



Conflict of Interest Policy

Organization of literacy support for independent Afghanistan

2025

OLSIA CONFLICT OF INTEREST POLICY

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Board Approval

The board of director of OLSIA, by resolution duly adopted by unanimous vote at a meeting duly called and held and not subsequently rescinded or modified in any way, has duly determined that this policy is workable and fair to and in the best interests of OLSIA, the board, approve this policy, recommended for use and directed that the amendment be submitted for consideration by OLSIA board members and ED at the OLSIA board meeting.

Each member of the board agrees to perform such further acts and execute such further documents as are necessary to effectuate the purposes hereof. This policy manual shall be understood and enforce in accordance with and governed by the laws of the government of Afghanistan.

The OLSIA Board Approval constitutes approval of this policy manual undersigned.

Abdul Qaum Almas

Signature

Fazal Rabani

Signature

Abdul Jabar Ameri

Signature

Farhad Naderi

Signature

Haroon Ahmadi

Signature



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Background of the Organization

The Organization of Literacy Support for Independent Afghanistan (OLSIA) was founded in 2024 with the conviction that education is the cornerstone of lasting peace, economic stability, and social inclusion in Afghanistan. Grounded in the belief that every person—regardless of age, gender or circumstance—deserves the opportunity to learn and grow, OLSIA is committed to building a brighter future for Afghan communities.

From its inception, OLSIA has positioned education as “first and for all,” directing its efforts toward increasing access to literacy, computer skills, vocational training and the English language. By mobilizing educated Afghan youth and partnering with local communities, OLSIA strives to overcome barriers that have long limited opportunities, especially among women and underserved populations.

Operating across multiple provinces, OLSIA implements projects that combine classroom learning with practical skill-building: establishing computer learning centers, delivering soft-skills training, and facilitating vocational pathways. These initiatives are designed not only to educate but to empower learners to participate meaningfully in the economy and society.

OLSIA’s vision is of a united and prosperous Afghanistan where development opportunities are accessible to all, thereby fostering social inclusion and stability. Its mission centers on building a collective movement of educated Afghan youth who champion education for all ages and all genders—with no discrimination. The ultimate goal is to enhance livelihoods, create economic opportunities, and contribute to the country’s long-term development.

Through transparent governance, community-centered design and partnerships that link education with employment, OLSIA seeks to ensure that every Afghan has a chance to unlock their potential. We believe that when people lead their own learning and development, the benefits ripple outward—strengthening families, communities and the nation.

Our Vision:

A united and prosperous Afghanistan where education and development opportunities are accessible to all, fostering social inclusion and stability.

Our Mission:

We aim to build a collective movement of educated Afghan youths to support education above all, education for all ages and all genders without any discrimination of any kind.

Goal

To improve access to education, vocational skills, and economic opportunities, enhancing the livelihoods of Afghan communities and contributing to the country’s long-term development.

Humanitarian Principles:

OLSIA is committed to the principles that are central to establishing and maintaining the provision of humanitarian response to the affected people in natural disasters and complex emergency situations
www.olsia.org Cheknawry high school Street# 1, 7rd Zone, Jalalabad-Afghanistan

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and/or implementation of human development interventions. The main humanitarian principles defined by UN have been adopted by OLSIA. The four core principles are:

- Humanity
- Neutrality
- Impartiality and,
- Independence

Purpose:

The purpose of the policy is to prevent the occurrence of corruption and wrongdoing at the origin and make the employees to perform to the highest loyalty to serve the people of Afghanistan. Financial or other relationships of an employee or their family with a prospective or actual grantee, contractor, vendor or supplier could create the appearance of impropriety or interfere with an employee's ability to perform their responsibilities on behalf of and in the best interests of the organization. Such relationships should be disclosed as per the requirements provided in this policy.

Additionally, certain types of relationships between co-workers may create impermissible conflicts of interest. For example, financial/business relationships in the workplace may raise perceptions of bias and favoritism. For these reasons, personal financial/business relationships between co-workers that could create the appearance of impropriety or interfere with an employee's ability to perform their responsibilities on behalf of and in the best interests of the organization should be promptly disclosed to the management of OLSIA.

What is conflict of Interest?

A conflict of interest is potential interest that undermines or conflict with the interest of the OLSIA. Or the situation where resulting to inappropriate financial gain to an employee of the organization, or a situation which makes a member of the organization not to perform with solely loyalty to the organization.

The following are example of situation may result in conflict with interest of OLSIA

This is not possible to identify and describe all conflicts of interest situations that may arise involving the organization at this occasion or in this policy. Therefore, all employees must use good judgment to avoid any appearance of impropriety; the following are some of the possibilities of possible or actual conflict of interest.

- If two or member of a family is working in OLSIA at the same time, will result in conflict interest, therefore, as per the definition of family relation defined in human resource policy, it is not allowed for two or more members of single family to work for OLSIA at the same time.
- A member of organization staff or his/her family member or a person closely associated with one of the organization staff member gain improper financial or material benefit from a transaction made by organization
- Competing the organization in external opportunities
- The OLSIA employees are not allowed to compete against the OLSIA in no circumstances.

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Accepting Gifts

The OLSIA staff can accept gift of all kind if valued less than 500 Afghani, all gift above this value which supposed to be provided because of the capacity which OLSIA have provided should be submitted to the OLSIA management, because such kinds of gift may influence the recipient negatively.

Political Activities

The OLSIA's employees are strictly prohibited from engaging in electoral politics or lobbying activities on the capacities provided by the organization. OLSIA employees are free to engage in these types of political activities on a personal base. These activities should not conflict with their ability to carry out their OLSIA's responsibilities.

There shouldn't be confusion between positions or action taken by the staff personally versus as a representative of OLSIA. Individual political activities should only take place at the employee's own expense, and without use of the OLSIA's name, resources, facilities, or equipment.

Disclosure

All employees have to disclose any affiliation developed in their private and carrier life which may bring conflict of interest with interest of the OLSIA. This has to be done through signing the declaration form. All employees have to sign the disclosure declaration from on joining the organization, every six months and while reporting a change in the relations of all types deemed necessary because of possible conflict with the interest of OLSIA.

The policy encourages employees to ask when in doubt if a conflict of interest exists by consulting the immediate supervisor and /or the director or member of senior management team.

Working only for OLSIA:

While employed by OLSIA either paid or volunteer you are not allowed to work for other organizations either paid or volunteer. If the employee would like to work for other organization at the same time working for OLSIA he/she should obtain written approval from the director of the OLSIA.

Confidentiality

The policy requires all OLSIA staff including board members for keeping confidentiality of confidential and privileged information. The information should not be lift open and avoid sharing of the information inadvertently. Personnel information including staff of the OLSIA, venders and partners are confidential they should not be shared without obtaining permission from the OLSIA's director.

Ethically it is required to maintain confidentiality of all types of information which access is provided due to the given capacity by the OLSIA. Unauthorized disclosure of confidential and privileged information is considered a serious violation of this policy and the offender is subject to disciplinary action including dismissal.

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Violation of the policy

If it will be revealed by others that an employee failed to disclose actual or possible conflict of interest, the person will be informed from the allegation and will be given the opportunity to explain alleged failure to OLSIA senior management team. If after hearing the STM decides that the person, actually failed to report an actual conflict of interest, SMT will initiate disciplinary action including termination. The chance of appeal is given as per the request.

Managing Conflict of Interest

Not all relation which causes conflict of interest may be terminated, it depends to the severity of conflict which they may produce, and there are some examples of conflict at acceptable level depending on the circumstances, for example using of OLSIA's publication on awareness about specific agenda for general population.

1. Disclosing the conflict of interest (primarily the responsibility of the member or official concerned)
2. Assessment of the seriousness of conflict.
3. Deciding what action (if any) is necessary to best avoid or mitigate any effects of the conflict of interest.

OLSIA Board of director's affairs / and Conflict of interest.

As OLSIA's Board of directors don't receive any payment from the organization and they are engaged in other business, they should discuss the possible situations of conflict of interest and how they should take reasonable action not undermining organization interest

Policy Update

In order to provide flexibility and operate within this policy, the policies and procedures in this manual are subject to review and updates on regular basis. This policy was created in March 2024 and reviewed in April 2024. The changes in rules and regulation, and implementation of new conflict of interest measures and practices are subject to changes in regulations and the existed processes or policies of OLSIA will need to be modified accordingly. Added this, it's important that any best practices or 'lessons learned' are regularly incorporated into the policies and procedures for continual improvement in regards conflict of interest.

Any changes and updates will be incorporated in this manual on annual basis and will be effective for implementation after the approval of the OLSIA board. The next review of the policy will be performed in Jan 2027.

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Policy Implementation

The Executive Director, supported by the conflict of interest focal point, is responsible for developing, reviewing and implementing policies and procedures, as well as monitoring existing project and organizational based practices. OLSIA believes that all relevant staff receive access and necessary trainings about conflict of interest practices and this policies and procedures of the organization, so the benefits the document creates can be realized.

The OLSIA board has a fiduciary duty to the organization to ensure that its staff understands and takes into consideration the proper use of the document and its implementation in practice. This includes making sure that there are good documented policies and procedures to conflict of interest and management of OLSIA is responsible for ensuring these policies and procedures are communicated, followed, monitored, and corrected as needed.

Policy Orientation

The purpose of this policy is to ensure the implementation of this policy at workplace organization and promote conflict of interest consideration and responsibilities to all. This manual includes policies and rules that align with the overall goals of the organization that are written with enough clarity to be understood by individuals throughout the organization.

It is important that all staff, volunteers and clients understand the importance of this policy and procedures adopted in this document. To effectuate, OLSIA conflict of interest focal point is responsible to conduct an orientation about the policy and all the updates and changes incorporated in this manual.

key recommendations

Full Disclosure:

Always disclose any personal, family, or financial interests that could influence — or appear to influence your decisions at work. Transparency prevents misunderstandings and protects both you and the organization.

Avoid Personal Gain:

Do not use your position to benefit yourself, your relatives, or close associates. All decisions, especially those related to procurement, recruitment, and project implementation, must prioritize the organization's interests.

Recusal from Decisions:

If you have a potential conflict in any matter (e.g., a relative applying for a job or a friend's company bidding for a contract), immediately inform your supervisor and step back from related decision-making or discussions.

Maintain Confidentiality:

Do not share or use internal information for personal advantage or to benefit others outside the organization. Sensitive organizational data must remain confidential at all times.

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Annual Declaration of Interest Form

I _____ Designation _____ Department _____

Hereby disclose the following:

Family Relationship (as defined in the OLSIA human resource policy) _____

Businesses Interest (any Capital Share, Partnership Share or Self-Proprietorship Share): _____

Professional Affiliations (including Voluntary NGO work, Boards, Memberships, Voluntary Associations): _____

Political Affiliations (including Membership of, or Office held, in a Political Party): _____

Do you have any type of relation with other board member organization operating in Afghanistan? (OLSIA board member explain) If yes explain?

Do you think of any type of information necessary to be disclosed to the OLSIA Board of Directors (OLSIA board member explain) If yes explain?

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Annual Declaration of Interest Form

I hereby confirm that I have read and understood the OLSIA Conflict of Interest Policy content. My responses to the above questions are complete and correct to the best of my knowledge and belief.

I agree to immediately file a new disclosure form if my new changed circumstances are likely to trigger a potential conflict of interest issue.

I agree that if I become aware of any subsequent information that might indicate that this disclosure is inaccurate or that I have not complied with the OLSIA Conflict of Interest Policy, I will duly notify it to my direct supervisor immediately.

Name _____

Signature _____

Designation _____

Date _____

All the OLSIA newcomers should sign this form right upon joining the organization, and then annually and when the employees believe that a recent or existing affiliation may cause possible or actual conflict

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COMPLIANCE DECLARATION

I, the undersigned hereby confirm:

That I have read and understood the OLSIA Conflict of Interest Policy and commit myself to fully comply with the requirements provided therein. In addition to that I commit myself to comply with other policies requirements of the OLSIA.

Name _____

Designation _____

Signature _____

Date _____