



MOSES WELFARE FOUNDATION

"Bring Back The Smiles"

Conflict of Interest Policy

Policy Number: MWF-COI-001

Version: 1.0

Effective Date: 28 July 2026

Review Date: 28 July 2027

Approved By: Board of Directors, Moses Welfare Foundation

Conflict of Interest Policy

1. Policy Statement

Moses Welfare Foundation (MWF) is committed to the highest standards of integrity, impartiality, transparency, accountability, and ethical governance. The Foundation recognizes that decisions must always be made in the best interests of the organization and the communities it serves, free from improper personal, financial, or professional influence.

As a Christian humanitarian and development organization, MWF expects all Board Members, employees, volunteers, consultants, contractors, and representatives to avoid situations where personal interests could conflict, or appear to conflict, with their responsibilities to the Foundation.

MWF maintains a **zero-tolerance approach** to undisclosed conflicts of interest and requires all actual, potential, or perceived conflicts to be declared and managed appropriately.

2. Purpose

The purpose of this policy is to:

- Protect the integrity and reputation of MWF.
- Ensure decisions are made fairly and objectively.
- Prevent personal interests from influencing organizational decisions.
- Promote transparency and accountability.
- Protect donor funds and organizational assets.
- Comply with legal, regulatory, and donor requirements.
- Strengthen public confidence in MWF's governance.

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3. Scope

This policy applies to:

- Board of Directors
- Chairman / Executive Director
- Employees
- Volunteers
- Consultants
- Interns
- Contractors
- Procurement Committee Members
- Recruitment Panel Members
- Project Committees
- Partner Organizations acting on behalf of MWF
- Any individual authorized to make decisions or represent MWF

This policy applies to all organizational activities, including:

- Recruitment
- Procurement
- Contract management
- Financial approvals
- Grant management
- Programme implementation
- Partnerships
- Asset disposal
- Investments
- Vendor selection
- Donor engagement
- Board decisions

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4. Guiding Principles

MWF is committed to the following principles:

- Integrity
- Transparency
- Accountability
- Fairness
- Objectivity
- Independence
- Responsible stewardship
- Ethical leadership
- Equal opportunity
- Public trust

5. Definition of a Conflict of Interest

A conflict of interest exists when an individual's personal, financial, family, business, political, or other private interests could influence or reasonably appear to influence the impartial performance of their duties on behalf of MWF.

A conflict may exist even if no improper action occurs.

6. Types of Conflict of Interest

Actual Conflict

A direct conflict currently exists between personal interests and organizational responsibilities.

Potential Conflict

A situation where a conflict could reasonably arise in the future.

Perceived Conflict

A situation where others could reasonably believe that a conflict exists, even if none actually does.

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7. Examples of Conflicts of Interest

Examples include, but are not limited to:

- Awarding contracts to a company owned by a family member.
- Participating in recruitment involving a close relative or friend.
- Receiving gifts, hospitality, or benefits that could influence decision-making.
- Holding a financial interest in a supplier or contractor.
- Using confidential information for personal gain.
- Using organizational resources for personal benefit.
- Accepting outside employment that interferes with MWF responsibilities.
- Serving on another organization where competing interests may arise.
- Participating in decisions affecting one's own salary, benefits, or contracts.

8. Duty to Disclose

All covered individuals must promptly disclose any actual, potential, or perceived conflict of interest.

Disclosures shall be made:

- Upon appointment or engagement.
- Annually through a Conflict-of-Interest Declaration.
- Whenever a new conflict arises.
- Before participating in any decision where a conflict may exist.

Failure to disclose a conflict may constitute misconduct.

9. Conflict of Interest Register

*MWF shall maintain a confidential **Conflict of Interest Register** recording:*

- Name of the individual.
- Nature of the conflict.
- Date of disclosure.
- Assessment of the conflict.
- Action taken to manage the conflict.
- Date of resolution or review.

The register shall be maintained securely and reviewed periodically.

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10. Managing Conflicts of Interest

Where a conflict is identified, MWF may require one or more of the following actions:

- Disclosure of the conflict.
- Withdrawal from discussions.
- Recusal from decision-making.
- Transfer of responsibilities.
- Independent review of the matter.
- Enhanced management oversight.
- Termination of a procurement or recruitment role where necessary.

The selected management approach shall be proportionate to the nature and level of risk presented by the conflict.

11. Gifts, Hospitality and Benefits

Personnel shall not solicit or accept gifts, favors, hospitality, or benefits that could improperly influence or reasonably appear to influence their judgement.

Modest and culturally appropriate tokens of appreciation may be accepted where they:

- Are of nominal value.
- Do not influence decision-making.
- Are not cash or cash equivalents.
- Comply with MWF policies.

Cash gifts and personal payments are strictly prohibited.

12. Procurement and Contracting

Individuals involved in procurement shall:

- Declare any relationship with suppliers.
- Avoid participating where a conflict exists.
- Ensure fair and competitive procurement.
- Protect confidential supplier information.
- Make decisions solely in the best interests of MWF.

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13. Recruitment

Recruitment processes shall be conducted fairly and transparently.

Individuals shall not participate in recruitment decisions involving:

- Immediate family members.
- Close personal relationships.
- Financial interests.
- Any other relationship that may compromise impartiality.

All appointments shall be based on merit, qualifications, experience, and organizational needs.

14. Financial Decision-Making

Personnel involved in financial approvals shall:

- Avoid approving payments that directly benefit themselves or closely related persons.
- Declare financial interests.
- Follow delegated financial authority limits.
- Maintain complete supporting documentation.

15. Confidential Information

Confidential organizational information shall not be used for:

- Personal gain.
- Commercial advantage.
- Political activities.
- Private business interests.
- Assisting competitors or suppliers.

Confidentiality obligations continue after employment or engagement ends.

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16. Responsibilities

Board of Directors

The Board shall:

- Approve this policy.
- Promote ethical governance.
- Review significant conflict of interest cases.
- Ensure compliance across the organization.

Chairman / Executive Director

The Chairman shall:

- Ensure implementation of this policy.
- Promote a culture of transparency.
- Ensure conflicts are appropriately managed.
- Support regular declarations and training.

Managers

Managers shall:

- Identify potential conflicts.
- Encourage disclosure.
- Maintain impartial decision-making.
- Escalate significant concerns.

Employees and Volunteers

All personnel shall:

- Declare conflicts promptly.
- Act honestly and ethically.
- Cooperate in managing identified conflicts.
- Avoid situations that could damage MWF's reputation.

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17. Training and Awareness

MWF shall provide periodic training covering:

- Conflict of interest principles.
- Ethical decision-making.
- Gifts and hospitality.
- Procurement integrity.
- Financial accountability.
- Disclosure procedures.

All new personnel shall receive orientation on this policy during induction.

18. Monitoring and Compliance

Compliance shall be monitored through:

- Annual conflict declarations.
- Internal audits.
- Procurement reviews.
- Recruitment reviews.
- Board oversight.
- Financial audits.
- Policy compliance assessments.

Any identified weaknesses shall be addressed through corrective actions.

19. Policy Violations

Failure to comply with this policy may result in:

- Corrective action.
- Mandatory retraining.
- Removal from decision-making processes.
- Disciplinary action.
- Termination of employment, volunteer engagement, or contracts.
- Recovery of losses where legally permissible.
- Referral to the appropriate authorities where required by law.

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20. Policy Review

This policy shall be reviewed annually or sooner if required by changes in legislation, donor requirements, governance standards, or organizational operations.

21. Commitment

Moses Welfare Foundation is committed to maintaining the highest standards of ethical leadership, integrity, and accountability. By identifying, disclosing, and managing conflicts of interest, we strengthen public trust, protect donor resources, ensure fair decision-making, and uphold our responsibility to the communities we serve.

Every person representing MWF shares responsibility for protecting the Foundation's reputation and ensuring that organizational decisions are always made in the best interests of our mission.

Approval

This Conflict-of-Interest Policy has been approved by the Board of Directors of Moses Welfare Foundation and is binding on all Board Members, employees, volunteers, consultants, contractors, partner organizations, and representatives acting on behalf of the Foundation.

Approved By: Board of Directors

Moses Welfare Foundation

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Motto: "Integrity in Every Decision. Transparency in Every Action. Trust in Every Relationship."



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