



## CONFLICT OF INTEREST POLICY

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**Kabalega Foundation** is committed to maintaining the highest standards of integrity, professionalism, and transparency in all its operations. This **Conflict of Interest Policy** ensures that decisions made by staff, volunteers, Board members, and any other stakeholders are free from any influence that may compromise the Foundation's mission, objectives, or the trust of its stakeholders.

### 1. Purpose

The purpose of this policy is to:

- Define what constitutes a conflict of interest.
- Set out the process for identifying, disclosing, and managing conflicts of interest.
- Ensure that decisions are made in the best interests of Kabalega Foundation, without undue influence from personal interests or relationships.
- Promote transparency and accountability within the Foundation.

### 2. Scope

This policy applies to all individuals involved in the governance and operations of Kabalega Foundation, including:

- Board members.
- Executive and senior management staff.
- Employees, contractors, and volunteers.
- Any third-party consultants or service providers who may interact with the Foundation.

### 3. What is a Conflict of Interest?

A **conflict of interest** arises when an individual's personal interests or relationships interfere, or appear to interfere, with their ability to act in the best interests of Kabalega Foundation. This can include, but is not limited to:

- **Financial Interests:** A personal, financial, or family interest in a business or entity that could be impacted by the decisions made by the Foundation.
- **Business Relationships:** Involvement in a business that competes with or provides services to the Foundation.
- **Personal Relationships:** Family or close personal relationships with individuals who may benefit from decisions made by the Foundation.
- **External Activities:** Participation in activities that could be seen as conflicting with the individual's duties and obligations to the Foundation, such as working for or serving on the board of a competing organization.

A conflict of interest does not necessarily imply wrongdoing, but it can raise concerns about impartiality, objectivity, and fairness in decision-making.

#### 4. Disclosure of Conflicts of Interest

All individuals covered by this policy are required to:

- **Declare Conflicts:** Disclose any personal, financial, or business interests that could be seen as a conflict of interest to the Board of Directors or Executive Management.
- **Timely Disclosure:** Disclosures must be made as soon as an individual becomes aware of a potential or actual conflict of interest, or at the start of their engagement with the Foundation.
- **Annual Declaration:** All relevant individuals must submit an annual conflict of interest declaration to ensure that any potential conflicts are regularly assessed and addressed.

The Foundation will maintain a **Conflict of Interest Register** to record disclosed conflicts of interest and the steps taken to manage them.

#### 5. Managing Conflicts of Interest

Once a conflict of interest has been identified and disclosed, the Foundation will take appropriate steps to manage and resolve the conflict. Actions may include:

- **Recusal:** The individual with the conflict may be required to recuse themselves from decisions, discussions, or votes related to the conflict.
- **Independent Review:** In some cases, the Foundation may request that an independent party review the situation to ensure impartiality and fairness.
- **Adjustments to Role:** If necessary, adjustments to the individual's role, responsibilities, or involvement with certain projects may be required to eliminate or mitigate the conflict.
- **Monitoring:** The Foundation will monitor the situation to ensure that the conflict has been resolved and that no further issues arise.

#### 6. Board Members and Senior Management

For Board members and senior management, conflicts of interest can be more sensitive due to the leadership role they play within the Foundation. As such:

- **Board Decisions:** Board members who have a conflict of interest should not participate in decision-making processes or discussions that could be influenced by the conflict.
- **Disclosure to the Board:** Any conflict of interest involving a Board member must be disclosed to the full Board. The Board may decide to delegate the resolution of the conflict to an independent committee or third party if needed.

#### 7. Breaches of the Policy

Any failure to disclose a conflict of interest or failure to manage conflicts in accordance with this policy will be taken seriously. Breaches of this policy may result in disciplinary action, including removal from the Board or termination of employment, depending on the severity of the breach.

## 8. Education and Training

To ensure all individuals are aware of their responsibilities under this policy, Kabalega Foundation will:

- **Provide Training:** Offer training to staff, Board members, and volunteers on how to identify, disclose, and manage conflicts of interest.
- **Ongoing Awareness:** Continuously raise awareness of the importance of avoiding conflicts of interest and maintaining the Foundation's integrity in decision-making.

## 9. Confidentiality

All disclosures of conflicts of interest and related discussions will be handled confidentially. Only those who have a legitimate need to know (such as the Board of Directors or senior management) will be informed of a potential or actual conflict.

## 10. Policy Review and Updates

This **Conflict of Interest Policy** will be reviewed periodically to ensure that it remains effective and reflects any changes in regulations, best practices, or the Foundation's activities. Any amendments will be communicated to all relevant stakeholders.

Kabalega Foundation is committed to ensuring that all individuals involved in its operations act with integrity and in the best interest of the organization. By managing and addressing conflicts of interest, we aim to maintain public trust, promote transparency, and ensure that all decisions are made objectively and in line with the Foundation's mission and values.

Signed:



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Executive Chairperson

Date: 04/01/2020 .....