

Conflict of Interest Policy

Outline & Rationale

1. EFT International (EFTi) is committed to the highest standards of ethics and integrity in its operations. This conflict-of-interest policy is one tool to ensure that the interests of the charity are protected and that conflicts of interest are managed appropriately.
2. This policy exists to provide guidance for the trustees, volunteers, members and staff of EFTi to identify, disclose, and manage conflicts of interest that may arise in the course of the charity's operations.

Definitions

3. For purposes of this policy, the following terms shall have the meanings set forth below:
 - Conflict of Interest: A conflict of interest arises when an individual's personal interests, or those of a related party, conflict with the interests of the charity.
 - Related Party: A related party includes any individual who has a personal or financial interest in any matter being considered by the charity, including a spouse, domestic partner, parent, child, sibling, or any organisation in which the individual has a controlling interest.

Disclosure Requirements

4. Trustees, volunteers, members and staff of EFTi must disclose any actual or potential conflicts of interest as soon as they become aware of them.
5. Disclosure should be made in writing to the Board of Trustees or the appropriate officer of the charity (as appointed by the Board). The disclosure should include:
 - The nature of the conflict.
 - The identity of the related party or parties.
 - Any financial interest that the individual or related party has in the matter. ▪ Any other information that the individual or related party believes is relevant to the disclosure.

Review of Disclosure

6. Upon receipt of a disclosure, the Board of Trustees or the appropriate officer shall review the disclosure and determine whether a conflict of interest exists.
7. In making this determination, the Board or officer may consider any relevant information, including the nature and scope of the conflict, the potential impact on the charity, and any available alternatives to mitigate or eliminate the conflict.

Management of Conflicts

8. If a conflict of interest exists, the Board of Trustees or the appropriate officer shall take appropriate steps to manage the conflict, which may include:Page | 60

- Modification of the activity or decision to avoid the conflict.
- Disclosure of the conflict to the membership or to the public.
- Abstention by the conflicted individual from participating in the activity or decision.
- Appointment of a disinterested person or committee to evaluate or approve the activity or decision.
- Any other action that the Board of Trustees or the appropriate officer deems necessary under the circumstances.

Annual Disclosure

9. Trustees, senior volunteers (as determined by the Board), and staff of EFTi shall make an annual disclosure of any potential or actual conflicts of interest that may exist with respect to the charity. The annual disclosure should be made in writing and should be filed with the Board of Trustees or the appropriate officer of the charity.

Recordkeeping

10. The charity shall maintain a record of all disclosures and actions taken to manage conflicts of interest. This record shall be maintained for at least six years and shall be made available to the public upon request.

Compliance

11. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment, removal from the Board of Trustees or revocation of membership.