

## EFSCRJ Conflict of Interest Policy

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### 1. Purpose

The Edward Francis Small Centre for Rights and Justice (EFSCRJ) is committed to integrity and transparency in all operations. The purpose of this policy is to prevent actual, potential, or perceived conflicts of interest that could compromise our integrity, credibility, or mission. It ensures that decisions are made in the best interest of the Centre and its stakeholders. This policy provides that conflicts of interest are identified, disclosed, and managed to protect EFSCRJ's mission and public trust, in alignment with:

- EFSCRJ Constitution (Articles 17, 18, 23)
- Strategic Plan Pillar 5 (Accountability & Transparency)
- Best practices in nonprofit governance

### 2. Definition of Conflict of Interest

A conflict of interest occurs when a person's personal, professional, financial, or other interests may compromise or appear to compromise their ability to act impartially and in the best interest of EFSCRJ. This includes:

- Personal financial gain or benefit
- Family or personal relationships influencing decisions
- Outside employment or business interests that conflict with EFSCRJ's objectives
- Receiving gifts or favors that could influence judgment or actions

### 3. Scope

This policy applies to:

- Board members
- Executive staff and all employees
- Volunteers, interns, and consultants
- Any individuals or organizations acting on behalf of or representing EFSCRJ

### 4. Disclosure Requirements

#### A. Who Must Disclose

- All trustees, staff, volunteers, and contractors in decision-making roles.
- Any person subject to this policy must disclose actual or potential conflicts of interest immediately to:
  - The Board Chairperson (for board members or Executive Director), or
  - The Executive Director (for staff, consultants, or volunteers)
- Disclosures must be made in writing and documented in the Conflict of Interest Register.

- Upon disclosure:
  1. The conflict will be assessed by the Executive Director or the Board.
  2. If the conflict is deemed significant, the individual may be:
    - Recused from decision-making processes
    - Asked to step down from the relevant role or duty
    - Subject to further review or action
- Board members with a conflict must abstain from voting or participating in related discussions.

**B. External Affiliations**

- Board members may not serve on boards of competing organizations without approval.

**C. Annual Disclosure**

- All board members and senior staff are required to complete and submit an Annual Conflict of Interest Disclosure Form, even if no conflict exists.

**5. Prohibited Practices**

To avoid conflicts of interest:

- No employee, board member, or affiliate shall approve contracts or decisions from which they or their relatives may benefit financially.
- EFSCRJ will not engage vendors or partners where a conflict of interest exists unless approved with full transparency by the Board.
- Gifts, hospitality, or favors exceeding a nominal value (GMD 1,000) must be declared and may be refused or shared with the organization.
- No gifts accepted from entities seeking EFSCRJ contracts.

**6. Confidentiality**

- All conflict disclosures and related proceedings shall be handled confidentially.
- Retaliation against anyone who reports a conflict in good faith is strictly prohibited.

**7. Breach of Policy**

A. Failure to disclose a conflict of interest or engaging in prohibited behavior may result in:

- Disciplinary action, including dismissal
- Training or reprimand
- Termination of contract or position
- Reporting to legal or regulatory authorities, where applicable

B. Whistleblower Protections

- Reports made in good faith are confidential and protected from retaliation (Article 23 EFSCRJ Constitution).

## 8. Training and Compliance

- Annual training for all trustees and staff.
- Policy acknowledgment required upon hiring/joining.

## 9. Acknowledgment

- I have read and agree to comply with this policy:

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## 10. Related Documents:

- ✓ Conflict of Interest Disclosure Form
- ✓ Whistleblower Policy
- ✓ Code of Conduct

## 11. Policy Review

This policy will be reviewed every two years or upon significant organizational or legal changes.

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## 12. Contact

### Executive Director

Edward Francis Small Centre for Rights and Justice

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This policy safeguards EFSCRJ's mission and complies with legal and ethical standards. Violations undermine our credibility and will be addressed promptly.

**Transparency is the foundation of trust.**