

**PREVENTING AND MITIGATING
CONFLICTS OF INTERESTS POLICY**

RDIS

Rural Development Inter-Diocesan Service
A Holy Soul in a Healthy Body

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1. Background

RDIS is an organization striving for sustainability and professionalism at leadership, managerial and technical levels; to make it, a set of comprehensive strategies likely to serve as basis, fighting against conflicts of interest are required. This conflict of interest policy is elaborated to serve as guidance whenever decisions are to be made within the organization. It does not replace the existing administrative and managerial documents, rather, it is intended to complement them clearly explains issues of conflicts that may occur within the organization and the manner by which they can be dealt with.

2. Definition

Conflict of interest is a conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of RDIS organization by contradicting or not complying with organization written procedures, statutes, internal regulations or policies prevailing in RDIS organization. It may be a kickback or a personal interest.

Kickback to employees by a supplier in return for a supplier receiving favorable conditions; purchase of a property at a price higher than market value in exchange of the kickback; preference treatment of a customer in exchange for a kickback, etc.;

Personal interest as collusions with customers/suppliers; favoring a supplier in which an employee has financial interest; transfer of knowledge to a competitor by an employee who intends to join the competitor's company; insider trading; etc.

The following are examples of actual or potential conflicts of interest covered under this Policy:

- An employee who makes purchasing decisions receives a gift or loan from an existing or prospective supplier to RDIS organization
- The employee's position in RDIS is such that s/he may be able to influence the decision regarding the benefits to be received by employees of the organization in a situation whereby an employee's vote counts one-third of voting rights
- An employee's family member negotiates to sell or lease property of RDIS with an intention to underestimate its real cost compared to its value indicated in the assets register of RDIS organization

- An employee's close relative is part owner of a firm, which carries out building maintenance, construction services for RDIS organization
- An employee or his/her family member is involved in a dispute with RDIS organization.

3. Key controls

- Cases of any nature of corruption (financial, sexual or tangible assets) from staff or individuals to either member of Governing Entities, Management Team, staff as to access or win opportunities within RDIS organization attempting to worsen the principle of fairness and integrity.
- Spreading information to a group, individuals or interfering people's attributions intended to anticipate the written processes of tender procedures within RDIS organization.
- Deviating from annually adjustments/ depreciation and values of RDIS assets as indicated in assets register during the sell process of properties.

4. Handling conflicts of interest within RDIS organization

Audit committee exists within RDIS organization from 2nd May 2013, the duties of that committee are stipulated in the statutes of RDIS article 25. Once a conflict arises, the manner by which it dealt with is a follow:

- Acknowledgment of the conflict by the eligible individuals or entities, the situation or whoever committed to growth and sustainability of the organization amongst governance entities, management team, staff
- Report of the case of conflict either verbally or in writing. For verbal communication, it calls upon eligible entities and individuals to assess whether or not the situation is true. If it is true, then the case is handled by either the Executive Secretary or Conflicts resolutions committee depending on the damage it can produce
- Find out if the situation communicated is true, or just a rumor. For cases of conflict supported by evidence or proof, this must automatically be dealt with rigorously in an administrative manner which may ultimately result in the suspend/terminate job contract of the person concerned if s/he an employee or even be taken to court following the decision of the conflict management committee. As none is proud of being accused of poor behaviors and therefore, record of information is always a must whenever evidences or proof are provided

- For any nature of conflict beyond the capacity of Management Team; the issue is to be dealt by the audit committee, which, in case of failing to resolve it, it is to be taken to members of the Board of Directors of RDIS meeting whose right include the ability to introduce the case to the court and inform the General Assembly

5. Record of conflicts of interest

- Annual Declaration of Conflicts of Interest – mandatory for Trustees, Directors (Senior Management Team) and discretionary for volunteers and staff – using the Conflict of Interests Declaration Form
- Maintenance of Register of Interests to record conflicts of interest
- Register of Interests made available to the audit Committee and to the members of the Board of Directors
- Disclosure of trustee benefits (related party transactions) in the Annual Accounts

6. Benefits of the members of governing entities

Members of the Board or other governing entities can only benefit from RDIS whenever there is an explicit authority in place before any decision conferring trustee benefit is made. Benefits include paying a trustee, or a person or company owned or in which the member of the board of directors and or staff members are amongst shareholders, for providing a service to RDIS.

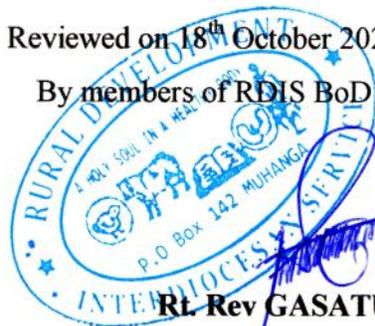
Members of governing entities are not paid for their roles, but, they are facilitated by means of transportation, meals and accommodation. However, whenever an active participation for leadership assignment or managerial one is given to them as add –hock attributions to respond to a specific need or challenge within RDIS organization they have to get the amount of fees as maybe determined by the management team as sign of recognition of the work undertaken.



Mr. Viateur NTARINDWA
Secretary of the BoD

Reviewed on 18th October 2020

By members of RDIS BoD



Rt. Rev GASATURA KAMUSIIME NATHAN
The Chair and President of BoD