



**UNNATI**  
**Organisation for Development Education**

## **Conflict of Interest Policy<sup>1</sup>**

The policy guides UNNATI to avoid any conflict or appearance of a conflict between interests of individuals and organisational interests. It lays the principles for undertaking business transactions without any personal conflicts.

### **1. Purpose**

- 1.1 This policy is designed to provide guidance to conduct the activities of the organisation with professionalism, integrity, honesty, moral and ethical standards.
- 1.2 The Conflict-of-Interest policy is intended to ensure that all associates avoid obligations to or relationships with any person or conducting the business with UNNATI.
- 1.3 The policy guides us to avoid any conflict or appearance of a conflict between our personal interests and our organisational interests. It lays the principles for undertaking transactions with undivided loyalty and without any personal conflicts.

### **2. Applicability**

This policy applies to all Associates - on-roll employees, Chief Executive (Director), Executive Committee Members (Board Members), contractors, suppliers, consultants and trainees.

### **3. Policy Framework**

Conflicts of Interest may arise where an Associate places his or her personal interests before the interests of UNNATI. Such personal interests may exist or appear to exist due to a relationship with an individual(s) or entity(s) which can influence or appear to influence the objectivity or efficiency while undertaking assigned responsibilities. The broad areas can be:

- 3.1 The employees, Chief Executive and the Board Members shall not engage (in any form of paid/unpaid, verbal/contractual, relationship, directly or indirectly) in any personal capacity with any of the associates where UNNATI has on-going relationship/ business transactions that compromises the interest of UNNATI.
- 3.2 Employees including the Chief Executive and/or their close relatives holding an office, financial and commercial interest in another entity shall not pursue any association, program or financial on behalf of the organisation.
- 3.3 Employees and the Chief Executive shall not work as consultants/advisors in any form to any government/regulatory body/industry association, which can adversely impact the organisation.
- 3.4 Acceptance of personal gifts, illegal payments, remuneration, donations, or comparable benefits from competitors that may influence the judgement for the organisation. (This does not include token appreciation in the form of a pen, shawl, books, etc. offered by other entities in public.)
- 3.5 There shall not be any overt/ covert pressure to shortlist and select candidates for career opportunity, trainee, consultant and/ or supplier in UNNATI who may be a relative or a friend.

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<sup>1</sup> This policy was approved by the Executive Council in its meeting held on 27<sup>th</sup> September 2021 and is operational from 1<sup>st</sup> October 2021.

- 3.6 Employees and the Chief Executive shall not enter into any business transactions with parties related to their own or family members which appear to be detrimental to the interests of UNNATI.
- 3.7 In case a relative<sup>2</sup> is working the organisation or selected for appointment the person already working in the organisation shall bring to the notice of the Chief Executive. Both shall not be involved in the decisions related to work location, appraisal, compensation, hiring, retention, transfer, leave requests, etc.
- 3.8 UNNATI staff cannot accept any employment or work - remunerative or otherwise, outside the organisation which may interfere, restrict or impair the ability to undertake the assigned roles and responsibilities of the Organisation.
- 3.9 Academic speaking engagements for limited hours, on a non-remunerative basis, (not part of organisational contract) may be accepted if they do not adversely affect the work one is involved in UNNATI. However prior intimation and approval of such engagements should be sought from not less than the position of Chief of Program Operations or Chief Executive and higher ups.
- 3.10 For engagement in any services or roles irrespective of whether they are remunerative or non-remunerative including association with CSOs, Networks, CSRs and government organisations or any form of participation, consultancy or support must be informed to the higher ups.

#### **4. Reporting and Complaint Procedure**

- 4.1 The organisation is aware that certain conflicting interests cannot be avoided or are impractical to avoid, such as closely related person employed, works as a trainee, hired as a consultant, customer/vendor.
- 4.2 All associates are expected to report genuine concerns pertaining to unethical behaviour, actual or suspected fraud or violation of Conflict-of-Interest Compliance Principles without fear of reprisal.
- 4.3 A potential or actual conflict of interest must be promptly declared to the Chief of Program Operations, Chief Executive and higher ups using the mechanism provided (Refer Annexure A). Associates must disclose any potential or existing conflict of interest during their employment and or association with the organisation.
- 4.4 Any of the organisation related tasks must be avoided with the conflicted party in the interim. If a task has to be performed involving a conflicting party, it must be notified, approved and disclosed.

#### **5. Breach of Policy**

Any breach of the Policy including failure to report potential violations of compliance may result in disciplinary measures as specified in the Staff Service Rules.

#### **6. Exceptions to the Policy**

Any exception to the principles mentioned in this policy must be pre-approved by Chief Executive and in case of Chief Executive, it has to be pre-approved by the Executive Committee.

#### **7. Governance**

The Chief Executive of UNNATI with the approval of the Executive Committee is authorised to change the policy after reviewed. The Chief Executive shall periodically monitor the effectiveness of the compliances of the policy.

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<sup>2</sup> The organisation defines a 'Relative' or a 'Closely related person' as someone related closely by blood or marriage, or whose relationship with the associate is similar to that of persons who are related by blood or marriage, (such as spouse, son, daughter, mother, father, brother, sister, grandparents or grand-children, step-parent or step-children, step-sister, step-brother, in-laws, aunt, uncle, nephew, niece, first cousin, domestic partner), or any other relationship that would present a conflict of interest as determined by the organisation.

**Annexure - A**

**Declaration of Conflict of Interest**

I understand that it is my obligation to make this declaration of all conflicts and potential conflicts of interests to the organisation. I would like to declare an existing or potential conflict of interest situation arising from the discharge of my duties concerning the operation of UNNATI. The details are as follows

**Name of party/ individual with whom I may have a direct or indirect potential relationship:**

**Details of my relationship with the party:**

(This may include details of any relationship as per the Policy on Conflict of Interest such as family relationship such a brother, sister etc., including a family member employed in the entity, or a commercial interest such as loans or shareholding or contractual relationship such as employment, etc.)

**Type of Conflict (select which apply):**

- 1. Relationship with person/entity outside UNNATI
- 2. Relationship with a UNNATI Associate
- 3. Relationship with an individual employed
- 4. Employment outside UNNATI

**Relationship of the conflicted party with UNNATI:**

(This may include relationships such as vendor, customer, contractor, consultant, etc. In case of an on-roll associate within UNNATI please provide their designation, function and location)

**Any other details:**

By signing this declaration, I acknowledge that the information provide by me is true to the best of my knowledge.

Name: \_\_\_\_\_ Designation: \_\_\_\_\_ Location \_\_\_\_\_

Signature: \_\_\_\_\_ Place: \_\_\_\_\_ Date: \_\_\_\_\_