THE WORLD
ORGANIZATION OF
WOMEN NATIONS
WOMAFREESM INC.

US 501(c)(3) Public Charity | EIN: 98-1867647
Florida Not For Profit Corporation
FL Doc. No.: N25000005813

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St. Petersburg, FL 33702, USA

CONFLICT OF INTEREST & ETHICAL INDEPENDENCE STATEMENT

The World Organization of Women Nations Womafreesm Inc.

Governance
Effective Date: May 28, 2026

The World Organization of Women Nations Womafreesm Inc. ("Womafreesm," "we," "our," or "the Organization") is committed to the highest standards of integrity, transparency, accountability, and ethical independence.

This Statement explains how Womafreesm identifies, discloses, reviews, and manages actual, potential, or perceived conflicts of interest in order to protect the Organization's charitable mission, donors, beneficiaries, partners, members, volunteers, and the public trust.

This public Statement summarizes our approach and does not replace the Organization's internal Conflict of Interest Policy adopted by the Board of Directors.

1. Purpose

The purpose of this Statement is to ensure that Womafreesm's decisions are made in the best interests of the Organization and its charitable mission, and not for the private benefit of any director, officer, employee, contractor, volunteer, donor, partner, advisor, representative, ambassador, vendor, related party, or any other individual or organization.

Womafreesm does not allow personal, financial, professional, political, family, donor, partner, or institutional interests to improperly influence its governance, programs, research, fundraising, procurement, partnerships, public statements, legal response activities, or allocation of resources.

2. Scope

This Statement applies, as relevant to their role, to:

- members of the Board of Directors;
- officers and senior leadership;
- employees and contractors;
- committee members and advisors;
- consultants and vendors;
- volunteers and project leads;
- ambassadors, representatives, speakers, and public-facing contributors;
- grant reviewers, research contributors, and partner organizations;
- any person or entity acting on behalf of Womafreesm.

3. What We Consider a Conflict of Interest

A conflict of interest may be actual, potential, or perceived.

A conflict may exist when a person connected to Womafreesm has a personal, financial, professional, family, political, organizational, or other interest that could influence, or appear to influence, their judgment, decision-making, access to resources, public role, or actions on behalf of Womafreesm.

Examples include, but are not limited to:

- a financial interest in a vendor, contractor, partner, grantee, service provider, or organization seeking to work with Womafreesm;
- a compensation arrangement or proposed compensation arrangement involving Womafreesm;
- a family, romantic, business, employment, investment, or close personal relationship with a person or entity involved in a decision;
- gifts, favors, hospitality, travel, discounts, or other benefits that are more than nominal and could influence judgment;
- using Womafreesm's name, data, contacts, programs, platform, reputation, donor relationships, or opportunities for private gain;
- influencing procurement, hiring, partnership, grant, research, or case decisions for personal or third-party benefit;
- a donor, sponsor, funder, or partner seeking to influence Womafreesm's methodology, findings, publications, public statements, legal case priorities, governance, appointments, or operational decisions;
- a public representative or ambassador having undisclosed affiliations that may create reputational, political, sanctions, financial crime, or ethical risk;
- any situation that could reasonably cause a donor, bank, regulator, partner, beneficiary, or member of the public to question Womafreesm's independence.

4. Core Principles

Womafreesm follows these principles:

- **Mission first.** Decisions must serve Womafreesm's charitable purposes and public benefit.
- **No private inurement or improper private benefit.** Womafreesm's assets, funds, opportunities, data, reputation, or programs may not be used to enrich or improperly benefit private individuals or entities.
- **Disclosure before decision.** Any person with an actual, potential, or perceived conflict must disclose it before participating in a related discussion, decision, recommendation, vote, procurement process, grant process, research process, partnership review, or public action.
- **Recusal.** A person with a conflict may be required to leave the discussion, abstain from voting, and take no part in the decision-making process unless specifically invited to provide factual information.
- **Independent review.** Conflicted matters are reviewed by disinterested decision-makers whenever possible.

- **Fairness and reasonableness.** Transactions, compensation, procurement, partnerships, and arrangements must be fair, reasonable, documented, mission-aligned, and in the best interests of Womafreesm.
- **Documentation.** Conflicts, disclosures, recusals, decisions, and the basis for decisions are documented internally.
- **Transparency with safeguards.** Womafreesm is committed to public transparency while protecting confidential, personal, legal, security-sensitive, and case-related information.

5. Donor, Sponsor, Funder, and Partner Independence

Womafreesm welcomes donations, grants, sponsorships, memberships, in-kind support, and partnerships that are lawful, ethical, mission-aligned, and compatible with our independence.

No donation, grant, sponsorship, membership fee, pledge, partnership, in-kind support, or financial contribution gives the provider:

- ownership of Womafreesm's mission or public position;
- special voting power;
- control over research methodology, analysis, conclusions, publications, or data interpretation;
- control over Legal Rapid Response case selection, escalation, or legal strategy;
- control over appointments, staffing, procurement, or internal governance;
- the right to speak on behalf of Womafreesm without authorization;
- the right to use Womafreesm's name, logo, data, beneficiaries, or community without written permission;
- preferential treatment inconsistent with Womafreesm's policies and charitable purposes.

Restricted funding may be accepted only when the restriction is lawful, documented, mission-aligned, does not create improper private benefit, and does not compromise Womafreesm's independence.

Womafreesm reserves the right to decline, return, suspend, or terminate any funding, pledge, sponsorship, partnership, or relationship that creates unacceptable conflict-of-interest, reputational, legal, sanctions, financial crime, political, safety, or mission-drift risk.

6. Banks, Payment Providers, and Financial Integrity

To protect the integrity of the Organization and the financial system, Womafreesm may conduct due diligence before accepting or continuing certain donations, grants, sponsorships, partnerships, payments, or financial relationships.

Depending on the risk level, this may include:

- identity verification;
- organization and beneficial ownership checks;
- sanctions screening, including relevant U.S., UK, EU, and international sanctions lists where applicable;
- politically exposed person and adverse media review where appropriate;
- review of source-of-funds or source-of-wealth concerns where appropriate;

- review of whether the proposed transaction or relationship creates a conflict of interest or improper influence risk.

Womafreesm does not knowingly accept funds or support connected to fraud, corruption, sanctions evasion, money laundering, terrorist financing, human rights abuse, exploitation, or activity inconsistent with our charitable purposes.

7. Procurement, Vendors, and Related-Party Transactions

Womafreesm seeks to purchase goods and services on a fair, transparent, reasonable, and mission-aligned basis.

When a director, officer, employee, contractor, volunteer, advisor, donor, partner, family member, or related party may benefit from a transaction, the relationship must be disclosed and reviewed before the transaction is approved.

Where appropriate, Womafreesm may seek alternative quotes, compare market terms, document the basis for selection, require recusal, or decline the transaction.

Related-party transactions may proceed only when they are lawful, fully disclosed, fair and reasonable, in the Organization's best interests, and approved by disinterested decision-makers.

8. Compensation and Benefits

Individuals who receive or may receive compensation from Womafreesm may not vote on, approve, or improperly influence decisions regarding their own compensation, benefits, contract terms, reimbursement, or paid role.

Compensation and benefits must be reasonable, documented, and consistent with applicable law, available resources, role requirements, and the Organization's charitable purposes.

9. Research, Data, Publications, and Legal Response Independence

Womafreesm's research, data collection, analysis, publications, policy recommendations, case intake, Legal Rapid Response activities, and public statements must remain independent, evidence-based, ethical, and mission-aligned.

Donors, sponsors, partners, members, advisors, public figures, corporations, institutions, or government actors may not purchase, direct, suppress, or alter Womafreesm's findings, methodology, conclusions, case decisions, or public-interest positions.

Where a funder, partner, advisor, researcher, or contributor has a relevant interest that could affect research, publications, legal response, or public advocacy, that interest must be disclosed and managed.

10. Gifts, Favors, Hospitality, and Personal Benefits

People acting for or on behalf of Womafreesm must not solicit or accept gifts, favors, hospitality, travel, personal discounts, payments, opportunities, or other benefits that could influence, or appear to influence, their judgment or role.

Nominal items may be accepted only where lawful, reasonable, transparent, culturally appropriate, and not intended to influence a decision.

Any gift, benefit, or hospitality that may create a conflict or appearance of conflict must be disclosed.

11. Public Roles, Ambassadors, Representatives, and Use of Name

No person may present themselves as speaking or acting on behalf of Womafreesm unless they have been specifically authorized to do so.

Public-facing representatives, ambassadors, speakers, partners, and campaign participants may be subject to additional review, including conflict-of-interest, reputational, sanctions, fraud, public hate, and safety checks where appropriate.

Womafreesm may withdraw authorization, remove public references, or end a relationship where a conflict, misconduct, reputational risk, misrepresentation, or breach of policy is identified.

12. Confidentiality and Privacy

Conflict-of-interest disclosures may contain sensitive personal, financial, family, legal, security, or case-related information.

Womafreesm handles such information confidentially and limits access to those who need it for governance, compliance, legal, risk management, or decision-making purposes.

Public transparency will be balanced with legal obligations, privacy rights, beneficiary safety, case confidentiality, and organizational security.

13. Reporting Concerns

Anyone who becomes aware of an actual, potential, or perceived conflict of interest involving Womafreesm is encouraged to report it promptly.

Reports may be submitted to:

Compliance Contact: info@womafreesm.com

Board Contact: marina@womafreesm.com

Womafreesm reviews conflict-of-interest concerns in good faith and may take appropriate corrective action, including disclosure management, recusal, independent review, contract termination, removal from a role, withdrawal of public authorization, or other steps required to protect the Organization and its mission.

Womafreesm does not tolerate retaliation against anyone who raises a good-faith concern.

14. Annual Review and Ongoing Disclosure

Directors, officers, and other covered individuals may be required to complete conflict-of-interest disclosures at onboarding, annually, and whenever relevant circumstances change.

Womafreesm periodically reviews its conflict-of-interest practices to ensure that they remain effective, lawful, and aligned with the expectations of donors, banks, payment providers, regulators, foundations, partners, and the communities we serve.

15. Relationship to Other Policies

This Statement should be read together with Womafreesm's internal governance documents and applicable policies, including where relevant:

- Conflict of Interest Policy;
- Code of Conduct;
- Anti-Money Laundering and Sanctions Commitment;
- Data Protection Statement;
- Whistleblower Statement;
- Financial Transparency and Reporting commitments;
- Research Ethics and Human Subjects Protection Policy;
- Partnership, procurement, donor, and public representation procedures.

If there is any inconsistency between this public Statement and a more detailed internal policy, the internal policy and applicable law will govern.