

Conflict of Interest Policy

Global Institute for Circular Economy and Sustainable Development Goals (ICE&SDGs)

Version	1.0
Effective date	15 June 2026
Next review	15 June 2027
Policy owner	Ethics Officer / Governing Council, ICE&SDGs
Legal alignment	Principles of Section 184 & related-party provisions, Companies Act, 2013; good-governance standards for non-profits
Contact	connect@ce-sdg.org

1. Purpose

ICE&SDGs' decisions must always serve its mission and stakeholders — not the private interests of individuals. This policy explains how to identify, declare and manage conflicts of interest so that we act fairly, objectively and in the organisation's best interest.

2. Scope

This policy applies to all members of the Governing Council, management, employees, interns, volunteers, consultants, assessors and contractors of ICE&SDGs.

3. What is a Conflict of Interest

A conflict of interest arises when a person's private interest could improperly influence, or appear to influence, their ICE&SDGs duties. Examples include:

- A financial or personal interest in a vendor, partner, client or grantee dealing with ICE&SDGs;
- Awarding work or benefits to a family member, friend or related party;
- Outside employment, consultancy or board roles that compete or interfere with ICE&SDGs duties;
- Accepting gifts or favours that could influence a decision (see Anti-Corruption & Bribery Policy);
- Using ICE&SDGs' position, information or resources for personal gain.

A conflict can be actual, potential or merely perceived — all must be handled openly.

4. Disclosure

1. Declare any actual, potential or perceived conflict in writing to your supervisor and the Ethics Officer as soon as you become aware of it.
2. Make a disclosure before any decision, contract or transaction where the conflict may arise.
3. Members and key personnel provide an annual declaration of interests; updates are made whenever circumstances change.

5. Managing a Conflict

- **Recusal** — the conflicted person steps out of discussions and decisions on the matter and does not vote or approve.

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- **Independent decision** — the matter is decided by others without the conflicted person's influence.
- **Transparency** — the conflict and how it was managed are recorded in the minutes or a conflicts register.
- **Related-party care** — any transaction with a related party is conducted at arm's length, properly approved and documented.

6. Register of Interests

ICE&SDGs maintains a confidential register of declared interests and conflicts, reviewed periodically by the Ethics Officer / Governing Council.

7. Breach & Reporting

Failing to declare or manage a conflict is a serious matter and may lead to disciplinary action. Suspected undisclosed conflicts may be reported to connect@ce-sdg.org or under the Whistle Blower Policy.

8. Review

This policy is reviewed at least annually.

Approved by the Governing Council / Management of ICE&SDGs. For questions or to raise a concern under this policy, contact connect@ce-sdg.org.