

MILES2SMILE FOUNDATION

POLICY DOCUMENT UPDATED 2023



CONFLICT OF INTEREST POLICY

Conflict of Interest Policy

1. Preamble

Miles2Smile Foundation is committed to its mission of uplifting children from systematically marginalized sections of Indian society by providing them with access to quality education. In pursuit of this mission, it is essential that all individuals associated with Miles2Smile Foundation act in the best interest of the organization and the children it serves. This Conflict of Interest Policy aims to maintain the integrity and transparency of Miles2Smile's operations, ensure the avoidance of conflicts that could compromise the organization's mission, and uphold the trust of our beneficiaries, stakeholders, and the public.

At Miles2Smile Foundation, there exists a fiduciary duty between the organization and its management, employees, and volunteers. This duty entails a strong and unwavering commitment to loyalty. The management, employees, and volunteers of Miles2Smile Foundation have a responsibility to administer the organization's affairs with honesty, prudence, and careful judgment. They must exercise their utmost care, skills, and expertise for the exclusive benefit of the organization and the transactions involved in their roles. It is strictly prohibited for them to utilize their positions within Miles2Smile Foundation or the knowledge they acquire for personal gain. The best interests of the organization must always take precedence. In terms of purchasing goods and services, Miles2Smile Foundation is committed to obtaining a full competitive advantage in terms of product, service, and price, ensuring that all acquisitions are made to benefit the organization as a whole.

2. Persons Covered

This Conflict of Interest Policy applies to all individuals involved in the activities of Miles2Smile Foundation, including but not limited to board members, officers, employees, volunteers, consultants, and any other individuals associated with the organization.

3. Statement of Policy

Without limiting the scope of this policy, all individuals associated with Miles2Smile Foundation shall adhere to the following guidelines:

- 3.1 Prohibition of Gifts and Benefits:** No covered person shall actively seek or accept any gift, gratuity, entertainment, travel, or any other item or service of significant value from any individual or organization that is conducting or seeking to conduct business with Miles2Smile Foundation.
- 3.2 Prohibition of Offering Gifts and Benefits:** Similarly, no covered person shall make or offer any gift, gratuity, entertainment, travel, or any other item or service of significant value to any individual or organization that is conducting business with Miles2Smile Foundation or with whom Miles2Smile Foundation intends to conduct business.
- 3.3 Exceptions for Reasonable and Customary Gifts:** Reasonable and customary gifts of promotional merchandise (such as calendars, pens, bags, etc.) or occasional meals (that are not excessively costly) shall not be considered items of significant value within the context of this policy.

4. Areas in Which Conflicts May Arise

Conflicts of interest may arise in various situations, including but not limited to:

- 4.1 Financial Interests:** When an individual, their family member, or any associated entity stands to benefit financially from a decision made by Miles2Smile Foundation.
- 4.2 Employment or Professional Engagements:** When an individual has a personal or professional connection with an organization or individual that may influence their decision-making in a manner contrary to the best interests of Miles2Smile Foundation.
- 4.3 Personal Relationships:** When an individual's personal relationships with other individuals associated with Miles2Smile Foundation could compromise their ability to act impartially.

5. Disclosure and Procedure for Board Review

- 5.1** All individuals covered by this policy are required to disclose any potential or actual conflicts of interest in writing to the designated authority within Miles2Smile Foundation, such as the Board of Directors or a designated officer.
- 5.2** The disclosure should include all relevant details about the nature of the conflict, including but not limited to financial interests, relationships, or professional engagements that may give rise to a conflict.
- 5.3** The designated authority shall review the disclosed conflicts of interest on a case-by-case basis and determine the appropriate course of action in consultation with legal counsel, as needed.
- 5.4** The designated authority may require the individual to recuse themselves from decision-making processes or take any other necessary actions to mitigate or eliminate the conflict of interest.
- 5.6** The minutes of the board or committee meetings should reflect the disclosure of conflicts, the actions taken to address them, and the rationale behind such decisions.
- 5.7** Miles2Smile Foundation shall maintain strict confidentiality regarding all disclosures and related discussions, except as required by applicable law or regulation.
- 5.8** This policy shall be periodically reviewed and updated as necessary to ensure its continued effectiveness and relevance.

By adhering to this Conflict of Interest Policy, we reaffirm our commitment to the principles of transparency, accountability, and integrity in all our endeavors.

About the organization:

Miles2Smile was established three years back as a not-for-profit organization, based in Delhi. The organization works primarily in relief activities and brings smiles to the faces of victims looming over penury and distress. Livelihood creation, healthcare and educational empowerment are also some core areas of work by the organization. In the past two years, the organization has made commendable service in delivering solace to the people languishing in the heap of despair. The organization is on an assiduous mission to revive happiness to the people ripped after communal tensions.



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