



EFICOR'S **Conflict of Interest** **Policy**

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The term “Conflict of Interest” means where the interests or benefits of one person or entity conflict with the interests or benefits of the organization. Each staff is expected to comply and sign and inform that while executing the project or purchase there was no Conflict of Interest.

The Directors, Managers and staff of EFICOR recognize a shared responsibility to ensure that they conduct themselves in an unbiased manner. It is the responsibility of the Management to guard against conflicts of interest, which might compromise the integrity and objectivity of the operations of EFICOR.

A. Purpose

The purpose of the Conflicts of Interest Policy is to protect the interests of EFICOR when it is contemplating entering into a transaction or arrangement that might benefit the private interests of the Directors, Managers and staff of the organization.

B. Definitions

1. Interested Person

Directors, Managers and staff of the organization or consultant or project staff whoever receives salary/stipend/allowance (Cos, supervisors, volunteers, animators) or member of a committee which the Management had delegated powers with, that have a direct or indirect financial interest (giving quotes, supplying materials etc.) and is an interested person.

2. Financial Interest

A person has a financial interest if the person has, directly or indirectly, through business, investment or family:

- a. An ownership or investment interest in any entity with which EFICOR has a transaction or arrangement,
- b. A compensation arrangement with EFICOR or with any entity or individual with which EFICOR has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which EFICOR is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature. A financial interest is not necessarily a conflict of interest unless deemed so by the Management or appropriate committee.

C. Procedures

1. Duty to Disclose

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In connection with any actual or possible conflicts of interest, an interested person must disclose the existence of his or her financial interest and must be given the opportunity to disclose all material facts to the Directors and Members of Committees with delegated powers considering the proposed transaction or arrangement.

2. Determining Whether a Conflict of Interest Exists

The Management Committee will decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest

a. An interested person may make a presentation at the Management or Committee meeting and the Management or the Committee will decide.

b. The ED or the Director shall, if appropriate, appoint a disinterested person or Committee to investigate alternative to the proposed transaction.

c. After exercising due diligence, the Management shall determine whether EFICOR can obtain a more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest.

d. If a more advantageous transaction or arrangement is not reasonably attainable, under circumstances that would not give rise to a conflict of interest, the Management or Committee shall determine whether the transaction or arrangement is in EFICOR's best interest and for its own benefit, and whether the transaction is fair and reasonable to the association and shall make its decision as to whether to enter into the transaction or arrangement in conformity with such determination.

D. Violations of Conflicts of Interest Policy

1. If the Management or Committee has reasonable cause to believe that a member has failed to disclose actual or possible conflicts 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.

2. If, after hearing the response of the member and making such further investigation as may be warranted in the circumstances, the Management or Committee determines that the member has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

E. Records of Proceedings

The minutes of the Management and all Committees with Management-delegated powers shall contain:

1. The names of the persons who disclosed or otherwise were found to have a



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financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Management's or Committee's decision as to whether a conflict of interest in fact existed.

2. The names of the persons who were present for discussions relating to the transaction or arrangement, the content of the discussion, including alternatives to the proposed transaction or arrangement.