



Profonanpe

# Guideline to prevent conflict of interest

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## Guideline to Prevent Conflict of Interest

### Introduction

Profonanpe's Code of Ethics has established general guidelines for the behavior of its employees and consultants/suppliers hired to provide professional services and, in general, specific services; so that their actions are in line with the values of the institution, as well as to the ethical principles essential to ensure transparency in internal relations and with the people and/or entities with which Profonanpe has contact or maintains a contractual relationship or inter-institutional work link and to favor the permanent existence of a healthy management environment, within the framework of morality, honesty and personal ethics.

Among the duties under the scope of application of the Code of Ethics is the duty of Neutrality, by which it must act with absolute political, economic or any other kind of impartiality in the performance of its functions or services commissioned or contracted, demonstrating independence to its links with individuals, political parties or institutions.

The Code of Ethics states that "A conflict of interest arises when the personal, family or business interests of personnel, consultants/suppliers hired to provide professional services, specific services and/or specific services may affect the impartial performance of their employment, position or commission."

The conflict of interest may be:

- **Potential:** There is no conflict of interest at the moment, but in the future, given certain circumstances, it may appear.
- **Actual:** When an interest partially influences the performance of a servant's or official's activities.

### Objective

The objectives of this Guideline are as follows:

- i. Establish the procedure to prevent aspects related to conflict of interest, in order to be complied with by Profonanpe employees, consultants/suppliers hired to provide professional services, punctual and/or specific services, etc.
- ii. Avoid scenarios that lead to this type of conflict.
- iii. In the event of a conflict, to know how to act correctly.

### Scope

This document and the obligations derived from it are applicable to all Profonanpe employees, consultants/contracted suppliers, who provide services for Profonanpe, regardless of their employment regime, contracting modality and/or source of financing, within the framework of the different activities or tasks programmed in each case.

**Guideline to Prevent Conflict of Interest:** Employees of Profonanpe, consultants/suppliers hired to provide professional services in general for Profonanpe, during their tenure and the duration of their contractual relationship, must fulfill the following:

- They shall protect their independence and avoid any possible conflict of interest, rejecting gifts or gratuities that could be construed as attempts to influence the independence and integrity of the employee.
- They should avoid relationships with people who may influence, compromise or threaten the employee's ability to act independently and convey the image of independent action.
- They shall not use their position for private purposes and shall avoid relationships that imply a risk of corruption or that may raise doubts about their objectivity and independence.
- They shall not use information received in the performance of their duties as a means to obtain personal benefits or in favor of third parties. They shall not disclose information that gives unfair or unjustified advantages to other persons or organizations, nor shall they use such information to the detriment of third parties.

**Should any doubt or situation of Conflict of Interest arise:** In the event of any situation, potential or actual, of conflict of interest that contravenes or violates this guideline, it must be reported immediately to Profonanpe, as follows:

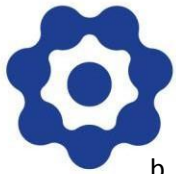
- a. If you are an employee of Profonanpe, you must report it to your immediate superior so that the pertinent preventive or corrective measures can be applied in a timely manner. If the report is not addressed or resolved by your superior, you can do so in writing and directly to the Executive Directorate of Profonanpe.
- b. In the case of consultants and/or suppliers contracted to provide professional services and/or in general any person who provides services for Profonanpe, you must report the fact in writing, directly to the Administration and Finance Division (AFD) of Profonanpe.
- c. If the report is not addressed or resolved by your superior, you can do so in writing and directly to the Executive Directorate of Profonanpe.

It is important to consider that any violation of these guidelines constitutes a breach of contractual obligations with the institution.

**Compliance of the Guideline:** The Administration (personnel) area of the Administration and Finance Division will be responsible for overseeing compliance with this guideline, in accordance with the following:

- a. Make available to all Profonanpe personnel, on the internal computer server, the information related to this guideline so that personnel have permanent access and due knowledge of the same, and if applicable, to its updates.





- b. Include in the respective fixed-term and/or indeterminate employment contracts, if applicable, the corresponding clauses for compliance with this guideline.
- c. Verify that the Procurement and Contracts Area likewise considers the inclusion of the same clause applied to Profonanpe personnel contracts, so that professional services and/or consulting contracts, public tenders and/or bids, etc., that this area is responsible for preparing, include the obligation to know and comply with all the scope and aspects related to the Code of Ethics and this Guideline.
- d. The “Affidavit of No Conflict of Interest” forms, duly signed by Profonanpe employees, will form part of their personal files.
- e. The forms must also be signed by each supplier and/or consultant or service provider as a mandatory and conditional requirement for entering into a service contract with Profonanpe. Profonanpe’s Procurement and Contracts Area will be in charge of monitoring and complying with this provision and the document will form part of the corresponding contracting file.
- f. Verify through periodic evaluations that Profonanpe employees, consultants/suppliers contracted to provide professional services, and in general all persons who provide services at Profonanpe, are aware of the Code of Ethics and these Guidelines. Annually evaluate their adequate understanding and dissemination.