

Conflict of Interest Policy



Version History

No.	Date	Description
Final version 1.0	November 2025	Final version of the <i>Touch Switzerland Conflict of Interest Policy</i> after integrating comments from the Board review

1. Purpose

This Conflict of Interest Policy aims to protect the integrity and impartiality of Touch Switzerland (TS), ensuring that decisions made by its Board Members, Committee Members, and volunteers are not influenced by personal or financial interests.

2. Scope

This policy applies to all Board Members, Committee Members, and volunteers of Touch Switzerland, including anyone acting on behalf of the organization.

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, professional, or financial interests may compromise, or appear to compromise, their ability to make impartial decisions in the best interest of Touch Switzerland. Conflicts of interest may be actual, perceived, or potential.

Definitions:

- **Actual Conflict of Interest:** A situation where an individual's personal, professional, or financial interests are directly at odds with the interests of Touch Switzerland, leading to an immediate and tangible conflict.
- **Perceived Conflict of Interest:** A situation where an individual's actions or relationships could reasonably appear to objective others to influence their decision-making, even if no actual conflict exists.
- **Potential Conflict of Interest:** A situation where a conflict may arise in the future due to evolving circumstances or relationships.

Examples of potential conflicts include:

- Holding financial interests in entities involved with Touch Switzerland.
- Personal relationships influencing decisions.
- Accepting gifts or benefits from parties conducting or seeking to conduct business with Touch Switzerland.

4. Duty to Disclose

All individuals subject to this policy must disclose any potential or actual conflict of interest as soon as it arises. Disclosures must be made in writing to the Executive Committee of Touch Switzerland. It is recommended to write to the general Touch Switzerland email address: info@touchswitzerland.ch.

5. Review Process

Upon disclosure of a potential conflict, the Executive Committee will:

1. Review the circumstances.
2. Consult with relevant stakeholders, if necessary.
3. Determine whether a conflict exists and recommend appropriate action to mitigate or resolve it.

6. Resolution of Conflicts

When a conflict of interest is identified, one or more of the following actions may be taken:

- Recusal of the individual from decision-making processes related to the conflict.
- Reassignment of responsibilities.
- Termination of the relationship with the conflicting party.

Touch Switzerland may determine and implement other appropriate resolution actions as it deems necessary to effectively manage conflicts of interest.

7. Prohibited Activities

Individuals covered by this policy must not:

- Use their position within Touch Switzerland for personal or financial gain.
- Engage in activities that undermine the organization's mission and values.
- Participate in decisions where they have a conflict of interest.

8. Recordkeeping

All disclosures and actions taken to address conflicts of interest must be documented and stored securely by the Executive Committee of Touch Switzerland. The Executive Committee of Touch Switzerland must maintain a register of declared interests.

9. Compliance and Violations

Failure to disclose a conflict of interest or comply with this policy may result in disciplinary action, up to and including removal from a position or termination of responsibilities.

10. Policy Review and Amendments

This policy will be reviewed within a maximum of 5 years from the date of approval by the Board of Touch Switzerland and confirmed, revised, or withdrawn.

Annex A: Touch Switzerland Conflict of Interest Declaration Form

Part A: Personal Information

- Name: _____
 - Position/Role within Touch Switzerland: _____
 - Date: _____
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Part B: Declaration of Interests

1. Do you have any actual, perceived, or potential conflicts of interest to declare?

- Yes
- No

2. If yes, please provide details below:

- Nature of Interest (e.g., financial, personal, professional):

- Parties Involved: _____
- Potential Impact on Role/Decisions in Touch Switzerland:

3. If you are unsure whether a situation constitutes a conflict of interest, provide details below for review:

Part C: Acknowledgment and Commitment

By signing this form, I acknowledge that:

1. I have read and understood the Touch Switzerland Conflict of Interest Policy.
2. I will act in the best interests of Touch Switzerland and disclose any actual, perceived, or potential conflicts of interest as soon as they arise.
3. I will comply with any measures deemed necessary to manage or resolve conflicts of interest.

I declare that the information provided above is true and complete to the best of my knowledge. I understand that failure to disclose conflicts of interest or comply with the policy may result in disciplinary action.

Signature: _____

Date: _____

For Executive Committee Use Only

- Received by: _____
- Date of Review: _____
- Action Taken (if any):

Annex B - Touch Switzerland - Register of Declared Interests Template

Date of Declaration (YYYY-MM-DD)	Name	Position	Nature of Interest	Parties Involved	Mitigation Actions Taken	Review Date (YYYY-MM-DD)