



Aas Health Foundation

Swayambhu Apt 2, Near Nasare Sabhagruh,
Hudkeshwar Road, Nagpur – 440034.

Conflict of Interest Policy

Introduction

Aas Health Foundation (AHF) is committed to upholding the highest standards of integrity, accountability, and transparency in its operations. This 'Conflict of Interest' Policy is designed to identify, disclose, and manage conflicts of interest that may arise among employees, volunteers, board members, contractors, and other stakeholders, ensuring that decisions are made solely in the best interests of the organization and its mission.

Purpose

The purpose of this policy is to:

1. Define what constitutes a conflict of interest.
2. Establish a framework for identifying, disclosing, and managing conflicts of interest.
3. Ensure that all stakeholders act in the best interests of AHF and avoid personal or financial interests that could improperly influence decisions.

Scope

This policy applies to all employees, board members, volunteers, interns, contractors, and any individuals or entities engaged in activities or decision-making for or on behalf of AHF.

Definitions

1. *Conflict of Interest*

- A conflict of interest arises when an individual's personal, financial, or other interests interfere with, or appear to interfere with, their ability to act in the best interests of AHF.

2. *Personal Interest*

- Includes financial interests, family relationships, friendships, or any other association that could unduly influence decisions.

3. *Material Interest*

- Any interest that could result in financial gain or benefit to an individual or their immediate family members.

Examples of Conflicts of Interest

1. *Financial Interests*

- Engaging in transactions with vendors or contractors in which an employee or their family member has a financial stake.

2. *Dual Roles*

- Holding outside employment or consulting positions that conflict with the responsibilities at AHF.

3. *Gifts and Hospitality*

- Accepting gifts, favors, or hospitality from individuals or entities that could influence or appear to influence decision-making.

4. *Family and Personal Relationships*

- Making decisions that directly benefit family members, close friends, or associates, such as hiring or awarding contracts.

5. *Use of Resources*

- Using AHF's resources, reputation, or information for personal gain or for the benefit of an external organization.

Policy Statement

1. Disclosure

- All individuals covered by this policy are required to disclose any actual, perceived, or potential conflicts of interest as soon as they arise.

2. Avoidance

- Employees and stakeholders must avoid situations where their personal interests conflict with the interests of AHF.

3. Transparency

- All decisions must be made transparently and in the best interests of AHF, free from undue personal influence.

4. Prohibition of Undue Influence

- Employees and stakeholders are prohibited from influencing decisions that could result in personal or financial gain for themselves or their close connections.

Disclosure Process

1. Initial Disclosure

- Upon joining AHF, employees, board members, and other stakeholders must complete a Conflict-of-Interest Disclosure Form detailing any existing or potential conflicts.

2. Ongoing Disclosure

- Any new conflicts that arise must be disclosed in writing to the Conflict-of-Interest Officer (CIO) or designated authority as soon as they are identified.

3. Annual Updates

- Stakeholders must update their disclosures annually to ensure all potential conflicts are recorded and managed.

Managing Conflicts of Interest

1. Assessment

- The CIO or designated authority will review all disclosed conflicts to determine if they pose a risk to AHF's operations or reputation.

2. *Resolution*

- If a conflict is identified, one or more of the following actions may be taken:
- Restrict the individual's involvement in the decision or activity.
- Transfer responsibilities to another individual.
- Terminate the relationship or activity causing the conflict.

3. *Documentation*

- All disclosures, assessments, and resolutions will be documented and retained for organizational records.

Confidentiality and Non-Retaliation

1. *Confidentiality*

- All disclosures will be handled confidentially, and sensitive information will only be shared with those directly involved in the assessment process.

2. *Non-Retaliation*

- Individuals who disclose conflicts of interest in good faith will not face retaliation or adverse consequences.

Responsibilities

1. *Employees and Stakeholders*

- Understand and comply with this policy.
- Promptly disclose any actual or potential conflicts of interest.

2. *Conflict of Interest Officer (CIO)*

- Maintain and manage the Conflict-of-Interest Register.
- Review disclosures and determine appropriate resolutions.
- Provide guidance and training on this policy.

3. *Board Members*

- Ensure compliance with this policy and act in the best interests of AHF at all times.

Consequences of Non-Compliance

- Failure to disclose conflicts of interest or comply with this policy may result in disciplinary action, including termination of employment, removal from the board, or cancellation of contracts.
- Severe violations may be reported to legal authorities if applicable.

Monitoring and Review

- This policy will be reviewed annually or as required by changes in laws or organizational needs.
- Regular audits will be conducted to ensure compliance.

Contact Information

Conflict of Interest Officer (CIO)

Aas Health Foundation

Help@ashealthfoundation.com

7304317605

Acknowledgment

All employees, board members, and stakeholders must sign a declaration acknowledging that they have read, understood, and agree to comply with this policy.

Approved by:

Dr. Kamlesh Kakde

Secretary,

Aas Health Foundation

Date: