



**INDIAN DEVELOPMENT ORGANISATION
TRUST**
Perambalur,
Tamilnadu

**CONFLICT OF INTEREST POLICY
2022**

(Latest Approval by Board resolution number 132 dated 23.03.2024)



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Introduction

Indian Development Organisation Trust was registered under the Indian Trust Act, in 1990 with the registration number of 193/90. It is registered under FCRA Act, u/s 12AA and 80G of Income Tax Act.

INDO trust implemented projects like, Family Counselling Centre, Creches, Child line 1098, Link Workers Scheme, Environment Programme, EIC for HI, Supplementary Educational Centre and Water and Sanitation Programme. INDO Trust working areas are Perambalur, Ariyalur, Pudukkottai and Trichy. INDO TRUST is a registered civil society organization works for the protection and promotion of rights of multiply marginalized women, historically marginalized Dalit Communities, and vulnerable and most marginalized children in Perambalur District.

INDO Trust working areas are Perambalur, Ariyalur, Pudukkottai and Trichy.

Vision:

Enhancing Sustainable development, empowering and equal access to vulnerable communities.

Mission:

For attaining sustainable development, INDO Trust empower and mainstream the vulnerable communities for their livelihood through education, skill trainings, enlightening right based awareness creation, environment awareness, benefits and opportunities available, resource engagement with community involvement and social participation in working areas

POLICY INTRODUCTION

It is important that those who work with and for Indian Development Organisation Trust conduct themselves in an ethical and transparent manner. The decisions and actions of the leadership of Indian Development Organisation Trust can have a direct and significant impact on the reputation of the organization with its supporters and the general public. This tool contains sample elements that can be used in the creation of a policy to address potential conflicts of interest with Employees and Board of Directors. Therefore, Indian Development Organisation Trust adopts this Policy as an important component of its Administrations strategy.

PURPOSE

The purpose of the conflict-of-interest policy is to protect INDO Trust interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest



Indo Trust Conflict Policy

of an officer or director of the Organization or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to non-profit and charitable Organizations.

DEFINITIONS

Interested Persons:

Any Director, Principal Officer, or Board of Trustees with advisory committee delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

Financial Interest:

- a. An ownership or investment interest in any entity with which the Organization
A person has a financial interest if the person has, directly or indirectly, through business, Investment, or family: has a transaction or arrangement,
- b. A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.

PROCEDURE FOR ADDRESSING CONFLICT OF INTEREST

- a. An interested person may make a presentation at the Board meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The Managing Trustee of INDO Trust shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the Board of Trustees shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest. d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board of Trustees shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.



VIOLATIONS

- a. If the Board of Trustees has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Board of Trustees determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

RECORDS OF PROCEEDINGS

The minutes of the Board of Trustees and all committees with board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board of Trustees or committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes connection with the proceedings.

COMPENSATION

- a. A voting member of the Board of Trustees who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- c. No voting member of the Board of Trustees or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization, either individually or collectively, is prohibited from providing information to any committee regarding compensation



ANNUAL STATEMENTS

Each Director, Principal Officer and member of a committee with Board of Trustees delegated powers shall annually sign a statement which affirms such person:

- a. Has received a copy of the conflicts of interest policy,
- b. Has read and understands the policy.
- c. Has agreed to comply with the policy, and
- d. Understands the Organization is charitable and in order to maintain its tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

PERIODIC REVIEWS

To ensure the Organization operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.
- b. Whether partnerships, joint ventures, and arrangements with management Organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

EXPERTS VIEW

When conducting the periodic reviews as provided above, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the Board of Trustees of its responsibility for ensuring periodic reviews are conducted.

CONFLICT OF INTEREST POLICY ADOPTION

We do hereby certify that the above stated Conflict of Interest Policy for Indian Development Organisation Trust has been approved under the Resolution No...125... and adopted by the Board of Trustees on its Board meeting held on 29-01-2022 constitutes a complete copy of the Conflict-of-Interest Policy of the Organization.