

Conflict of Interest Management Policy



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Introduction:

Agrogoti Sangshta is a regional organization working in the southwest part of Bangladesh. Since 1996 Agrogoti Sangstha has been working in development issues like human rights, child protection, protecting freedom, good governance and climate change adaptation. As per our working experience we realized that transparent procurement process may be manipulated due to conflict of interest. To ensure transparent procurement procedure, Agrogoti Sangstha introduced the Conflict of Interest Management policy. The conflict of Interest Management policy has been finalized through discussion with the executive committee, management committee, staff and relevant stakeholder.

A conflict of Interest of general and executive committee members, employee(s) is any interest, financial or otherwise, direct or indirect, participation in any business, transaction or professional activity for financial gains, or incurring any obligation of any nature, which is appears to be in substantial conflict with the proper discharge of duties in relation to Agrogoti Sangstha.

The following areas in respect of any transaction/business will be treated as conflict of interest:

1. Take any advantage from any vendor or institution using the organizational identity for personal benefit.
2. Business/ transaction with any relative or friend for giving advantage avoiding transparent process.
3. A situation is which professional actions or decisions might become questionable.
4. Appointment of any person having blood relationship/any relatives of the Executive and staff.
5. Use of any assets /properties of the organization for personal benefit.
6. Assigning any sub-ordinate employee in performing any personal work.

Handling Conflicts of Interest

Under the situation of a conflict of interest it is vitally important that any new or serving Board members learn how to identify such conflict of interest and how to deal with the situation. Handling such conflicts of interest for the organization may be resolved in the following manner in relation to the conflict:

1. Take any personal advantage may be overcome and conflict of interest is avoided through:
 - The staffs will be oriented on conflict of interest at the initial stage after recruitment.
 - In case of accusation, the committee will form for proper investigation and take action as per policy.
2. Business/ transaction with any relative or friend: the situation may be overcome and conflict of interest is avoided through:
 - The relevant board and committee member should disclose the relationship and should withdraw from his/her membership from the board and refrain from putting any decision.
 - The procurement should be justified through procurement analysis.

3. A situation in which professional action or decisions might become questionable: The any person who may become questionable must not be involved in the procurement and the procurement may be handled by Independent procurement person as indicated in above situation through appointment of outsiders (teacher, human rights activist) and Justification by procurement analyst.

4. Appointment of any person having blood relationship/relatives with any of the Executive, Management and Staff: Both the applicant and exiting staff will declare in black and white during the recruitment period. In that case the existing staff will not be engaged in the recruitment process. If any one disobeys the rules or hide the information then organization keep rights to take any decision against him/her.

5. Double Employment/Consultancy: No employees of Agrogoti Sangstha should be engaged in Double Employment either on full time or part time basis, except in exceptional circumstances, each employee has to Agrogoti Sangstha working time. The staff of Agrogoti Sangstha may get appointment with more than one project on partial basis in that case 100% work time of that employee must not be exceeded. The employee must submit time sheet according to each project.

6. Use of any assets /properties of the organization for personal benefit: The Executive members as well as the others staff of the organization should consider the fact that the organization belongs to all and the persons in question are involved to run the organization for organizational benefit. So must refrain from any involvement in person gain benefit.

7. Assigning any sub-ordinate employee in performing any personal work: The Executive committee members and others official should keep in mind that all sub-ordinates and staff are being appointed for carrying out works or task of the organization for organizational benefit and progress and they are employees of the organization and not of any persons. This mentally will prevent them to order for personal works. All employees should be made aware of the conflict of interest so that they know the norms and rules.

8. Conflict of Interest regarding related party transaction: Conflict of Interest may arise through transaction with sister concerns or such others party for any gain. Such Conflict of Interest may be resolved in the following manner:

- Disclosure of information to the Related party about sister concern.
- Different and Independent committee.
- Individual identities of the sister concern/related party.
- Individual financial and administrative procedure.
- Independent management.
- Unbiased financial transaction within the arm's length.
- The procedure that is applicable for the other vendor will also follow in the same way for the sister concern.