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# **A CONFLICT OF INTEREST POLICY**

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**(A Non Profit Organization)**

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## **1) INTRODUCTION:**

Bheemabhai Mahila Mandali (BMM) follows a Conflict of Interest policy designed to foster public confidence in integrity and to protect interest when, contemplating entering a transaction are arrangement that might benefit the private interest of a Governing Body member or any of BMM employee. Having commercial Interest in any decision or resolution leads to conflict of interest. The Governing body of BMM is committed to High standards of ethical conduct and accordingly places great importance on making clear any exiting or potential Conflict of Interest.

**2) SCOPE:** Conflict of interest policy establishes guidelines and procedures regarding timely and proper disclosure of potential conflict of interest on an annual basis and on a case by case basis where an employee or governing body member may have or develop a conflict in relation to another party that has dealing with BMM. Disclosure is necessary to enable the management and Governing Body members of BMM to set in motion procedure to review conflict of interest on case by case basis in order to protect BMM's reputation and Institutional Integrity. Conflict of interest policy applies to the members of the Governing body and employees of BMM. The policy provides for specific disclosure and approval procedures to address situations where involvement of Governing body members and employees of BMM may give rise to real or perceived conflict of interest.

## **3) PROCEDURES:**

**a)** Before Governing Body on agreement or transaction involving a Conflict of Interest, President or Governing Body Member having a

Conflict of Interest, and who is in attendance at the meeting shall disclose all facts material to the Conflict of Interest. Such disclosure should be reflected in the minutes of the meeting.

b) President or Governing Body Member who plans not to attend a meeting at which she has reason to believe that the Governing Body will act on a matter in which the person has a Conflict of Interest shall disclose to the President at the meeting all facts material to the Conflict of Interest. The President shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the meeting.

c) A Person, who has a Conflict of Interest shall not participate in or be permitted to hear the Board's discussion of the matter except to disclose material facts and to respond to questions such person shall not attempt to exert influence with respect to the matter either at or outside the meeting.

**d)** A Person who has a Conflict of Interest with respect to an agreement or transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote. The Person having a Conflict of Interest may not vote on the agreement or transaction and shall not be present in the meeting room when the vote is taken, unless the vote is by secret ballot. Such person's ineligibility to vote shall be reflected in the minutes of the meeting.

e) Responsible persons who are not members of the Governing Body of BMM or who have a Conflict of Interest with respect to an agreement or transaction that is not the subject of Governing Body action shall disclose to the Chief Functionary any Conflict of Interest that such responsible person has with respect to an agreement or transaction. Such disclosure shall be made as soon as the Conflict of

Interest is known to the responsible person. The responsible person shall refrain from any action that may affect BMM'S participation in such agreement or transaction.

#### **4) Violations of Policy:**

a) If the Governing Body has reasonable cause to believe a member has failed to disclose actual or possible Conflict of Interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

b) If, after hearing member's response and after making further investigation as warranted by the circumstances, the Governing Body determines the member has failed to disclose an actual or possible Conflict of Interest, it shall take appropriate disciplinary and corrective action.

#### **5) Reviews and Amendment:**

a) Each new responsible person shall be required to review a copy of Conflict of Interest policy and to acknowledge in writing that he or she has done so.

b) Each responsible person shall annually complete a disclosure form identifying any relationships, positions or circumstances in which the responsible person is involved that he or she believes could contribute to a Conflict of Interest arising. Such relationships, positions or circumstances might include service as a Director to a not for profit organisation or ownership of a business that might provide goods or services to BMM. Each responsible person should also disclose to the Governing Body members any potential Conflict of Interest that may arise during the course of the year between the submission of annual disclosure forms. Any such information regarding business interests of a responsible person or a family

member shall be treated as confidential and shall generally be made available only to the Chief Functionary, the Project Director and any committee appointed to address Conflict of Interest, except to the extent additional disclosure is necessary in connection with the implementation of the Conflict of Interest Policy.

C) This policy shall be reviewed annually by each member of the Governing Body. Any changes to the policy shall be communicated immediately to all responsible persons.

#### **6) Declaration:**

Annual Declaration of interest: The Declaration of interest applies not only to members of the Governing Body but also to any other employee who can potentially influence BMM's decisions for example this holds veiled for employee charged with making procurement decisions. Proposal vetting management decisions at any level or those with access to proprietary information effecting the interests and reputation of BMM.

The declaration of interest should be filed every year and should cover the fiscal period from 1<sup>st</sup> April to 31<sup>st</sup> March of the following year.