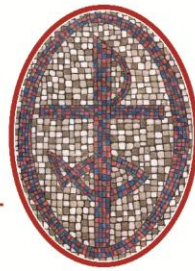


<p>Title:</p>	<p>Conflict of Interest</p>
<p>Policy statement:</p>	<p>All board members staff and representatives will perform their duties and conduct their private life in a manner that ensures possible conflicts of interest with their role in DSPR are subject to legal ramifications.</p> <p>Conflicts of interests that are undeclared or improperly managed result in risks, including financial risks, legal risks, moral risks (conduct that would be considered unethical or illegal), reputational risks and compliance risks.</p> <p>Personal Responsibility</p> <p>All board members, staff and representative are responsible for:</p> <p>1. Avoiding Conflict of Interest</p> <p>You should proactively, whenever possible, avoid even the appearance of partiality, evade placing yourself in any situation where self-interest or favoritism could be perceived as being present.</p> <p>If you, or a connected person, is offered a role or opportunity, which would be in direct conflict to DSPR interests you should decline this role or opportunity.</p> <p>You should not engage in activities outside of work that may adversely affect DSPR's reputation, that make use of DSPR confidential information or that will, or are likely to, negatively influence the performance of your work for DSPR.</p> <p>2. Identify and Disclose Conflict of Interests</p> <p>Where you identify an Actual, Potential or Perceived conflict of interest you should [notify your immediate supervisor]</p> <p>The information provided will be recorded on DSPR's Register of Conflicts. (form to be developed and annexed) needed</p> <p>In addition, all staff will be required to complete an annual declaration, either disclosing any conflict of interest or confirming that there are no conflicts of interests that they are aware of.</p> <p>3. Managing Conflict of Interests</p> <p>Once the conflict has been considered a decision (by the relevant decision-making authority) will be made as to whether a conflict of interest will need to be removed or can be appropriately managed. Often this may involve no longer taking part in decisions where an actual, potential or perceived conflict exists but may also include removing responsibility for a particular area of work.</p> <p>Some key principles that will be taken into consideration for how the conflict will be managed are:</p> <p>(i) The default position is that individuals will not take part in decisions or discussions unless it can be clearly demonstrated that they can do so objectively and without improper</p>

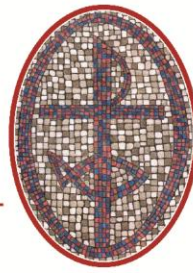


	<p>influence; this person should be separated or neutralized from the issue at hand.</p> <p>(ii) relevant persons to the issue at hand should not receive confidential DSPR information that may impact their ability to make decisions in the best interests unless a clear confidentiality commitment has been provided</p> <p>It is your responsibility to ensure that they follow any controls that have been put in place in connection with a conflict.</p> <p>If a conflict previously declared is resolved the individual should notify their Line Manager.</p> <p>4. Compliance and reporting any breaches:</p> <p>If you become aware that either you, or another staff member, is in breach of this policy you should notify your immediate supervisor without delay.</p> <p>If you are not comfortable with reporting a breach to your line manager you may report concerns via DSPR Whistleblowing Procedure.</p> <p>All board members, staff, representatives must comply with this policy. Failure to comply will be treated as a misconduct issue for all. (according to DSPR regulations)</p> <p>5. Training</p> <p>Training will be provided to all levels of governance and managements. This training provides examples and further information on conflicts of interests.</p>
<p>Procedures:</p>	<p>See annex 1 for detailed procedures of this policy in identifying, disclosing, evaluating, and managing issues of conflicts of interest to protect the integrity and reputation of the organization.</p> <p>Other steps related to the procedures:</p> <p>Step 1: Each staff member should sign (Annex 2) Non-disclosure and conflict of interest agreement part and parcel of their employment contract</p> <p>Step 2: Each staff member to sign (annex 3) Annual Conflict of Interest Disclosure Statement</p> <p>Step 3: Each staff to attend an orientation of this policy and read materials related; for more information on orientation package (see annex 4: orientation and awareness PowerPoint package)</p>
<p>Definitions:</p>	<p>Conflict of Interest: A conflict of interest occurs when a person's or entity's vested interests raise a question of whether their actions, judgment, and/or decision-making can be unbiased. A conflict of interest arises when a person chooses personal gain over duties to their employer, or to an organization in which they are a stakeholder, or exploits their position for personal gain in some way.</p> <p>Financial Interest: A conflict of interest, in which the individual or a connected person may receive a financial benefit directly or indirectly from an arrangement with the organization or the prospect of which could influence or constrain the individual from making a decision only</p>



	<p>in the best interests of DSPR.</p> <p>Connected Persons: In broad terms this means family, relatives or business partners of an individual, as well as businesses in which an individual has an interest through ownership or influence. This term includes an individual's husband or wife, children, siblings, grandchildren and grandparents, as well as businesses where an individual or family member is a Director holds a senior position in the organization such as director, senior employee (influence).</p> <p>Actual Conflict: a demonstrable conflict where someone's private interests and DSPR interests are either opposed or significantly at variance.</p> <p>Potential Conflict: an actual conflict has not yet occurred, but it could arise in the future.</p> <p>Perceived Conflict: a situation where other people might perceive there is a conflict regardless of whether one actually or might exist.</p> <p>Types of Conflict of Interest: Financial, Relational, Professional, Ideological, time-bound, organizational and disclosing.</p>
Related Policies & Procedures:	<ul style="list-style-type: none"> - Whistleblowing policy - Expenses policy - Procurement policy - HR Policy
Who must follow this policy:	<p>This policy applies to all staff and associates.</p> <p>Staff includes:</p> <ul style="list-style-type: none"> ● all staff, national and international ● all volunteers and interns <p>Associates include:</p> <ul style="list-style-type: none"> ● all contractors, e.g., consultants ● all Board Members ● all partners including local community-based partners ● Guests and Visitors

Next formal review:	[Next review and approval date within 3 years of the above date or sooner if legislation, best practice or other circumstances indicate that it is necessary] May 2028
Person responsible:	DSPR Executive Director AC Executive Directors
Version:	11 June 2025



Approved by:	<p>Central Committee Members:</p> <p>Dr. Audeh Butros Audeh Quawas; Chairperson-Member at Large- Representing Orthodox Church Family</p> <p>Mr. Bassem Issa Audeh Thabet Vice- Chair- Delegate DSPR-ICC Jerusalem & WB Area Committee</p> <p>Dr. Farah Atallah Farah Attallah; Treasurer- Delegate DSPR-NECC Jordan Area Committee</p> <p>Bishop Sani Ibrahim Charly Azar; Member at Large- Representing Episcopal – Lutheran Church Family</p> <p>Mrs. Sandra Tawfiq Habesch Khoury; Member at Large- Representing Catholic Church Family</p> <p>Dr. Jean Salaminian; Member at Large- Representing Eastern Orthodox Church Family</p> <p>Mr. George Jamal Jamil Antone; Delegate DSPR-NECC Gaza Area Committee</p> <p>Mr. Adel Nasser; Delegate DSPR-ICCI Galilee Area Committee</p> <p>MS. Nina Farah Shaddad; Delegate DSPR-JCC Lebanon Area Committee</p>
Approval date:	CC meeting: 4 July 2025



Annex 1: Procedures and steps

Step 1: Identification of Potential Conflicts

- All stakeholders must assess their personal, financial, or professional interests and relationships that might conflict with organizational duties.
 - Examples include (but are not limited to): financial interests in vendors/suppliers, outside employment with competitors
 - Family members involved in organizational transactions

Step 2: Disclosure

- **Annual Disclosure Form:** All covered individuals must complete and submit an annual conflict of interest disclosure form (annex 2).

Step 3: Evaluation of the Disclosure

- A DSPR assigned committee by the Chairperson and the Central office director to review all disclosures.
- Assess the materiality of the conflict and determine if it is:
 - Non-material: No action required beyond recordkeeping.
 - Manageable: Can be addressed through a management plan.
 - Unmanageable: Requires recusal or disengagement from the activity.

Step 4: Documentation and Recordkeeping

- Maintain a conflict-of-interest log with records of: disclosures received, decisions made and actions taken; These records should be accessible to authorized personnel only.

Step 6: Training and Awareness

- Annual conflict of interest training must be completed by all covered persons (see Annex 4)

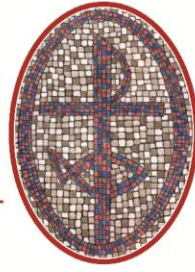
Step 7: Monitoring and Review

- Conduct annual reviews of disclosures and management plans.
- Internal audit or compliance team to verify adherence to the policy.



Step 8: Non-Compliance Consequences

- Failure to disclose or comply with management plans may result in disciplinary action, up to and including termination or board removal.



Annex 2: Non-disclosure and conflict of interest agreement

NON-DISCLOSURE AND CONFLICT OF INTEREST AGREEMENT

(For Board Members and Staff)

This Non-Disclosure and Conflict of Interest Agreement ("Agreement") is entered into as of the date of signature below by and between:

[DSPR (area)], a [nonprofit] organization with its principal place of business at [Organization Address] ("Organization"),
and
[Name of Board Member or Staff], ("Individual").

1. Purpose

The purpose of this Agreement is to protect confidential and proprietary information disclosed to the Individual in the course of their service with DSPR Organization, and to ensure the Individual's understanding and compliance with the organization's Conflict of Interest Policy.

2. Definitions

Confidential Information means all non-public information disclosed by DSPR that is designated as confidential or would reasonably be understood to be confidential given the nature of the information, including but not limited to: strategies, donor information, financial data, Internal discussions and decisions, legal and regulatory matters, any information related to actual or potential conflicts of interest

Conflict of Interest refers to any situation in which the central committee's or staff's personal, financial, or professional interests could interfere or appear to interfere with the interests or integrity of DSPR

3. Non-Disclosure Obligations

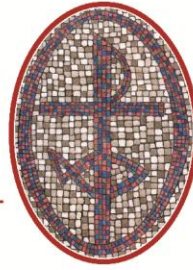
Each person who signs this document agrees:

- Not to disclose, or use any Confidential Information except as necessary in the course of their official duties;
- To take all reasonable steps to protect the confidentiality of the Confidential Information;
- To return or destroy all materials containing Confidential Information upon termination of their service, if requested by the Organization.

4. Conflict of Interest Obligations

The Individual agrees:

- To promptly disclose any actual, potential, or perceived conflicts of interest to DSPR Executive Directors or the central committee chairperson in writing;
- To recuse themselves from any decision-making process in which they have a conflict of interest, unless otherwise directed by the Board;



c. To annually complete and sign a conflict-of-Interest disclosure Statement as part of the Organization's compliance practices.

5. Term

This Agreement shall remain in effect throughout the Individual's term of service and shall continue to apply to any Confidential Information acquired during that term after termination of service.

6. Remedies

DSPR shall be entitled to seek injunctive relief and any other remedies available at law or in equity in the event of breach or threatened breach of this Agreement.

7. Governing Law

This Agreement shall be governed by and construed in accordance with the laws of the State of [Insert State], without regard to its conflict of law principles.

8. Entire Agreement

This Agreement constitutes the full and complete agreement between the parties and supersedes all prior communications or agreements, whether oral or written, concerning the subject matter herein.

IN WITNESS WHEREOF, the parties have executed this Agreement as of the date written below.

DSPR (Area)

By:

Name:

Title:

Date:

Signature:

Name:

Position: [Board Member / Staff / Other]

Date:



Annex 2: Annual Conflict of Interest Disclosure Statement

Annual Conflict of Interest Disclosure Statement

[DSPR]

Effective Date: [Insert Date]

Reporting Period: [Insert Year or Fiscal Year]

I. Purpose

The purpose of this Conflict-of-Interest Disclosure Statement is to ensure transparency and integrity in the operations of DSPR (INSERT AREA). This document is intended to identify and address any personal, professional, or financial interests that may conflict, or appear to conflict, with the interests of the organization.

II. Definitions

Conflict of Interest: A situation in which a person's personal, financial, or other outside interests interfere with, or have the potential to interfere with, their duties and responsibilities to DSPR.

Interested Person: Any director, officer, employee, contractor, or volunteer who has a direct or indirect financial interest, as defined below.

Financial Interest: A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- An ownership or investment interest in any entity with which DSPR has a transaction or arrangement,
- A compensation arrangement with DSPR or with any entity or individual with which DSPR has a transaction or arrangement, or
- A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which DSPR is negotiating a transaction or arrangement.

III. Disclosure

Please complete the following to the best of your knowledge:

1. **Do you or any immediate family member have a financial interest in any entity doing business with DSPR?**

Yes No

If yes, please describe:

2. **Are you or any immediate family member an officer, director, partner, or employee of any entity doing business or seeking to do business with DSPR?**



Yes No

If yes, please describe:

3. Do you have any personal or professional relationships that could reasonably be seen as influencing your decision-making on behalf of DSPR?

Yes No

If yes, please describe:

4. Do you receive any compensation, gifts, or benefits from any individual or organization that may be viewed as a conflict of interest with your role?

Yes No

If yes, please describe:

IV. Certification

I hereby certify that the information provided in this Conflict-of-Interest Disclosure Statement is true and complete to the best of my knowledge.

I agree to promptly update this disclosure if any relevant changes occur.

I understand that failure to disclose a potential conflict of interest may result in disciplinary action, including removal from my position.

Signature: _____

Print Name: _____

Title/Role: _____

Date: _____



Annex 4: Awareness and Orientation Package (PowerPoint)