

# HAI's

## EMPLOYEE ASSET DISCLOSURE POLICY

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### Purpose

This policy outlines the requirements for employees to disclose personal financial interests, assets, and potential conflicts of interest to ensure the integrity, transparency, and ethical standards within the organisation. The aim is to prevent any situations that could lead to a conflict of interest or improper influence on decision-making processes.

### Scope

This policy applies to all employees of Humanitarian Aid International, particularly those in positions where their decisions may have a significant impact on HAI's operations or reputation.

## 1. Disclosure of Financial Interests and Assets

Employees, particularly those in decision-making roles, are required to disclose any personal financial interests that may influence, or be perceived to influence, their work decisions. This includes, but is not limited to:

- **Investments:** Stock holdings, shares, or bonds in other organisations, including those that compete with or are suppliers to the organisation.
- **Ownership Interests:** Any ownership stake in other businesses, including partnerships or limited companies, especially if these businesses could be seen to have a financial relationship with the organisation.
- **Real Estate:** Ownership or financial interests in property that could impact or be influenced by the organisation's operations.

Employees should disclose any such interests upon joining the organisation and update their disclosures on an annual basis or when changes occur.

## 2. Conflicts of Interest

Employees must declare any situation that could create, or be perceived to create, a conflict of interest. This includes:

- **Family or Personal Relationships:** Any familial or close personal relationships that could influence decision-making, particularly with individuals who have a direct or indirect business relationship with the organisation.
- **External Business Interests:** Involvement in external businesses, particularly those that compete with, supply, or partner with the organisation. For example, employees involved in a startup that provides services or products to the organisation must disclose this involvement. Take reference from the **Conflict-of-Interest Policy of HAI**.

Employees must make disclosures via email or other modes (Written) to the appropriate **line manager or HR department** and review the situation regularly to ensure no conflicts of interest arise.

### 3. Gift and Hospitality Disclosure

Employees are required to disclose any gifts, hospitality, or entertainment offered or received from third parties, including clients, suppliers, or other external stakeholders. This policy aims to ensure that such gifts do not create a perception of improper influence on decision-making.

The following should be disclosed:

- Any gift or hospitality valued above a certain threshold (as set by the organisation).
- Any gifts or hospitality received that could be perceived as an attempt to influence professional decisions.

Employees must report these gifts within a specified time frame (e.g., within 10 working days) to their line manager and/or the compliance department.

### 4. Outside Employment

Employees must disclose any outside employment, side business interests, or freelance work that could conflict with the interests of the organisation. This include:

1. Any Work for competitors, suppliers, or clients of the organisation.
2. Participation in any external business ventures or the consultancies that could impact the employee's performance or commitment to their role.

Employees must seek approval from their line manager or HR Department before taking up any outside employment.

### 5. Monitoring and Updating

Employees are required to keep their asset disclosures up to date. This includes:

- Annual updates to disclose any new financial interests, relationships, or external employment.
- Immediate disclosure of any significant changes in financial circumstances, including the acquisition of new assets, changes in outside business interests, or other relevant developments.

Employees should promptly inform their **manager or HR department** of any changes in their circumstances.

### 6. Code of Ethics and Compliance

The organisation expects all employees to adhere to a high standard of ethical conduct. The Code of Ethics and this policy must be followed at all times to ensure transparency, fairness, and compliance with legal and regulatory obligations.

Employees are encouraged to raise concerns if they believe there are potential conflicts of interest or ethical violations. The organisation has a confidential reporting system for such concerns, and retaliation against any employee for raising ethical concerns will not be tolerated. Take reference from the **Safeguarding & Whistleblower Policy of HAI**.

## **7. Enforcement and Consequences**

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment. The organisation takes any potential conflicts of interest, unethical behaviour, or failure to disclose significant financial interests very seriously.

## **8. Review of Policy**

This policy will be reviewed periodically to ensure its relevance and effectiveness. Any amendments or updates to the policy will be communicated to all employees.

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### **Declaration & Acknowledgement**

I, the undersigned, hereby confirm that I have carefully reviewed the **Employee Asset Disclosure Policy of Humanitarian Aid International**. I fully understand the contents of the policy and acknowledge my responsibility to adhere to its provisions.

By signing this document, I agree to comply with all the terms outlined in the policy and confirm that I will follow the guidelines set forth in the Employee Asset Disclosure Policy throughout my employment with Humanitarian Aid International.

**Employee Name:** \_\_\_\_\_

**Employee Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

### **Policy Review & Finalisation:**

**Approved by:** HAI Board

**Date:** 12 February 2025