

# D: CSR Policies

## Conflict of interest Policy

<b>Date of Implementation:</b>	<b>01/04/2022</b>
<b>Date of last review:</b>	<b>15/04/24</b>
<b>Date of next review:</b>	<b>Scheduled with manual review</b>
<b>Related Documents:</b>	<ul style="list-style-type: none"><li>● <b>Authorisation policy</b></li><li>● <b>Financial policy</b></li></ul>

**1. Reasons for this policy:** Mosaico EuroAfricano (MEA) recognises that the nature of its work may bring about potential conflicts of interest for its directors, staff and volunteers. There may also be situations when these individuals find themselves in a situation where there is a conflict of interest between the work they are required to do at MEA and other personal or professional interests they may have.

Therefore this policy will help to:

- Protect the integrity of MEA's decision-making processes.
- Enable stakeholders to have confidence in the organization's integrity.
- Protect the integrity and reputation of staff, volunteers and directors.
- Ensure that MEA maintains its charitable status.

**2. Who does the policy apply to?:** All staff, volunteers, and directors of MEA should strive to avoid any conflict of interest between the interests of MEA on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

### **3. Description:**

Examples of conflicts of interest include:

- A director who is also a board member of a MEA partner organization may be faced with a decision in a Board meeting regarding whether financial support to a particular region or partner organization should be increased.
- A director who is related to a member of staff and there is a decision to be taken on staff pay and/or conditions at a Board meeting.
- A director who is also on the Board of another organization that is competing for the same funding.
- A director, staff member or volunteer who has shares in a business that may be awarded a contract to do work or provide services for MEA or is a director, partner or employee or related to someone who is. (A relative may be a child, parent, grandchild, grandparent, brother, sister, spouse or civil partner of the staff.)

### **Process for dealing with potential Conflicts of Interest**

Upon appointment to their position at MEA, all staff members, volunteers and directors will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated annually or as appropriate.

In the course of meetings or activities, staff members, volunteers and directors will disclose any interests in a transaction or decision where there may be a conflict between MEA's best interests and that person's best interests or a conflict between the best interests of the two organizations with which the person is involved with. If in doubt the potential conflict must be declared and clarification sought.

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In the case of staff and volunteers, the conflict of interest must be disclosed to their supervisor.

In the case of a conflict of interests arising for a director because of a duty of loyalty owed to another organization or person and the conflict is not authorized by virtue of any other provision in the articles of association, the un-conflicted director may authorize such a conflict of interests where the following conditions apply:

- The individual who has declared the conflict of interest withdraws from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organization or person;
- The board member who has the conflict of interest does not vote on any such matter and is not to be counted when considering whether a quorum of board members is present for that portion of the meeting;
- The other board members who have no conflict of interest in this matter consider that it is in the interests of MEA to authorize the conflict of interest in the circumstances applying.
- Any such disclosure and the subsequent actions taken will be noted in the minutes.

This policy is meant to supplement good judgment and staff, volunteers and directors should respect its spirit as well as its wording.