

Acento, Acción Local, A.C. Conflict of Interest Policy

I. General

1. Coverage

This policy applies to the members of the governing bodies and operational team of Acento, Acción Local, A.C., as well as related persons, in order to prevent their personal and/or professional interests from interfering with their ability to perform their work, and to ensure that no personal, professional or political benefits exist that may be detrimental to the organization.

2. Definition

A conflict of interest occurs when the judgement or performance of the members of the governing bodies or operational team of Acento, Acción Local, A.C. ceases to be objective and impartial, and the fulfillment of their obligations in the organization is affected. In order to further their personal, professional, familial or business interests, they take decisions or actions for their own benefit, or that of a third party, resulting in a conflict with the responsibilities of the position held at the organization.

It is also considered a conflict of interest when a person related to someone who either currently holds a role at Acento, or has done so previously, either provides classified information obtained through their work to a third party, without proper authorization, or uses it for their own benefit.

No person related to Acento, Acción Local, A.C. may accept gifts, special treatment, loans or anything of value from any organization or individual that may be understood or perceived as a gift motivated by the desire to exert some form of influence

II. Management of Possible Conflicts of Interest

Conflicts of interest are not necessarily illegal, but they must be immediately and expressly disclosed in order to be dealt with transparently, and ensure that they do not result in an administrative conflict within the organization. To this effect, Acento promotes the prevention of conflicts of interests and swift implementation of necessary measures in the event of a likely conflict.

Acento will analyze and resolve conflicts of interest depending on the area of the organization affected and its level of importance.

1. Operational Team

Whenever a person from Acento's operational team believes that they may be facing a conflict of interest, they must inform either their direct superior or the organization's Executive Management in writing.

The situation will be evaluated, and a decision will be made as to whether a real conflict of interest exists, and therefore if it is necessary for the individual to terminate the situation evaluated, or waive the right to participate in the process of decision-making in relation to the issue under consideration.

Minutes shall be taken, detailing the situation, along with any decisions made and by whom. The minutes must be securely store by Administrative Management.

In the event that the decision taken is not complied with, or a conflict of interest is known that is not reported by the member of the team affected, the situation shall be reviewed, and a decision shall be made that, depending on the severity, could result in the termination of the individual in question's employment at Acento.

2. Executive Direction

When the Executive Director believes that she/he may be facing a conflict of interest, she/he must inform the chair of the organization's Assembly of Associates in writing.

The chair of the Assembly will evaluate the situation and decide whether it can be resolved internally, or if an *ad hoc* committee should be created.

In either of these cases, the process shall be documented, detailing the situation, along with any decisions made and details of all persons involved in decision-making. The minutes must be securely stored together with the acts of Assembly.

In the event that the decision taken is not complied with, or a conflict of interest is known that is not reported by the member of the team affected, the situation shall be reviewed, and a decision shall be made that, depending on the severity, could result in the termination of the individual in question's employment at Acento.

3. Assembly

Whenever a member of the Assembly of Associates believes that that they may be facing a conflict of interest, they must inform the chair of the Assembly of Associates of the organization in writing.

In the event that the chair of the Assembly is involved in the potential conflict, they must inform the plenary of the Assembly, who will decide how to handle the issue, potentially through the formation of an *ad hoc* committee.

Either the chair of the Assembly or the *ad hoc* committee will analyze the situation under consideration, and will make a decision, if it is necessary for the individual to terminate the

situation evaluated or waive the right to participate in the process of decision-making in relation to the issue under consideration.

In either of these cases, the process shall be documented, detailing the situation, along with any decisions made and details of all person involved in decision-making. The minutes must be securely stored together with the acts of Assembly.

In the event that the decision taken is not complied with, or a conflict of interest is known that is not reported by the member of the team affected, the situation shall be reviewed, and a decision shall be made that, depending on the severity, could result in the termination of the individual in question's employment at Acento.