REPUBLIC OF SOUTH SUDAN

RELIEF AND REHABILITATION COMMISSION (RRC)

THE REGISTRATION OF NGOs, CBOs, CSOs, SOCITIES, AND ASSOCIATIONS.

Certificate Of Registration

REG. NO. 5270

This is to certify that GOD SPEAKING TO MANKIND CHURCH AND DEVELOPMENT AGENCY has been registered with

Relief and Rehabilitation Commission (RRC) as NATIONAL ORGANIZATION

Under Chapter 3, Section 10 Of NGOs Act, 2016

Given under my hand at Juba on 11th day of JUNE, 2026 expiry date 11th JUNE, 2027

WOL DHIEU AKUJANG

Chief Registrar of NGOs

Relief and Rehabilitation Commission (RRC)

DIRECTORATE OF REGISTRATION AND NGOs AFFAIRS
11 JUN 2026
Relief and Rehabilitation Commission (RRC)
JUBA - SOUTH SUDAN

GOD SPEAKING TO MANKIND'S CHURCH DEVELOPMENT AGENCY (GSM-CDA)

CONFLICT OF INTEREST POLICY

Policy Number: GSM-CDA/HR/003

Effective Date: GSM-CDA/BR/02/2026. Dated on 02/02/2026

Approved By: Board of Directors

Review Date: Every Three (3) Years

1. PURPOSE

The purpose of this Conflict-of-Interest Policy is to protect the integrity, credibility, and reputation of GSM-CDA by ensuring that all Board Members, Management, Employees, Volunteers, Consultants, and Representative's act in the best interests of the organization and avoid situations where personal interests may conflict with official duties.

2. POLICY STATEMENT

GSM-CDA is committed to maintaining the highest standards of honesty, transparency, accountability, and ethical conduct in all its operations.

All individuals serving GSM-CDA shall avoid actual, potential, or perceived conflicts of interest and shall disclose any situation that may influence their impartiality in decision-making.

3. SCOPE

This policy applies to:

- **Board of Directors**
- **Executive Director**
- **Deputy Executive Director**
- **Senior Management Team**
- **Employees**
- **Volunteers**
- **Consultants**
- **Contractors**
- **Project Staff**
- **Partner Representatives acting on behalf of GSM-CDA**

4. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest occurs when an individual's personal, family, financial, political, or business interests interfere, or appear to interfere, with the interests of GSM-CDA.

A conflict may be:

a) Actual Conflict

A direct conflict currently exists.

b) Potential Conflict

A conflict may arise in the future.

c) Perceived Conflict

Others may reasonably believe a conflict exists even when it does not.

5. TYPES OF CONFLICTS OF INTEREST

5.1 Financial Interest

When an individual benefits financially from decisions made by GSM-CDA.

Examples:

- **Awarding contracts to a company owned by a family member.**
- **Approving payments that directly benefit oneself.**
- **Receiving commissions from suppliers.**

5.2 Family or Personal Relationships

When decisions involve relatives or close associates.

Examples:

- **Hiring a spouse, child, sibling, or relative.**
- **Supervising a family member.**
- **Participating in recruitment involving relatives.**

5.3 Business Interests

When staff or Board Members have business interests that may compete with or influence GSM-CDA operations.

Examples:

- **Owning a company bidding for GSM-CDA contracts.**
- **Serving as director of another organization with competing interests.**

5.4 Gifts and Hospitality

Receiving gifts, favors, or hospitality that may influence decision-making.

Examples:

- **Accepting expensive gifts from suppliers.**
- **Receiving personal benefits from beneficiaries or contractors.**

5.5 Political Influence

Using GSM-CDA resources, position, or influence for political purposes or personal political gain.

6. DISCLOSURE REQUIREMENTS

Every Board Member, employee, volunteer, consultant, and contractor shall:

1. **Disclose any actual, potential, or perceived conflict immediately.**
2. **Complete and sign a Conflict-of-Interest Declaration Form annually.**
3. **Update disclosures whenever circumstances change.**
4. **Cooperate fully during conflict reviews.**

Failure to disclose a conflict may result in disciplinary action.

7. PROCEDURES FOR MANAGING CONFLICTS

When a conflict is identified:

Step 1: Disclosure

The concerned individual shall report the conflict in writing.

Step 2: Review

The Board, Executive Director, or designated committee shall review the matter.

Step 3: Determination

The organization shall determine whether the conflict is actual, potential, or perceived.

Step 4: Mitigation

Appropriate measures shall be taken, including:

- **Recusal from discussions.**
- **Abstention from voting.**
- **Reassignment of duties.**
- **Termination of involvement in the matter.**

8. PROCUREMENT AND CONTRACTING

Individuals with conflicts of interest shall not:

- **Participate in procurement decisions.**
- **Influence supplier selection.**

- Approve contracts involving related parties.
- Access confidential procurement information for personal benefit.

All procurement processes shall remain transparent, fair, and competitive.

9. CONFIDENTIAL INFORMATION

No person associated with GSM-CDA shall use confidential information obtained through their position for:

- Personal gain.
- Family benefit.
- Business advantage.
- Political interests.

Confidential information remains the property of GSM-CDA.

10. GIFTS AND BENEFITS

Personnel shall not solicit or accept gifts, favors, payments, or hospitality that may influence or appear to influence official decisions.

Nominal gifts of low value may be accepted only when:

- Allowed by law.
- Consistent with local customs.
- Properly declared to management.

11. RESPONSIBILITIES

Board of Directors

The Board shall:

- Enforce this policy.
- Review conflict disclosures.
- Ensure impartial decision-making.
- Take corrective action where necessary.

Executive Director

The Executive Director shall:

- Promote awareness of this policy.
- Maintain disclosure records.
- Investigate reported conflicts.
- Report significant cases to the Board.

Employees and Volunteers

Personnel shall:

- Act honestly and ethically.
- Disclose conflicts promptly.
- Avoid improper influence.
- Follow decisions made under this policy.

12. VIOLATIONS OF THE POLICY

Failure to comply with this policy may result in:

- Verbal warning.
- Written warning.
- Suspension.
- Termination of employment or engagement.
- Removal from Board membership.
- Legal action where applicable.

13. PROTECTION AGAINST RETALIATION

No employee, volunteer, consultant, or Board Member shall suffer retaliation for reporting a genuine conflict of interest in good faith.

GSM-CDA shall protect whistleblowers who report concerns honestly and responsibly.

14. MONITORING AND REVIEW

The Board of Directors shall review this policy every three (3) years or whenever necessary to ensure compliance with organizational, donor, and legal requirements.

15. APPROVAL

This Conflict-of-Interest Policy was approved by the Board of Directors of God Speaking to Mankind GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY (GSM-CDA) and shall take effect immediately upon approval.

Approved by:

Chairperson of GSM-CDA:

Rev. Angelo World Tiger Panyuan

Secretary General of GSM-CDA:

Mr. Franco Puok Ruach

Date: GSM-CDA/BR/02/2026. Dated on 02/02/2026

Official Stamp:

CONFLICT OF INTEREST DECLARATION

I, ____, declare that I have read, understood, and agree to comply with the GSM-CDA Conflict of Interest Policy. I further declare that I have disclosed all actual, potential, or perceived conflicts of interest known to me.

Name: ______________________

Position: ______________________

Signature: ______________________

Date: ______________________

16. RELATED PARTY TRANSACTIONS

Any transaction involving a Board Member, employee, volunteer, consultant, contractor, or their relatives shall be disclosed and reviewed before approval.

The interested person shall:

- Not participate in discussions.
- Not influence the decision.
- Not vote on the matter.

The Board shall document the justification for approving any related-party transaction.

17. DECLARATION OF INTEREST REGISTER

GSM-CDA shall maintain a Conflict-of-Interest Register containing:

- Name of the individual.
- Nature of the interest.
- Date of disclosure.
- Action taken.
- Approval authority.

The register shall be reviewed annually by management and the Board.

18. ANNUAL DISCLOSURE REQUIREMENT

All Board Members, Senior Management, Procurement Committee Members, Finance Staff, and Project Managers shall submit a written Conflict of Interest Declaration at least once every year.

19. RECRUITMENT AND EMPLOYMENT OF RELATIVES

GSM-CDA recognizes that qualified relatives may apply for positions; however:

- Recruitment must be competitive and transparent.
- Relatives shall not participate in recruitment processes affecting family members.
- No employee shall directly supervise a relative.

- The relationship must be disclosed before appointment.

20. DONOR COMPLIANCE

All GSM-CDA personnel shall comply with conflict-of-interest requirements established by:

- Donors
- Government authorities
- Regulatory agencies
- Partnership agreements

Where donor requirements are stricter than this policy, the stricter requirement shall apply.

21. PROCUREMENT COMMITTEE INTEGRITY

Every member of a procurement committee shall sign a Non-Conflict Declaration before participating in:

- Tender evaluations
- Bid reviews
- Supplier selections
- Contract awards

Any member with an interest in a bidding entity shall immediately withdraw from the process.

22. USE OF ORGANIZATIONAL RESOURCES

No person shall use GSM-CDA resources for personal benefit.

This includes:

- Vehicles
- Equipment
- Office facilities
- Staff time
- Organizational funds

- Intellectual property

Unauthorized use may result in disciplinary action.

23. BOARD MEMBER ETHICAL CONDUCT

Board Members shall:

- Act solely in the best interest of GSM-CDA.
- Maintain confidentiality.
- Avoid personal gain from Board service.
- Exercise independent judgment.
- Declare conflicts before deliberations.

24. RECORD KEEPING

All conflict disclosures, investigations, reviews, and decisions shall be documented and securely maintained for a minimum period of seven (7) years.

25. TRAINING AND AWARENESS

GSM-CDA shall provide regular orientation and training on:

- Ethics
- Integrity
- Anti-corruption
- Conflict of Interest
- Accountability standards

All newly recruited personnel shall receive training within three months of joining the organization.

26. FALSE DECLARATION OR NON-DISCLOSURE

Any person who knowingly:

- Conceals a conflict of interest,
- Provides false information,
- Misleads investigators,

shall be subject to disciplinary action, including possible termination and legal proceedings.

27. POLICY REVIEW AND AMENDMENT

This policy shall be reviewed every three years by the Board of Directors or earlier if:

- Legal requirements change.
- Donor requirements change.
- Significant governance risks emerge.

Amendments shall be approved by the Board of Directors.

ANNEXES**ANNEX A**

CONFLICT OF INTEREST DECLARATION FORM

God Speaking to Mankind GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY (GSM-CDA)

Personal Information

Name: ____

Position/Title: ____

Department/Project: ____

Employee/Volunteer/Board Member: _______________________

Date: ____

Declaration

I hereby declare that:

☐ I have read and understood the GSM-CDA Conflict of Interest Policy.

☐ I agree to comply with all provisions of the policy.

☐ I have disclosed all actual, potential, or perceived conflicts of interest known to me.

☐ I understand that failure to disclose a conflict of interest may result in disciplinary action.

Disclosure of Interests

Do you have any financial, personal, family, business, political, or other interests that may create a conflict of interest with GSM-CDA?

☐ Yes

☐ No

If yes, provide details:

Certification

I certify that the information provided is true and complete to the best of my knowledge.

Signature: ________________________

Date: ________________________

Witness: ________________________

Date: ________________________

ANNEX B

ANNUAL DISCLOSURE FORM

God Speaking to Mankind GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY (GSM-CDA)

Reporting Year: ________________________

Name: ________________________

Position: ________________________

Annual Disclosure Stat

Please indicate whether you or your immediate family members have any of the following interests:

Type of Interest	Yes	No
Ownership in a business dealing with GSM-CDA	☐	☐
Financial interest in suppliers or contractors	☐	☐
Employment relationship with GSM-CDA partners	☐	☐
Family relationship with GSM-CDA personnel	☐	☐
Board membership in another organization	☐	☐
Other potential conflict of interest	☐	☐

If yes, provide details:

I certify that the information contained in this disclosure is accurate and complete.

Name: ________________________

Signature: ________________________

Date: ________________________

ANNEX C

RELATED PARTY TRANSACTION DISCLOSURE FORM

God Speaking to Mankind GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY (GSM-CDA)

Name of Individual: ________________________

Position: ________________________

Date: ____________________

Related Party Information

Name of Related Party:

Relationship to GSM-CDA Representative:

☐ Spouse

☐ Parent

☐ Child

☐ Sibling

☐ Relative

☐ Business Partner

☐ Other

Specify:

Nature of Proposed Transaction

Description:

Estimated Value:

US$ ____________________

Expected Benefit to GSM-CDA:

Declaration

I declare that I have fully disclosed this relationship and understand that I shall not participate in discussions, evaluations, approvals, or decisions relating to this transaction.

Signature: ________________________

Date: ________________________

Board/Management Decision:

☐ Approved

☐ Rejected

Reason:

Authorized Signature:

Date:

ANNEX D

PROCUREMENT COMMITTEE NON-CONFLICT DECLARATION FORM:

God Speaking to Mankind GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY (GSM-CDA)

Procurement Reference Number:

Tender Title:

Committee Member Name:

Position:

Declaration

I declare that:

☐ I have no personal interest in any bidder participating in this procurement process.

☐ I have no financial interest in any bidder.

☐ I have no family relationship with any bidder.

☐ I have not received gifts, favors, or benefits from any bidder.

☐ I shall maintain confidentiality throughout the procurement process.

☐ I shall immediately disclose any conflict that may arise during the process.

Signature:

Date:

Witness:

Date:

ANNEX E

CONFLICT OF INTEREST REGISTER TEMPLATE

God Speaking to Mankind GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY (GSM-CDA)

No.	Name	Position	Nature of Conflict	Date Disclosed	Action Taken	Approved By	Status
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

Register Maintenance

The Conflict-of-Interest Register shall:

1. Be maintained by the Executive Director or designated officer.
2. Be updated whenever a conflict is disclosed.
3. Be reviewed annually by the Board of Directors.
4. Be treated as a confidential governance document.

5. Be retained for at least seven (7) years.

Authorized Officer: ______________________

Signature: ______________________

Date: ______________________

ANNEX F

CONFLICT OF INTEREST INVESTIGATION PROCEDURE

GOD SPEAKING TO MANKIND GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY (GSM-CDA)

1. PURPOSE

This procedure establishes a fair, transparent, confidential, and accountable process for receiving, investigating, and resolving allegations of actual, potential, or perceived conflicts of interest within GSM-CDA.

The procedure seeks to:

- Protect the integrity of GSM-CDA.
- Ensure impartial decision-making.
- Promote accountability and transparency.
- Protect individuals who report concerns in good faith.
- Maintain donor and stakeholder confidence.

2. SCOPE

This procedure applies to:

- Board Members
- Executive Director
- Deputy Executive Director
- Employees
- Volunteers

- Consultants
- Contractors
- Procurement Committee Members
- Project Staff
- Any individual acting on behalf of GSM-CDA

3. REPORTING A CONFLICT OF INTEREST

A conflict-of-interest concern may be reported by:

- Employees
- Volunteers
- Board Members
- Beneficiaries
- Donors
- Suppliers
- Contractors
- GOD SPEAKING TO THE MANKIND'S CHURCH AND DEVELOPMENT AGENCY GSM-CDA Members
- Partner Organizations

Reports may be submitted:

a) In Writing

Through a formal written complaint addressed to:

- Executive Director
- Board Chairperson
- Ethics Committee (where applicable)

b) By Email

Using the official GSM-CDA reporting channels.

c) Through Whistleblower Mechanisms

Where available under GSM-CDA policies.

4. GOOD FAITH REPORTING

All reports shall be made honestly and in good faith.

Individuals reporting concerns shall not be subjected to:

- Harassment
- Intimidation
- Retaliation
- Discrimination
- Unfair treatment

False or malicious allegations may result in disciplinary action.

5. PRELIMINARY ASSESSMENT

Within seven (7) working days of receiving a complaint, the responsible authority shall:

- Review the complaint.
- Determine whether sufficient information exists.
- Assess whether the matter falls under this policy.
- Decide whether a formal investigation is necessary.

Possible outcomes:

a) No Further Action Required

If no conflict exists.

b) Informal Resolution

Where minor issues can be corrected through disclosure and management action.

c) Formal Investigation

Where significant concerns exist.

6. APPOINTMENT OF INVESTIGATION PANEL

For formal investigations, GSM-CDA shall appoint an Investigation Panel consisting of:

- One Board Representative
- One Senior Management Representative
- One Independent Member where appropriate

Panel members shall:

- Have no personal interest in the case.
- Be impartial and objective.
- Maintain confidentiality.

7. INVESTIGATION PROCESS

The Investigation Panel shall:

Step 1: Review Documents

Examine:

- Contracts
- Procurement records
- Financial documents
- Emails and correspondence
- Meeting minutes
- Disclosure forms

Step 2: Conduct Interviews

Interview:

- The complainant
- The subject of the complaint
- Witnesses
- Relevant personnel

Step 3: Gather Evidence

Collect evidence sufficient to determine:

- Whether a conflict existed.
- Whether disclosure occurred.
- Whether organizational procedures were followed.
- Whether organizational interests were compromised.

8. RIGHTS OF THE ACCUSED PERSON

The individual under investigation shall have the right to:

- Be informed of the allegation.
- Respond to allegations.
- Present evidence.
- Identify witnesses.
- Receive fair treatment.
- Be presumed innocent until findings are made.

9. CONFIDENTIALITY

All investigations shall remain confidential.

Information shall only be shared with:

- Authorized investigators
- Management
- Board Members responsible for oversight
- Legal authorities where required

Unauthorized disclosure may result in disciplinary action.

10. INVESTIGATION TIMELINE

GSM-CDA shall endeavor to complete investigations within:

Standard Cases

Thirty (30) calendar days.

Complex Cases

Sixty (60) calendar days.

Where delays occur, reasons shall be documented.

11. INVESTIGATION REPORT

Upon completion, the Investigation Panel shall prepare a written report containing:

- Background of the complaint
- Investigation methodology
- Evidence reviewed
- Findings
- Conclusions
- Recommendations

The report shall be submitted to the Executive Director or Board of Directors as appropriate.

12. POSSIBLE FINDINGS

The investigation may conclude that:

a) No Conflict Exists

No violation occurred.

b) Potential Conflict Exists

Disclosure and management actions are required.

c) Actual Conflict Exists

Corrective measures are required.

d) Serious Misconduct Exists

Disciplinary action is warranted.

13. CORRECTIVE ACTIONS

Depending on findings, GSM-CDA may:

- Require formal disclosure.

- Remove the individual from decision-making.
- Reassign duties or, terminate.
- Cancel affected transactions.
- Recover improperly obtained benefits.
- Issue warnings.
- Suspend personnel.
- Terminate employment or engagement.
- Refer the matter to legal authorities.

14. APPEALS PROCESS

An affected individual may submit a written appeal within fourteen (14) days of receiving the decision.

Appeals shall be reviewed by:

- The Board of Directors; or
- An independent review panel appointed by the Board.

The appeal decision shall be final.

15. RECORD RETENTION

All records relating to conflict-of-interest investigations shall be securely maintained for a minimum period of seven (7) years.

Records include:

- Complaints
- Investigation notes
- Evidence
- Reports
- Decisions
- Appeals

16. LESSONS LEARNED AND PREVENTION

Following each investigation, GSM-CDA shall review:

- Policy weaknesses
- Internal control gaps
- Training needs
- Governance improvements

Appropriate corrective measures shall be implemented to prevent recurrence.

17. APPROVAL

This Annex forms an integral part of the GSM-CDA Conflict of Interest Policy and shall be applied together with all provisions of the policy.

Approved by:

Chairperson of the Board:

Rev. Angelo World Tiger Panyuan.

Secretary General of the Board:

Mr. Franco Puok Ruach Lam

Date: GSM-CDA/BR/02/2026. Dated on 02/02/2026

Official Stamp:

This Annex F completes the Conflict-of-Interest Policy framework and significantly strengthens GSM-CDA's governance, accountability, donor compliance, and audit readiness without being informed to be audited by an external Auditor..