



GAFSP Policy on Conflict of Interest

Adopted by the Steering Committee on
November 15th, 2023

PREAMBLE

The Global Agriculture and Food Security Program (“GAFSP” or the “Program”) is a Financial Intermediary Fund (FIF) that supports medium- to long-term investments in more sustainable and resilient agriculture and food systems in low-income countries.

The GAFSP Steering Committee is a decision-making body established to oversee the overall activities of GAFSP and is comprised of donors, partner countries, multilateral development agencies, and civil society organizations. This provides a unique forum at which key stakeholders contribute to the delivery of GAFSP’s mandate, in accordance with the GAFSP Governance Document, adopted on May 14, 2010.

The World Bank serves as trustee of GAFSP, and the Coordination Unit under the Agriculture and Food Global Practice provides administrative support to GAFSP’s Steering Committee.



1. PURPOSE

- 1.1. The purpose of this Conflict of Interest ("Col") policy (the "Policy") is to establish principles and procedures on conflict of interest pertaining to a GAFSP Person (as defined below) who participates in a Decision-Making Process (as defined below).
- 1.2. Due to diversity of interests and perspectives represented by various stakeholders, it is important that GAFSP operates in a balanced, ethical, collaborative, transparent and open manner. GAFSP recognizes that the multi-stakeholder nature of its Steering Committee may result in conflicts of interest when the Steering Committee considers matters that have a direct effect on the interests of countries, organizations, persons, and other entities that are represented in the Steering Committee or the Technical Advisory Committee. Similar conflicts may arise in the work of the Technical Advisory Committee. GAFSP recognizes that these conflicting interests must be identified early and that actual, potential or perceived conflicts need to be disclosed and managed with the highest degree of integrity to safeguard against any perception that participation by a particular person, country, organization or other entities in GAFSP confers an undue advantage thereon in connection with GAFSP's decisions.

2. DEFINITIONS

- 2.1. "**Associated Institution**" means:
 - (a) Any entity, agency, organization, corporation, administration or similar institution in which a GAFSP Person is serving as an officer, director, trustee, partner, employee or consultant, that receives or may receive, directly or indirectly, funding from GAFSP or with which GAFSP has, either directly or through an intermediary, an agreement, contract, grant, understanding, arrangement or relationship; or
 - (b) Any entity, agency, organization, corporation, administration or similar institution with which a GAFSP Person is seeking or negotiating an arrangement concerning employment or consultancy.
- 2.2. "**Decision-Making Process**" means a meeting or other discussion of the Steering Committee or the Technical Advisory Committee, whether in person or virtual or by electronic means, regarding matters covered by the GAFSP Governance Document, including, but not limited to, strategic and policy decisions and/or allocations, cancellation or reduction of a financial allocation from GAFSP.



- 2.3. “**GAFSP Person**” means any of the following persons participating in the Decision-Making Process: (i) members or alternates of the Steering Committee¹; or (ii) members of the Technical Advisory Committee.
- 2.4. “**Immediate Family Members**” means a GAFSP Person’s spouse or domestic partner recognized under law, and dependents, including all children under the age of 21.

3. CONFLICT OF INTEREST

- 3.1. A conflict of interest arises when a GAFSP Person participates or expects to participate in a Decision-Making Process in which, to his or her knowledge, he or she or an Immediate Family Member or an Associated Institution has a financial, professional or other interest.
- 3.2. A distinction should be made between potential, actual and apparent conflicts of interest, all of which are covered by the present Policy. A conflict of interest is **potential** when a GAFSP Person has a conflict of interest with regards to a certain exercise of his or her judgment but is not yet in a situation where he or she must make that judgment. A conflict of interest is **actual** when GAFSP Person has a conflict of interest with regards to a certain exercise of his or her judgment and is already in a situation where he or she must make that judgment. **Apparent** conflict of interest occurs where the GAFSP Person’s actions create the perception that the GAFSP Person is using his or her position at the GAFSP for benefit of an Associated Institution, or Immediate Family Member.

4. SCOPE AND APPLICATION OF THE POLICY

- 4.1. This Policy applies to all GAFSP Persons in connection with any Decision-Making Process, except as otherwise provided herein.
- 4.2. GAFSP Coordination Unit staff are subject to the conflict of interest policies of the World Bank. Staff of Supervising Entities shall be subject to the conflict of interest policies of the respective Supervising Entity.

¹ Per the GAFSP Governance Document adopted by the Steering Committee in 2010, members of the Steering Committee currently consist of both Voting Members and Non-Voting Members. The Voting Members comprise: (a) a representative from each of the five (5) Initial Contributors to the Trust Fund and each subsequent Contributor which has voting rights; and (b) an equal number of representatives from Recipient Countries, of which at least one (1) would represent Africa. The Non-Voting Members comprise (a) a representative of the Trustee; (b) representatives from the Supervising Entities and the IFC as agreed by the Steering Committee; (c) three (3) representatives from CSOs, two (2) of whom represent CSOs headquartered in countries eligible to receive financing from IDA and the other who represents CSOs headquartered in an Organization for Economic Co-operation and Development country; (d) a representative from each Contributor which is not a Voting Member; and (e) a representative from the remaining pre-selected Recipient Country and a representative from each of the additional Recipient Countries as agreed by the Steering Committee.

5. PRINCIPLES FOR MANAGEMENT OF CONFLICT OF INTEREST

Being Mindful

- 5.1. GAFSP Persons must at all times be mindful of conflicts of interest that pertain to their conduct. GAFSP Persons engage with GAFSP at an institutional/organizational level in their representative capacities with their respective entities, not in their individual capacities. GAFSP Persons participating on behalf of their entities must accordingly be mindful of conflicts of interest as representatives.

Ensuring Prior Review and Action

- 5.2. As a matter of timing, conflict of interest treatment is meant to be anticipatory and preventive. It is the responsibility of each GAFSP Person to address conflict of interest considerations, in advance, for example, through recusal.

Non-Interference

- 5.3. This Policy acknowledges that GAFSP Persons fall under their respective national, institutional/organizational or other conflicts of interest and ethics policies. This Policy is not intended to interfere with these policies or obligations in any way.

Transparency

- 5.4. This Policy balances an emphasis on transparency with considerations of privacy, with transparency as the overarching goal. The degree of disclosure depends on the circumstances and recipient audience. Disclosures of conflicts of interest are expected to enable fulsome deliberations toward context-specific, consistent approaches, including the ability of the Steering Committee to seek additional information. Disclosure of conflicts of interest to the Steering Committee is expected to enable the development of a shared culture and understanding of conflicts of interest within GAFSP.

Equality

- 5.5. This Policy emphasizes that its principles and procedures apply equally to every GAFSP Person regardless of the voting status of the GAFSP Person on the Steering Committee.

6. CONFLICT OF INTEREST MANAGEMENT PROCEDURE

Disclosure

- 6.1. It is the duty of every GAFSP Person to disclose his or her conflicts of interest, including those that derive from Immediate Family Members or Associated Institutions, and the nature of such conflict to the Chair of the Steering Committee



prior to his or her participation in the relevant Decision-Making Process. It is understood that GAFSP Persons shall be subject to this duty to disclose even in case of self-recusal.

- 6.2. Upon request from the Chair of the Steering Committee, the relevant GAFSP Person shall provide any additional information that may be reasonably required for the Steering Committee to reach a determination pursuant to paragraph 6.7 of this Policy, which information the Chair of the Steering Committee shall promptly share, together with the original disclosure, with the voting members of the Steering Committee.
- 6.3. In order to enhance compliance with this Policy, any GAFSP Person who has reasonable cause to believe that a GAFSP Person has failed to disclose a conflict of interest before participating in a Decision-Making Process or has otherwise violated this Policy shall notify the Chair of the Steering Committee. The Chair of the Steering Committee shall promptly share such information with the voting members of the Steering Committee. The Steering Committee shall provide the affected GAFSP Person the opportunity to respond.
- 6.4. In the event that the Chair of the Steering Committee has conflicts of interest, including those that derive from Immediate Family Members or Associated Institutions, a disclosure (by the Chair of the Steering Committee) or notification (by any other GAFSP Person) of such conflict of interest shall be made to all voting members of the Steering Committee.
- 6.5. There shall be a presumption that a GAFSP Person representing a country, organization or entity that will receive a grant from an allocation approved by the GAFSP Steering Committee has a conflict of interest and is obligated to make a disclosure in accordance with paragraph 6.1 of this Policy.

Reaching a Determination

- 6.6. The Steering Committee shall determine whether a conflict of interest exists, based on the information received under this Policy, and take a risk-based decision on how it should be managed. Such determination and decision shall be made by simple majority voting of the voting member of the Steering Committee, excluding the GAFSP Person with the alleged conflict of interest, prior to the relevant Decision-Making Process.
- 6.7. In the event that the Steering Committee determines that the conflict of interest exists pursuant to paragraph 6.7 above, it shall decide on taking one of the following measures in relation to the respective GAFSP Person, considering all risks and benefits arising out of such conflict of interest:
 - a. A determination that there is a conflict of interest, with acceptance to proceed as is.

- b. A determination that there is a conflict of interest, with recusal or some other modified behavior.

Remedying Non-Compliance

- 6.8. Information may arise that subsequently points to non-compliance with this Policy. If a GAFSP Person's engagement in the Decision-Making Process occurred without disclosure and management of a conflict of interest, then the respective decision or activity could potentially be unwound or redone. Such a case would be reviewed by the Steering Committee for a decision on how to proceed. A decision shall be made by simple majority voting of the voting members of the Steering Committee, excluding the non-compliant GAFSP Person. The non-compliant GAFSP Person shall be afforded an opportunity to respond to the allegations of non-compliance before the Steering Committee takes the final decision on the matter.

