

NCD Alliance Organisational Conflict of Interest Policy

Version: May 2022

1. PURPOSE AND SCOPE

The NCD Alliance's vision, mission and organisational structure propels and obliges the organisation to engage and partner with a wide range of people and organisations who share its goals - including member organisations, international agencies, governments, NGOs, academia, foundations, relevant private sector entities, and the general public. It is NCDA's belief that making prevention and control of NCDs a priority on a global scale demands a whole of society response, with engagement from a range of relevant sectors and organisation. Furthermore, as a global alliance and membership-based organisation with a mission to unite and strengthen civil society to stimulate action on NCDs, engagement and partnership has always been in the DNA of NCDA's approach and work.

Interacting with such a broad range of organisations and partners brings great benefits and strengths to NCDA's work, but also demands a clear understanding of the actual, potential or perceived conflicts of interest (COI) that may arise at the organisational level, in order to protect the integrity and reputation of NCDA and its members. NCDA's reputation remains central to achieving its strategic objectives, and we are committed to ensuring the highest levels of integrity and transparency throughout its governance, policies, procedures, partnerships and operations.

The purpose of this Organisational Conflict of Interest Policy is to protect the integrity and reputation of NCDA by ensuring the identification, management, and mitigation of actual, potential or perceived conflicts of interest across the organisation. It provides a comprehensive framework that guides NCDA's various forms of engagements and partnerships with a broad range of external organisations, from informal engagements to developing and maintaining formal partnerships with financial commitments. It outlines processes and procedures to manage the actual, potential or perceived COI that might arise across these different types of engagements, preventing inappropriate or potentially damaging engagements from developing. It is intended to protect NCDA's integrity, to promote its goals and to enhance public, stakeholder and donor confidence in NCDA and those associated with it.

This organisational COI policy covers a summary of definitions and typologies of conflict of interest; a summary of the types of engagement and partnerships NCDA enters into; the benefits, overarching principles and criteria for engagement and partnerships; a rigorous step-by-step due diligence process for developing and managing formalised partnerships; processes in place to manage and mitigate conflicts of interest; and processes to ensure transparency.

This policy builds upon the NCDA Constitution and the Governance Framework, and is aligned with the NCDA Due Diligence Process for Partnerships and the NCDA Risk Management Policy. This policy does not cover in detail individual conflict of interest by NCDA officials (such as board members, staff or volunteers). This is covered in a separate and aligned Individual Conflict of Interest Policy, with an established process for declaration of interest on an annual basis, as well as for board members ahead of each board meetings. These policies can be accessed on the NCDA website.

2. DEFINITIONS AND TYPOLOGIES OF CONFLICT OF INTEREST

The **NCD Alliance** is an independent, non-governmental organisation registered in Switzerland with membership comprised of organisations around the world committed to preventing and controlling NCDs. NCDA is governed by its member organisations, which elects the NCDA Board and elects the President at a biennial General Assembly meeting.

A **conflict of interest (COI)** arises in circumstances where an organisation or member of an organisation is susceptible to pressures that might compromise their primary duty. COI occurs when a secondary interest (a vested interest in the outcome of the organisation’s work) unduly influences either the independence or objectivity of professional judgement or actions regarding the organisation’s primary interest. The existence of COI in all its forms does not necessarily mean that improper action has occurred, but rather that there is risk of improper action occurring. COI is not only financial but can take other forms as well.

An **organisational COI** describes a situation where an organisation’s primary interest, as reflected in its constitution, may be unduly influenced by the conflicting interest of another actor (UN agency, government, private sector, NGO, academia) in a way that affects, or may reasonably be perceived to affect, the independence and objectivity of the organisation’s work.

An **individual COI** can involve officials affiliated to the organisation, for example board members, staff, or volunteers. Individuals may experience a conflict if a private interest (financial, personal, or other non-governmental interest or commitment) interferes—or appears to interfere—with their ability to act impartially, discharge their functions or regulate their conduct in the sole interests of the NCD Alliance. A COI does not necessarily mean that the individual involved is actually conflicted: the perception of a COI alone may create a negative image. As referenced above, NCDA has an individual COI policy and declaration process.

3. TYPES OF ENGAGEMENT

NCDA’s vision, mission and organisational structure propels and obliges us to engage and partner with a wide range of people and organisations who share its goals - including member organisations, international agencies, governments, NGOs, academia, foundations, relevant private sector entities, and the general public. As a result, NCDA has many different types of engagement for different purposes, which have different types of contributions attached to them. These can range from a formal engagement with no financial relationship, a transactional engagement focused on a specific goal, to a multi-year formalised partnership with a financial relationship attached.

Below is a summary of the different types of engagements that NCDA enters into:

Types of engagement	Description
Formal partnerships with an entity and a financial relationship.	NCDA has annual or multi-year partnerships with relevant NGOs, academic institutions, multilateral organisations, governments, foundations and corporates which focus on shared goals aligned with NCDA’s mission and include a financial relationship. These entities are defined as NCDA’s “Supporters” and have three categories with different funding levels – NGO Supporter, Corporate Supporter, and Foundation Supporter. All join the NCDA Supporters Group. See section 4.
Formal partnership with an entity and an in-kind contribution.	NCDA has formal MOU’s with UN agencies for example that are not associated with a financial contribution. Instead, they include in-kind contributions including staff time, technical knowledge, communication vehicles, access to platforms and dialogues etc. In addition, NCDA formally partners in research projects with academic partners, with in-kind contributions.
Transactional engagements.	When NCDA and other entities/organisations combine their resources to achieve a given mission or goal. Examples of

	transactional engagements are contractual services and sponsorship for a specific event.
Grant relationships.	Through NCDA’s capacity development work, NCDA awards grants to NCDA members and national/regional NCD alliances for organisational capacity building and specific advocacy deliverables. NCDA follows an established grant management process which includes due diligence of grantees and aligns with this policy. All grant MOUs include a COI section.
Membership.	NCDA has a membership model with three types of membership (Founding, Full and Associate), with criteria and a tiered fee structure based on income. In addition, NCDA has a Network membership which is for free. Members sign a specific COI form for members, which is aligned to this broader policy.
Member of a coalition and network.	NCDA can become a member of other relevant global coalitions and alliances to further its mission.
Informal collaboration with an entity to influence policies or corporate practices and behaviour	NCDA informally engages with a diverse range of organisations (e.g. international agencies, governments, NGOs, companies) to influence policies, corporate behaviour, practices or partnerships in line with NCDA goals and priorities. For example, uptake of workplace wellness policies and programmes by corporations; adherence by UN agencies to the WHO Framework Convention on Tobacco Control (FCTC).

The scope of the document is intended to guide NCDA’s approach to engagements across this whole spectrum, from informal engagements and to formalised partnerships.

4. FORMAL PARTNERSHIPS

For formal partnerships with entities that involve a financial relationship, NCDA has a partnership model which encompasses three different types of partners – NGO and academic partners; corporate partners; and foundation/philanthropic partners. For each of the three types of partners, there is a set entry level unrestricted financial commitment per annum. This assists NCDA in retaining its independence and is not influenced by the interests of specific partners, and has the flexibility to be able to use funds to support the longer-term NCDA strategic plan. Partners have the opportunity to support programmatic work on top of this entry level unrestricted commitment, where it aligns with NCDA strategy and priorities. All partners are subject to NCDA’s due diligence process (see section 8 below). All partnerships have to be aligned with NCDA’s strategic plan priorities, and bilateral partnership agreements are developed with the partner, based upon shared priorities. Where possible, multi-year partnership agreements are developed.

In addition, by becoming an NCDA partner, organisations join the NCDA Supporters Group, which meets four times a year (via teleconference or in-person) and provides a platform for engagement, coordination and consultation on global issues, NCDA progress and implementation strategies. The terms of reference for the NCDA Supporters Group and membership of the Supporters Group can be found on the NCDA website. NCDA partners access a range of benefits via the Supporters Group, including invitations to high-level events and sessions, updates on progress and trends at global and national levels, as well as opportunities to access, learn from and engage with NCDA’s network of national and regional NCDA alliances. The Supporters Group does not have a role in NCDA governance or policy development.

The NCDA Board appoints a Membership and Partnerships Sub-Committee which has delegated responsibility to oversee the strategy and operations of these partnerships, to ensure that their activities are in alignment with the NCDA strategy, mission and purpose. The Committee reviews new partnership agreements, and conducts an annual review of partnerships. In addition, via NCDA's risk management process outlined below, any potential risks associated with NCDA partnerships are regularly reported to the NCDA Board.

5. BENEFITS OF ENGAGEMENTS AND PARTNERSHIPS

Benefits accruing from such engagements and partnerships for NCDA include:

- **Impact:** Improve the ability of NCDA to strategically achieve its mission and goals, and have an impact on improving NCD prevention and control nationally and globally;
- **Reach and networks:** Access to credible and respected networks, communities and diverse audiences for greater reach for dissemination and engagement purposes;
- **Knowledge and expertise:** Access to topic-specific knowledge, expertise and a variety of resources (financial and non-financial) which can be mobilised to increase NCDA's ability to deliver on its ambitions;
- **Resources and financial commitment:** Within the context of formal partnerships, NCDA's Supporters pledge significant funds to support NCDA deliver its mission and goals.

In return, NCDA brings value to partners through its reputation, credibility, networks, expertise, action, and influence. Partnership is a mutually beneficial interchange, meaning there must be cooperation, communication and collaboration in the relationship.

6. OVERARCHING PRINCIPLES FOR ENGAGEMENT AND PARTNERSHIPS

In order to ensure that all of NCDA's forms of engagements with external organisations are built upon shared objectives, mutual respect, cooperation, transparency and impact, all engagements should be guided by the following overarching principles:

- Shared commitment to NCDA's vision of making NCD prevention and control a priority everywhere;
- Potential for impact aligned with NCDA's priorities and opportunities for NCDA to expand its influence, scope and audience;
- Shared commitment to the principles of good development practice and ethical corporate practice, as well as compatibility with NCDA's culture of management and operations;
- Recognition of the need for the protection of NCDA's reputation, name, impartiality, independence and brand;
- Respect for each entity's achievements, stage of development and circumstances;
- Shared commitment to collaboration, with active and positive collaboration in all areas of work;
- Transparency and honesty in dealings with each other, with mutual conviction to an open exchange of information, dialogue, cooperation and collaboration;
- Readiness to be accountable to each other because of shared goals.

Within the context of formal partnerships, these overarching principles are included in the partnership agreement contract and signed by each party, indicating their agreement to adhere to them. Failure to agree to or abide by these principles will result in termination of the relationship.

7. EXCLUSIONARY CRITERIA FOR FORMAL PARTNERSHIPS

NCDA recognises that entering into formal partnerships with external organisations can bring significant added value to its work, but that care must be taken to ensure that potential COI are evaluated and risks minimised. In order to safeguard NCDA's reputation and status as an independent, not-for-profit, non-governmental organisation, any potential formal partnership with a financial relationship must be screened against NCDA's exclusionary criteria. These criteria are considered in the first step of NCDA's comprehensive due diligence process (as described below):

Exclusionary criteria:

- Involvement in alcohol¹, tobacco and nicotine², ultra-processed and HFSS foods and beverages³, fossil fuel extraction, and arms industries, given they are considered as either harmful to health or may increase the risk of NCDs;
- An evidenced track record of advocacy and lobbying to oppose or delay adoption and implementation of public health treaties (e.g. WHO FCTC) or cost-effective NCD policies and laws (e.g. WHO Best Buys, WHO International Code of Marketing of Breast-milk Substitutes);
- Evidence of unethical corporate behaviour and breaches of international development conventions and practices (e.g. breaches of human rights conventions, issues of child labour, marketing and advertising practices, environmental and government relations practices, tax avoidance).

Other criteria to be considered when entering into new formal partnerships are:

- **Diversification:** NCDA will seek a diverse range of partners, so that it is not overly exposed to a single funding source, such as an individual person, single organisation, or a particular industry. In so far as possible, NCDA should avoid situations where a programme or project becomes dependent upon continued funding from just one commercial or civil society partner;
- **Long term and regular review:** NCDA will seek to establish multi-year partnerships with partners to ensure continuity and increase chances of long-term impact, and maintain a regular assessment, monitoring and evaluation system in place;
- **Restricted funding for programmes:** Restricted funds will be accepted to support programmatic activity that is aligned with NCDA's strategy and objectives. Partnering organisations must agree that NCDA has the responsibility and control over the planning, content, terms and implementation of the programme and activities, selection of vendors and grantees;
- **Commitment and legal compliance:** NCDA aims to ensure a letter of intent, memorandum of understanding, or partnership agreement (including the partnership principles, detailed in

¹ For the purposes of this document the term "alcohol industry" is defined to include manufacturers of alcoholic beverages. In addition, it includes business associations, front groups or other non-state actors representing or funded largely by any of the afore-mentioned entities.

² For the purpose of this document, the term "tobacco and nicotine industry" is defined to include any tobacco or nicotine product manufacturer, and any parent, affiliate, branch, or subsidiary of a tobacco manufacturer. In addition, it includes business associations, front groups or other non-state actors such as foundations representing or funded largely by any of the afore-mentioned entities.

³ For the purpose of this document, the term "ultra-processed and HFSS food and beverages industry" relates to manufacturers of nutrient poor foods and beverages, including high in fat, sugar, and/or salt (HFSS) including sweetened drinks, sweet or savory packaged or unpackaged snacks, infant formulas, follow-on milks and other baby food products, reconstituted meat products and pre-prepared frozen dishes, which are not modified foods but formulations made mostly or entirely from substances derived from foods and additives. In addition, it includes business associations, front groups or other non-state actors representing or funded largely by any of the afore-mentioned entities.

section six), specifying the scope and purpose, deliverables, duration of the partnership, financial contribution amount are signed by NCDA and a new partner before collaboration begins.

8. DUE DILIGENCE PROCESS

Where new formal partnerships are being explored, NCDA must complete a due diligence process before and periodically thereafter, to ensure a successful and impactful relationship. Due diligence refers to the actions taken by NCDA to gather and verify relevant information on a potential partner. This is necessary to guarantee partnerships are built on shared objectives, mutual respect, cooperation, communication, transparency, and impact.

The decision of whether to partner with a given entity will be based on a risk assessment, prioritising at all times to avoid COI or impaired independence. In successful partnerships, both parties bring credibility with selected segments of the population on certain issues and/or technical expertise.

It is important to note, the due diligence process does not end with the signing of a partnership agreement. NCDA consistently evaluates the partnership via the risk management process on compatibility and COI, as well as in response to any crises or negative news events, should they arise.

Furthermore, as of 2022 NCDA conducts an annual self-declaration process for all its existing partners whereby NCDA requests partners to self-declare any relationships with Tier 1 industries and any direct investments in the tobacco industry.

The following table provides a summary overview of the step-by-step due diligence process that supports NCDA in the evaluation of a potential partnership. This process creates a standard protocol for NCDA management. The detailed operational due diligence tool can be found on the NCDA website.

Step	Name of Step	Objective	Description
1	Initial due diligence and adherence to overarching criteria check	Determine compatibility of the organisation, based on NCDA's partnership criteria.	Initial evaluation of the organisation before meeting to assess against NCDA's overarching exclusionary criteria for partnerships, determine compatibility, and gauge potential of partnership.
2	Profile	To reach a clear, accurate and unbiased understanding of the profile of the organisation and gauge any potential risks.	Such a profile contains a review of the information provided by the organisation and an examination and analysis of public information (e.g. website, annual reports and financial reports) about the organisation, its activities, funding courses, public reputation and financial solvency, as well as the organisation's behaviour in areas not directly related to health as well as its overall ethical corporate behaviour (e.g. issues of child labour, marketing and advertising practices, environmental commitment and government relations, investments, tax avoidance).
3	Risk assessment	Have a clear understanding of the risk profile of the organisation and the engagement.	A risk assessment of the external organisation and the proposed engagement is conducted in addition to the profile. This includes a review of the nature of the organisation, using a risk-matrix. See section 9. The outcome of the risk assessment can lead to two different paths: if the

			risks are too high, NCDA will consider avoiding the engagement; and if the risks are low, NCDA moves to step four.
4	Principles for partnership	Clarity and consensus on the overarching conditions for the partnership, with an emphasis of NCDA's overarching principles.	Each partner is required to adhere to NCDA's overarching principles for partnership described in section 6 to guarantee partnerships are built on shared objectives, mutual respect, cooperation, dedication, communication, transparency, and impact. Failure to agree to or abide by these principles will result in termination of the relationship. These principles are included in the partnership agreement and signed by each party, indicating their agreement to adhere to them.
5	Formalising a partnership agreement	Clarify the scope and goals of the partnership via the development of a partnership agreement.	The purpose of the partnership should support implementation of NCDA's strategic plan. A partnership agreement is developed and signed by both parties.
6	Risk management	Manage the risks throughout the partnership, based on mitigation measures.	NCDA has a risk management process to guide and inform management decisions. See section 12. This includes regular risk assessment and discussion of required mitigation measures of all NCDA partnerships. Regular risk management is conducted by the NCDA Board Finance and Audit Committee.
7	Monitoring and evaluation	Ensure the partnership has achieved the goals.	Monitoring and evaluation of the partnership is carried out through a systematic process of evaluation that includes assessment of the engagement, communication of the relevant results, and a system which enables NCDA to respond to observed weaknesses.
8	Transparency and communication	Communicate the engagement activities and outcomes relevant to audiences.	NCDA communicates to the relevant audiences the information about the partnership and related conflict of interest in an open, transparent and timely manner.

9. RISK-BASED APPROACH TO ASSESS POTENTIAL FORMAL PARTNERSHIPS

As outlined in step 3 of the due diligence process summary above, NCDA utilises a risk-based approach to evaluate and guide decision-making on potential formal partnerships and potential or real COI. NCDA considers in this assessment the type of organisation and industry sector with whom a partnership is being considered, as well as the type and scope of engagement being planned. This is because different types of organisations and sectors differ in their likely level of conflict of interest with NCDA's core mission and values and hence in their potential risk.

NCDA's risk matrix outlines categories of organisation and their likely level of risk. It has three levels for different industry sectors – high risk (excluded); moderate risk; and minimal risk.

- **Tier 1 – High risk (Excluded):** the objective and practices of these sectors are entirely incompatible with public health goals, therefore NCDA will not formally partner in any circumstances. NCDA’s exclusionary criteria form the basis for Tier 1.
- **Tier 2 - Moderate risk:** the objectives and practices of these sectors have the potential for conflict of interest with public health goals, therefore NCDA considers them moderate risk and require scrutiny.
- **Tier 3 - Minimal risk:** the objectives and practices of these sectors are unlikely to be in conflict with public health goals however in certain circumstances NCDA will assess the potential partnership.

These categories are regularly reviewed and may change over time. NCDA recognises that the framework of this policy and the risk matrix cannot cover all circumstances. The decision to enter into a formal partnership with an external organisation will be evaluated on its own merits and must be assessed on a case-by-case basis. Where a category is in doubt, a higher risk category is always adopted.

Tier	Risk	Industry sector
1	High risk - Excluded	<ul style="list-style-type: none"> • Companies / organisations involved in alcohol, tobacco and nicotine, ultra-processed and HFSS foods and beverages, fossil fuel extraction, arms industries given they are considered as either harmful to health or may increase the risk of NCDs. • Business associations, front groups or other non-state actors such as foundations representing or funded largely by the alcohol, tobacco and nicotine, ultra-processed and HFSS foods and beverages, fossil fuel or arms industries; firms or companies commissioned by one of these aforementioned industries; and foundations or charitable trusts that have direct investments in the tobacco or nicotine industry. • Companies / organisations with an evidenced track record of advocacy and lobbying to oppose or delay adoption and implementation of public health treaties (e.g. WHO FCTC) and cost-effective NCD policies and laws (e.g. WHO Best Buys, WHO International Code of Marketing of Breast-milk Substitutes). • Companies / organisations with an evidenced track record of unethical corporate behaviour and breaches of international development conventions (e.g. breaches of human rights conventions, issues of child labour, marketing and advertising practices, environmental and government relations practices, tax avoidance). • Political parties and organisations promoting political parties⁴
2	Moderate	<ul style="list-style-type: none"> • Medical equipment manufacturers and suppliers, producers of pharmaceutical and diagnostic products. • Food manufacturers (and their representative bodies) promoting other products, including fruit and vegetable products, meat, fish and dairy products. • Wholesale distributors, major retailers and importers of tier 1 products (i.e. alcohol, tobacco and nicotine, and ultra-processed and HFSS food and beverages).
3	Minimal	<ul style="list-style-type: none"> • Automobile and road building companies. • Advertising, publishing, broadcasters, audio-visual and digital media companies.

		<ul style="list-style-type: none"> • Private health service providers, health insurance companies. • Marketing and public relations companies. • IT companies. • Finance sector and pension funds. • Tourism and hotels. • Public authorities, governments, UN agencies. • Sports and fitness industry. • Mass transport companies. • Renewable energy and water suppliers.
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10. MANAGING AND MITIGATING CONFLICT OF INTEREST IN OTHER TYPES OF ENGAGEMENTS

Other than formal partnerships, there are many types of engagements and activities involving external organisations that present NCDA with particular risks for potential or real COI. Below is a summary of how NCDA manages and mitigates against potential risks and COI across these types of engagements and activities, based upon the risk matrix and tiers outlined above:

Type of engagement	How NCDA mitigates risk of COI
Contracts with suppliers	NCDA avoids contracting with suppliers (advertising agents, PR consultants, website agencies etc) which have major clients in Tier 1 companies/organisations.
Product endorsement	NCDA does not endorse any products, brands or services owned by any commercial organisation. This applies to NCDA supporters and any commercial organisation across all tiers.
Awarding grants	NCDA should not award grants (e.g. capacity development grants) to members, civil society organisations and alliances which receive funding from Tier 1 companies/organisations.
Hospitality	NCDA hospitality events (such as receptions and similar functions) can be paid for by private entities, but they have to be an existing NCDA supporter with a partnership agreement in place and having signed up to NCDA's partnership principles. This funding should be acknowledged at the reception. Tier 1 companies are entirely excluded from such forms of engagement.
Co-sponsorship of events	NCDA may collaborate with private entities, UN agencies and governments to organise and co-sponsor events. In the context of private entities, NCDA primarily only collaborates with existing NCDA supporters to co-sponsor events. Within the context of co-sponsorship, NCDA should ensure oversight and opportunity to input into the agenda, organisation, publicity, invitation strategy, and dissemination of outcomes. Decisions on co-sponsorship are the responsibility of NCDA's CEO on a case-by-case basis. Tier 1 companies are entirely excluded from such forms of engagement.
Speaking invitations	NCDA board members (when representing NCDA) and staff members can accept honoraria, fees or expenses for speaking engagements from NCDA supporters or other private entities, with the exception of Tier 1 companies. The fees must be paid to NCDA and declared in the annual accounts.
Meetings with commercial entities	NCDA board members and staff members regularly organise or get invited to meetings with different external organisations. In the

	<p>context of private entities, NCDA officials should not meet with representatives from the tobacco or nicotine industry (in accordance with the WHO FCTC article 5.3). In the context of meeting with companies or front groups for alcohol, ultra-processed food and beverages, and fossil fuels, NCDA officials should take particular caution to mitigate risks and COI, including agreeing a meeting agenda in advance, taking minutes of the meeting, and sharing the minutes of the meeting with the NCDA Board.</p>
Projects and programmes	<p>NCDA develops projects and programmes independently and with NCDA members, supporters, UN agencies and governments where there is a partnership agreement or MOU in place. All projects and programmes must be designed so that NCDA maintains its independence, control and objectivity of judgement. Tier 1 companies are entirely excluded from such forms of engagement. In the case of Tier 2 companies, high scrutiny is required via the programme development stage and throughout the implementation of the programme.</p>
Publications	<p>NCDA collaborates with a range of partners to produce a diverse set of knowledge products, including policy briefs, publications, case study reports, capacity development tools and resources, and communications resources. Primarily these are produced in collaboration with NCDA members, supporters or UN agencies where there is a partnership agreement or MOU in place. Funds can be accepted from Tier 2 and 3 private entities for meeting costs of NCDA knowledge products and publications, with the exception of policy and advocacy publications (e.g. policy briefs and policy positions or reports). Tier 1 companies are entirely excluded from this form of engagement.</p>
Membership in coalitions, consortiums or networks	<p>NCDA should not join a coalition, consortium or network of organisations that includes Tier 1 companies or is funded even partially by Tier 1 companies. Careful scrutiny is required for joining coalitions with Tier 2 companies.</p>
Commissioned articles for publication	<p>Invitations to NCDA board members (when representing NCDA) or staff members to submit or develop articles for publication for a fee should be carefully assessed for their relevance to NCDA strategic priorities and objectives. For work conducted in NCDA's name, fees should be paid to NCDA and declared. Articles or publications funded by Tier 1 companies are not acceptable under any circumstances.</p>
Investments	<p>NCDA should not hold any investments in Tier 1 companies. NCDA has a zero-tolerance approach to direct investments in the tobacco industry by partner organisations that generate their income entirely from investments (i.e. charitable trusts and Foundations). NCDA also has an annual self-declaration process whereby NCDA requests all existing partners to self-declare any relationships with Tier 1 industries and direct investments in the tobacco industry.</p>
Gifts and donations	<p>As per NCDA's individual conflict of interest policy, excluding Tier 1 companies, NCDA board members (when representing NCDA) and staff members may accept and declare incidental gifts, customary hospitality or other benefits of nominal value, those less than a \$100 USD (for example chocolates or flowers). NCDA officials may not accept larger gifts of more than a \$100 value without first reporting to</p>

	the CEO for recording purposes and advice on appropriate action. They shall not offer, solicit or accept transfers of personal economic benefit to or from any third party with whom NCDA has, or is considering having, any contractual or binding agreements or arrangements.
Membership (Full and Associate members of NCDA)	NCDA should not approve membership applications from any Tier 1 organisations or those who are involved with Tier 1 organisations. All organisations who apply for NCDA membership should adhere to the NCDA Membership COI Policy and the NCDA Membership Criteria and Principles. NCDA requests members to annually self-declare any relationships with Tier 1 organisations.

11. PROTECTING THE INDEPENDENCE OF NCDA'S POLICY AND ADVOCACY WORK

In order for NCDA to carry out its mission and have an impact, it must inspire confidence in its expertise, integrity, credibility and independence. This is particularly the case in terms of NCDA's policy and advocacy work. COI, real or apparent, can undermine such confidence and the mission of NCDA's advocacy work. It is critical for NCDA that these functions are delivered with professional integrity and are supported by the interest of its members, and not compromised or influenced from commercial interest.

The following processes are in place to safeguard the independence of NCDA policy and advocacy work, and avoid and manage any COI:

- The NCDA Constitution dictates that NCDA's strategy and policy development is the responsibility of the Board, working in unison with NCDA's CEO and management team;
- The Board appoints a dedicated Policy and Strategy Sub-Committee to review and recommend issues of strategy and policy to the NCDA Board. This committee is solely composed of NCDA board members;
- The process to develop NCDA policy positions is firewalled from external partner influence. When NCDA develops new policy positions, the Supporters Group may be consulted for views and insights, as well as external experts, however the policy is decided upon and finalised by the NCDA Board and CEO solely;
- Should a COI emerge with a NCDA partner related to policy and advocacy work, NCDA's CEO will review the relationship within the context of the risk management process and take action as needed; up to and including retaining the right to cancel the partnership agreement with immediate effect.

12. RISK MANAGEMENT PROCESS TO MANAGE AND MITIGATE CONFLICTS OF INTEREST

As outlined in step 6 of the due diligence process, NCDA adopts a rigorous approach to regularly review, manage and mitigate against any potential or real COI in engagements and partnerships and more broadly across the organisation. NCDA's risk management process is adapted from industry best practice, allowing for the specific circumstances of NCDA as an NGO and a membership organisation:

- The risk management process applies to all aspects of NCDA operations and any established relationship and partnership. This includes, but not limited to, NCDA members and partners, NCDA Board of Directors, its staff, its network of volunteers and providers;
- All risks are identified and logged across six domains of operation: governance, operational, financial, environmental/external, compliance, law/regulation and reputational. This work is undertaken on an ongoing basis by the NCDA CEO, with regular reporting to the Finance and Audit Committee, President and NCDA Board;

- The Board expects the CEO to provide sufficient information and to conduct sufficient due diligence and monitor ongoing potential or real COI and any reputational issues within this risk management process, reporting to the Board in a timely fashion any risks of which the Board should be aware. Assessed risks are included in a risk register which is used to give the President, Board and Finance and Audit Committee oversight of the full set of risks NCDCA is addressing in each domain and overall;
- NCDCA's appointed Finance and Audit Committee is responsible for overseeing the risk management of the organisation (including any potential COI), reviewing on a regular basis the risk register and ensuring that mitigating actions are followed through by the CEO;
- In addition, the NCDCA Board appoints a Membership and Partnership Sub-Committee which has delegated responsibility to oversee the strategy of partnerships, and to ensure that the activities are in alignment with the NCDCA strategy, mission and purpose. The Committee reviews new partnerships involving significant financial contributions, and conducts a comprehensive review of partnerships on an annual basis to ensure they align to NCDCA's mission and strategy.

13. TRANSPARENCY AND COMMUNICATION

NCDCA is committed to transparency in its actions and accountability of engagements and formal partnerships. NCDCA acknowledges the trust partners and members place in it, respect their rights to hold NCDCA to account, and pledge transparency in NCDCA's relationship with them.

NCDCA is committed to ensuring to make full and accurate information available about its financial position. NCDCA's Annual Report provides a review of key achievements, membership, and partners, as well as financial standing. All of NCDCA's supporters are recognised on the NCDCA website. In addition, NCDCA's annual audit report is shared with NCDCA's membership.

NCDCA aims to be in close communication with its supporters and to review partnerships together on a regular basis. NCDCA will report diligently to supporters, who will receive designated reports and programme and financial reporting as appropriate.

In addition, NCDCA's Membership and Partnership Sub-Committee conducts an annual comprehensive review of all NCDCA partnerships, to ensure they are aligned with NCDCA's strategic goals and objectives.

All NCDCA governance policies and procedures related to membership, partnerships, and COI are published on the NCDCA website. They are reviewed and updated on a periodic basis by the Board and relevant Sub-Committees. This policy will be reviewed on an annual basis, and updated accordingly.