



Code of Conduct Regarding Procurement Activities

This policy statement outlines ACHRO policies and procedures with regard to standards of conduct governing the performance of its employees engaged in the procurement of supplies, contracted services, and equipment. All such employees are required to sign this policy statement indicating that they have read and understood this statement.

ACHRO employees have the responsibility to administer the affairs of ACHRO honestly and prudently. The interests of ACHRO and all of its Donors and Contributors must be affected on a basis that secures, for the organization, full competitive advantages as to product, service, and price for all procurement transactions.

This statement is directed at all ACHRO employees who can influence the actions of the organization or make commitments on its behalf.

Areas of Potential Conflicts of Interest are:

- Persons or entities supplying goods and equipment
- Persons or entities supplying contractual services
- Persons or entities from whom ACHRO leases property and equipment

A **conflict of interest** would arise when an employee of ACHRO or any member of his or her immediate family (defined as brothers and sisters, spouse, ancestors and lineal descendants), his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. A financial or other interest is defined as owning stock or holding debt or other proprietary interests in the contracting organization, or holding office, serving on the board, or participating in management of the contracting organization.

The areas for potential conflicts of interest and the nature of conflicting interests noted above are not exhaustive. Conflicts might occur in other areas or through other relations. It is assumed that employees will recognize such areas and relations by analogy.

The fact that one of the interests described above exists does not necessarily mean that a conflict exists, or if one does exist, that it is material enough to be of practical importance. It is also possible, upon full disclosure of all relevant facts and circumstances, that doing business with a related organization is not necessarily adverse to the interests of Mercy Corps. However, it is the policy of ACHRO that the existence of any of the conflicting interests described above shall be fully disclosed before any transaction is consummated. It shall be the continuing responsibility of the employees to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make disclosures.

(Translated version on other side)

Disclosures of conflict of interest shall be made to:

- The Head of Office or Procurement Manager for Finance Manager. If the Head of Office or Procurement Manager for Finance Manager has a conflict, they shall disclose to the Program Manager.

The appropriate officer as noted above shall then determine whether a conflict exists and is material, and in the presence of an existing conflict, whether the contemplated transaction may be authorized as just, fair, and reasonable. The decision of the appropriate officer on these matters will rest in their sole discretion, and their first concern must be the welfare of the organization and the advancement of its purposes. If ACHRO does engage in transactions with such an organization, then the employee with such a conflict shall be prohibited from participating in the selection, award, or administration of a contract.

This code also strictly prohibits ACHRO employees from soliciting or accepting gratuities, favors, or anything of monetary value from suppliers, contractors, or parties to sub-agreements. This shall not apply to gifts of immaterial value (less than \$ 50.) These are PR materials from suppliers; calendars, note books, organizers etc.

Failure to abide by the standards established herein will subject the employee to sanctions to be determined by the employee's supervisor including the possibility of termination.

Signed: _____

Print Name: _____

Title: _____

Date: _____

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