceived conflicts of interest: A perceived conflict of CARE fundraiser receives a gift from a CARE donor and:

- a. The gift is made by Will, in trust, in cash or in kind;
- b. The gift results solely from the fundraiser's work for CARE;
- c. The fundraiser was in a position to influence the gift.

This policy does not apply if the employee has a preexisting or independent personal relationship with the donor and the gift arises from that relationship. Examples of preexisting or independent personal relationships may include that the employee is a family member or longstanding friend of the CARE donor or other facts and circumstances that establish that the gift did not result solely from the fundraiser's work for CARE.

This policy does not apply to meals or unsolicited gifts of a nominal value, training, travel, materials, or other items provided for the benefit of CARE with supervisor approval.

Disclosure: Employees aware of situations involving an actual or perceived conflict of interest must disclose the situation to their immediate supervisor. This applies, for example, to fundraisers placed in the position of soliciting their friends on CARE's behalf. In such situations, CARE may reassign another fundraiser to the relationship or permit the employee to remain in the perceived conflict of interest situation. Only the Executive Vice President of Global Advocacy & External Relations is authorized to permit the perceived conflict to continue.

Redirecting gifts or Disciplinary action: As a condition to continued employment at CARE, any employee in a perceived or actual conflict of interest situation, as described above, shall ask that the donor instead make the gift to CARE. If that is not possible or the gift is already irrevocable, the fundraiser should, after consultation with the appropriate staff at CARE, disclaim (or politely decline) the gift. Actual conflicts of interest or serious or repeated perceived conflicts of interests may result in appropriate disciplinary action up to and including termination.

Signing this Conflict of Interest Statement: By signing where indicated below, you acknowledge that you have read and understand the contents of this Conflict of Interest Statement for Fundraisers.

CARE may modify this policy from time to time.