

# DECLARATION OF INTEREST FORM

**Amended on  
18 January  
2024**

## 1. INSTRUCTIONS

### **What is the purpose of this Form?**

A key element of protecting the Global Fund's integrity and reputation is ensuring that its decision-making processes are not affected by conflicts of interest. Conflicts are situations where a Global Fund official could be influenced to make decisions for improper reasons, specifically for reasons that relate to their own financial interests. It is the responsibility of all Global Fund officials and employees to disclose any personal financial interests that could relate to their work for the Global Fund, such that potential and actual conflicts can be appropriately addressed.

### **Who must complete this Form?**

As required by the Global Fund's Conflict of Interest Policy (the "COI Policy"), this Form must be completed by all Board Members and Alternates, delegation members at Board meetings, Committee Members, members of advisory groups (e.g., TRP, IEP) and non-administrative employees of the Secretariat (i.e., when onboarding and Staff at the level of Grade D and higher)

The COI Policy requires that when completing this Form, Global Fund officials must disclose both their own personal interests, those of their family members, and those of any organizations to which they have a professional relationship.

## **What is a “conflict of interest”?**

Generally, a conflict of interest is **a situation in which a Global Fund official has a competing professional or personal financial interest that could have a real or perceived effect on the official’s ability to fulfill his/her responsibilities with the best interests of the Global Fund in mind.** Conflicts can create the perception that a Global Fund official’s judgement is biased. As such, conflicts can compromise or undermine the trust that the public places in the Global Fund.

## **Who is a “family member” for purposes of this Form?**

When completing this Form, you are required to respond to the questions regarding you and your family members". For the purposes of this Form, "family members" include: (i) your spouse or domestic partner, (ii) your or your domestic partner's children or dependents; (iii) your parents, siblings, grandparents, grandchildren, or (iv) other familial relationships that could create an actual, potential or perceived conflict of interest.

## **What must I declare through this Form?**

This Declaration of Interest Form is designed to identify and address both actual and potential conflicts of interest and other ethics-related issues.

There are four questions in the Declaration of Interest Form. Guidance and examples for completing each question are provided below. These examples are not exhaustive; if you are unsure whether to disclose a particular situation in your Form, please err on the side of over-inclusiveness.

Through the Declaration of Interest Form, you must declare:

**(a) Any financial interest in the work of the Global Fund held by you or your family members.**

**Guidance and examples:** The term “financial interest” is broadly defined under the Global Fund’s COI Policy. For reference, the table below lists four key financial interests and provides examples of how these may appear in practice.

<b>Financial interest</b>	<b>Examples in practice: to be declared on this Form</b>
1. A direct financial or business relationship with an entity that receives Global Fund grant funds.	<p><i>A Global Fund Board Member is employed by a current or prospective Principal Recipient.</i></p> <p><i>A Global Fund Board Member is hired as a consultant to develop a funding proposal for a Global fund grant.</i></p> <p><i>The spouse of a Secretariat staff member is employed by a current or prospective Principal Recipient or Sub-recipient, or by a CCM.</i></p>
2. A professional of financial relationship with a contractor of goods or services to the Global Fund.	<p><i>A TRP member providing consulting services to a Local Fund Agent or CCM.</i></p> <p><i>A Secretariat staff member holds an ownership interest (e.g., shares of stock) in a company submitting a bid to supply goods or services to the Secretariat.</i></p> <p><i>The spouse of a Secretariat staff member is employed by a company submitting a bid to supply goods or services to the Secretariat.</i></p>
3. A professional relationship with a provider of goods or services to recipients of Global Fund grant funds.	<p><i>A Secretariat staff member is actively engaged in employment discussions with a manufacturer of health products (e.g., ARVs, bednets, or condoms) used in Global Fund programs.</i></p> <p><i>A Board Committee Member is employed by a manufacturer of health products used in Global Fund programs.</i></p>
4. A financial stake or controlling interest in any of the entities listed in (1)-(3) above.	<p><i>A Board Member or Secretariat staff member owning shares of stock in a manufacturer of health products used in Global Fund programs.</i></p> <p><i>A IEP member serving as a Board member of a company that supplies consulting services to a Principal Recipient or CCM.</i></p>

**(b) Any professional relationship you or your family members have with an organization that is or was subject to a diagnostic review, audit, investigation, or similar activity by the Global Fund’s Office of the Inspector General. Disclosure should also include any instances in which you or a family member has been personally subject to an audit, investigation, or similar activity by the Office of the Inspector General. Finally, disclosure should include investigations by any other authority against you, your family members, or an organization to which you have a professional relationship.**

**Guidance and examples:** Situations to be disclosed under this question include the following:

<b>Relationship or Activity</b>	<b>Examples in practice: to be declared on this Form</b>
1. A professional relationship you or your family members have with an organization that is or was subject to a diagnostic review, audit, investigation, or similar activity by the Office of the Inspector General.	<p><i>A Global Fund Board Member is employed by a Principal Recipient that was under investigation by the Office of the Inspector General.</i></p> <p><i>A TRP member providing consulting services to a CCM that is subject to an investigation by the Office of the Inspector General.</i></p>
2. You or a family member has been personally subject to an audit, investigation, or similar activity by the Office of the Inspector General.	<p><i>A Board Committee Member is subject to an investigation by the Office of the Inspector General.</i></p> <p><i>The spouse of a Secretariat employee was under investigation by the Office of the Inspector General.</i></p>
3. Investigations by any other authority against you, your family members, or an organization to which you have a professional relationship.	<p><i>A Global Fund Board Member is employed by an organization that is subject to an investigation by a government authority.</i></p> <p><i>A TRP member was the subject of an investigation by a government authority.</i></p> <p><i>A Board Committee Member is employed by an organization that is subject to an investigation by a donor to the organization.</i></p>

**(c) Any legal dispute you or any of your family members been involved in with the Global Fund or its grant recipients, now, or in the past, or any other legal dispute that could have a real or perceived effect on your Global Fund duties.**

**Guidance and examples:** Both current and concluded legal disputes should be disclosed when responding to this question, including, but not limited to, matters involving the Global Fund. Other examples of legal disputes that should be disclosed are claims for professional malpractice, and legal proceedings relating to fraud, theft, and other financial or professional illegality (e.g., money laundering).

**Note:** This question is intended to only address legal disputes that could have a real or perceived effect on your ability to work with the best interests of the Global Fund in mind. Therefore, any legal issues you may have experienced relating to your gender, sexual orientation, political beliefs, disease status, activities as a sex worker or drug user, or activities associated with advocacy for social, political or human rights issues do not need to be disclosed here. For the legal disputes disclosed here, you may provide any background you deem relevant, such as your view on the legitimacy of the claim (for example, its basis in fact; whether it was motivated on political grounds).

**(d) Anything else that could affect your objectivity or independence in the performance of your duties for the Global Fund, or the perception of that independence and objectivity by others.**

**Guidance and examples:** This question is intended to capture any other situation – or perceived situation – which could affect your work with the Global Fund, whether financial, professional, or personal in nature.

## **How do I complete this Form?**

Please answer the questions in the Form (at the end of this document) and sign electronically. Should you have any questions related to your disclosure, please contact the Global Fund's Ethics Office at [GlobalFundEthics@theglobalfund.org](mailto:GlobalFundEthics@theglobalfund.org).

## **When must I complete this Form?**

Proposed members of the Global Fund Board, any Board Committee, or any Advisory Group are requested to complete this form before their formal appointment.

Secretariat staff members are required to complete this form upon beginning work as a Global Fund employee.

As noted above, submitting and updating a Declaration of Interest Form is mandatory for all Board Members and Alternates, Committee Members, members of advisory groups (e.g., TRP, TERG) and non-administrative employees of the Secretariat. Non-administrative employees that have not submitted their completed Forms - or any required update - to the Global Fund's Ethics Officer as required may be subject to formal reprimand or other disciplinary measures. In the case of members of the Board, Board Committees and Advisory Groups, failure to submit and update completed Forms may result in non-appointment to the body in question.

## **When must I update my completed Form?**

Once you have submitted this Form for the first time, you are required to update it:

1. At the request of the Global Fund's Ethics Officer; and
2. If you have a change to your financial or professional situation that creates a 'financial interest' that must be disclosed. Examples of such a change include:
  - a. You begin new employment with a Principal Recipient, LFA, or other organization involved with Global Fund programs; or
  - b. Your current employer develops a financial relationship with the Global Fund, such as by becoming a grant recipient or a provider of goods or services to the Global Fund.

## **How will my Form be evaluated?**

If the Global Fund identifies an actual or potential conflict of interest based on your disclosure, the Global Fund's Ethics Officer will contact you to discuss the matter and identify potential ways for resolving the conflict. The issue may then be raised to the Ethics and Governance Committee for consideration and decision.

## **How will my Form be used?**

The Global Fund's Ethics Officer will maintain information disclosed on this Form in confidence, on behalf of the Global Fund's Ethics and Governance Committee, which will have the right to review the information. The Ethics and Governance Committee may share the information in your completed Form with the Board of the Global Fund and the Office of the Inspector General, when required, and with all appropriate confidentiality restrictions. The Ethics Office may also be required to share your disclosures with the External Auditors, which audits the Global Fund's compliance with the IFRS international accounting standard "IAS 24 - Related Party Assessment".

# DECLARATION OF INTEREST FORM

Please respond to the following four questions.

Please refer to the guidance and examples for each question contained in the Instructions to this Form when preparing your response.

If you require additional space to complete a response, please continue your response on a separate page and sign and date that page.

**1) Do you or any of your family members have any financial interest in the work of the Global Fund?**

***including professional relationships with the Global Fund, its recipients, suppliers, governance, review and advisory bodies***

**Yes**

**No**

If you have responded “yes”, please give details in the box below sufficient for the Global Fund to evaluate the situation, including, but not limited to, the following:

- If the financial interest relates to a role held at an organization, please list the name of the organization, the role held at the organization (such as employee, consultant, or Board member), the work performed in the role, and the dates during which the role was held.
- If the financial interest relates to an ownership interest, please describe the nature and amount of the interest owned, the duration for which the interest has been held, and any other relevant information.

2) Have you or a family member had a professional relationship with an organization subject to a diagnostic review, audit, investigation, or similar activity by the Global Fund's Office of the Inspector General, or been personally subject to an investigation by the Office of the Inspector General? Has there ever been an investigation by any other authority against you, your family members, or an organization to which you have a professional relationship?

Yes

No

If you have responded "yes", please describe relevant information in the box below, including, as applicable:

- The organization involved;
- The role and title held (such as employee, consultant, or Board member), whether the role was held by you or by a family member, and the dates when the role was held;
- The work performed, and whether the role involved working on, managing, or overseeing matters involving the Global Fund;
- The investigating authority (whether the Office of the Inspector General or another agency);
- The focus of the investigation or other action; and
- The outcome or resolution of the investigation or other action (such as findings of fraud or misuse of funds).

**3) Have you or any of your family members been involved in a legal dispute with the Global Fund or its grant recipients, or are you currently involved in any other legal dispute that could have a real or perceived effect on your Global Fund duties?**

**Yes**

**No**

If you have responded “yes”, please give details in the box below on the nature of the dispute, the parties involved, and, as applicable, the status of the dispute or how and when the dispute was resolved.

**Note:** This question is intended to only address legal disputes that could have a real or perceived effect on your ability to work with the best interests of the Global Fund in mind. Therefore, any legal issues you may have experienced relating to your gender, sexual orientation, political beliefs, disease status, activities as a sex worker or drug user, or activities associated with advocacy for social, political or human rights issues do not need to be disclosed here. For the legal disputes disclosed here, you may provide any background you deem relevant, such as your view on the legitimacy of the claim (for example, its basis in fact; whether it was motivated on political grounds).

4) Is there anything else not captured in the questions above that could affect your objectivity or independence in the performance of your duties for Global Fund, or in your opinion, the perception by others of your objectivity and independence?

Yes

No

If you have responded “yes”, please give details in the box below sufficient for the Global Fund to evaluate the situation.

I confirm that I have read, understood and will comply with the Global Fund Policy on Conflicts of Interest <sup>1</sup>. I declare that the information which I disclose in this Declaration of Interest Form is correct and complete. I undertake to update the information in this Declaration of Interest Form in the event of any material change in these circumstances and, in any event, at least annually.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name (please print)

\_\_\_\_\_  
Title (please print)

<sup>1</sup> See [https://www.theglobalfund.org/media/6016/core\\_ethicsandconflictinterest\\_policy\\_en.pdf](https://www.theglobalfund.org/media/6016/core_ethicsandconflictinterest_policy_en.pdf)