

1. INTRODUCTION

- 1.1 As a charity, NATURE SOCIETY SINGAPORE's (NSS) Executive Committee (EXCO) and Staff have an obligation to act in the best interest of the NSS.
- 1.2 We need to avoid situations where there may be real, potential or perceived conflicts of interest which may arise where personal interests conflict with those of the NSS's interest.
- 1.3 Such conflicts may create problems that may result in the following:
 - a. Damage to the NSS's reputation which may lead to its inability to sustain operations;
 - b. Influence of our EXCO's and Staff's judgement, compromising objectivity when conducting the NSS's affairs;
 - c. Restriction of free discussion, resulting in actions or decisions that are not in the interests of the NSS; and
 - d. Reputational risk arising from the impression that EXCO or Staff have acted improperly.
- 1.4 This Policy aims to protect the NSS and its EXCO members and Staff from any appearance of impropriety.

2. DEFINITIONS

- 2.1 "NSS" refers to NATURE SOCIETY SINGAPORE, named as the issuer of this document.
- 2.2 "Executive Committee member" refers to a board member or management member of the NSS.
- 2.3 "Staff" refers to anyone employed whether full-time or part-time by the NSS.
- 2.4 "Policy" refers to this Conflict of Interest Policy.
- 2.5 "Interest" means any commitment, investment, relationship, obligation or involvement, financial or otherwise that may influence a person's judgement. This would include:
 - a. *Direct interest* – ownership in the name of the EXCO member or Staff;
 - b. *Indirect interest* – ownership beneficially held through another investment, estate, trust or other intermediary;
 - c. *Vested interest* – personal stake or involvement, which may or may not include an expectation of financial gain; and
 - d. *Deemed interest* – an EXCO member or Staff is deemed to have an interest in which his/her spouse, partner or relations holds an interest
- 2.6 A *Conflict of Interest* refers to a situation in which an EXCO member's or Staff's personal,

professional, financial considerations could, directly or indirectly, affect said EXCO member's or Staff's judgement and performance in exercising his/her duty or responsibility to the NSS.

3. DECLARATION OF INTERESTS

3.1 Given the stated purpose of this Policy, we are asking:

- a. EXCO members and Staff to declare their interests, and any gifts or hospitality received in connection with their role in the NSS; and
- b. EXCO members and Staff must declare when the transaction to be effected may result in a conflict of interest.

3.2 A declaration of interests' form is provided for this purpose. The types of interests to be declared include, but are not limited to:

- a. EXCO members and Staff who have friends or other personal or business relationships must carefully consider whether those relationships create conflict of interest with their entrusted role in the NSS. Examples include:
 - i. Hiring a relative or friend as an employee or vendor,
 - ii. Buying or selling goods or services from/to a family business for which others might compete,
 - iii. Having a personal relationship where there is an immediate reporting relationship,
 - iv. Volunteering and/or having memberships in any other charities, or
 - v. Receiving goods/services as beneficiaries.

A declaration / disclosure of interests is required where a conflict is assessed to exist.

- b. EXCO members and Staff must disclose any outside activities, financial interest or relationship that may pose a real, potential or perceived conflict of interest. Disclosures are to be made to the Honorary Secretary with the required approval from EXCO obtained before accepting any position as an officer or director of an outside business.

3.3 The declaration of interests should be updated in the prescribed form on an annual basis or as well as when any changes occur.

3.4 Where EXCO members are not sure whether an interest should be declared, they are strongly encouraged to err on the side of caution and seek advice from the President and/or Honorary Secretary of NSS.

3.5 All disclosure of interests made by EXCO members and Staff and decisions made by the EXCO and Management of the NSS on such matters must be recorded, updated and filed with the Head of Secretariat of NSS.

4. OPERATING PROCEDURES

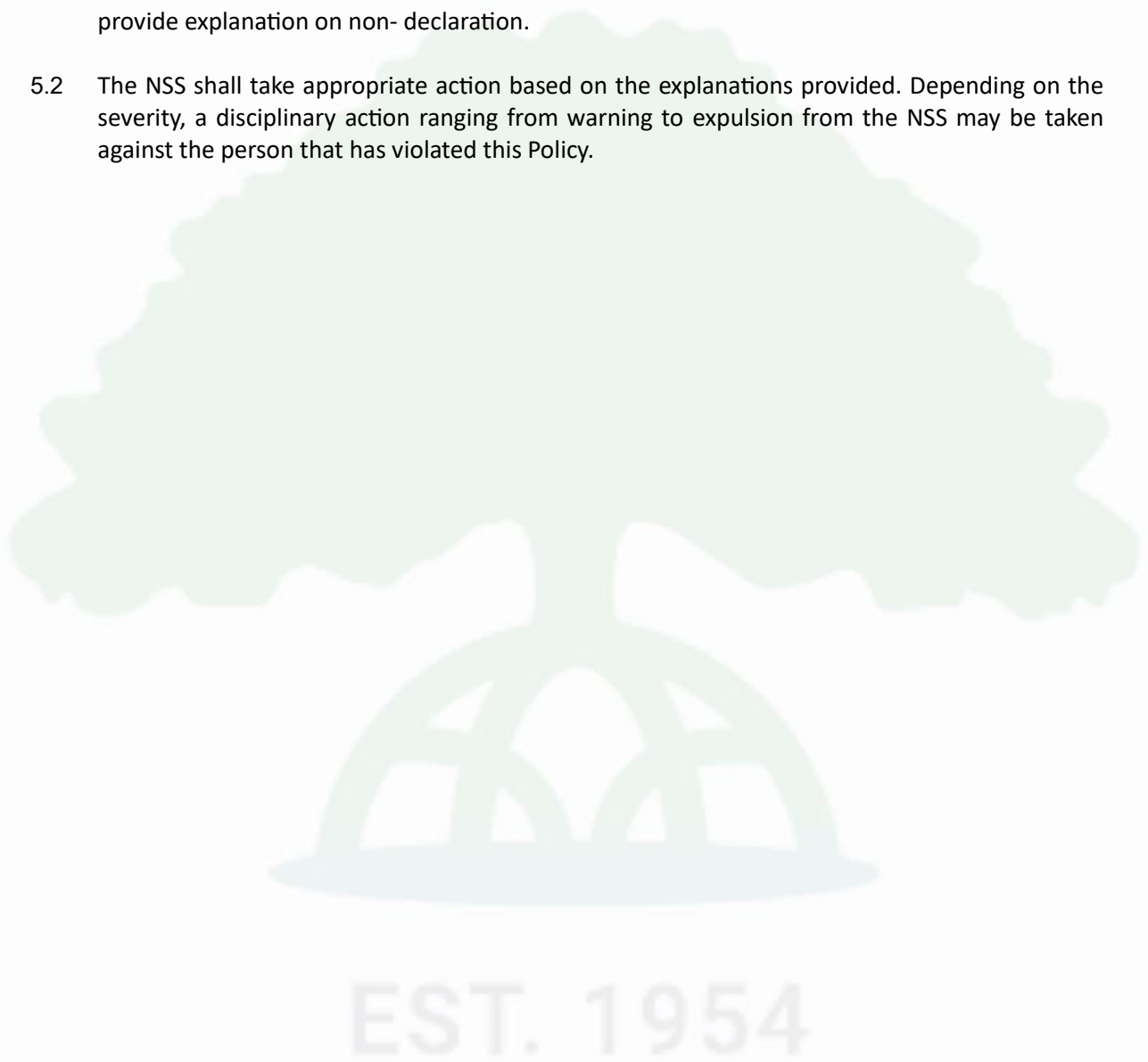
4.1 If the EXCO needs to decide on an issue where the EXCO member(s) or Staff has/have an interest,

- it is the responsibility of the EXCO member(s) or Staff to:
- a. identify the potential conflict of interest;
 - b. not participate in discussion of the programme or motion being considered; and
 - c. not vote on the issue.
- 4.2 Without limitation to paragraph 4.1 above, if the EXCO needs to decide on an issue where the EXCO member(s) has/have an interest, it is the responsibility of the EXCO to ensure that:
- a. all decisions are made by vote, with a two-thirds majority required based on the presence of a quorum; and
 - b. interested EXCO members must not vote on matters affecting their own interests.
- 4.3 It is the responsibility of the EXCO to:
- a. only decide to hire or contract with any vendor if they are the best qualified individuals available, and willing to provide the goods or services needed at the best price. The EXCO's decision shall not be influenced in any way by the fact that an EXCO member or Staff has an interest in the contract. In case of financial transactions, the EXCO shall ensure that the transaction is made on an arm's length basis and comparative quote/bid shall be submitted and documented; and
 - b. record in the minutes of the EXCO meeting the potential conflict of interest, and the use of the procedures and criteria of this policy.
- 4.4 It is the sole responsibility of any EXCO member or Staff of the NSS to report any possible real, potential or perceived conflict of interest. If it is an oversight of the NSS, the EXCO member or Staff shall promptly inform the NSS that he/she member of the NSS who has an interest in a client organisation or vendor of the NSS shall identify his or her affiliation with such agency or agencies; further, he/she shall not participate in the decision affecting that agency.
- 4.5 Any member of the NSS shall refrain from obtaining any list of clients from the NSS's database for personal or private solicitation purposes at any time during the term of their affiliation.
- 4.6 Any member who is a user or beneficiary of the NSS's services, or a member who is a carer of someone who uses or benefits from the NSS's services shall not be involved in decisions that directly affect the service received by the person he/she cares for. He/she shall declare his/her interest at the earliest opportunity and withdraw from any subsequent discussion.
- 4.7 An EXCO member or Staff of the NSS, may, however, participate in discussions from which he/she may indirectly benefit, for example, where the benefits are universal to all persons. In this regard, EXCO members shall exercise caution when evaluating such situations and when unsure on whether there is a conflict, err on the side of caution and make the appropriate disclosures or seek guidance from the EXCO members or Management.
- 4.8 The EXCO of the NSS shall have the right to suspend any involvement of any EXCO member or

Staff when it has come to their attention that a potential, actual or perceived conflict has arisen, but has not been voluntarily disclosed by the relevant EXCO member or Staff.

5. VIOLATIONS

- 5.1 The NSS shall notify the EXCO member or Staff involved when it suspects that there has been conflict of interest that was not declared. The EXCO member or Staff member involved shall provide explanation on non- declaration.
- 5.2 The NSS shall take appropriate action based on the explanations provided. Depending on the severity, a disciplinary action ranging from warning to expulsion from the NSS may be taken against the person that has violated this Policy.



ANNEX A

CONFLICT OF INTEREST DISCLOSURE STATEMENT

Date:

With regard to my service as [Executive Committee/Management/Staff] member of NATURE SOCIETY SINGAPORE, this is to declare that I, to the best of my knowledge except as described below, am not now nor at any time during the past year have been:

1. A participant, directly or indirectly, in any arrangement, agreement, investment or other activity with any vendor, supplier or other party doing business with NATURE SOCIETY (SINGAPORE) which has resulted, or could result in personal benefit to me.
2. A recipient, directly or indirectly, of any salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organisation engaged in any transaction with NATURE SOCIETY (SINGAPORE).

Any exceptions to (1) or (2) are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or had during the past year) in the persons or organisations having transactions with NATURE SOCIETY (SINGAPORE).

I would like to report the following potential conflict of interest:

(Please elaborate on the potential conflict, if any. Please declare N.A if a situation is "Not Applicable")

AREA OF CONFLICT	DETAILS
I am affiliated to a party providing or bidding for providing services to NATURE SOCIETY SINGAPORE, or have a direct or indirect interest in any NATURE SOCIETY SINGAPORE business transaction(s), agreement, or investment.	
I am affiliated* to a staff involved in NATURE SOCIETY SINGAPORE	
Others:	

Please attach a separate sheet if space is insufficient.

**Affiliation refers to being connected to another party who could be one of the following: spouse, domestic partner, child, mother, father, brother or sister or close associates; any corporation, business or non-profit organisation of which you serve as staff, officer, Executive Committee member, partner, participate in management or are employed by; and trust or other estate in which you have a substantial interest or as to which you serve as a trustee or in a similar capacity.*

- I hereby confirm that the disclosures made above are complete and correct to the best of my information and belief.
- I shall not participate in discussions and decision-makings of the matter in question should there be a conflict of interest.
- I will notify the NSS EXCO and NSS Head of Secretariat immediately if I come to know that this disclosure is inaccurate or that I have not complied with the conflict of interest policy.

Signature	Name and Designation	Date

EST. 1954