Organizational Conflict of Interest Policy

Document Governance

Function Owner	Department	Content Review Cycle	Date Last Revised
Vice President, Risk Management & Compliance	Rik Management & Compliance	Annual	November 2023

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1. Policy Statement

CRDF Global is committed to doing the right thing, which includes transparency and ethical conduct in all operations. CRDF Global shall not engage in any activity that creates an actual or perceived conflict of interest that could impair the ability of CRDF Global to carry out its mission. To this end, CRDF Global will avoid situations where Organizational Conflicts of Interest (OCI) prevent CRDF Global from rendering impartial assistance to a customer, performing work for a customer in an objective way, or result in a situation where CRDF Global has an unfair competitive advantage compared to other entities.

CRDF Global will monitor its activities and relationships and assess any actual or perceived OCI in the submission of bids, performance of work for customers, or other activities with the objective of ensuring such situations are identified and avoided and/or mitigated as appropriate. CRDF Global will incorporate appropriate provisions in all contractual and other agreements to this effect.

To avoid OCI, all CRDF Global employees shall:

- Prevent conflicting roles on the part of CRDF Global that could bias its judgment.
- Prevent situations that could give CRDF Global an unfair competitive advantage.
- Avoid using any proprietary information obtained from the government for any unauthorized purpose or for any unfair competitive advantage in any other procurement.

Any actual, perceived or potential OCI shall be disclosed to the Vice President, Risk Management and Compliance, who will evaluate the circumstances and take appropriate actions to mitigate actual, perceived or potential OCI.

A conflict of interest, or the appearance of a conflict of interest, may exist under any number of circumstances. CRDF Global cannot anticipate every potential conflict of interest but expects employees to stay alert for situations that advance or could appear to result in an OCI.

Failure to comply with this policy may result in disqualification of CRDF Global from business opportunities. Thus, it is imperative for CRDF Global employees to disclose all situations that could reasonably qualify as an actual, potential, or perceived conflict of interest.

2. Purpose

This Organizational Conflict of Interest Policy guides all CRDF Global personnel and partners to protect the trust that our customers place in us by identifying, avoiding, and mitigating actual or perceived situations that interfere with the ability to make decisions in the best interest of the organization and its customers and in compliance with our contractual and legal obligations and in keeping with the highest ethical standards.

This policy supports our compliance with Federal Acquisition Regulation Subpart 9.5 related to Organizational and Consultant Conflicts of Interest and 2 CFR 200.112 and 2 CFR.318 relating to conflicts of interest for Federal award recipients.. We are required to recognize and avoid organizational conflicts of interest (OCI) in connection with direct or indirect contracts with the U.S. Government.

3. Definitions

Organizational Conflict of Interest (OCI)	Activities or relationships with other entities that render an organization unable to (1) render impartial assistance or advice to a customer; (2) cannot perform the scope of work for the customer in an objective way, or (3) has an unfair competitive advantage compared to other entities.
Code of Conduct	Set of guidelines that outline the expected behavior and ethical standards for all CRDF Global personnel regarding conflict-of-interest regulations.
Business relationship	Any organization or individual that conducts or seeks to conduct business transactions with CRDF Global, which includes customers, contractors, subcontractors, and governmental agencies.
Outside	Refers to an entity that is not CRDF Global.
Actual Conflict of Interest	When an employee's individual interests and their actions to act in CRDF Global's best interest diverge wherein the employee may benefit personally from a decision they could make in their organizational capacity.
Potential Conflict of Interest	A situation that might give rise to an actual conflict of interest.
Perceived Conflict of Interest	When circumstances provide the appearance to others, such as third parties, that a CRDF Global employee may benefit personally from a decision they could make in their organizational capacity and/or can be influenced to undermine CRDF Global's interests.

4. Scope

All employees, consultants, contractors, and other entities conducting business with CRDF Global are expected to abide by this policy. This policy does not address Personal Conflicts of Interest. Please refer to the corporate Conflict of Interest Policy for guidance on personal conflicts of interest.

5. Exclusions

None.

6. Additional Content

Examples. The conflict of interest examples listed in this Section are illustrative of how conflicts may arise and is not exhaustive. Conflicts of interest may exist in situations other than the following circumstances:

- Unequal Access to Information
  - *Example A: In the performance of work under one federal award CRDF Global personnel obtain proprietary and non-public information related to another entity with whom CRDF Global will be competing for a separate contract award.*

- Impaired Objectivity
  - *Example B: CRDF Global bids on a contract to provide Monitoring & Evaluation services for programs which include ones CRDF Global performs under separate agreements.*

- Biased Ground Rules
  - *Example C: CRDF Global supports a customer in the establishment of the evaluation criteria and selection process for a procurement action and then submits a proposal to the opportunity for which it set those criteria.*

7. Related Documents

CRDF Global Policies, Processes, and Procedures

Related Policies	Related Processes	Related Procedures
Business Development Policy		
Code of Conduct		
Anti-Bribery and Anti-Corruption Policy		Annual CoI Disclosure Procedure
Corrective Action and Termination Policy		
Personal Conflict of Interest Policy		
Grievance Handling and Investigation Policy		
Legal Services Policy		
Gifts and Gratuities Policy		
Contract Management Policy		
Whistleblower Policy		
Procurement Policy		

External References

External Reference	Description
2 CFR 200.112	Conflict of interest for Federal awardees
2 CFR 200.318	Procurement standards for Federal awardees
FAR Subpart 9.5	Federal Acquisition Regulations related to Organizational and Consultant Conflicts of Interest