

## **CONFLICT OF INTEREST POLICY**

### **Women Development Trust (WDT)**

1. **Purpose:** The purpose of this policy is to ensure transparency and fairness in Women Development Trust's (WDT) decision making process; and to protect WDT's reputation, integrity and its interests; and to ensure broad public trust and confidence in WDT's Management and programme implementation.
2. This policy applies to all the Trustees, Director Cadre and Manager Cadre of Women Development Trust.
3. **"Conflict of Interest"** arises in situations where a Trustee's/Director's/Manager's:
  - A) Personal interests, or
  - B) Those of a family member, friend, business associate, corporation or partnership in which significant interest is held by the Trustee/Director, or
  - C) A person to whom an obligation is owed by the Trustee/Director; could influence the Trustee's/Director's/Manager's decisions and impair ability to:
    - I. Act in WDT's best interests, or ;
    - II. Represent WDT fairly, impartially and without bias.
4. It is important to note that a "conflict of interest" exists if the decision could be, or could appear to be influenced - it is not necessary that an actual influence takes place.
5. Unless authorized to do so by the Board of Trustees, or by a person the Board designates, Trustees/ Directors/Managers shall not:
  - A) Act on behalf of WDT, or deal with WDT, in any matter where there exists a conflict of interest or an **appearance of a conflict of interest**; nor
  - B) Use position, office or affiliation with WDT to pursue or advance personal interests or those of a person described in paragraph 1(b).
6. The **"appearance of a conflict of interest"** occurs when a competent person could have a reasonable perception that decisions made on behalf of WDT by a Trustee/ Director/Manager promotes personal interests or those of a person described in paragraph 1(b).
7. Trustees/ Directors/Managers must immediately disclose a conflict of interest to the Board of Trustees or to a person designated by Board either in writing or by documenting it in the minutes at a Board of Trustees' meeting.

8. It is important to make the disclosure when the conflict first becomes known. If there is doubt about whether there may be a conflict of interest, Trustees/Directors/Managers must request the advice of the Board of Trustees or a person the Board designates for this purpose.
9. If a conflict of interest or appearance of conflict interest exists then the Trustees/Directors/Managers in conflict of interest must immediately take steps to resolve the conflict or remove the suspicion that it exists, by:
  - A. Promptly declaring to the Board of Trustees or a person designated by the Board about any conflict of interest as defined by this policy and asking that such declaration be recorded in the minutes.
  - B. Not participating and/or not voting in the portion of any meeting where he/she is entitled to participate and/or vote; where the matter giving rise to the conflict of interest is being discussed.
10. Upon receiving knowledge about conflict of interest or appearance of conflict of interest, the Board of Trustees (not including the Trustee with conflict of interest) or the person designated by the Board may decide on the necessary actions to be taken to eliminate the conflict of interest or appearance of conflict of interest.
11. **Disciplinary action for non-disclosure:** Where a Trustee/Director/Manager is believed to have a conflict of interest that has not been disclosed to the Board of Trustees or a person designated by the Board as required by this policy, he/she will be informed why it is believed a conflict of interest exists or appearance of conflict of interest exists and be given an opportunity to explain his / her non-disclosure.

If, after hearing the response and making further investigations, the Board of Trustees or the person designated by Board of Trustees determines that the Trustee/Director/Manager has failed to disclose a conflict of interest, he / she may decide that disciplinary action should be taken in accordance with WDT's grievance and disciplinary procedures. The materiality of the conflict and the reasons for non-disclosure will be considered to determine the extent of disciplinary action to be taken against the person in violation with this policy.
12. If one or more trustees in conflict of interest are members of the Board of Trustees then for the purpose of this policy they shall not participate as a member of the Board of Trustees.
13. If any person designated by the Board of Trustees for the implementation of this policy is in conflict of interest, then the Board of Trustees may designate another person for the implementation of this policy or may itself implement the policy.

