



Sparsha Charitable Trust

Conflict of Interest Policy

1. Purpose

The purpose of this policy is to ensure that the decisions and actions taken by Sparsha Charitable Trust are in the best interest of the organization and its beneficiaries, free from any personal or professional conflict that may compromise integrity, transparency, and accountability.

2. Scope

This policy applies to all:

- Board Members and Trustees
- Staff (Full-time, Part-time, Contractual)
- Interns and Volunteers
- Consultants and Advisors

3. Definition of Conflict of Interest

A conflict of interest occurs when an individual's personal interests – family, financial, or otherwise – interfere or appear to interfere with their ability to act in the best interests of Sparsha.

Conflicts may be:

- Actual – the conflict currently exists
- Perceived – the appearance of a conflict exists
- Potential – the conflict may arise in the future

4. Examples of Conflict of Interest

- Personal or family benefit from any decision made by Sparsha
- Involvement in another organization with similar activities, interests, or funding sources
- Influencing the selection of vendors or service providers for personal gain
- Using Sparsha's confidential information for personal advantage

5. Disclosure Responsibilities

All individuals covered by this policy are required to:



- Disclose any actual, potential, or perceived conflicts to the reporting authority or designated committee
- Submit an annual conflict of interest declaration (for staff and trustees)
- Update the declaration if a new conflict arises during the year

6. Management of Conflict

Once a conflict is disclosed:

- The concerned person may be asked to recuse themselves from decision-making
- The leadership team or Board will review the disclosure and decide on further action
- All proceedings will be documented and retained for records

7. Consequences of Non-Disclosure

Failure to disclose a conflict of interest may lead to:

- Disciplinary action (verbal/written warning, reassignment, or termination)
- Removal from the board or advisory committee
- Legal action if the trust suffers damage or loss

8. Policy Review and Monitoring

This policy will be reviewed every two years or as required by law. The CEO or Governance Committee will be responsible for monitoring adherence and ensuring awareness across the organization.

9. Declaration

All individuals must sign the Conflict of Interest Declaration Form at the time of joining or engagement with Sparsha Charitable Trust.

Approved By: Sparsha Board of Trustees

Effective Date: 25/06/2024

Review Date: 26/6/2026



Conflict of Interest Declaration Form

I, the undersigned, acknowledge that I have received and read the Conflict of Interest Policy of Sparsha Charitable Trust. I understand the provisions and agree to comply with the policy. I declare that:

- I do not have any existing conflicts of interest;

OR

- I have disclosed all actual, potential, or perceived conflicts of interest as described below:

Description of Conflict (if any):

Name: _____

Designation: _____

Signature: _____

Date: _____