



Student Christian Organization of Malawi



Conflict of Interest Policy

SCOM-AUGUST, 2025

DEFINITIONS

Relative: A relative of the Employee;

Related Organization: Any corporation, partnership, or other organization (other than SCOM) of which an officer, director or employee of SCOM, or any Relative thereof, is an officer or partner, or in which an officer, director or employee of SCOM, or Relative thereof, either directly or indirectly, is the beneficial owner of any interest (except for securities listed on any recognized stock exchange); and

Trust or Estate: Any trust or estate in which an officer, director or employee of SCOM, or any Relative thereof, has a beneficial interest, or serves as a trustee or in a similar capacity.

Confidential Information: Information gained or received by an Employee through, or as a result of, his/her employment or other relationship with Student Christian Organization of Malawi, which is not generally known by, or disseminated by SCOM to, the public. When in doubt, the employee should treat the matter in the strictest confidence and consult his/her supervisor for clarification.

Organization Details: Details of the internal organization of SCOM

Wages and Salaries: Wages and salaries of Employee of SCOM

Financial Data: Financial Data not contained in published reports of SCOM

Information about Employees, Vendors, Donors, Etc.: Relations with, or information about, SCOM employees, vendors, contractors, partners, donors or other persons or organizations with whom SCOM does business, including any information about SCOM's business or contractual relationships with them, donations from them, and any other transactions with them.

Mailing Lists: SCOM mailing lists (i.e. donor and employee databases) are the property of Student Christian Organization of Malawi and may not be sold, loaned, used or taken for any purpose.

Materials: All manuals, handbooks, employee identification cards and passes, and other similar items of SCOM property shall be surrendered by me to the SCOM promptly upon termination of my employment



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1.0 BACKGROUND

The Student Christian Organization of Malawi, SCOM, is an indigenous interdenominational Christian organization founded by the Nyasaland Council of Churches in 1961 and is registered under the Trustees Incorporation Act Section 5.03 of the Laws of Malawi. SCOM was founded to champion the holistic development of students in post-primary academic institutions enabling them to serve Christ as Lord and Savior on campus and beyond.

2.0 INTRODUCTION

There should be no business transactions between Student Christian Organization of Malawi (SCOM) and any Employee or Related Party (see Appendix), involving a conflict between the duty of the Employee to Student Christian Organization of Malawi and the self-interest of the Employee or Related Party. Employees of SCOM should avoid all situations which affect, or might likely affect, their undivided loyalty and interest in serving Student Christian Organization of Malawi. No employee of SCOM, in his/her dealings on behalf of Student Christian Organization of Malawi, should realize any profit or benefit for himself/herself, or any Related Party, or secure gain apart from his/her remuneration from SCOM. A conflict of interest exists where an employee or board member owes a duty of loyalty to the Student Christian Organization of Malawi, which is or can be compromised, directly or indirectly, by the pursuit of one's personal interests. This policy sets a general standard for conduct when these situations arise. Each person who becomes an employee or board member shall acknowledge this policy in writing upon becoming employed/involved with Student Christian Organization of Malawi.

3.0 PURPOSE

The purpose of this policy is to demonstrate SCOM's commitment to avoid conflict of interest in all its transactions with the public. This policy is meant to protect the organization's interest when it is contemplating to enter into a transaction arrangement that might benefit the private interest of a trustee, NEC member or staff in a higher decision-making position, or might result in a possible excess benefit transaction.

4.0 SCOPE

This policy applies to all Student Christian Organization of Malawi Employees and Members of the National Executive Committee



5.0 POLICY GUIDELINES

The following guidelines, while not comprehensive, illustrate some situations in which conflict of interest may exist, describing Student Christian Organization of Malawi's policy as applied in those situations:

- 5.1 **Investments.** A conflict of interest may exist when an employee or board member has made an investment in or with any person or organization that is doing or seeking to do business with the Student Christian Organization of Malawi. It is presumed that employees and board members have knowledge of all investments and other financial interests of his/her related parties. In an event where a staff, an associate or board member has potential to supply any business materials or services to the organizations their interest must be declared freely and they must be allowed to compete like all other bidders and must be offered business only upon merit; without any favors.
- 5.2 **Employment.** A conflict of interest may result if an employee or board member is employed or compensated in any way, either directly or indirectly, by any person or organization that is doing or seeking to do business with SCOM. Accordingly, all employees and board members are prohibited from working for, or accepting compensation of any kind from, any such person or organization as an employee, consultant, director, agent, or otherwise. Exceptions to this policy must be approved by the General Secretary.
- 5.3 **Gifts and Other Benefits.** A conflict of interest may result if an employee or board member accepts gifts or gratuities of more than nominal value (no more than an accumulation of MK200, 000 per calendar year) from anyone seeking to do business with the Student Christian Organization of Malawi, regardless of the existence of a personal relationship with such person. Employees and board members must avoid placing themselves in situations in which a gift or show of favoritism may be implied as a natural result of accepting such a gift. Employees are expected to follow recognized standards of good judgment, ethics, and good taste in all of their business dealings, always maintaining the integrity of the relationship between the supplier and SCOM.
- 5.4 **Corporate Opportunity.** A conflict of interest may result if an employee or board member appropriates to themselves or divert to others, directly or indirectly, any opportunity in which it is known or could reasonably be anticipated that SCOM may have an interest.
- 5.5 **Noninterference with Contractual Relationships.** Employees shall not, during and following termination of employment with Student Christian Organization of Malawi for any reason, impair or damage the business of SCOM by interfering with SCOM's contractual relations with its employees, donors, beneficiaries, consultants, advisors, vendors or partners.



5.6 Nondisclosure/Confidential Information.

- 5.6.1** Employees and board members often have access to confidential and proprietary information and must use and/or disclose information learned or acquired through association with SCOM only for the performance of his/her jobs. Particular care must be taken to keep confidential any information of possible value to competitors or potentially damaging to customers and competitors, or information received under an express or implied obligation or information received from third parties.
- 5.6.2** Employees and board members shall not disclose or make accessible any confidential information obtained through their affiliation with SCOM to any person who does not have a legitimate need for such information, and whom SCOM has not authorized disclosure.
- 5.6.3** Employees and board members should exercise good judgment to avoid improper disclosure of confidential information, such as in public conversations, avoiding the exposure of confidential information on their desks when others are in their office, etc. Confidential information should be used solely to perform services as a board member or employee of SCOM, unless law requires disclosure of the information.
- 5.6.4** ***Board Members*** - Upon completion of a board member's term of office, or an employee's contract with Student Christian Organization of Malawi, they shall return (or destroy if the documents already exist at a SCOM's office) all documents, papers and other materials that may contain confidential information in his/her possession.
- 5.6.5** ***Employees*** - No employees, either during or after the term of their employment, shall divulge any confidential information to anyone, or use any confidential information in any way not directly related to the business activities of SCOM, or in any way that would adversely affect SCOM's best interests. Information acquired as a result of the person's position in the Student Christian Organization of Malawi may not be used for purposes unrelated to that position.
- 5.6.6** ***Employee/Board Member*** will hold the Confidential Information received from Student Christian Organization of Malawi in strict confidence and shall exercise a reasonable degree of care to prevent disclosure to others.



- 5.6.7 ***Employee/Board Member*** will not disclose or divulge either directly or indirectly the Confidential Information to others unless first authorized to do so in writing by SCOM.
- 5.6.8 ***Employee/Board Member*** will not reproduce the Confidential Information nor use this information commercially or for any purpose other than the performance of his/her duties for Student Christian Organization of Malawi.
- 5.6.9 ***Employee/Board Member*** will, upon the request or upon termination of his/her relationship with SCOM, deliver to the organization any notes, documents, equipment, and materials received from the organization or originating from its activities for SCOM.
- 5.7 The Student Christian Organization of Malawi reserves the right to take disciplinary action, up to and including termination for violations of this agreement.
- 5.8 **Intellectual Property.** Employees shall acknowledge as the sole and exclusive property of SCOM all inventions, discoveries, works of authorship, suggestions and business ideas ("intellectual property") which he/she has conceived, made or acquired or hereafter may conceive, make or acquire (either alone or jointly with others) during the term of employment by Student Christian Organization of Malawi, whether during or outside of regular working hours, or within one (1) year after termination of such employment, pertaining to: any duties or assignments performed in connection with such employment; any matters which have been or hereafter may be the subject of the business of SCOM; or any articles, models, tools, compositions, software, processes, programs or procedures which have been or hereafter may be used or sold by Student Christian Organization of Malawi. Student Christian Organization of Malawi shall have the right to use and to obtain patent, copyright, trademark and/or other forms of legal protection for such inventions and discoveries in Malawi and in foreign countries.
- 5.9 **Use of Resources.** An employee or board member may not make more than inconsequential use of SCOM's facilities, supplies or resources to serve personal interests unless authorized to do so.
- 5.10 **Notification of Subsequent Employers.** Student Christian Organization of Malawi reserves the right to inform any person or entity subsequently employing or evidencing an intention to employ SCOM employees, of the nature of the information Student Christian Organization of Malawi asserts to be confidential information and of the existence and content of this policy.



- 5.11 **Termination/Survival of Obligations.** Employee obligations under this policy shall survive termination of employment and termination of this policy up to one year.

6.0 EXCEPTIONS TO CONFLICTS OF INTEREST

- 6.1 Notwithstanding anything to the contrary in the above policy and guidelines:
- 6.2 **Approved Transactions:** No transactions shall be prohibited by this policy if it is properly authorized. A transaction shall be properly authorized if it is approved in advance and, at the time of its approval, the personal interest of the employee and his or her related parties has been fully disclosed. Transactions involving top management of SCOM must be approved by a majority of the disinterested members of the National Executive Committee. Transactions involving other employees of Student Christian Organization of Malawi must be approved by the General Secretary.
- 6.3 **Declaration of interest:** Board members and employees shall be required to declare any conflict of interest or make known their financial interests in an undertaking and seek the approval of the board or management before it is discussed.

7.0 ADMINISTRATION OF CONFLICTS OF INTEREST

- 7.1 **Enforcement.** The General Secretary of SCOM shall be responsible for enforcing this conflict of interest policy for all employees. The Chairman of the Board shall be responsible for its enforcement for board members.
- 7.2 **NEC's Voting Provision.** The General Secretary will disclose any and all possible conflicts of interest as they occur, and indicate on an annual basis, in writing, the existence of any such conflicts. If the General Secretary has a conflict of interest in decisions that are being made, or that may be made, on behalf of Student Christian Organization of Malawi, will exclude themselves from voting on such issues. Moreover, the person having a conflict shall retire from the room in which the board (or its committee) is meeting, and shall not participate in the final deliberation or decision regarding the matter under consideration.
- 7.3 The National Executive Committee or the Board of Directors will review possible conflicts of interests declared by employees or the director as they occur, excluding the person concerning whose situation the conflict arisen



8.0 ETHICAL BEHAVIOR

- 8.1** It is the policy of SCOM to maintain the highest standards of business ethics; anything less places the organization and its employees at risk. Even minor or ambiguous instances of misconduct can prove ruinous for an organization that depends on community confidence and public trust.
- 8.2** SCOM has an enormous stake in serving people in need around the world and in being accepted as an organization of integrity in all phases of its operations. To protect this vital investment, every department and employee of Student Christian Organization of Malawi must maintain very exacting standards of ethical conduct.

9.0 UNACCEPTABLE ACTIVITIES

These include, but are not limited to:

- 9.1.1** Unauthorized release of Student Christian Organization of Malawi information
- 9.1.2** Falsification of any Student Christian Organization of Malawi records
- 9.1.3** Removal or inappropriate use of Student Christian Organization of Malawi property (including electronic information) without permission
- 9.1.4** Unauthorized possession of Student Christian Organization of Malawi funds or property
- 9.1.5** Unauthorized charges to a Student Christian Organization of Malawi account
- 9.1.6** Deliberate or negligent damage to Student Christian Organization of Malawi property
- 9.1.7** Insubordination or incorrigible behavior
- 9.1.8** Willful violation of any rule; any deliberate action that is extreme in nature and is detrimental to Student Christian Organization of Malawi
- 9.1.9** Theft of the organization's property or the property of fellow volunteers
- 9.1.10** Breach of confidentiality of confidential information
- 9.1.11** Exchange of money, employment, goods, assistance, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior other serious misconduct of any kind.
- 9.1.12** Paying Bribes
It is the policy of Student Christian Organization of Malawi not to condone the paying of bribes. A commission or fee for service rendered, where such fees are publicly posted and there is the



satisfaction that what is being paid is an administrative fee, which may/may not rise to the level of extortion, will be acceptable. It is acknowledged that not every fee charged is a bribe; there are legitimate charges. In seeking to distinguish a bribe from a legitimate administrative fee, such requested payments should be publicly posted and be consistent.

- 9.1.13** Violations of the policy may result in discipline ranging from warning and reprimand to discharge. Employees will be informed of the charges against them and will be given the opportunity to explain actions before any disciplinary action is imposed.

10.0 EXPECTATIONS OF TRUSTEES/NEC MEMBERS/EMPLOYEES

- 10.1** Comply with all laws and regulations.
- 10.2** Deal honestly with all: volunteers, partner agencies, donors, vendors, consultants, Board members and each other.
- 10.3** Use Student Christian Organization of Malawi resources appropriately. All business payments and transactions must be properly authorized by the board and accurately and completely recorded on SCOM's books and records in accordance with generally accepted accounting principles and established Organization accounting policies. Do not make false, incomplete, or misleading entries. No undisclosed or unrecorded accounts shall be established for any purpose, nor should Student Christian Organization of Malawi funds be placed in any personal or non-corporate account.
- 10.4** Do not abuse a position of trust at Student Christian Organization of Malawi. Student Christian Organization of Malawi expects employees to devote full work-time to SCOM's interests and avoid any activity that may distract from or conflict with this effort.
- 10.5** Report violations. Strict adherence to this policy is vital. Supervisors are responsible for ensuring that employees adhere to provisions of the policy. Employees are expected to report any suspected violation of this policy.
- 10.6** In general, Student Christian Organization of Malawi expects employees to act responsibly and with integrity at all times.

Signed:

Position:

Date