

# **Conflict of Interest Policy**

## **1. Purpose**

This policy ensures that decisions taken by Swarga Foundation are free from personal, financial, or other interests that may compromise objectivity, fairness, or the Foundation's mission.

## **2. Applicability**

This policy applies to Trustees, Board members, employees, consultants, advisors, and key volunteers of Swarga Foundation.

## **3. Definition of Conflict of Interest**

A conflict of interest arises when an individual's personal, professional, or financial interests interfere or appear to interfere with the interests of Swarga Foundation.

Examples include:

- Financial interest in a vendor, partner, or service provider
- Employment or consultancy of relatives with the Foundation or its vendors
- Acceptance of gifts or benefits influencing decisions
- Use of Foundation information for personal gain

## **4. Disclosure**

All covered persons must disclose any actual or potential conflict of interest at the earliest opportunity and on an annual basis.

## **5. Management of Conflict**

- The concerned individual shall recuse themselves from discussions or decisions related to the conflict
- The Board or designated committee shall review and decide on appropriate action
- All disclosures and decisions shall be recorded

## **6. Gifts and Hospitality**

No individual shall accept gifts, favors, or hospitality that may influence or appear to influence decision-making. Nominal gifts of symbolic value may be permitted with disclosure.

## **7. Non-Compliance**

Failure to disclose or manage a conflict of interest may result in disciplinary action, including termination of association.

## **8. Review and Compliance**

This policy shall be reviewed periodically by the Board of Trustees to ensure relevance and compliance.

*Approved by the Board of Trustees, Swarga Foundation Effective Date: 1/7/25*