

CONFLICT OF INTEREST POLICY

1. PURPOSE

The purpose of this Conflict of Interest Policy is to ensure that all decisions, actions, and activities of the Wilson Erhun Foundation for Pharmacy Administration (WEFPA) are conducted with integrity, objectivity, and independence, and are free from undue personal, professional, financial, or institutional influence.

This policy protects WEFPA, its leadership, and stakeholders from actual, potential, or perceived conflicts that could compromise decision-making, credibility, or public trust.

2. SCOPE

This policy applies to:

- Members of the Board of Trustees
- Members of the Advisory Board
- Executive Management
- Employees and consultants
- Volunteers, fellows, and interns
- Any individual or entity acting on behalf of WEFPA

Compliance with this policy is a condition of service or engagement with WEFPA.

3. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest arises when an individual's personal, professional, financial, institutional, or other interests **could reasonably be perceived** to influence, or appear to influence, their objectivity, judgment, or actions in carrying out responsibilities for WEFPA.

Conflicts may be:

- **Actual:** A direct conflict exists
- **Potential:** A conflict may arise in the future
- **Perceived:** A reasonable third party could perceive a conflict, even if none exists in fact

All three forms are covered by this policy.

4. GUIDING PRINCIPLES

WEFPA is guided by the following principles in managing conflicts of interest:

- Transparency and full disclosure
- Independence of judgment
- Protection of institutional integrity
- Accountability to beneficiaries, donors, and the public

5. TYPES OF CONFLICTS

Conflicts of interest may include, but are not limited to:

5.1 Financial Interests

- Ownership, investment, or financial benefit in an entity that has dealings with WEFPA
- Receipt of gifts, benefits, or hospitality beyond acceptable thresholds

5.2 Professional or Institutional Interests

- Holding positions in organisations with competing or overlapping interests
- Participation in decisions affecting institutions with which the individual is affiliated

5.3 Personal Relationships

- Family, spousal, or close personal relationships that may influence decision-making

5.4 Academic or Research Interests

- Authorship, funding, or recognition that may compromise objectivity in research or programme decisions



6. DISCLOSURE REQUIREMENTS

All covered persons shall:

- Disclose any actual, potential, or perceived conflict of interest **upon appointment**
- Update disclosures **annually** and whenever circumstances change
- Make ad hoc disclosures prior to participating in decisions where a conflict may exist

Disclosures shall be made using a prescribed **Conflict of Interest Declaration Form**.

7. MANAGEMENT OF CONFLICTS

7.1 Assessment

Disclosed conflicts shall be reviewed by:

- The Board Chair (for Board members)
- The Executive Director (for staff and consultants), subject to Board oversight

7.2 Mitigation Measures

Management actions may include:

- Full disclosure and transparency
- Recusal from discussions or decisions
- Restriction of access to information
- Reassignment of duties
- Termination of engagement in severe cases

7.3 Recusal

Any individual with a conflict shall:

- Declare the conflict prior to deliberations
- Abstain from influencing or participating in related decisions
- Exit meetings where necessary

All recusals shall be documented in meeting minutes.

8. REGISTER OF INTERESTS

WEFPA shall maintain a confidential **Register of Interests** for:

- Board of Trustees
- Advisory Board
- Senior Management

The Register shall be reviewed periodically to ensure compliance.

9. GIFTS, HOSPITALITY & BENEFITS

- Gifts or hospitality that could compromise independence are prohibited.
- Acceptable tokens must be modest, culturally appropriate, and transparent.
- All reportable gifts shall be disclosed in line with WEFPA policy guidance.

10. FAILURE TO DISCLOSE

Failure to disclose a conflict of interest, whether intentional or negligent, constitutes a serious breach of this policy and may result in:

- Disciplinary action
- Removal from office or role
- Termination of engagement
- Legal or regulatory action where applicable

11. ROLES & RESPONSIBILITIES

Board of Trustees

- Provide oversight and enforcement
- Ensure conflicts are appropriately managed



Executive Management

- Implement disclosure processes
- Maintain records and monitor compliance

All Covered Persons

- Disclose conflicts fully and promptly
- Comply with management decisions

12. MONITORING & REVIEW

This policy shall be:

- Reviewed every three (3) years or as required
- Updated to reflect legal, ethical, and organisational developments

13. RELATED POLICIES

- Code of Ethics & Conduct
- Whistleblowing & Anti-Fraud Policy
- Partnership & Collaboration Policy
- Financial Management Policy

