



**Reaching out with love**

## CONFLICT OF INTEREST POLICY

---

|                       |   |              |
|-----------------------|---|--------------|
| APPLICABILITY         | : | (See Scope)  |
| VERSION               | : | (April 2024) |
| WILL BE AUTHORISED BY | : | (BOARD)      |
| SCHEDULED REVIEW DATE | : | (April 2027) |

## **TABLE OF CONTENTS**

|                                                   |    |
|---------------------------------------------------|----|
| INTRODUCTION                                      | 3  |
| PURPOSE                                           | 3  |
| SCOPE                                             | 3  |
| RESPONSIBILITY                                    | 3  |
| DEFINITIONS                                       | 3  |
| IDENTIFICATION OF CONFLICT SITUATIONS             | 4  |
| SITUATIONS THAT MAY CREATE CONFLICTS OF INTEREST  | 4  |
| DUTY TO DISCLOSE                                  | 6  |
| INVESTIGATING POTENTIAL CONFLICTS                 | 6  |
| INVESTIGATION PROCEDURE                           | 6  |
| INVESTIGATION OUTCOME                             | 7  |
| APPEALS                                           | 8  |
| INTERPRETATION                                    | 9  |
| ACKNOWLEDGEMENT                                   | 9  |
| ANNEXURE 1: CONFLICT OF INTEREST DECLARATION FORM | 10 |

## INTRODUCTION

Vision Rescue is committed to the highest levels of integrity. Employees and associated personnel, Board of Directors, Executive Leadership of Vision Rescue are expected to conduct their relationships with each other, Vision Rescue, and outside organizations with objectivity and honesty.

Vision Rescue employees and associated personnel, Board of Directors, Executive Leadership are obligated to avoid and disclose ethical, legal, financial, or other conflicts of interest involving the Vision Rescue, and remove themselves from a position of decision-making authority with respect to any conflict situation involving the Vision Rescue

## PURPOSE

The purpose of this policy is to provide guidance in identifying and handling potential and actual conflicts of interest involving the Vision Rescue. In most instances, conflicts of interest can be avoided simply by continuing to exercise good judgment and, indeed, Vision Rescue relies on the sound judgment of its Board of Directors, Executive Leadership, employees and associated personnel to prevent many such conflict situations.

## SCOPE

This policy refers to everyone in the Vision Rescue and associated personnel, beneficiaries from communities regardless of position or status.

This policy applies to following Vision Rescue's Stakeholders defined below.

- All Vision Rescue's Staff, Contractors and Consultants.
- All Vision Rescue's Agents.
- All Vision Rescue's Volunteers and/or Interns.
- All Vision Rescue's Board Members.

## RESPONSIBILITY

- All Staff, Contractors, Consultants, Agents, Interns, volunteers and Board members are responsible for making sure that they identify and disclose conflicts of interest.
- The Board must make sure that conflicts of interest of Board members are properly managed.
- Staff, Contractors and Consultants are responsible for telling the HR Team about a 'Conflict of Interest' for other employees, field workers, associates or volunteers who they supervise.
- Employees who deal with Agents (*as defined below*) are responsible for telling the HR Team about a 'Conflict of Interest' related to Agents.
- The HR Team is in general responsible for the effective implementation of this policy.

## DEFINITIONS

- a. Employee – any person who is employed by Vision Rescue in a part or full-time capacity and in accordance with the labor laws of state.
- b. Agent – an owner, director, stakeholder, contractor or other third-party that is in the position to act on behalf of Vision Rescue.

- c. Financial Interest – The interest that any individual may have in the monetary transactions of Vision Rescue. In particular, any interest that could have a direct bearing on the financial gain/loss of said individual.
- d. Non- Financial Interest- Employee relationships, Family, relatives’ relationships, Gifts, Outside employment for monetary gain, political affiliations, competitor organizations in the same line of business

## IDENTIFICATION OF CONFLICT SITUATIONS

Generally, a ‘Conflict of Interest’ may occur if an interest or activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual’s ability to perform his or her employment and services responsibilities in the best interests of the Vision Rescue.

- a) Actual ‘Conflict of Interest’ – being influenced
- b) Potential ‘Conflict of Interest’ – could be influenced
- c) Perceived ‘Conflict of Interest’ – could appear to be influenced

An individual stakeholder is considered to have a potential ‘Conflict of Interest’ when:

- He or she or any member of his or her family may receive a financial or other significant benefit as a result of the individual’s position at the Vision Rescue;
- The individual has the opportunity to influence the Vision Rescue's granting, business, administrative, or other material decisions in a manner that leads to personal gain or advantage; or
- The individual has an existing or potential financial or other significant interest which impairs or might appear to impair the individual's independence in the discharge of their responsibilities to the Vision Rescue.

## SITUATIONS THAT MAY CREATE CONFLICTS OF INTEREST

1. **Fees, Honorariums, Expense Reimbursements, and other Similar Payments** Stakeholders are permitted to undertake speaking engagements, write articles, and/or engage in similar activities that provides 3. Fees, Honorariums, Expense Reimbursements, etc., provided the time for such activities does not interfere with the Stakeholder’s Vision Rescue responsibilities.

2. **Receive or offer Gifts:** Vision Rescue stakeholders may not receive or offer any gift or anything else of significant value for the purpose of influencing the action of the Vision Rescue or of the recipient.

This guideline is not intended to prohibit normal business practices, such as meetings over meals, corporate items given to participants in meetings and conferences, or token hosting gifts, as long as they are of nominal and reasonable value and promote the Vision Rescue’s legitimate business interests.

3. **Accepting Compensated Work Outside the Vision Rescue**

- a) Vision Rescue employees, contractors or associated personnel may not conduct outside business or other take up employment activities for which they receive remuneration if it is related to their expertise as a Vision Rescue employee or the business of the Vision Rescue, without prior approval from the HR Team Dept.
- b) In requesting permission, the employee or associated personnel should disclose the organization for which the work will be done, the nature of the work, the expected time commitment and remuneration to be received. Such work is performed solely on personal

time, without the use of Vision Rescue resources, and provided that the time commitment required for such outside work does not impact the employee's ability to perform his or her work for the Vision Rescue.

- c) Vision Rescue employees may not accept compensated work outside the Vision Rescue provided for Political Activities. Vision Rescue employees or associated personnel is strictly prohibited from engaging in electoral politics or lobbying activities. Vision Rescue employees are free to engage in these types of political activities on a personal basis provided the activities do not conflict with their ability to carry out their Vision Rescue responsibilities or create confusion between positions or actions that are taken by them personally versus as a Vision Rescue representative. Such employee or associated personnel, who wish to involve in political activities on a personal basis, should discuss with the HR Team appropriate actions. However Individual political activities should only occur during off-duty hours, at the employee's own expense, and without use of the Vision Rescue's name, resources, facilities, or equipment.

#### **4. A Stakeholder 'Conflict of Interest' can be categorized in one of the following ways:**

- Financial Conflict of Interest: This occurs when an employee's financial interests or investments could potentially influence their decisions or actions within the organization. For example, if an employee owns stock in a company that the organization is considering for a business partnership, this could create a financial conflict of interest.
- Personal Relationship Conflict of Interest:
  - This arises when an employee's personal relationships, such as family ties or close friendships, could influence their decisions or actions within the organization. If an employee has a relationship with someone affiliated within the business (e.g., co-worker, client, etc.) and gains from it. For instance, if an employee's relative works for a vendor that the organization contracts with, this could create a personal relationship conflict of interest.
  - This also arises when someone hires, promotes or otherwise provide special treatment and favours in the workplace to a family member, relative or close friend or mutual reference. If the family members, relatives are hired and favoured over other candidates or workers.
- Professional Conflict of Interest: This occurs when an employee's outside professional activities or affiliations could impact their duties or responsibilities within the organization. For example, if an employee serves on the board of directors for a competitor company, this could create a professional conflict of interest.
- Vendor or Supplier Conflict of Interest: This arises when an employee has a financial or non financial relationship with a vendor, supplier, or contractor that the organization does business with. For instance, if an employee receives gifts or kickbacks from a supplier in exchange for preferential treatment, this could create a vendor or supplier conflict of interest.
- Intellectual Property Conflict of Interest: This occurs when an employee's involvement in external activities or ventures may result in the improper use or disclosure of the organization's intellectual property or proprietary information. For example, if an employee develops a product or technology outside of work that competes with the

organization's products or services, this could create an intellectual property conflict of interest.

**5. Purchase and Financial activities in which conflicts of interest may arise include, but are not limited to, the following:**

- Transactions with persons and organizations supplying goods and commercial services to VISION RESCUE
- Transactions with persons and organizations from which VISION RESCUE leases property and equipment
- Transactions with persons and organizations with whom VISION RESCUE is dealing or planning to deal in connection with the gift, purchase, or sale of real estate, or other property
- Transactions with persons representing competing or collaborating organizations
- Transactions with donors and others supporting VISION RESCUE
- Transactions with persons representing agencies, organizations, and associations that affect the operations of VISION RESCUE
- Transactions with organizations or individuals receiving grants from VISION RESCUE

## DUTY TO DISCLOSE

Every stakeholder of Vision Rescue mentioned within the scope of this policy is obligated to disclose any known or potential conflicts of interest as soon as they arise or annual basis (*Annexure 1*), whichever is early. Failure to do so could result in termination of service.

## INVESTIGATING POTENTIAL CONFLICTS

When a possible 'Conflict of Interest' arises, the HR Team will collect the pertinent information and may question any concerned parties. If no conflict exists, the inquiry may be documented but no further action will be taken. If the HR Team determines that a conflict exists, following steps will be taken to address to conflict:

- When an actual 'Conflict of Interest' is found, any transactions that may have been affected will be reviewed retroactively.
- Affected parties both within and outside of the business, including Board of Directors, Executive Leadership, employees, associated personnel, and contractors will be notified.
- A preliminary inquiry will be conducted by the HR Team and submit a report to the Policy Council (*as referred in Complaints Handling Policy*) to determine the extent and the seriousness of the conflict and the intentions of the parties involved.

## INVESTIGATION PROCEDURE

When a 'Conflict of Interest' is found within the organization, it's essential to conduct a thorough investigation to understand the nature and extent of the conflict and to determine the appropriate course of action.

Within 2 working days of receiving the notification from HR Team for investigation, the Policy Council will thoroughly go through all relevant information such as preliminary inquiry report, supporting records, documents or emails before making a decision to investigate.

Once the Policy Council makes a decision to investigate the potential conflict of interest following procedures will be followed during such investigations:

- The Policy Council will explain the investigation process, consequences and the rights of participants to the parties and witnesses involved.
- The Policy Council will document all relevant details pertaining to the conflict of interest, including the individuals involved, the nature of the conflict, and any evidence or supporting documentation.
- The Policy Council will conduct interviews, within 2-3 working days, with the individuals involved in the conflict of interest to gather their perspectives and explanations. This may include the stakeholder in question, as well as any other relevant stakeholders.
- The Policy Council will review the organization's policies, procedures, and guidelines related to conflicts of interest to ensure that the investigation is conducted in accordance with established protocols.
- The Policy Council will assess the potential impact of the conflict of interest on the organization, its stakeholders, and its operations. Consider factors such as financial implications, reputational risk, and compliance with laws and regulations.
- The Policy Council will implement immediate measures to mitigate the conflict of interest pending the outcome of the investigation. This may include temporarily reassigning responsibilities, implementing monitoring mechanisms, or placing restrictions on the individual involved.
- Based on the findings of the investigation, the Policy Council will determine the appropriate course of action, ideally in 5 working days from the start of investigation unless there is a reasonable need to extend. This could range from providing additional training and guidance to the individual involved, to disciplinary actions, termination of employment, or legal proceedings if necessary.
- The Policy Council will communicate the outcome of the investigation and any actions taken to relevant stakeholders, including employees, management, regulatory authorities, and other affected parties.
- The Policy Council will prepare a report on the investigation within 2 working days of completion of investigation, giving all the relevant facts that have been uncovered. The report from the Policy Council will include the lessons learned from the investigation and the recommendations to implement preventive measures to minimize the likelihood of similar conflicts of interest occurring in the future. This may involve updating policies, enhancing training programs, or improving oversight and monitoring processes.

## INVESTIGATION OUTCOME

As all conflicts of interest will be reviewed on a case-by-case basis, a review may or may not result in a disciplinary action, based on two following outcomes:

- **‘Conflict of Interest’ allegation is justified**  
The Policy Council investigating the ‘Conflict of Interest’ are satisfied that the allegation is justified, and the decision is reasonable in view of the available information, the Policy Council will then decide on a course of action that is fair and reasonable in all the circumstances, which will be implemented by HR.

- Examples of possible outcomes include:
  - an apology;
  - training;
  - changes in work practices;
  - counselling; and/or
  - disciplinary action.
- A decision to take disciplinary action should take into account:
  - the seriousness of the grievance;
  - the attitude, intent and previous record of the respondent; and
  - any mitigating circumstances.
- Disciplinary action could include:
  - an official warning;
  - transfer to another work area;
  - demotion; and/or
  - dismissal.

If disciplinary action is taken, a record of the 'Conflict of Interest' and the outcome will be placed on the personnel file of the person who is disciplined.

- **'Conflict of Interest' allegation is not supported**

It is determined that the 'Conflict of Interest' allegation is not supported by the results of the investigation, where there is not enough information to decide whether or not the 'Conflict of Interest' allegation is justified. This will be explained to the relevant stakeholders. In this case steps may be taken to restore good faith, working relations and prevent any 'Conflict of Interest' problems from recurring by ensuring that relevant stakeholders to this particular investigation understands their rights and responsibilities. Examples of this could be done training, improving communication channels, and timely declarations as mandated by this policy.

## APPEALS

If an individual(s) involved in 'Conflict of Interest' appeals, the decision can be reviewed once again in accordance with Grievance Resolution Procedure. Such appeals can be made to the General Secretary of Vision Rescue Board.

Contact Details of General Secretary of Vision Rescue Board

Name : Mr. Navin Chatterjee  
 Email : secretary@visionrescue.co.in

Phone : +91 98677 45305

The General Secretary of Vision Rescue Board who reviews appeal may:

- check that the process was conducted according to this procedure and the principles of procedural fairness;
- check that the outcome was fair in view of all relevant evidence and any mitigating circumstances;
- consider particular aspects of the process or the outcome;
- “rehear” the ‘Conflict of Interest’ investigation if it appears that there were defects in the process or the outcome; and/or
- interview more witnesses or seek other evidence where appropriate.

The General Secretary of Vision Rescue Board performing the review may confirm the original decision or make a different decision.

## INTERPRETATION

This policy cannot describe all conflicts of interest situations that may arise involving the Vision Rescue. Therefore, Vision Rescue stakeholders mentioned in the scope of this policy must use good judgment to avoid any appearance of impropriety. Appropriate circumstances may also justify exceptions to the application of the policy.

## ACKNOWLEDGEMENT

I, the undersigned, as the Board of Directors / Executive Leadership / Employee / Agent named below understand the procedure for conflicts of interest with Vision Rescue, including their duty to disclose any known or potential conflicts.

I, the undersigned, as the Board of Directors / Executive Leadership / Employee / Agent agree to abide by the procedures outlined in this policy for the duration of their professional relationship with Vision Rescue.

I, the undersigned, agree to comply and submit the “Conflict of Interest Acknowledgment Form as per attached below Annexure 1 from time to time

---

Stakeholder Name

---

Date

---

Signature

## ANNEXURE 1: CONFLICT OF INTEREST DECLARATION FORM

|                       |                            |
|-----------------------|----------------------------|
| Name:                 |                            |
| Position/Title:       |                            |
| Department/Division:  |                            |
| Employee ID:          |                            |
| Address:              |                            |
| Phone:                |                            |
| Email:                |                            |
| Period of Declaration | 1 April 2024 – 31 Mar 2025 |

### **Declaration of actual, potential or perceived Conflicts of Interest:**

*A 'Conflict of Interest' may arise when your personal, financial, or professional interests could influence, or be perceived to influence, your decisions or actions within the organization.*

*(a) Actual – you are being influenced*

*(b) Potential – you could be influenced*

*(c) Perceived – you could appear to be influenced*

*Please provide details of any conflicts of interest that you may have.*

#### Financial Interests:

*List any financial interests you have in other organizations that may have a relationship with our organization (e.g., ownership interests, investments, partnerships).*

|  |
|--|
|  |
|--|

#### Outside Employment or Affiliations:

*List any outside employment, consulting work, board memberships, or other affiliations that may pose a 'Conflict of Interest'.*

|  |
|--|
|  |
|--|

#### Personal Relationships:

*Disclose any personal relationships (e.g., family, close friends) with individuals or entities that do business with or are otherwise associated with our organization.*

**Other Potential Conflicts:**

*Provide any additional information about potential conflicts of interest that you believe should be disclosed.*

**Certification**

- ☐ I have read and understood Vision Rescue's policy on 'Conflict of Interest'. As part of Vision Rescue, I understand that this policy on 'Conflict of Interest' applies to me.
- ☐ I understand that I am expected to conduct business in accordance with the letter, spirit, and intent of all relevant 'Conflict of Interest' laws and the 'Conflict of Interest' policy and to refrain from any illegal, dishonest, or unethical conduct.
- ☐ I understand that if a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with the HR Team, Executive Leadership and Board for advice and consultation.
- ☐ In addition, I recognize the need to maintain confidentiality regarding information I might receive as a trustee or officer regarding donors, donations, and grant making activities of Vision Rescue.

I certify that the information provided in this declaration is complete and accurate to the best of my knowledge. I understand my obligation to promptly update this declaration if my circumstances change and any new potential conflicts of interest arise.

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

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