PREVENTION & MANAGEMENT POLICY OF CONFLICTS OF INTEREST

Last reviewed on 31/07/2026

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Preamble

In addition to the applicable contractual and legal documents, CartONG has policies and procedures that reflect its commitments to integrity:

- The Code of Conduct;
- The Policy on Preventing and Combating Sexual Exploitation and Abuse (PSEA);
- The Policy for the Prevention and Fight against Fraud and Corruption;
- The Policy on the Prevention and Fight against Money Laundering and Terrorist Financing;
- An internal whistleblowing system.

These documents apply to all members of CartONG and allow everyone to have a common ethical framework.

This policy on the prevention and management of conflicts of interest is part of this framework.

All these documents can be consulted on CartONG's internal computer network for its members and on CartONG's website for third parties.

1. Purpose of this policy

A policy for the prevention and management of conflicts of interest is intended to prevent the personal and/or institutional interests of the persons involved in contractual decision-making from interfering with their work within CartONG. No individual, professional or political interest shall prejudice the Association as a whole.

The purpose of this policy is not to prohibit the existence of relations between a third party and the members attached to the decision-making bodies, but to ensure that if there is a relationship, it does not benefit the personal interest of one or the other of the third parties involved, but rather the achievement of the common interest for the benefit of the Association.

On the other hand, this policy implies that, if, despite the benefit that CartONG could derive from the contractual relationship, this agreement benefits one of its members, there is an obligation to inform the Association, so that it can decide whether there is a conflict of interest, and that the person(s) involved do not participate in the decision-making process.

2. Scope

This policy applies to all members of staff, employees, interns, civic services, consultants, board members, members and volunteers (hereinafter referred to as "members").

3. Definition

Conflict of interest is defined as an interest that could affect - or could appear to affect - the opinion or behavior of one or a few members of CartONG to the detriment of the interests of the Association.

A conflict of interest is any situation in which the discretion or decision-making power of a natural person, legal person, undertaking or organisation may be influenced or altered, in its independence or integrity, by personal considerations, direct or indirect interests, or by the power of pressure emanating from a third party.

A conflict of interest arises in the following situations:

- Adoption of agreements that establish a contractual relationship between CartONG and directly or indirectly the person who participates in the decision-making of the contract.
- Adoption of agreements that establish a contractual relationship between CartONG and a company or organization in which the person who participates in the decision-making of the contract, the members of his or her family (direct or by marriage), his or her spouse or the person with an emotional relationship similar to that of the spouse, hold a participation of more than twenty-five percent (25%) or decision-making power.
- Adoption of agreements that result in a member of CartONG obtaining personal benefits in his or her favor, which he or she would not have in the absence of this relationship, whether for himself, for his or her representative, members of his or her direct or in-law family, or a person with an emotional bond similar to that of the spouse, even if this interest is compatible with the activity of CartONG.

4. Procedure & documentation

4.1. Information

The person or persons who are aware of the potential existence of a conflict of interest concerning themselves or another person who participates in the decision-making process during the award of a contract, have the duty to inform the "Alert Unit" (alerte@cartong.org) by providing sufficient evidence or arguments to be able to determine whether there is a conflict of interest.

This information must take place as soon as the potential conflict of interest is known.

Statements made in the context of this policy will be considered confidential and will only be communicated if necessary, in accordance with the "need to know" principle (imperative need to know information in the context of a specific function and for the proper performance of a specific mission).

4.2. Instruction

4.2.1. Actors of the whistleblowing system

The alert unit
Composed of a member of the Association's Board and a member of the CSE (Social & Economic Committee).

They undertake to treat the information received, and subsequently analysed, in the strict confidentiality of this function and they report to the Alert Committee for all matters relating to the complaint received.

The alert Committee:
Composed of 3 permanent seats (1 member of the Alert Unit, the General Director, the HR Manager).
In the event that one of the permanent members is unable to participate in the meetings of the Committee, the seat shall remain vacant.
The Alert Unit is empowered to exclude one of the permanent members if it considers that he or she is directly concerned by the case, that he or she is in a situation of conflict of interest or deemed as such. In this case, it will not be replaced. The expelled member will not be informed of the subject matter of the complaint or summoned to the said Committee.

The General Director
He/she decides on any disciplinary sanctions against the employees involved based on the investigation report.

The Association's Board
It decides on any legal proceedings against the persons involved based on the investigation report and the sanctions against the volunteers and members.

4.2.3. Analysis of the alert

The Alert Unit will convene the Alert Committee to study the case presented with all possible data and the person concerned will be heard. Thereafter, the person will leave the meeting, and after discussion, the Alert Committee will decide whether to consider a conflict of interest or not.

The Alert Committee may convene one or more persons not concerned by the case to the meeting, in order to propose alternatives to the transaction or contract entered by the person concerned.

It will have to decide whether some of the proposed alternatives may be more appropriate for CartONG than the one that involves conflict of interest.

If none of the proposed alternatives is more appropriate than the one presented by the person concerned, the Alert Committee will have to decide by majority whether the contract or the agreement will be concluded.

4.3. Documentation

The minutes of the Alert Committee meetings must include:

- The names of all the people who have intervened since the beginning of the process with a description of their interventions.
- A description of the elements that lead to a finding of a conflict of interest.
- Alternatives to the agreement proposed by the person concerned.
- The reasons why it was decided to continue or cancel the transaction.
- The agreement reached and the final vote.

These documents will be stored electronically on the Association's network in a file specific to the Alert Committee, for the duration of the contractual relationship concerned, plus the legal retention period.

5. Penalties

If the Alert Unit becomes aware of a potential non-implementation of the conflict of interest policy, it must inform the person of the reasons that lead him or her to believe this and allow the person concerned to present his or her point of view on the situation. If, subsequently, the Alert Unit determines that the appropriate process has not been followed, or that it has not been informed of a conflict of interest, whether real or supposed, the information will be forwarded to the Director and the Board who will decide on the appropriate measures to be taken.

Any breach of this policy by a CartONG employee, intern or civic service, in particular any breach of the duty to declare quickly, completely and accurately any actual or potential conflict of interest, is likely to result in disciplinary measures against the person concerned by the conflict of interest in accordance with the Internal Regulations.

For elected officials or volunteer members of CartONG, sanctions may go as far as exclusion according to the association's statutes.

And finally, for operational partners, service providers and suppliers, the current contract may be terminated (According to commitments made).

6. Advertisement

This policy has been the subject of information and consultation with the Social and Economic Committee (CSE), in accordance with the legal provisions.

Each current member of the Association is made aware of the existence of this policy via electronic communication when it comes into force and when updated, new members are informed during their onboarding briefing.

All current or newly recruited members of CartONG are required to read and declare that they have read this Policy and agree to abide by it. A document to this effect will be signed by each of the members in two copies, one kept by CartONG, the other for the signatory member.

Members are informed that this document may be given to the association's donors who request it.

7. Effective date

This policy for the prevention and management of conflicts of interest will come into force on September 1, 2026.

Done in Chambéry on 31/07/2026

Signature of Sophie Oddo, as Co-Director of CartONG



Signé électroniquement par
Sophie Oddo
Le 31/07/2026 à 14:33