

CONFLICT OF INTEREST POLICY

Saath Gramin Trust is committed to maintaining the highest standards of integrity, transparency, and accountability in all its operations. This Conflict-of-Interest Policy outlines the principles and procedures for identifying, disclosing, and managing situations that may present actual or perceived conflicts of interest, thereby safeguarding the credibility and ethical foundation of the organization.

1. Definition of Conflict of Interest

A conflict of interest arises when a person's private interests (financial, personal, professional, or otherwise) have the potential to interfere with their responsibilities to Saath Gramin Trust. Such conflicts may:

- Compromise, or appear to compromise, the individual's objectivity
- Result in personal gain at the expense of the organization
- Lead to decisions that are not in the best interest of the Trust or its stakeholders

2. Principles and Objectives

Saath Gramin Trust seeks to:

- Promote transparency and ethical behavior across all levels
- Prevent any personal gain from professional decisions
- Ensure full disclosure of potential and actual conflicts
- Foster a culture of accountability and impartiality

Conflicts of interest must be disclosed in writing and addressed before any related decision or transaction is finalized.

3. Scope and Applicability

This policy applies to:

- All Board Members and Trustees
- Full-time, part-time, and contractual employees
- Consultants, interns, and volunteers
- Members involved in purchasing, approvals, grants, or funding decisions

Any individual who has access to confidential information or can influence organizational decisions is subject to this policy.

4. Common Areas of Conflict

Conflicts of interest may arise in dealings with:

- Vendors and service providers
- Funding agencies and donors
- Government departments, regulators, or affiliated institutions

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- Family members or relatives associated with competing or collaborating organizations
- Secondary employment or consultancy engagements

5. Disclosure Process

All individuals must disclose potential or actual conflicts:

- During onboarding or induction
- When circumstances change (e.g., personal or professional relationships evolve)
- During Board or staff meetings, when agenda items present a conflict

Disclosures must be documented using the prescribed Conflict of Interest Disclosure Form and submitted to the Director or designated Compliance Officer.

6. Management of Conflicts

Upon disclosure, the Trust may take one or more of the following actions:

- Require the individual to abstain from decision-making processes
- Reassign the matter to another person without conflict
- Terminate relationships that present unavoidable and unmanageable conflicts
- Record the decision in official meeting minutes or compliance records

7. Prohibited Conduct

Individuals covered by this policy must not:

- Use their position for personal advantage
- Influence or participate in decisions where they have a vested interest
- Withhold relevant information that could influence ethical decision-making
- Accept benefits or kickbacks from vendors, donors, or partners

8. Monitoring and Enforcement

Violations of this policy may lead to disciplinary actions, including termination of service, dismissal from the Board, or legal action depending on the severity of the breach.

Saath Gramin Trust is committed to upholding transparency, ethical governance, and the trust placed in it by communities, donors, and partners. Adherence to this policy ensures the integrity and credibility of the organization's mission and work.

This policy was approved by the Board in October 2024

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