

CONFLICT OF INTEREST POLICY OF THE INTERNATIONAL INITIATIVE FOR IMPACT EVALUATION

Introduction and overview

1. The Commissioners, officers, committee members, and volunteers of **INTERNATIONAL INITIATIVE FOR IMPACT EVALUATION, INC.** (the "Corporation"), while acting on behalf of the Corporation, must avoid conflicts of interest. Even the appearance of a conflict of interest must be avoided. All actions by Commissioners, officers and other individuals with the ability to influence the financial affairs of the Corporation (i.e., insiders) must be based solely on the best interests of the Corporation, in accordance with applicable state and federal laws and regulations. Actions must not be influenced by personal considerations or the considerations of other institutions with which the Commissioner is associated where these considerations conflict with the best interest of 3ie.
2. A conflict of interest occurs whenever an individual has a direct or indirect interest, financial or otherwise, in the outcome of any transaction or matter involving the Corporation. A conflict of interest also occurs whenever an individual has a relationship, either personal or professional, with other parties to the transaction or matter such that the relationship might reasonably be expected to affect the judgment of the individual in the particular transaction or matter in a manner potentially or actually adverse to the Corporation.
3. Examples of a conflict of interest which may arise in the business of the Corporation include (1) when a Commissioner is a current or past employee of an institution having a current or potential relationship to the Corporation (e.g. being a recipient of a 3ie grant, or employee of a 3ie funding agency), (2) when a Commissioner, or relation of the Commissioner, is in receipt of funds from the Corporation for services performed, other than the honorarium received by Commissioners), and (3) when the Commissioner is an employee of, or otherwise associated with, an organization whose work may be seen to compete with that of the Corporation.
4. Performing services in association with the Corporation on a *pro bono* basis is explicitly excluded from the policy.

Register of interests: the Mandatory Disclosure Statement

5. The Corporation has instituted a Mandatory Disclosure Policy under which each of the following categories of individuals will be required to sign and submit a Mandatory Disclosure Statement (sample attached) to the Executive Director annually and every time a conflict of interest (as defined herein) arises: (i) Board of Commissioners, (ii) Officers, and (iii) Other specific appointees as designated by the Chairman of the Board or the Board of Commissioners. These Statements will be kept on record.
6. The Executive Director shall maintain a file of Mandatory Disclosure Statements signed by each above-named individual.

7. If an individual has a conflict of interest or potential conflict of interest in connection with any Corporation transaction or matter, he or she must immediately notify the Executive Director or the Board of Commissioners, and disclose all the material facts concerning the actual or potential conflict of interest and his or her relationship to the transaction or matter at issue.

Conflicts of interest arising in relation to specific agenda items in Board meetings

8. Each Commissioner must identify whether he or she has a conflict of interest with respect to any particular agenda item or issue being discussed. This conflict should be declared when the agenda is read at the start of the meeting. Exceptionally, the Commissioner may declare the interest once the agenda item is opened if an unrealized conflict arises.
9. Once a conflict of interest has been declared, those Commissioners without such a conflict for that agenda item shall determine with the Commissioner(s) with a conflict should: (i) Fully recuse themselves, meaning they shall absent themselves from the Board room for the duration of the item, (ii) Be in the room for the discussion, but not take part, (iii) Make an opening presentation on the matter, but otherwise abstain from participation in the discussion and voting, (iv) Be in the room for the discussion, and asked to comment at the Chair's discretion, and abstain from voting, (v) Take part in the discussion in the normal manner, but abstain from voting, (vi) Take part in both discussion and voting in the normal manner, noting details in the minutes of the interest that was declared.
10. The minutes must record the details of the Commissioner's conflict and the process by which it was managed.

INTERNATIONAL INITIATIVE FOR IMPACT EVALUATION, INC.

Conflict of Interest Mandatory Disclosure Statement

I have read the Conflict of Interest Policy of the **INTERNATIONAL INITIATIVE FOR IMPACT EVALUATION, INC.** (the "Corporation") and I support its intent.

I hereby certify, that to the best of my knowledge, I do not have any financial or other interest that raises an actual or potential conflict of interest with my activities on behalf of the Corporation. If any actual or potential conflict of interest exists, the conflict as well as the financial or other interest upon which it is based are listed below and are more fully described in the written statement I have attached to this form.

If an actual or potential conflict of interest subsequently develops, I will promptly submit an amended Mandatory Disclosure Statement to the Executive Director or the Board of Commissioners.

As directed and where appropriate, I will make disclosure of the conflict of interest to fellow members of the Corporation's deliberative bodies.

Signature and Title

Date