

## **CONFLICT OF INTEREST POLICY**

### **Reform Institute Foundation**

#### **1. VALUES AND OBJECTIVES**

The credibility of Reform Institute (hereinafter the “Institute”), the trust of its partners and its renown represent the common good of the team and the Institute. Conflicts of interest may undermine these values.

The purpose of the Conflict of Interest Policy (hereinafter the “Policy”) is to protect the above values by ensuring that all decisions within the Institute are impartial, transparent and based on transparent criteria.

#### **2. SUBJECTIVE SCOPE**

All team members, regardless of the basis of employment and position, are obligated to follow this Policy.

#### **3. CONFLICT OF INTEREST**

3.1. Team members must avoid conflicts of interest, i.e. situations in which their personal interest or personal interest of a third party might collide with the interest of the Institute or its partner, where such situations would give rise to reasonable doubts about a team member’s impartiality or integrity. Conflicts of interest occur whether or not the Institute’s or its partner’s interest has been actually violated or threatened.

3.2. A conflict of interest occurs, in particular, when:

- a. team member takes up employment with the Institute’s partners or entities engaged in competitive business;
- b. employment at the Institute is offered to a spouse, life partner, person related by consanguinity or affinity or a friend;
- c. any team member is directly subordinate to their spouse, life partner, person related by consanguinity or affinity or a friend.

#### 4. THE INSTITUTE AND CONFLICT OF INTEREST BETWEEN THIRD PARTIES

4.1. The Institute must avoid situations in which it could become involved in a conflict of interest between third parties, resulting in a conflict with the interests of the Institute, including its financial interests, or its values, such as integrity and credibility. In particular, the Institute will not:

- a. employ any individuals who are concurrently and permanently employed in public administration;
- b. employ any individuals who in the course of their employment in public administration were involved in any decisions or other actions concerning the Institute, unless at least 2 years have passed since that decision or action.

#### 5. PREVENTION AND RESPONSE

5.1. In the event of any signs of a conflict of interest:

- a. Team member involved in the conflict has an obligation to:
  - excuse themselves from any proceedings in that matter,
  - report the conflict of interest to their direct superior or the Management Board, and if the conflict concerns a member of the Management Board – to the Foundation Board.
- b. The direct superior, the Management Board or (if the conflict concerns a member of the Management Board) the Foundation Board will nominate a team member who will replace the member affected by the conflict of interest and take decisions or actions in their stead. The nominated team member cannot be subordinate to the excused member.
- c. The nominated team member will take decisions in the excused member's stead on the basis of transparent criteria, in line with the rules of fair competition and considering specific circumstances of the case, including limited availability of particular services or unique qualifications of a candidate employee.

- 5.2. Every team member may consult their superior or the Management Board if they are uncertain whether a given situation constitutes a conflict of interest.
- 5.3. Any person who becomes aware of a conflict of interest at the Institute or the situation referred to in Section 4 should report it to a competent team member. It is recommended that the conflict be reported first to the direct superior or person in charge of the relevant area. In special cases, e.g. when the conflict of interest involves the direct superior of the whistleblower, it should be reported to the Management Board via email, phone or in person (see Appendix no. 1 – Contact Details). Unless initially made in writing, the report should be recorded in the form of a written report. Reports should be made only if there are reasonable grounds to believe that the information reported is true. The Management Board will protect whistleblowers against retaliation.
- 5.4. Failure to report a conflict of interest may constitute a breach of obligations, including a gross breach of basic obligations towards the Institute, in particular the obligation to protect the interests and good name of the Institute, and, as a consequence, may provide grounds for immediate termination of the employment contract.

## 6. ADOPTION, ACCESS AND REVIEW

This Diversity and Inclusion Policy was adopted by the Management Board under the resolution no. 2023/XI/3 of 3 November 2023.

This Policy was made available to all team members and it will be made available to every new member.

This Policy is available in the Institute's cloud and on its website at [www.ireform.eu](http://www.ireform.eu).

Questions about the Policy should be directed to Operations Specialist via email (see Appendix no. 1 – Contact Details).

This Policy will be reviewed every 2 years.

**Appendix no. 1**  
**Contact Details**

Full name	Position	Email address
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