

CONFLICT OF INTEREST POLICY

1. Principle

- 1.1. The staff of Oxfam India aspires to the highest levels of ethical conduct in all of their work for the organization.
- 1.2. Oxfam India strongly believes that its work for the poor and marginalized benefits from having members of its staff with current and past experience in the not-for-profit sector and in the substantive fields in which Oxfam India works. Given the broad experience and interests of Oxfam India's staff, from time to time, staff may serve as officers, employees, directors, trustees, or consultants to an organization under consideration for Oxfam India's support or for provision of goods or services. Consequently, transactions may arise during the ordinary course of Oxfam India's work where conflicts of interest are present.
- 1.3. Oxfam India has adopted a conflict of interest policy to ensure the legal and ethical integrity of its decision-making and to make clear that no organization or individual benefits inappropriately because of a relationship with either staff, partners or Board Members of Oxfam India.

2. Prohibited transactions

- 2.1 While initiating partnership, appointing consultants and entering into other services agreements the organisation shall be driven by the following (where financial involvement exists):
- 2.2 We shall not engage in partnership with any organization or individual where the concerned officials of Oxfam is a board member of that organization, or respective Oxfam official is related to any of the board members/management team members of that organization or that individual. This may not apply in case of Oxfam or Oxfam's staff members, which is part of a larger network/association like Association of NGOs, CSOs, INGOs etc.
- 2.3 Due care needs to be exercised in the appointment of consultants so that it does not cause conflict of interest. We shall not appoint any consultant or service provider who is affiliated (member of board/staff member) with an organization where an Oxfam official is also a board member of any such organization. This may not apply in case of Oxfam or Oxfam's staff members, who are a part of larger networks/associations like Association of NGOs, CSOs, INGOs etc.
- 2.4 This principle will apply for all consultancies and services, small, long term and large.
- 2.5 We shall also not appoint any consultant and other services provider who is a close relative of either an Oxfam staffer or of Oxfam's Board Members and partners.

3. Procedure for related party transactions

- 3.1 If we have to involve financially with any related party under any exceptional circumstance then the CEO will give a formal approval.

- 3.2** Formal approval will involve submission of a note to the CEO describing the nature of involvement and relationship, explanation on exceptional circumstances, task, financial involvement and period of transactions.

4. Disclosure of related party transactions

Our year end statutory accounts will disclose related party transactions as per the generally accepted accounting and auditing standards.

5. Disclosure of existing related party transactions

All Oxfam India staff will have to disclose their all existing related party transactions at the time of joining **the** organisation or as soon as it is known. This disclosure should include-nature of involvement and relationship, circumstances, task, financial involvement and period of transaction. This disclosure note must be submitted to Director Operations.

6. Definition of Relative

For the above purpose of this policy relative means:

- Spouse/parents of the individual;
- Brother or sister of the individual or their children;
- Brother or sister of the spouse of the individual or their children;
- Brother or sister of either of the parents of the individual or their children;
- Any lineal ascendant or descendant of the individual;
- Any lineal ascendant or descendant of the spouse of the individual;
- Spouse of the person referred to in clauses (b) to (f).