

## Conflict of Interest Policy

### DEVI Sansthan, Lucknow

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#### 1. Purpose

DEVI Sansthan is committed to maintaining the highest standards of integrity, transparency, and accountability in all its activities. This Conflict of Interest Policy is established to prevent and address actual, potential, or perceived conflicts of interest that may arise in the conduct of the organization's operations. The policy ensures that decisions are made in the best interest of DEVI Sansthan and not influenced by personal interests.

#### 2. Scope

This policy applies to all board members, employees, consultants, volunteers, and any individuals acting on behalf of DEVI Sansthan. It covers financial, professional, and personal relationships that may influence or appear to influence decision-making processes.

#### 3. Definition of Conflict of Interest

A conflict of interest occurs when an individual's personal interests—whether financial, professional, or familial—compete with the interests of DEVI Sansthan. This includes but is not limited to:

- **Financial Gain:** Receiving financial benefits from vendors, donors, or partners due to one's position in the organization.
- **Nepotism:** Favoring family members or close associates in hiring, procurement, or contracts.
- **Personal Bias:** Making decisions that benefit personal relationships at the expense of the organization.
- **Outside Employment or Engagements:** Holding external roles that may interfere with one's responsibilities at DEVI Sansthan.
- **Influence on Organizational Decisions:** Using one's position to secure advantages for themselves or their associates.
- **Accepting Gifts or Favors:** Receiving significant gifts, services, or perks from external stakeholders that could impact objectivity.



#### 4. Disclosure and Reporting

- Individuals must disclose any potential or actual conflict of interest as soon as it arises.
- Disclosures should be made in writing to the designated Conflict of Interest Officer or the Board of Directors.
- Annual declarations of interest must be submitted by board members and senior management.
- Any changes in circumstances that create a new conflict must be reported immediately.
- The organization shall maintain a register of disclosed conflicts and actions taken.

#### 5. Management of Conflict of Interest

- **Recusal from Decision-Making:** Individuals with a conflict of interest must abstain from discussions and decisions where their impartiality may be compromised.
- **Independent Review:** A designated committee will assess the conflict and determine appropriate actions to mitigate risks.
- **Documentation:** All disclosures and actions taken to resolve conflicts will be recorded for transparency.
- **Guidance on Resolution:** The organization may require divestment of conflicting interests, reassignment of duties, or restrictions on participation in certain activities.

#### 6. Compliance, Monitoring, and Enforcement

- Regular training will be conducted to educate staff and stakeholders about conflicts of interest and ethical decision-making.
- Compliance with this policy will be monitored by the Board of Directors and senior management.
- Instances of non-compliance will be subject to investigation, and corrective measures will be taken.

#### 7. Consequences of Non-Compliance

Failure to disclose a conflict of interest or attempts to unduly influence decisions may result in disciplinary action, including:

- Formal warnings or reprimands.
- Removal from committees or decision-making roles.



- Termination of employment or association with DEVI Sansthan.
- Legal action in cases involving fraud, misconduct, or financial impropriety.

## 8. Review and Amendments

This policy will be reviewed periodically by the Board of Directors to ensure its effectiveness. Amendments may be made as necessary to align with legal, ethical, and organizational standards.

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### Approved by Governing Board of DEVI Sansthan



Nixon Joseph  
Group Director  
DEVI Sansthan

