WORK ORGANIZATIONAL AND INDUSTRIAL PSYCHOLOGISTS' ASSOCIATION

CONFLICT OF INTEREST POLICY

1. Purpose

The Work Organizational and Industrial Psychologists' Association (the "Association") is committed to acting with integrity, impartiality, transparency and accountability. This Policy establishes the principles and procedures for identifying, disclosing, assessing, managing and documenting actual, potential and perceived conflicts of interest.

The purpose of the Policy is not to prohibit all personal, professional or institutional relationships. Rather, it is to ensure that such relationships are disclosed promptly and managed so that decisions are made in the best interests of the Association and its public-benefit purposes.

2. Scope

This Policy applies to:

- Members of the Board of Directors and the Audit Board, including substitute members when acting on behalf of the Association;
- Employees, project personnel, researchers, coordinators, interns and consultants;
- Committee and working-group members, volunteers and authorized representatives;
- Any person participating in recruitment, procurement, contracting, grant, partnership, research, publication, financial or program decisions on behalf of the Association; and
- Where appropriate, suppliers, service providers, project partners, donors and other third parties whose relationship with the Association may create a conflict.

3. Governing Principles

- Association-first duty: Covered persons must act in the best interests of the Association and its mission.
- Transparency: Actual, potential and perceived conflicts must be disclosed fully, accurately and promptly.
- Impartiality: A person with a conflict must not influence, evaluate, approve or vote on the relevant matter.
- Proportionality: Conflicts must be managed through measures proportionate to the level of risk.
- Documentation: Disclosures, assessments, recusals, decisions and management measures must be recorded.
- Fairness and confidentiality: All parties must be treated fairly, and information must be shared only with persons who need it for review or decision-making.
- No retaliation: No person may be disadvantaged for making a good-faith disclosure or raising a concern.

4. Definitions

Conflict of interest: A situation in which a personal, family, financial, professional, institutional, political or other interest may improperly influence, may appear to influence, or could reasonably be perceived as influencing a person's judgment or actions on behalf of the Association.

Actual conflict: A conflict that currently exists and directly affects a decision, transaction or activity.

Potential conflict: A situation that may develop into an actual conflict because of existing interests or relationships.

Perceived conflict: A situation in which an informed third party could reasonably believe that a person's impartiality may be affected, even where no actual improper influence has occurred.

Related person: A spouse or partner; parent, child, sibling, grandparent, grandchild or in-law; a person with whom there is a close personal relationship; or any person or entity whose interests are closely connected to the covered person.

Financial interest: Ownership, investment, employment, compensation, consulting income, debt, gift, benefit, contract right or other economic interest, whether direct or indirect.

Related-party transaction: Any transaction, contract, appointment, payment, procurement, partnership or other arrangement between the Association and a covered person, a related person, or an entity in which either has an interest.

Recusal: Withdrawal from access to non-public decision materials, discussion, evaluation, recommendation, approval and voting concerning the matter in conflict.

5. Duty to Identify and Disclose

Each covered person is responsible for considering whether their interests or relationships may create an actual, potential or perceived conflict. When in doubt, the person should disclose the matter rather than decide independently that no conflict exists.

5.1 Annual declarations

Board and Audit Board members, employees with decision-making authority, project managers, financial personnel and any other persons designated by the Board must complete an Annual Conflict of Interest Declaration:

- On appointment or commencement of their role;
- Within 30 days after this policy first becomes effective; and
- Once each calendar year thereafter.

5.2 Event-based disclosures

A covered person must make a written disclosure as soon as they become aware of a relevant conflict and, whenever possible, before receiving confidential materials or participating in discussion or decision-making. A new disclosure is required whenever previously reported information materially changes.

5.3 Meeting disclosures

At the beginning of each Board, committee, procurement, recruitment or project decision meeting, participants must be invited to declare any conflict relating to the agenda. The declaration and any recusal must be recorded in the minutes.

6. Examples of Conflicts of Interest

Conflicts may include, but are not limited to:

- Participating in the selection, supervision, evaluation or payment of a related person;
- Selecting a supplier, consultant or project partner in which the covered person or a related person has an ownership, employment, advisory or other interest;
- Receiving a payment, grant, consultancy, travel benefit, gift or other advantage from a person or entity affected by an association decision;
- Using association funds, equipment, data, confidential information, name, logo, contacts or opportunities for personal or third-party benefit;
- Participating in decisions concerning an organization in which the covered person serves as a board member, employee, consultant, researcher or representative;
- Influencing recruitment, scholarship, award, publication, research, procurement or contracting decisions involving a close associate, student, supervisor, colleague or business partner;
- Holding an external role or activity that competes with, materially interferes with, or may compromise duties owed to the association;
- A researcher or project decision-maker having a financial or professional interest that may affect the design, implementation, analysis, reporting or dissemination of a study or funded project; and
- Accepting gifts, hospitality or favors that could reasonably be understood as intended to influence an association decision.

7. Disclosure Channels and Initial Review

1. Disclosures must be submitted in writing using the Annual Declaration Form or Transaction-Specific Disclosure Form attached to this Policy.
2. The primary recipient is the Governance and Compliance Focal Point designated by the Board. Until such designation, disclosures are submitted to the Board Secretary.
3. If the disclosure concerns the Focal Point or Board Secretary, it must be submitted to the Chair of the Board and the Chair of the Audit Board.
4. If the disclosure concerns the Chair of the Board, it must be submitted to the Vice Chair and the Chair of the Audit Board.
5. The recipient acknowledges the disclosure, ensures that immediate recusal is applied where necessary, and forwards the matter for impartial assessment.

Reporting email or secure channel:info@iocp.org.tr

8. Assessment and Decision-Making

The existence and management of a conflict are determined by Board members who are not affected by the matter. The conflicted person may provide factual information if requested but must not be present during deliberation or voting, except where strictly necessary to answer questions.

The assessment should consider:

- The nature, value and duration of the interest;
- The person's role and degree of influence over the matter;
- The likelihood that impartiality may be affected or reasonably questioned;
- The financial, legal, ethical, reputational and program risks to the association;
- Whether an objective alternative process or independent comparison is available; and
- The requirements of applicable law, the bylaws, donor or grant agreements and other association policies.

A written decision must state whether a conflict exists, the management measures imposed, the persons responsible for monitoring those measures and, where appropriate, the period for which the decision applies.

9. Management Measures

Depending on the circumstances, one or more of the following measures may be used:

- Full disclosure to the relevant decision-makers;
- Recusal from receiving materials, discussion, evaluation, negotiation, approval and voting;
- Reassignment of supervision, procurement, financial approval, research or project duties;
- Obtaining competitive quotations, independent review or external professional advice;
- Modifying the proposed transaction, contract, role or activity;
- Placing conditions or monitoring requirements on the relationship;
- Declining, suspending or terminating the transaction, appointment, partnership, funding or activity;
- Requiring the person to relinquish the conflicting role or interest where proportionate and lawful; or
- Referring the matter to the general assembly or another competent body where required by the bylaws or applicable law.

10. Related-Party Transactions and Procurement

A related-party transaction may proceed only where the disinterested decision-makers determine, on the basis of documented information, that the arrangement is lawful, fair, reasonable, mission-aligned and in the Association's best interests.

- The relationship must be disclosed before any commitment is made.
- The conflicted person must not prepare specifications designed to favor the related party, select offers, negotiate terms, approve the transaction or authorize payment.
- Alternative offers or market information must be obtained where reasonably practicable.
- The basis for selection, price reasonableness, expected benefit and management measures must be documented.

- Payments to Board or Audit Board members, or to entities connected with them, require approval by disinterested Board members and must comply with the Bylaws, law and donor restrictions.
- No person may use confidential Association information or their Association position to secure an improper advantage.

11. Recruitment, Appointments and Project Roles

Recruitment, consultancy, research and project appointments must be based on documented qualifications, merit, relevant experience, objective criteria and available resources. A person must disclose any close personal, family, academic, supervisory, professional or financial relationship with an applicant or candidate and withdraw from the assessment and appointment process.

Related persons must not be placed in a direct or indirect reporting, approval or financial-control relationship unless the disinterested Board determines that exceptional circumstances justify the arrangement and adopts written safeguards.

12. Research, Grants and Donor-Funded Activities

Persons responsible for the design, conduct, management, analysis, reporting or financial administration of research or donor-funded activities must disclose relevant financial and non-financial interests. Sponsor-specific conflict-of-interest requirements that are stricter than this Policy must also be followed.

- Association or restricted project funds may not be used for the personal benefit of a covered person or related person except for properly authorized, documented and reasonable compensation or reimbursement.
- No person may approve their own payment, reimbursement, timesheet, consultancy agreement or procurement request.
- Project data, findings and reporting must not be altered, withheld or presented in a misleading way to protect a personal or institutional interest.
- Any conflict that may affect the objectivity of research or reporting must be managed before the relevant activity or expenditure proceeds.

13. Board-Level Conflicts and Lack of Disinterested Quorum

Where a conflict concerns a Board member, that member must leave the decision process and the minutes must record the disclosure, absence from deliberation and non-participation in the vote.

Where the Chair is conflicted, the Vice Chair leads the matter. Where the Vice Chair is also conflicted, the disinterested Board members designate another member to lead. Where a majority of the Board is conflicted or a disinterested decision cannot validly be made, the matter must be referred to the General Assembly or another competent body under the Bylaws. The Audit Board or an independent adviser may be asked to review the facts and provide a non-binding recommendation.

14. Records, Minutes and Confidentiality

The Association will maintain a confidential Conflict of Interest Register and retain annual declarations, event-based disclosures, supporting documents, decisions and management plans in restricted records.

- Minutes must identify the nature of the conflict without including unnecessary sensitive personal information.
- Minutes must record the names of persons who left and returned to the meeting, the management measure and the decision reached.
- Access to detailed declarations is limited to persons responsible for assessment, oversight, audit or legal compliance.
- Personal data must be processed only to the extent necessary and retained in accordance with applicable law and the Association's record-retention practices.

15. Reporting Concerns and Protection from Retaliation

Any person may report a suspected undisclosed or improperly managed conflict to the Governance and Compliance Focal Point, Board Secretary, Chair of the Board or Chair of the Audit Board, depending on who is involved. Reports should include available facts and documents but a reporter is not required to prove misconduct before raising a concern.

Good-faith reporters and persons cooperating with a review must not be subjected to retaliation, intimidation or disadvantage. Knowingly false or malicious allegations may be addressed under applicable internal procedures, without discouraging good-faith reporting.

16. Non-Compliance and Corrective Action

Failure to disclose a conflict, providing incomplete or misleading information, influencing a matter after recusal, or failing to comply with a management plan may result in corrective action proportionate to the circumstances.

- Reminder, training or written warning;
- Removal from the relevant decision, role, committee, project or approval authority;
- Suspension or cancellation of a payment, procurement, contract, partnership or activity;
- Recovery of improperly paid amounts where lawful;
- Termination or non-renewal of employment, consultancy, volunteer or supplier relationships;
- Initiation of membership or governance procedures under the bylaws; and
- Referral to donors, auditors, regulators or competent authorities where legally or contractually required.

Any action affecting membership or an elected position must be taken by the competent body and in accordance with the Association's Bylaws and applicable law.

17. Roles and Responsibilities

Board of Directors: Approves this Policy; ensures implementation; makes disinterested determinations; adopts management plans; and provides resources for compliance.

Governance and Compliance Focal Point: Receives declarations, maintains the register, coordinates reviews, monitors management measures, supports annual certification and proposes updates. The Board will designate the person serving in this role.

Board Secretary: Ensures that disclosures, recusals and decisions are accurately reflected in meeting minutes and acts as interim policy custodian unless the Board decides otherwise.

Treasurer / Financial Responsible Person: Ensures that payments, procurement and financial approvals reflect conflict-management decisions and that no person approves their own payment.

Audit Board: Reviews the design and operation of controls at least annually within its statutory and bylaw authority and may advise on cases where Board independence is questioned.

Covered persons: Identify and disclose conflicts, update declarations, comply with recusals and management measures, and cooperate with reviews.

18. Training, Annual Certification and Reporting

Covered persons must receive or acknowledge guidance on this Policy when appointed and whenever the Policy is materially revised. The Governance and Compliance Focal Point will collect annual declarations and prepare an anonymized annual compliance summary for the Board, including:

- The number of declarations received;
- The number and general types of conflicts disclosed;
- The management measures used;
- Any overdue declarations or unresolved matters; and
- Recommended improvements.

19. Review, Interpretation and Precedence

This Policy will be reviewed at least annually and whenever there is a material change in the Association's activities, governance, funding requirements or applicable rules. Amendments require Board approval.

This Policy supplements the Association's Bylaws and applicable law. If any provision conflicts with mandatory law or the Bylaws, the law and Bylaws prevail, and the remaining provisions continue to apply. Donor, grant or research requirements may impose stricter obligations.

20. Effectiveness

This policy enters into force upon the approval of the Board of Directors and is implemented by all members and employees.

Appendix A — Annual Conflict of Interest Declaration

Calendar year: ____________________

Name and surname: ____

Role / position: ____

Date completed: ____

Please disclose any current or reasonably foreseeable interest or relationship relevant to your duties with the Association.

□ **Yes** □ **No** Do you or a related person have an ownership, employment, consultancy, governance or financial interest in an entity that currently does business, seeks to do business, partners, competes or may receive funds from the Association?

□ **Yes** □ **No** Do you have a family, close personal, academic, supervisory or professional relationship with any person employed, contracted, appointed or funded by the Association?

□ **Yes** □ **No** Do you hold an external role or activity that may interfere with, compete with, or reasonably be perceived as affecting your duties to the Association?

□ **Yes** □ **No** Have you received any gift, hospitality, travel, payment or other benefit from a party affected by an Association decision that should be disclosed?

□ **Yes** □ **No** Do you have any financial or non-financial interest relevant to the design, conduct, reporting or administration of an Association research project or grant?

□ **Yes** □ **No** Are there any other circumstances that could create an actual, potential or perceived conflict of interest?

Details of any "Yes" answer, including the relevant person/entity, nature of interest and affected Association activity:

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Certification: I have read the Conflict of Interest Policy. The information provided is complete and accurate to the best of my knowledge. I will promptly disclose any material change or new conflict and will comply with any recusal or management measure.

Signature: ________________________________ Date: ____________________

Appendix B — Transaction-Specific Conflict Disclosure

Name and role of person making disclosure:

____

Date of disclosure:

____

Meeting, decision, transaction, project or activity concerned:

____

Person(s), entity or relationship giving rise to the conflict:

____

Nature of the actual, potential or perceived conflict:

____

Financial or non-financial interest involved:

____

Relevant supporting documents:

____

Immediate action already taken, including any recusal:

____

Proposed management measure:

____

Assessment and Decision — For Official Use

□ No conflict identified □ Conflict identified □ Further information required

Management measure(s):

____

____

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____

Decision-makers present: ____

Conflicted person excluded from deliberation and vote: □ Yes □ No □ N/A

Board / committee decision date and number: ________________________________

Monitoring responsibility and review date: ________________________________

Authorized signature: ____________________________ Date: ________________

Appendix C — Confidential Conflict of Interest Register

This register is maintained by the Governance and Compliance Focal Point or other person designated by the Board. Access is restricted.

Ref.	Date	Person / role	Matter	Conflict type	Management action	Status / review

Board Approval Record

Board decision number: ___________________________

Approval date: _________________________________

Effective date: _________________________________

Chair of the Board — Name / signature: ____________________________________

Secretary of the Board — Name / signature: __________________________________