

# **Punjab Population Innovation Fund**

## **Conflict of Interest Policy**

### **Introduction**

This policy addresses conflict of interest so as to ensure highest standards of ethics and integrity and to protect Punjab Population Innovation Funds (PPIF) interests, reputation, work and Personnel from potentially damaging instances of impropriety arising from conflict of interest issues. The objective is that PPIF Personnel must carry out their work in an environment that is free from any suggestion of improper influence and take all reasonable steps to avoid being in an actual or potential conflict of interest situation.

### **Scope**

This policy applies to all PPIF Personnel. For the purposes of this policy the term '**PPIF Personnel**' includes:

- Members of PPIF;
- Chief Executive Officer of PPIF;
- Directors of PPIF, by whatever name called;
- Any and all employees, staff and volunteers of PPIF, irrespective of the type or nature of employment.

A person who must consider whether he/she has a conflict includes any PPIF Personnel or a major donor to PPIF or anyone else who is in a position of influence over PPIF.

### **Definition of Conflict of Interest**

A conflict of interest is defined as an actual or perceived interest by a staff or Board member in an action that results in, or has the appearance of resulting in, personal, organizational, or professional gain. PPIF Personnel are obligated to always act in the best interest of PPIF. This obligation requires that PPIF Personnel, in the performance of their duties, seek only the furtherance of the PPIFs mission. At all times, PPIF Personnel are prohibited from using their job title or the PPIF's name or property, for private profit or benefit.

- A. PPIF Personnel should neither solicit nor accept gratuities, favors, or anything of monetary value or otherwise from contractors/vendors. This is not intended to preclude PPIFs bona-fide fund raising-activities.
- B. No, PPIF Personnel shall participate in the selection, award, or administration of a purchase or contract with a vendor where, to his knowledge, any of the following has a financial interest in that purchase or contract:
  - a. That PPIF Personnel himself;
  - b. Any member of their immediate family;
  - c. Their partner;
  - d. Any organization in which any of the above is an officer, director or employee;
  - e. A person or organization with whom any of the above individuals is negotiating or has an arrangement concerning prospective employment

## **Conflict of Interest is created when**

- A. A PPIF Personnel or a family member of the foregoing is a party to a contract or involved in a transaction with Nonprofit Network for goods or services.
- B. A PPIF Personnel or a family member of the foregoing has a material financial interest in a transaction between PPIF and an entity in which the PPIF Personnel has an interest or relationship.
- C. A PPIF Personnel or a family member of the foregoing is engaged in some capacity or has a material financial interest in a business or enterprise that competes with PPIF.
- D. A PPIF Personnel has a personal interest that conflicts with the interests of PPIF or arises in situations where a board/staff member has divided loyalties (also known as a “duality of interest”).

A conflict arising out of a personal interest can occur in situations that result in inappropriate financial gain to persons in authority at PPIF and can lead to financial penalties and violations of regulations. Situations or transactions arising out of a conflict of interest also can result in either inappropriate financial gain or the appearance of a lack of integrity in PPIFs decision-making process. Other situations may create the appearance of a conflict, or present a duality of interests, with a person who has influence over the activities or finances of PPIF.

PPIF takes a broad view of conflicts and PPIF Personnel are urged to think of how a situation/transaction would appear to outside parties when identifying conflicts or possible conflicts of interest.

## **PPIF Personnel**

PPIF Personnel should avoid situations in which they may be called upon to negotiate or do business with an organization in which the employee or close relative of the employee or other person with whom the employee has a close personal relationship, has substantial ownership or other interest.

Because of the potential for a conflict of interest, all PPIF Personnel considering or having employment, performing services or consulting work at entities other than PPIF must have prior written approval from the CEO/Executive Director and may not accept fees for service when representing PPIF.

## **Disclosure**

It is the duty of all PPIF Personnel to be aware of this policy, and to identify conflicts of interest and situations that may result in the appearance of a conflict and to disclose those situations, conflicts or potential conflicts to:

- i) the PPIF Personnel’s supervisor (if any);
- ii) the executive director;
- iii) the chairperson of the Board; or
- iv) any other designated person, as appropriate.

For the purposes of clarity, staff should disclose a conflict of interest to their supervisor/Executive Director and members of the Board of Directors of PPIF should disclose to the board/chairperson of the board as soon as the person with the conflict is aware of the conflict, potential conflict or appearance of a conflict exists.

PPIF Personnel are urged to disclose any and all instances of a conflict of interest situation as soon as they arise and are also obligated to disclose those situations that are evolving and that may result in

a conflict of interest. PPIF Personnel shall make an advance disclosure of any and all conflict of interest situation so that a determination may be made as to the appropriate plan of action to manage the conflict.

In the event it is not entirely clear that a Conflict of Interest exists, the PPIF Personnel with the potential conflict shall disclose the circumstances to his or her supervisor or the Chair of the Chair's designee, as the case may be, who shall determine whether there exists a Conflict of Interest that is subject to this policy.

All such circumstances should be disclosed to the board or staff, as appropriate, and a decision made as to what course of action PPIF and/or PPIF Personnel should take so that the personal interests of any PPIF Personnel do not compromise the best interests of PPIF in any manner whatsoever.

#### Reporting Possible Violations

PPIF maintains an "open door" policy to communicate possible violations of any of PPIF's policy. All communication of this nature will be kept in strictest confidence and will be investigated by the board thoroughly and fairly.

#### **Board Action**

When a conflict of interest is relevant to a matter requiring action by the Board, the interested person(s) shall call it to the attention of the Board and said person(s) shall not vote on the matter. In addition, the person(s) shall not participate in the final decision or related deliberation regarding the matter under consideration. When there is a doubt as to whether a conflict exists, the matter shall be resolved by vote of the Board, excluding the person(s) concerning whose situation the doubt has arisen.

#### **Record of Conflict**

The official minutes of the Board shall reflect that the conflict of interest was disclosed and the interested person(s) did not participate in the final decision or vote and did not vote on the matter.

## Conflict of Interest Disclosure Form

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

Position (employee/volunteer/member): \_\_\_\_\_

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), of circumstances that you believe could contribute to a conflict of interest between Nonprofit Network and your personal interests, financial or otherwise:

\_\_\_\_\_ I have no conflict of interest to report

\_\_\_\_\_ I have the following conflict of interest to report (please specify other nonprofit and for-profit boards you (and your spouse) sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own):

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of Nonprofit Network.

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