

Conflict of Interest Policy – Swashodhan Trust

1. Purpose

Swashodhan Trust is committed to the highest ethical standards. This policy ensures transparency and integrity in all decisions and actions, by identifying, managing, and disclosing any potential, actual, or perceived conflicts of interest.

2. Scope

This policy applies to:

- Board Members and Trustees
- Staff (permanent, contractual, and part-time)
- Volunteers, consultants, and partners

3. Definitions

A conflict of interest arises when an individual's personal, professional, or financial interest could compromise or appear to compromise the objectivity of their decisions made on behalf of the Trust.

4. OPTER Framework Implementation

****O – Observe****

- All members must self-monitor and remain alert to situations that may present conflicts.
- Common examples: awards of contracts to family/friends, personal gain from Trust decisions, dual employment, etc.

****P – Prevent****

- Annual Conflict of Interest Declaration Forms must be submitted by all stakeholders.
- During recruitment and vendor onboarding, conflicts should be screened in advance.
- Individuals with potential conflicts shall not participate in related decision-making.

****T – Track****

- A Conflict of Interest Register shall be maintained by the Compliance Officer.
- All declarations, recusals, and outcomes will be documented for audit purposes.

****E – Evaluate****

- The Compliance Committee shall evaluate conflicts disclosed, recommend actions, and monitor implementation.
- Recusal, reallocation of duties, or third-party mediation may be enforced depending on severity.

****R – Report****

- All declared conflicts and actions taken will be reported:
 - Internally to the Board of Trustees quarterly
 - To relevant authorities as required by law or grant terms

5. Responsibilities

- All members must disclose any actual or potential conflict.
- Supervisors and Committee Chairs must ensure the policy is applied consistently.
- Compliance Officer shall maintain records and oversee policy implementation.

6. Procedures

- Submit the Conflict of Interest Declaration Form annually or when a situation arises.
- If a conflict is declared:
 1. It is reviewed by the Compliance Committee.
 2. A resolution or mitigation plan is recommended.
 3. Actions are recorded in the register and meeting minutes.

7. Non-Compliance

Failure to disclose a conflict may result in disciplinary actions, including:

- Verbal/written warnings
- Suspension or termination
- Legal reporting, if required

8. Annual Review

This policy will be reviewed annually and updated as necessary to reflect legal, operational, or governance changes.