

Conflict of Interest Policy

1. Purpose

The purpose of this Conflict of Interest Policy is to ensure that the activities and decisions of Earth Focus Foundation are made in the best interests of the organization and its mission. This policy seeks to prevent any actual, potential, or perceived conflicts of interest that could interfere with the integrity, objectivity, or fairness of the Foundation's operations.

2. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, professional, or financial interests could compromise or appear to compromise their ability to act in the best interests of the Foundation. Conflicts may arise in situations including, but not limited to:

- Personal financial gain from Foundation activities.
- Relationships with vendors, contractors, or partners of the Foundation.
- Engagement in activities that compete with or undermine the Foundation's mission.
- Favouritism or preferential treatment in decision-making.

3. Applicability

This policy applies to all board members, officers, employees, and volunteers of the Foundation ("Covered Individuals").

4. Disclosure of Conflicts

Covered Individuals must disclose any actual or potential conflicts of interest as soon as they arise. Disclosures should be made in writing to the Board of Directors or an appropriate ethics committee.

5. Procedures for Addressing Conflicts

- 1. Recusal: The individual with the conflict must abstain from participating in discussions or decisions related to the matter.
- 2. Evaluation: The Board will assess the conflict and determine if corrective action is needed.
- 3. Mitigation: If necessary, the Board may require actions such as divestment from financial interests, modification of responsibilities, or other measures to resolve the conflict.
- 4. Documentation: All disclosed conflicts and resolutions must be documented in meeting minutes and kept on record.



6. Violations and Enforcement

If a Covered Individual fails to disclose a conflict or violates this policy, the Board may take appropriate disciplinary action, including but not limited to removal from their position, termination of employment, or legal action if warranted.

7. Annual Review and Acknowledgment

All Covered Individuals must review this policy annually and sign a statement acknowledging their understanding and compliance. Updates or amendments to this policy will be communicated promptly.

Adopted by the Board of Directors on [01/01/2025]

Name: Mr. Vipul Gupta

Title: Executive Director