



# Conflict of Interest Policy

Effective Date: [01/04/2023]

## Introduction:

Rushabh Foundation Charitable Trust (the "Trust") is committed to maintaining the highest standards of integrity, transparency, and accountability in all its activities. This Conflict of Interest Policy (the "Policy") establishes guidelines and procedures to identify, disclose, and manage conflicts of interest to ensure that the Trust's interests are prioritized and protected. The Policy applies to trustees, employees, volunteers, contractors, and any other individuals representing or acting on behalf of the Trust (collectively referred to as "Individuals").

### 1. Definition of Conflict of Interest:

- 1.1. A conflict of interest arises when an individual's personal, professional, financial, or other interests or relationships have the potential to influence or compromise their objectivity, judgment, or decision-making in matters related to the Trust.
- 1.2. Conflicts of interest can occur in various forms, including but not limited to financial interests, outside employment or consulting engagements, family relationships, and personal associations.

### 2. Duty of Loyalty:

- 2.1. Individuals must always act in the best interests of the Trust and prioritize the Trust's mission and objectives over any personal or external interests.
- 2.2. Individuals must exercise their duties and responsibilities with honesty, integrity, and independence of judgment.

### 3. Identification and Disclosure of Conflicts of Interest:

- 3.1. Individuals have a duty to proactively identify and disclose any actual, potential, or perceived conflicts of interest to the designated person or authority within the Trust.
- 3.2. Individuals must make full and accurate disclosures, providing all relevant details about the nature and extent of the conflict.
- 3.3. The Trust will maintain a process for individuals to disclose conflicts of interest, including a designated form or mechanism for documentation.

### 4. Evaluation and Management of Conflicts of Interest:

- 4.1. The Trust will evaluate each disclosed conflict of interest on a case-by-case basis, considering the specific circumstances and the potential impact on the Trust's integrity and mission.
- 4.2. The Trust may establish an independent review or evaluation committee to assess conflicts of interest and recommend appropriate actions.



- 4.3. In instances where a conflict of interest is identified, the Trust may take actions to manage or mitigate the conflict, including but not limited to:
  - **a. Recusal:** The individual with the conflict may be required to recuse themselves from decision-making processes or discussions related to the conflicted matter.
  - **b. Restructuring:** The Trust may reassign responsibilities or alter reporting lines to minimize or eliminate the conflict.
  - **c. Disclosure:** The conflict may be disclosed to relevant stakeholders to ensure transparency and maintain the Trust's credibility.
  - **d. Independent Advice:** The Trust may seek independent advice or opinion to inform decision-making in situations involving conflicts of interest.
- 5. **Confidentiality and Non-Exploitation:**
  - 5.1. The Trust will treat all disclosures of conflicts of interest with confidentiality, ensuring that information is shared on a need-to-know basis.
  - 5.2. Individuals involved in evaluating or managing conflicts of interest must exercise discretion and avoid exploiting the information for personal gain or advantage.
- 6. **Record-Keeping:**
  - 6.1. The Trust will maintain accurate and up-to-date records of disclosed conflicts of interest, evaluations, and actions taken to manage conflicts.
  - 6.2. These records will be securely stored and made available for review by authorized parties as required by applicable laws and regulations.
- 7. **Annual Review and Compliance:**
  - 7.1. The Trust will conduct an annual review of this Policy and its implementation to ensure its effectiveness and relevance.
  - 7.2. Individuals are responsible for familiarizing themselves with this Policy and complying with its provisions.
  - 7.3. Failure to comply with this Policy may result in disciplinary actions, up to and including termination of employment, termination of volunteer services, or legal action, as appropriate.

### Conclusion:

This Conflict of Interest Policy establishes the guidelines and procedures for identifying, disclosing, and managing conflicts of interest within Rushabh Foundation Charitable Trust. By adhering to these principles, we can safeguard the Trust's integrity, protect its interests, and ensure transparency and accountability in all our activities.

By signing below, I acknowledge that I have received, read, and understood the Rushabh Foundation Charitable Trust Conflict of Interest Policy and agree to comply with its provisions and guidelines.

[Individual's Name]

[Individual's Position/Role]

[Date]

