



## BARN OCH KVINNOR ORGANISATION

*Faith • Action • Results*

# CONFLICT OF INTEREST POLICY

*Policy, Operating Procedures and Declaration of Interests*

| Document Reference | Version | Date of Issue | Next Scheduled Review |
|--------------------|---------|---------------|-----------------------|
| BOK-POL-004        | 2.0     | May 2025      | May 2026              |

As a Board member, staff member, or volunteer (a "Member") of Barn Och Kvinnor Organisation ("the Organisation"), each individual has an obligation to act in the best interests of the Organisation at all times. This Policy exists because situations may arise in which a Member's personal or family interests conflict, or appear to conflict, with those of the Organisation.

Unmanaged conflicts of interest can damage the Organisation's reputation and its ability to sustain operations, compromise objectivity in decision-making, restrict free and open discussion, and create the impression that the Organisation has acted improperly. This Policy exists to protect both the Organisation and its Members from any actual conflict of interest and from the appearance of impropriety.

This Policy has been approved by the Board of Directors and applies to all board members, management, staff, volunteers, consultants and any other person acting on behalf of the Organisation.

## 1. Purpose

This Policy sets out the Organisation's requirements for identifying, declaring and managing situations of real, potential or perceived conflict of interest, so as to:

- protect the integrity, objectivity and independence of decision-making across the Organisation;
- safeguard the Organisation's reputation and its relationships with donors, partners and beneficiaries;
- ensure free and open discussion within the Board and management is not restricted by undisclosed personal interests; and
- meet the governance standards expected by institutional donors, including those in Sweden, Germany, the Netherlands and the wider European Union.

## 2. Definitions

- "Organisation" refers to Barn Och Kvinnor Organisation.



- "Member" refers to a board member, management representative, staff member, volunteer or consultant of the Organisation.
- "Policy" refers to this Conflict of Interest Policy.

"Interest" means any commitment, investment, relationship, obligation or involvement, financial or otherwise, that may influence a Member's judgement, including:

- Direct interest: ownership held in the name of the Member;
- Indirect interest: ownership beneficially held through another investment, an estate, a trust or other intermediary;
- Vested interest: a personal stake or involvement, whether or not it includes an expectation of financial gain; and
- Deemed interest: an interest held by a Member's spouse, domestic partner or other closely affiliated person is deemed to be an interest of the Member.

A "conflict of interest" arises where the personal interests of a Member may potentially interfere, or appear to interfere, with the proper performance of that Member's duties to the Organisation. It may be actual, potential or perceived, and each is treated with equal seriousness under this Policy, since a perceived conflict left unmanaged can be as damaging to the Organisation's integrity and reputation as an actual one.

### 3. Scope of Application

This Policy applies to all decisions made on behalf of the Organisation, including but not limited to:

- recruitment, employment and human resources decisions;
- procurement of goods, works and services;
- grant-making, fundraising and partnership decisions;
- beneficiary selection and programme targeting;
- financial transactions, contracts and disposal of assets.

### 4. Declaration of Interests

Given the purpose of this Policy:

- board members and management shall declare their interests, and any gifts or hospitality received in connection with their role in the Organisation, using the Declaration of Interests form at Annex A;
- staff and volunteers shall declare any transaction or relationship that results, or could result, in a conflict of interest.

Interests to be declared include, without limitation:

- hiring a relative or friend as an employee, volunteer or vendor;
- buying or selling goods or services from or to a family business for which others might compete;
- a personal relationship where there is a direct reporting relationship;
- volunteering for, or holding membership or office in, another charity or organisation;



- receiving goods or services from the Organisation as a beneficiary;
- any outside activity, financial interest or relationship that may pose a real, potential or perceived conflict of interest.

Disclosures are made to the Board Chair (for board members) or to Senior Management or the designated Human Resources focal point (for staff and volunteers), with any necessary approval obtained before a Member accepts an outside position as an officer or director of another organisation.

The Declaration of Interests must be renewed in writing at least annually and updated immediately whenever a Member's circumstances change. Where a Member is uncertain whether something should be declared, the Member is strongly encouraged to err on the side of caution and disclose, or to seek advice from the Board Chair or Senior Management.

All disclosures, and all decisions taken by the Board or Senior Management in response to them, shall be recorded and filed by the designated Policy Owner. A register of interests shall also record all gifts and hospitality received by Members in connection with their role that exceed a nominal value set by the Board.

## 5. Operating Procedures

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### 5.1 Board Decisions Involving a Conflicted Member

Where the Board must decide a matter in which a Board member has a declared or apparent interest, the Board shall:

- determine whether a conflict of interest exists;
- require the concerned Board member to withdraw from discussion of the matter; and
- require the concerned Board member to abstain from voting on the matter.

The Board shall further ensure that:

- the decision is made by vote, with the majority required by the Organisation's Constitution, based on the presence of a quorum; and
- the conflicted Board member does not participate in voting on any matter affecting their own interest.

### 5.2 Contracting with, or Employing, a Conflicted Member

Where the Organisation is considering hiring or contracting with a Board member or a party affiliated with a Member, the Board shall:

- confirm that the individual or entity is the best-qualified party available and willing to provide the goods or services at the best price;
- ensure the decision is not influenced in any way by the Member's interest; and
- record the potential conflict of interest and the decision-making process in the minutes of the relevant meeting.

### 5.3 General Conduct Rules

- it is the sole responsibility of each Member to report a real, potential or perceived conflict of interest as soon as it arises; where the Organisation identifies an undisclosed conflict, the Member shall be required to disclose it promptly upon being made aware of it;



- no Member may profit or gain personally, directly or indirectly, from their participation in the Organisation; each Member shall disclose any personal interest in a matter before the Organisation and shall refrain from participating in any decision on that matter;
- a Member affiliated with a client organisation, partner or vendor of the Organisation shall identify that affiliation and shall not participate in any decision affecting that party;
- Members, consultants and business partners shall not obtain any list of the Organisation's beneficiaries, donors or clients for personal or private solicitation purposes at any time during or after their engagement;
- a Member who is also a beneficiary of the Organisation's services, or the caregiver of a person who receives such services, shall not be involved in any decision directly affecting the service received by that person, and shall declare the interest at the earliest opportunity and withdraw from any related discussion;
- a Member may, however, participate in discussions from which they may indirectly benefit where that benefit is universal to all beneficiaries or staff and not particular to the Member;
- the Board shall have the right to suspend the involvement of any Member in a specific matter where it becomes aware that a potential, actual or perceived conflict has arisen but has not been voluntarily disclosed.

## 6. Violations

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A breach of this Policy, including a failure to make a required disclosure or a failure to comply with a management measure applied to a disclosed conflict, will result in disciplinary action, up to and including termination of employment, removal from the Board, or expulsion from a volunteer role. Where a breach involves misappropriation of funds or corrupt conduct, it shall additionally be addressed under the Organisation's Anti-Corruption Policy and, where appropriate, reported to statutory authorities.

## 7. Roles and Responsibilities

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### Board of Directors

- approves this Policy, reviews the register of declared interests annually, and manages conflicts declared by senior management or fellow Board members.

### Senior Management

- ensures staff and volunteers are aware of and comply with this Policy, receives and manages disclosures from staff, and escalates significant conflicts to the Board.

### All Members

- disclose actual, potential or perceived conflicts of interest promptly and in full, and comply with any management measures applied to them.

## 8. Monitoring and Review

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The register of declared interests and compliance with this Policy shall be reviewed by the Board of Directors on an annual basis. This Policy shall be reviewed at least annually, or sooner in the event of a material governance concern or a change in donor requirements or applicable law.



*This Policy has been formally approved by the Board of Directors of Barn Och Kvinnor Organisation.*

**Barn Och Kvinnor Organisation • Empowering Women • Protecting Children • Strengthening Communities**



## ANNEX A

## Conflict of Interest Disclosure Statement

|                                     |           |
|-------------------------------------|-----------|
| Period of Declaration (from): _____ | To: _____ |
|-------------------------------------|-----------|

Board members, management, staff and volunteers (“Members”) of Barn Och Kvinnor Organisation have an obligation to act in the best interests of the Organisation. It is therefore important that Members avoid situations where a personal or family interest conflicts with those of the Organisation.

**Declaration**

With regard to my service as a [ Board / Management / Staff / Volunteer ] member of Barn Och Kvinnor Organisation, I certify that, except as described below, I am not now, nor at any time during the past year have been:

- ☐ a participant, directly or indirectly, in any arrangement, agreement, investment or other activity with any vendor, supplier or other party doing business with the Organisation which has resulted, or could result, in personal benefit to me;
- ☐ a recipient, directly or indirectly, of any salary payment, loan, gift, free service, discount or other benefit from or on behalf of any person or organisation engaged in a transaction with the Organisation;
- ☐ aware of any other potential or actual conflict of interest between myself, or any person affiliated to me, and the Organisation.

Any exception to the above is stated below, with a full description of the transaction and of the interest — direct or indirect — that I have, or have had during the past year, in the person(s) or organisation(s) concerned:

- ☐ I have the following potential conflict of interest to declare:

| S/N | Area of Conflict                                                                                                                                                                                                      | Details |
|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| 1   | Affiliation to another charity or organisation                                                                                                                                                                        |         |
| 2   | Affiliation to any vendor, supplier or other party providing or bidding to provide services to the Organisation, or having a direct or indirect interest in any related business transaction, agreement or investment |         |
| 3   | Business dealings or transactions with a vendor, supplier or other party that could result in personal benefit to me, or to a person affiliated with me                                                               |         |
| 4   | Affiliation to any staff member or Board member of the Organisation                                                                                                                                                   |         |
| 5   | Affiliation to any person involved in, party to, or having an interest in, any pending legal proceedings involving the Organisation                                                                                   |         |
| 6   | Other interests                                                                                                                                                                                                       |         |

“Affiliated person” includes: a spouse, domestic partner, child, parent, sibling or close associate; any corporation, business or non-profit organisation of which you are a staff member, officer, Board member, partner, or in which you participate in management or are employed; or any trust or estate in which you have a substantial interest or act as trustee or in a similar capacity.



Please elaborate on the potential conflict arising from the above (nature of the service or transaction, the affiliated person involved, and your relationship with that person). Attach a separate sheet if space is insufficient:

**I hereby confirm that:**

- ☐ the disclosures made above are complete and correct to the best of my knowledge and belief;
- ☐ should any conflict of interest situation arise in the course of my service, I will abstain from participating in the discussion, decision-making and/or voting (where applicable) on the matter concerned; and
- ☐ I will notify the Board Chair or Vice Chair, or Senior Management, immediately if I become aware of any information indicating that this disclosure is inaccurate or that I have not complied with this Policy.

|           |                      |      |
|-----------|----------------------|------|
| Signature | Name and Designation | Date |
|-----------|----------------------|------|