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	Conflict of Interest Policy	
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Prepared on: Date: April 2017	Approved by Executive Committee Date: Sept 2018	

1. Policy Statement

- 1.1. It is Cuesports Singapore's policy that Board Members, Board Committee Members, staff, volunteers and all individuals representing or acting on behalf of Cuesports Singapore must be free from conflicts of interest that could adversely influence their judgment or objectivity in conducting the Association's activities and assignments.

2. Purpose & Scope

- 2.1. As Representatives of the Association, individuals have an obligation to act in the best interest of the Association. Hence, individuals need to avoid situations where there may be real, potential or perceived conflicts of interest, which may arise where a Representative's personal or family interest conflicts with those of the Association.
- 2.2. Such conflicts may create problems that may result in the following:
- a. Cause damage to the Association's reputation which may lead to its inability to sustain operations;
 - b. Influence the Representatives' judgement and compromise objectivity when conducting the Association's affairs;
 - c. Restrict free discussion, thus resulting in decisions or actions that are not in the interests of the Association; and
 - d. Risk the impression that the Association has acted improperly.
- 2.3. This Policy aims to protect both the Association and its Representatives from any appearance of impropriety.

3. Terms and Definitions.

- 3.1. "Association" refers to the Cuesports Singapore.
- 3.2. "Representative" refers to Board Members, Board Committee Members, staff, volunteers and all other individuals representing or acting on behalf of the Association.
- 3.3. "Policy" refers to this Conflict of Interest Policy.
- 3.4. "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 Representative;
 - b. Indirect Interest – ownership beneficially held through another investment, estate, trust or another intermediary;
 - c. Vested Interest – personal stake or involvement, which may or may not include an expectation of financial gain; and
 - d. Deemed Interest – a Representative is deemed to have an interest which his/her immediate family member holds an interest.

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- 3.5. "Interested Representative" means a Representative with a real, perceived or potential conflict of Interest
- 3.6 A conflict of Interest arises when the personal interests of the Representative may potentially interfere with the performance of his/her duties in the Association. When actual, potential or perceived conflict of interest arises, the integrity, objectivity and accountability of the person may be affected, which could impede the best interest of the Association.

4. Declaration of Interests

- 4.1. Given the stated purpose of this Policy, Representatives must:
- a. Declare their Interests, and any gifts or hospitality received in connection with their role in the Association; and
 - b. Declare when the transaction to be effected may result in a conflict of Interest.
- 4.2. A declaration of Interests' form is provided for this purpose. The types of Interest to be declared will include, but is not limited to the following:
- a. Representatives who have friends or other personal or business relationships must carefully consider whether those relationships create conflicts of Interest with their entrusted role in the Association. 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 with another Representative, especially where there is an immediate reporting relationship;
 - iv. volunteering and/or having memberships in any other associations/charities; or
 - v. receiving goods/services as beneficiaries.
 - b. Representatives must disclose any outside activities, financial interest or relationships that may pose a real, potential or perceived conflict of Interest to the Board.
- 4.3. To be effective, the declaration of interests needs to be updated in written form at least annually and within the deadline stipulated by the Board.
- 4.4 At any point of time where there are any changes, additions or deletions in the information declared, a supplementary declaration describing such change should be made and filed, as soon as reasonably possible.
- 4.5. In situations where the Representatives are not sure what to declare, or whether/when their declaration needs to be updated, they are strongly encouraged to err on the side of caution or seek advice from the Board.
- 4.6. All disclosure of Interest made by the Representatives and decisions made by the Board on such matters must be recorded, updated and filed with the head of the Human Resources Department (or his designee). Upon receiving notice from the conflicted Representative, Human Resources Department (or his designee) should disseminate the information to the Board as soon as practicable.

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5. Operating Procedures

- 5.1. If the Representative is placed in a position of power to influence decision on an issue where he/she has an Interest, it is the responsibility of the Representative to:
- a. Identify the potential conflict of Interest;
 - b. Make the potential conflict of Interest known to other Representatives voting or working on the same issue;
 - c. Offer to withdraw or absent himself from the meeting; and
 - d. Not vote on the issue.
- 5.2. If the Board or any Board Committee needs to make a decision on an issue where the relevant Representative(s) has/have an interest, it is the responsibility of the Board / the relevant Board Committee to ensure that:
- a. All decisions are made by vote, with a simple majority required based on the presence of a quorum;
 - b. Interested Representatives must not vote on matters affecting their own interests;
 - c. Interested Representatives are recused from the vote and any other related meetings.
 - d. Any discussions and/or votes passed at these meetings are properly recorded.
- 5.3. It is the responsibility of the Board / Board Committee to:
- a. Only decide to hire any prospective employee or contract with any vendor if they are the best qualified individuals available, and in the case of a vendor, willing to provide the goods or services needed at the best price. The Board / Board Committee's decision shall not be influenced in any way by the fact that relevant Representative has an Interest in the transaction and/or recruitment.
 - b. Record in the minutes of the Board Meeting / relevant Board Committee Meeting the potential conflict of Interest, and the use of the procedures and criteria of this Policy.
- 5.4. It is the sole responsibility of any Representative of the Association to report any possible real, potential or perceived conflict of Interest. If it is an oversight of the Association, the Representative shall promptly inform the Association that he/she has been put in such a position of conflict of Interest.
- 5.5. No Representative of the Association shall derive any personal profit or gain, directly or indirectly, by reason of his or her participation with the Association without prior consent of the Association. Each individual shall disclose to the Association any personal interest which he or she may have in any matter pending before the Association and shall refrain from participation in any decision on such matter.
- 5.6. Any Representative of the Association shall refrain from obtaining any list of clients of the Association for personal or private solicitation purposes at any time during the term of their affiliation.
- 5.7. The Board shall have the right to suspend any involvement of any Representative 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 individual. Prior to suspension, the Board shall afford the Representative concerned a right to make representations to the Board for the Board's deliberation.

5.8 Board Members shall serve without any remuneration for their voluntary service to the Association so as to maintain the integrity of serving for public trust and community good instead of personal gain. However, the Association shall reimburse Executive Committee Members for out-of-pocket expenses directly related to the service.

6. Violations

6.1 Suspected violations to this Policy should be communicated to the President or Chief Executive Officer (if any). If the suspected violations involve the President or Chief Executive Officer (if any), they should be communicated to the Chairman of the Audit & Compliance Committee and/or to the Governance Unit, Sport SG.

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**CUESPORTS SINGAPORE
CONFLICT OF INTEREST DECLARATION FORM**

With regard to my service as [Board Member / Board Committee Member / staff / volunteer / other representative] member of Cuesports Singapore, this is to declare that I, 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 Cuesports Singapore, which has resulted, or could result in a 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 Cuesports 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 the Cuesports Singapore.

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

➤ **I am affiliated* to the following charities or organisations:**

- 1) Name of Company: _____
 Type of Company: Public-listed / Private Limited / Sole Proprietorship / Partnership / Others:
 Nature of Business: _____
 Role/Capacity: _____
- 2) Name of Company: _____
 Type of Company: Public-listed / Private Limited / Sole Proprietorship / Partnership / Others:
 Nature of Business: _____
 Role/Capacity: _____

- 3) If you have more than 2 affiliations, please provide details below.

➤ **I am affiliated* to the following Affiliate Members and/or Individual Member of the Association:**

1) Name of Company: _____

Type of Company: Public-listed / Private Limited / Sole Proprietorship / Partnership / Others:

Nature of Business: _____

Role/Capacity: _____

2) Name of Individual: _____

Nature of association: _____

3) If you have more than 2 affiliations, please provide details below.

➤ **I am affiliated* to any vendor, supplier, or any other party providing or bidding for providing services, having a direct or indirect interest in any business transaction(s), agreement, or investment:**

1) Name of Company: _____

Nature of Business: _____

Nature of Interest: _____

Role/Capacity: _____

2) Name of Company: _____

Nature of Business: _____

Nature of Interest: _____

Role/Capacity: _____

3) If you have more than 2 affiliations, please provide details below.

➤ **I have business dealings or transactions with a vendor, supplier or any other party which could result in benefit to me:**

1) Name of Companies: _____
 Nature of Businesses: _____
 Nature of Interest: _____

2) Name of Companies: _____
 Nature of Businesses: _____
 Nature of Interest: _____

3) Others; please provide details below.

➤ **I am affiliated* to another Representative involved in Cuesports Singapore.**

1) Name of Representative: _____
 Role of Representative: _____
 Nature of Relationship: _____

2) Name of Representative: _____
 Role of Representative: _____
 Nature of Relationship: _____

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3) If you have more than 2 affiliations, please provide details below.

➤ **Any other real, potential or perceived conflicts of interest. Please provide details below.**

**Affiliated refers to being connected to another party who could be one of the following: Family Member as defined in the Constitution or close associates; any corporation, business or non-profit organisation of which you serve as staff, officer, board member, partner, participate in management or are employed by; any 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.*

(Please tick)

- I have read and understood the Conflict of Interest Policy and hereby agree to comply with the terms therein.
- 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 the discussion and decision-making of any matter in question which I have a real, potential or perceived conflict of interest.
- I will notify the Board and/or the Chief Executive Officer (if any) immediately if I come to know

that this disclosure is inaccurate or that I have not complied with this Conflict of Interest Policy.

Name: _____

Designation: _____

Signature: _____

Date: _____

Note: This Conflict of Interest Declaration Form has been adopted and amended from the Financial Governance for Charities (supported by the Social Service Institute).