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| Responsible Person | The Board |

CONFLICT OF INTEREST POLICY

For the purpose of this policy:

- 'CRSF' means the Cambodia Rural Students Foundation.
- 'CRST means the Cambodia Rural Students Trust.

This policy outlines the CRSF commitment to ensuring the safety and protection of all children to ensure that all children in its care are safe from harm and abuse regardless of the child's race, religion, indigeneity, disability, age, displacement, caste, gender, gender identity, sexuality, sexual orientation, poverty, class or socio-economic status.

1. COVERAGE

Unless the context otherwise applies, this policy applies to the CRSF Board and its directors, team members, advisors and mentors, the CRST management team and leadership team, all teachers, all CRSF and CRST volunteers, guests and visitors, all CRST students and all children and young people involved in CRST activities.

2. PURPOSE

- 2.1 The purpose of this policy is to ensure that actual, potential and perceived conflicts of interest are identified and managed.
- 2.2 Management of conflicts of interest is necessary in order to comply with relevant internal policies and local legislative requirements.

3. APPLICATION AND SCOPE

All CRSF directors, members, executives, managers, volunteers, contractors and consultants are bound by the principles and procedures of this policy.

4. DEFINITION

A conflict of interest occurs when an individual's personal interests – family, friendships, financial, or social factors – could compromise judgment, decisions, actions or conflict with your responsibility to act in the best interests of CRSF.

CRSF is committed to ensuring that all conflicts of interest are identified and declared. To develop, implement and monitor actions to appropriately manage the conflict and report all identified conflicts to the CRSF Board and its Directors to ensure that CRSF maintains a high standard in operations and ethical behavior.

5. POLICY STATEMENT

CRSF is committed to ensuring that conflicts of interest are not only identified, but also appropriately managed, in order to ensure that CRSF maintains a high standard in operations and ethical behavior. This is done by:

- (a) identifying and declaring all conflicts of interest;
- (b) developing, implementing and monitoring actions to appropriately manage the conflict;
- (c) reporting all identified conflicts to the CRSF Board and its directors; and
- (d) deal firmly with any breaches of this policy.

6. APPLICATION

6.1 CRSF Board and directors, management team and leadership team

- (a) Retain awareness conflicts of interest arise to ensure conflicts are resolved and disclosed appropriately. CRSF Board and directors will also be responsible for ensuring that all disclosed conflicts of interests are recorded in the meeting minutes.
- (b) CRSF Board and directors must ensure that the higher levels of management have a genuine focus on integrity, and comply with the policy.
- (c) Participate in conflict of interest register and resolution.

6.2 CRSF Board and its directors

Maintain a Conflict of Interest Register.

7. TEAM MEMBERS, CRST MANAGEMENT AND LEADERSHIP TEAM

7.1 Reporting

- (a) Team members of CRSF who become aware of an actual, potential or perceived conflict of interest must report it to appropriate management, whether matters are pecuniary or non-pecuniary.
- (b) All reported conflicts of interest must be reported at the CRSF Board meetings, and minuted accordingly.
- (c) Unreported conflicts of interest can be damaging not only to the internal structure of CRSF and its operations, but also CRSF's reputation. Thus, all team members are encouraged to undertake training to remain mindful and act in appropriation with CRSF values and integrity.

7.2 Resolution

- (a) Restriction of duties/information
 - (i) Not participating in the role or process where a conflict of interest exists.
 - (ii) Limiting access to information, particularly confidential or sensitive documents.
 - (iii) Withdrawing from discussion of the plan or proposal.
 - (iv) Abstaining from voting on the decision.
- (b) Involving an independent third party
 - (i) Arranging for an independent third party to make the decision.
 - (ii) Engaging an independent third party or auditor to oversee the decision-making process.

- (iii) Increasing the number of people on the decision-making committee.
 - (iv) Seek the opinion of parties who are likely to be concerned about the relevant conflict of interest.
- (c) By Removal
 - (i) Removing the person from any involvement.
 - (ii) Abstaining from any relevant formal or informal discussion.
 - (iii) Separating the person from the matter where they may influence any decisions.
 - (iv) Rearranging duties and functions to ensure that the conflict of interest is no longer relevant.
 - (v) Transferal to another project.
- (d) Relinquishment
 - (i) Liquidation of private interest in arms-length matters.
 - (ii) Divesting or withdrawing support for the private interest.
 - (iii) Assigning the conflicting interest to a genuinely 'blind trust' or 'blind management' arrangement.

7.3 Registering

- (a) Conflicts of interest should be reported to the CRSF Board and its directors and ensure that matters are recorded in the minutes.
- (b) Conflicts of Interest should be recorded by the CRSF Board and its directors in the Conflicts of Interest Register, containing the following details:
 - (i) Name of the person with the conflict of interest
 - (ii) Name of the person the conflict was reported to
 - (iii) What the conflict is
 - (iv) When it occurred
 - (v) What the risk exposure is
 - (vi) How it was resolved

8. BREACHES AND CONTRAVENTIONS

Failure to disclose a conflict of interest is a breach of the CRSF Code of Conduct and fiduciary obligations. It may result in severance from CRSF if deemed to be an incident of misconduct, wrongdoing, abuse of power or authority. Depending on severity, legal action may be taken.