

Conflict of Interest Policy

Heartfeldt Foundation

Last Updated: 7 March, 2025

1. Purpose

The Heartfeldt Foundation ("Foundation") is committed to maintaining the highest standards of integrity and transparency. This policy ensures that conflicts of interest (including *Belangenverstrengeling* and *Tegenstrijdig Belang*) are identified, disclosed, and managed appropriately to protect the Foundation's mission and public trust.

2. Scope

This policy applies to:

- Board members
 - Staff
 - Volunteers
 - Contractors and partners acting on behalf of the Foundation
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3. Definitions

- **Conflict of Interest (*Belangenverstrengeling*)**: A situation where personal, financial, or professional interests could improperly influence decisions or actions related to the Foundation.
 - **Conflicting Interest (*Tegenstrijdig Belang*)**: A direct or indirect personal interest that conflicts with the Foundation's mission or operations.
 - **Immediate Family**: Spouses, domestic partners, children, siblings, or parents.
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4. Disclosure Requirements

- **Annual Declaration**: All Board members and staff must submit a written declaration of potential conflicts at the start of each fiscal year.
 - **Ad Hoc Disclosure**: Disclose any new or potential conflicts promptly to the Board Chair or Head of Operations.
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5. Procedures for Managing Conflicts

1. **Recusal:** Individuals with a conflict must abstain from discussions, decisions, and voting on related matters.
 2. **Documentation:** All disclosures and actions taken will be recorded in meeting minutes.
 3. **Review:** The Board will assess significant conflicts and determine mitigation steps (e.g., modifying roles, terminating contracts).
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6. Examples of Conflicts

- Holding a financial stake in a vendor contracted by the Foundation.
 - Influencing grants or partnerships that benefit a family member's organization.
 - Accepting gifts or favors that could compromise impartiality.
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7. Reporting Violations

- Suspected breaches may be reported confidentially via the **Whistleblower Channel** (email: info@heartfeldt.org).
 - Retaliation against whistleblowers is prohibited and subject to disciplinary action.
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8. Training

- Annual training on conflict identification and management will be provided to all Board members and staff.
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9. Policy Review

- Reviewed biennially by the Board to ensure compliance with CBF norms and Dutch law.