

## Conflict of Interest Policy

### 1. Purpose

CSA's Conflict of Interest Policy ensures that employees and representatives act in the organization's best interests, free from any competing personal interests that could undermine CSA's work, reputation, or credibility. All staff have a duty to avoid situations where personal interests conflict—or appear to conflict—with CSA's mission.

### 2. Scope

This policy applies to:

- All CSA employees, contractors, consultants, board members, and others acting on CSA's behalf.
- Both current and potential conflicts of interest, whether financial, personal, professional, or otherwise.

### 3. Policy Statement

CSA values the experience employees bring through their external relationships and activities. However, all personnel are required to declare any activities, relationships, or financial interests that could conflict with CSA's work. Undisclosed conflicts can damage CSA's integrity and expose both the organization and individuals to legal or disciplinary action. Failure to disclose a conflict may lead to formal disciplinary proceedings.

### 4. Procedures

#### New Employees

- Must declare any potential conflicts of interest during recruitment.
- HR will assess declared conflicts; if necessary, CSA may withdraw an employment offer where conflicts cannot be reasonably managed.

#### Existing Employees

- Must complete an annual Conflict of Interest Declaration.
- Must immediately report new potential conflicts as circumstances change.
- HR will review conflicts and determine appropriate actions, which may include adjustments to roles or responsibilities to manage the risk.

If conflicts cannot be adequately managed, formal procedures will be followed in line with CSA's grievance policy.

### 5. Principles

CSA expects employees to:

- Prioritize CSA's interests over personal gain.
- Avoid activities, relationships, or decisions that could conflict with CSA's work.
- Never use CSA's resources, information, or reputation for personal benefit.
- Protect CSA's reputation for integrity, objectivity, and accountability.

## 6. Examples of Potential Conflicts

Conflicts may arise from:

- Personal relationships with suppliers, contractors, or partners.
- Financial interests in organizations doing business with CSA.
- Outside employment or consultancy that overlaps with CSA's work.
- Influencing procurement, recruitment, or funding decisions where personal connections exist.
- Accepting gifts or hospitality beyond modest, transparent business norms.

## 7. Personal Relationships

- Employees may not supervise, manage, or influence the recruitment or advancement of family members or close personal contacts.
- Personal relationships that could impact work decisions must be declared to HR to ensure appropriate safeguards are in place.

## 8. Use of CSA Resources and Information

- CSA resources must not be used for personal business.
- Confidential information must be protected, both during and after employment.
- Any work for external organizations, including publishing or public speaking related to CSA's work, requires prior written approval.

## 9. Political Activities

Employees are free to participate in political activities in their personal capacity. However, any political involvement that could compromise CSA's neutrality must be discussed with HR. Employees standing for public office must seek prior approval and ensure any campaigning does not interfere with CSA duties.

## 10. Procurement and Gifts

- Employees involved in procurement must not have undisclosed ties to suppliers or contractors.
- Gifts or hospitality from organizations with which CSA does business must comply with CSA's Anti-Bribery Policy and be transparent.

## 11. Whistleblowing and Concerns

Employees concerned about potential conflicts or breaches of this policy should report them confidentially to HR or the Director. Protected disclosures made in good faith will not lead to retaliation.

## 12. Review

This policy will be reviewed every two years or sooner if required by legislation or organizational change.