

Conflict of Interest Policy

1. PURPOSE

At Reach for Change we want to create a global movement of smart, brave and passionate change agents building a better world for children. It is important for us to ensure that no conflicting interests get in the way of this objective. Reach for Change is firmly committed to promoting market integrity and sustainable development. Business decisions must always be made a fair, honest and professional manner and in accordance with the best in the best interest of Reach for Change and our final customers - the children.

The purpose of this Policy is to protect the interests of Reach for Change. In the regular course of business, agents or employees of Reach for Change may have the opportunity to advance their own personal interests with or against the interests of Reach for Change. Acting in such a manner is unacceptable and any party who acts outside of Reach for Change's best interest may be subject to disciplinary action.

This Policy sets out the organisational and administrative procedures to identify and manage actual and potential Conflicts of Interest in Reach for Change operations. All Employees of Reach for Change, including non-permanent staff, volunteers and interns, persons involved in the provision of services on behalf of Reach for Change and Board members are subject to this Policy.

2. SCOPE

This Policy applies to all Reach for Change operations.

3. DEFINITIONS

A) **Conflict of Interest** - a conflict of interest is any situation that would cast doubt on an employee's ability to act with total objectivity with regard to Reach for Change's interest.

B) **Potential Conflict of Interest** - a reasonably foreseen situation where Conflict of Interest may arise conditional to certain circumstances or events.

C) **Actual Conflict of Interest** - a situation where the arising of a Conflict of Interest is not conditional to future circumstances or events.



D) **Employee** – any person who is employed by Reach for Change in a part or full-time capacity, including non-permanent staff, volunteers and interns, persons involved in the provision of services on behalf of Reach for Change.

E) **Agent** – a Board member, stakeholder, contractor, or other third-party that is in the position to act on behalf of Reach for Change.

4. **DUTY TO DISCLOSE**

Every employee/agent of Reach for Change is obligated to disclose any known or potential conflicts of interest as soon as they arise. Any known or potential conflict of interest must be reported promptly in writing to the employee's supervisor or Reach for Change's CEO. If an employee is uncertain whether a situation constitutes a conflict of interest the supervisor should still be informed.

Conflicts of interest include, but are not limited to:

- When an employee/agent or family member has a connection to, or significant financial interest in, another party which does or seeks to do business with Reach for Change.
- When an employee/agent diverts a business opportunity of Reach for Change to another person or organization.
- When an employee/agent participates in an employment-related decision regarding a family member or other person with whom the employee has a close personal relationship.

5. **MANAGING CONFLICT OF INTEREST**

A) Prevention: Conflicts of interest arise in many contexts and do not necessarily mean that Reach for Change cannot move forward with a transaction. However, Reach for Change applies the principle of independence. If an actual or potential conflict of interest is identified that employee/agent may not take part in any decisions related to the matter.

B) Response: When a conflict of interest is identified, any transactions that may have been affected will be reviewed retroactively by the supervisor. All affected parties, internal and external to Reach for Change, must be notified. An investigation must be conducted by the management team to determine the extent of the conflict and the intentions of the parties involved. Any conflict of interest with potentially serious consequences for the involved parties, or that involve members of the management team or board of directors must be investigated by the board of directors.



6. DISCIPLINARY ACTION

All conflicts of interest are reviewed on a case-by-case basis. If the conflict of interest upon investigation by the management team or board of directors is deemed of serious consequence and/or malicious intent it may result in disciplinary action, up to, and including dismissal for cause.

7. ASSOCIATED POLICIES

- Whistleblower Policy
- Anti-Corruption Policy
- Procurement Policy
- Bill of Authority
- Reach for Change Code of Conduct

This policy was adopted by the Reach for Change Board at the Board meeting on December 2nd 2020. This policy is to be applied until further notice. It's the CEO's responsibility to invite the Board to initiate changes to it whenever needed.