



KURDISTAN FILM FUND

Conflict of Interest Policy

Conflict-of-Interest Policy

1. Purpose

The Kurdistan Film Fund (KFF) is committed to ensuring that all applications, evaluations, funding decisions, and grant-management processes are conducted with **fairness, independence, impartiality, transparency, and professional integrity.**

This Conflict-of-Interest Policy establishes the principles and procedures for identifying, declaring, managing, and documenting actual, potential, or perceived conflicts of interest involving the Fund.

This Policy is not only to prevent improper influence but also to protect applicants, Jury members, staff, experts, and the reputation and credibility of the Kurdistan Film Fund.

2. Scope

This Policy applies to:

- KFF staff and management;
- Program Lead and Fund management personnel;
- Members of the Jury;
- Kurdish cultural experts and eligibility assessors;
- External readers, advisers, consultants, and evaluators;
- Financial, legal, or technical experts involved in the Fund;
- Members of governing or supervisory bodies involved in Fund decisions;
- Applicants, directors, producers, co-producers, and their representatives.

All persons involved in KFF processes are responsible for identifying and declaring conflicts as soon as they become aware of them.

3. What Is a Conflict of Interest?

A conflict of interest exists where a person's personal, professional, financial, family, institutional, or other interests could affect—or could reasonably be perceived as affecting—their independence or impartiality in relation to a KFF application or decision.

KFF recognizes three forms of conflict:

3.1 Actual Conflict

An actual conflict of interest exists where a person's current interests or relationships directly interfere with their ability to act impartially.

3.2 Potential Conflict

A potential conflict of interest exists where circumstances could develop into an actual conflict.

3.3 Perceived Conflict

A perceived conflict of interest exists where a reasonable person could believe that an individual's independence or impartiality may be compromised, even where no actual improper influence exists.

Perception matters. Protecting confidence in the fairness of KFF's decision-making process is essential to the Fund's integrity.

4. Situations That May Constitute a Conflict of Interest

A conflict may arise where a staff member, Jury member, expert, consultant, or decision-maker:

Financial Interest

- Has a financial interest in an applicant, project, production company, or partner;

- May financially benefit from the project’s selection or rejection;
- Is negotiating or expecting future paid work with an applicant or project.

Professional Relationship

- Is currently working on the project;
- Has previously worked substantially on the project;
- Has served as a consultant, script adviser, producer, co-producer, distributor, sales agent, or other professional collaborator on the project;
- Is currently employed by or professionally associated with the applicant or production company;
- Has an ongoing business relationship with the applicant.

Family or Personal Relationship

- Is an immediate or close family member of the applicant, director, producer, co-producer, or key project member;
- Has a close personal relationship that could reasonably affect impartiality;
- Has a significant personal dispute or adversarial relationship with an applicant.

Institutional Relationship

- Represents an organization that is directly involved in the project;
- Works for an organization financing, producing, distributing, or otherwise materially supporting the project;

- Holds a decision-making position in an institution with a direct interest in the application’s outcome.

Previous Involvement

Previous professional contact with an applicant does not automatically constitute a conflict.

For example, having:

- Met an applicant at a festival;
- Served on a previous Jury with them;
- Participated in the same professional event;
- Attended a workshop involving them;
- Had ordinary professional contact;

does not necessarily require recusal.

The nature, proximity, duration, financial relevance, and potential influence of the relationship must be considered.

5. Applicant Conflicts of Interest

Applicants must disclose any actual, potential, or perceived conflict of interest involving:

- A KFF staff member;
- Jury member;
- Cultural expert;
- Consultant;
- Fund manager;
- Governing-body member;
- Other individuals directly involved in the assessment or decision-making process.

Applicants must not attempt to conceal such relationships.

The existence of a disclosed relationship does not automatically make a project ineligible. KFF will assess whether the conflict can be appropriately managed.

6. Mandatory Declaration

All Jury members, staff, experts, and other persons participating in application assessment or decision-making must complete a Conflict-of-Interest Declaration.

Declarations should be completed:

Before access to applications is granted and updated whenever a new conflict becomes known.

Individuals must not wait until Jury deliberations to disclose a known conflict.

7. Project-by-Project Conflict Check

Once the list of eligible projects has been finalized, Jury members and relevant experts should receive the list of:

- Project titles;
- Directors;
- Producers;
- Production companies;
- Co-producers, where applicable.

They must review the list and declare any possible conflict before evaluating the affected application.

Where necessary, KFF may request further information to determine the appropriate action.

8. Management of a Conflict

Disclosure does not automatically require exclusion.

Depending on the nature and seriousness of the conflict, KFF may

determine that:

Level 1 — Disclosure Only

The relationship is recorded but does not reasonably affect impartiality.

The person may continue participating.

Level 2 — Restricted Participation

The person may participate generally but must not:

- Score the affected application;
- Comment on it;
- Access certain confidential materials;
- Participate in specific discussions.

Level 3 — Recusal

The person must:

- Not evaluate the application;
- Not score it;
- Leave the meeting during its discussion;
- Not participate in deliberation;
- Not participate in determining its grant amount;
- Not attempt to influence other Jury members.

Level 4 — Removal

Where the conflict is sufficiently serious or affects a significant part of the process, the individual may be removed from the Jury, evaluation process, or relevant Fund function and replaced where necessary.

9. Recusal Procedure

Where recusal is required:

- The conflict is formally recorded.

- The affected person receives no further evaluation responsibilities for the project.
- The person does not score the application.
- During Jury deliberations, the person leaves the discussion.
- The minutes record the recusal.
- The person returns only after the discussion and decision on that project have concluded.

The individual must not subsequently attempt to influence the decision.

10. Jury Member Responsibilities

Jury members must:

- Evaluate projects independently and impartially;
- Declare conflicts promptly;
- Respect confidentiality;
- Base decisions solely on the approved KFF evaluation criteria;
- Avoid preferential treatment;
- Avoid external influence;
- Refuse attempts by applicants or third parties to lobby them.

A Jury member must immediately report any attempt to improperly influence their evaluation to KFF.

11. KFF Staff Responsibilities

KFF staff must not use their position to:

- Promote or disadvantage an application;
- Influence Jury members regarding a preferred outcome;
- Give privileged information to an applicant;
- Provide artistic assistance to selected applicants during an active call;
- Modify eligibility requirements for a particular applicant;

- Accept unofficial documents or exceptions outside established procedures;
- Reveal confidential information about competing projects;
- Interfere with Jury scoring or deliberations.

Where a staff member has a conflict involving an application, that staff member should not manage the relevant eligibility assessment or decision.

The application should be reassigned to another authorized team member.

12. Gifts, Hospitality and Benefits

Persons involved in KFF evaluation and decision-making must not solicit or accept gifts, payments, commissions, favours, services, hospitality, or other benefits that could influence, or reasonably appear to influence, their independence.

Normal incidental hospitality at public professional events may be acceptable where it is modest, unrelated to an active application, and cannot reasonably be interpreted as an attempt to influence a decision.

When in doubt, the benefit should be declined and disclosed.

13. Contact Between Applicants and Jury Members

Applicants and their representatives must not contact Jury members concerning an active KFF application.

They must not:

- Lobby Jury members;
- Request support;
- Discuss their application;
- Send additional materials;
- Ask about scores;
- Ask about other applicants;
- Seek confidential information;
- Ask third parties to influence Jury members on their behalf.

All application-related communication must take place through the official KFF

channels.

Incidental social or professional contact is not prohibited, but the application must not be discussed.

14. External Pressure and Influence

No individual or institution—including public authorities, partners, sponsors, industry professionals, cultural organizations, or other third parties—may improperly influence the artistic evaluation or selection of KFF-supported projects.

If a KFF staff member, Jury member, or expert receives such a request, they should report it to the Programme Lead or designated authority and document it.

Funding decisions must follow the Fund’s approved procedures and evaluation criteria.

15. Confidentiality of Conflict Declarations

Conflict-of-interest declarations shall be treated as confidential internal records.

Information should be shared only with persons responsible for determining and managing the conflict.

A conflict declaration should not be disclosed to applicants or third parties unless required by law or formally authorized by KFF.

16. Failure to Declare a Conflict

Failure to disclose a known conflict may constitute a serious breach of KFF procedures.

Depending on the circumstances, consequences may include:

- Formal warning;
- Removal from evaluation of the affected project;
- Removal from the Jury or Fund process;
- Termination of consultancy or professional engagement;

17. Conflict of Interest Register

KFF should maintain a confidential Conflict of Interest Register recording:

- Name of person declaring the conflict;
- Role;
- Project concerned;
- Nature of the conflict;
- Date declared;
- Assessment;
- Decision taken;
- Recusal or mitigation measures;
- Person authorizing the decision;
- Date the matter was closed.

This register forms part of the Fund’s institutional audit trail.

18. Who Decides Whether a Conflict Exists?

Potential conflicts should be referred to the Program Lead or designated KFF authority for assessment.

Where the Programme Lead has a potential conflict, the matter must be referred to another authorized senior decision-maker.

No individual should make the final determination concerning their own conflict of interest.



19. Principle of Disclosure

KFF adopts the following principle:
When in doubt, disclose.
Declaring a possible conflict does not imply misconduct.

Disclosure protects the individual, the applicant, the Jury, and the Kurdistan Film Fund.
The objective of this Policy is not to eliminate normal professional relationships within the film industry, but to ensure that such relationships never compromise—or appear to compromise—the independence, fairness, and credibility of KFF’s decisions.

20. Acceptance

All persons subject to this Policy may be required to confirm that they:

- Have read and understood the Conflict-of-Interest Policy;
- Agree to comply with its requirements;
- Have disclosed all known conflicts;
- Will immediately disclose any conflict that arises subsequently.

Name:

Position / Role:

Signature:

Date:

Thank You!

Address

Hera Business Center Midya Street, Floor 3,
Office 30-31 As Sulaymaniyah, 46001 Iraq

Call Us

+964 (772) 139 2923

Email

info.fund@creativekurdistan.krd

