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CONFLICT OF INTEREST POLICY

Document	Conflict of Interest Policy
Organization	Non-Governmental Organization "International Anti-Corruption Assembly" (NGO "IACA")
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1. General Provisions

The Non-Governmental Organization “International Anti-Corruption Assembly” (hereinafter referred to as the “Organization” or “IACA”) maintains high standards for conflict of interest management as a key element of its integrity and anti-corruption framework.

This Conflict of Interest Policy establishes rules for the identification, disclosure, assessment, and management of actual, potential, or perceived conflicts of interest in all aspects of the Organization’s activities, regardless of the country in which projects are implemented.

This Policy has been developed in accordance with:

- The Charter of the Organization (2019 revised edition approved by the General Assembly);
- The legislation of Ukraine (including the Law of Ukraine “On Prevention of Corruption” and the Law of Ukraine “On Public Associations”);
- The United Nations Convention against Corruption (UNCAC), particularly Articles 7, 8, and 12;
- International standards and guidelines (OECD Guidelines for Managing Conflict of Interest in the Public Service, ISO 37001:2016, recommendations of Transparency International, and donor requirements including those of USAID, the European Union, and the United Nations);
- The Independence-First Principle, ensuring the Organization’s independence even when receiving external funding.

2. Purpose of the Policy

- To ensure the timely identification and management of actual, potential, or perceived conflicts of interest;
- To prevent the misuse of position, resources, or information for personal benefit;
- To ensure objectivity, impartiality, and transparency in decision-making;
- To strengthen the confidence of international partners, donors, beneficiaries, and the public;
- To support the Independence-First approach within the Organization’s hybrid operating model.

3. Scope of Application

This Policy is mandatory for all persons acting on behalf of, or in connection with, the Organization, regardless of their country of residence or form of engagement, including:

- Members of the General Assembly, the Central Committee, and the Audit Commission;
- The General Secretary;
- Employees (both staff and non-staff personnel), volunteers, and interns;
- Heads and members of Separate Subdivisions and Representative Offices (Clause 1.16 of the Charter);
- Consultants, experts, contractors, and representatives of partner organizations participating in joint projects.

4. Definition of Conflict of Interest

A conflict of interest is a situation in which a person's personal interest (direct or indirect), including financial, family-related, professional, political, emotional, or other interests, may influence, or reasonably appear to influence, the objective and honest performance of their duties in the best interests of the Organization.

A conflict of interest may be:

- Actual — currently exists and affects decision-making;
- Potential — may arise in the future;
- Perceived — creates an appearance of influence to third parties, even if no actual influence exists.

5. Core Principles

- Full, timely, and good-faith disclosure of conflicts of interest;
- Priority of the Organization's interests over any personal interests;
- Transparency, documentation, and accountability;
- Proportionality of management measures to identified risks;
- Zero tolerance for the concealment of conflicts of interest;
- Protection of individuals who disclose conflicts of interest in good faith.

6. Responsibilities

6.1 Every person covered by this Policy shall:

- Promptly disclose in writing any actual, potential, or perceived conflict of interest no later than three (3) working days after becoming aware of it;
- Recuse themselves from discussions and decision-making processes where a conflict exists;
- Declare conflicts of interest annually and whenever such conflicts arise;
- Cooperate fully in the review and management of the conflict.

6.2 General Secretary

The General Secretary shall review declarations, make decisions regarding conflict management measures, and, where necessary, inform the Central Committee about significant conflicts of interest.

6.3 Central Committee

- Reviews conflicts of interest involving the General Secretary or members of the Central Committee;
- Approves key decisions concerning conflict management.

7. Conflict of Interest Management Procedures

The Organization shall apply the following procedures:

- Registration of declarations in the Organization's Conflict of Interest Register;
- Risk assessment and selection of appropriate management measures (recusal, reassignment of responsibilities, enhanced oversight, withdrawal from participation, or other appropriate measures);
- Documentation of all decisions and actions taken;
- Alternative decision-making by another authorized individual where required;
- Monitoring compliance with adopted management measures;
- Involving the Audit Commission or external experts where necessary.

Concealment of a conflict of interest shall be considered a serious violation and may constitute corruption-related misconduct or fraud.

8. Related Documents

This Policy forms an integral part of the Organization's internal governance framework and is linked to:

- Anti-Corruption Policy;
- Anti-Fraud Policy;
- Code of Conduct;
- Procurement Policy;
- Whistleblowing and Whistleblower Protection Policy;
- Financial Procedures.

9. Final Provisions

This Policy shall enter into force on 25 February 2026.

The Policy shall be reviewed at least once every two years and whenever significant changes occur in applicable legislation, international standards, the Organizational structure, or donor requirements.

All new members, employees, volunteers, and partners are required to familiarize themselves with this Policy and sign a declaration confirming the existence or absence of any conflict of interest.

Approved by:

General Secretary of the Central Committee
NGO "International Anti-Corruption Assembly"



Viacheslav Sayenko