



**BANGLADESH FOOTBALL FEDERATION
(BFF)**

**CONFLICT OF INTEREST (COI)
POLICY**



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1. PURPOSE OF THE POLICY

Conflict of Interest Policy refers to any case where a person's personal interest might contradict interest of Bangladesh Football Federation (BFF). A conflict of interest arises if a person has, or appear to have, secondary interest that could influence his ability to perform his duties with integrity in an independent and purposeful manner.

The purpose of the conflict-of-interest policy is to ensure that all persons of BFF effectively identify, disclose, and manage any actual, potential or perceived conflict of interest. To protect BFF's interest when it is entering into any transaction or arrangement that might benefit any individual.

This policy will outline the rules regarding conflict of interest and the responsibilities of person and the federation in resolving any such discrepancies. This policy shall also implement a tone that any member of BFF, team, immediate family members or third party may not give, offer, or receive bribes to/from government officials or private parties (supplier, contractor, service provider) in exchange for improper business advantages.

2. SCOPE

This conflict-of-interest policy applies to all person of BFF as well as persons acting on behalf of the company. This policy needs to be strictly adhered to by all at BFF and conflict of Interest disclosure form need to sign by every new employee joining BFF and all person at BFF at the beginning of every financial year by HR (See Annexure I for format). The authority to ensure that the Conflict-of-Interest disclosure form is signed and rests with the General Secretary.

3. DEFINITIONS

Person: Any officer & staff, director, member of a committee who has a direct or indirect financial interest or other benefits

Secondary interest: A Secondary Interest is an interest that gives a person authority or inside information that could be used to benefit the person or their immediate family member.

Types of conflict: Actual, Potential & Perceived

- a) **Actual Conflict:** A person has an interest that will influence their judgment and decision
- b) **Potential Conflict:** A conflict of interest is predictable but not yet real. It will depend upon a future event that may occur.
- c) **Perceived Conflict:** A reasonable third person is concerned about the existence of a conflict of interest of another person.

Conflict of Interest can arise without intent to "cross the line" between professional and personal interest. In other words, conflict of interest can not only be actual, but also potential or perceived.



Immediate family member: a person's parents, siblings, spouse, children, grandparents, grandchildren, aunts, uncles, siblings-in-law, half-siblings, cousins, adopted children, stepparents/stepchildren, and cohabiting partners.

Board or committee: It's the authority in place to handle COI matters. Contact person of this committee is the General Secretary (GS) and persons shall communicate with the GS regarding COI disclosures and declarations.

Financial Interest: A person has a financial interest if the person has, directly or indirectly, through business, investment, or a family:

- a) An ownership or investment interest in any entity with which the BFF has a transaction or arrangement,
- b) A compensation arrangement with the BFF or with any entity or individual with which the BFF has a transaction or arrangement, or
- c) A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the BFF is negotiating a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are not substantial.

4. POLICY ELEMENTS

The relationship of the BFF with its person's should be based on mutual trust. BFF is committed to preserve the interests of people under its employment, it expects them to act only towards its own fundamental interests.

5. ADDRESSING AND DETERMINING- A CONFLICT OF INTEREST

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. Therefore, when a person understands or suspects that a conflict of interest exists. They should bring this to General Secretary's attention and disclose the conflict of interest and all material facts.

After getting all the details and all discussions with the interested person, in the absence of the interested person, the determination of a conflict of interest is discussed and voted upon at BFF (Annexure 2). The Chair of the board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement and shall decide if a conflict of interest exists. After exercising due diligence, the board or committee shall determine whether BFF can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the board or committee shall determine by a majority vote of the disinterested directors/member of the committee/persons is in FIRST'S best interest, for its own benefit, and whether it is fair and reasonable, then make its decision as to whether to enter the transaction or arrangement. Supervisors must also keep an eye on potential conflict of interests of their subordinates.



6. SOLUTIONS to CONFLICTS OF INTEREST

Outside Activities/Other jobs/beyond BFF: Outside interests are potential conflicts of interest when they interfere the ability to make decisions based upon the best interest of BFF. Hence, Persons must review their relationships with outside interests and they must fulfill their responsibilities towards BFF and it shall not be for the benefit of the vendors/suppliers. Disclosures must be done immediately if a situation arises. Disclosure of any secondary activities must be done and approval from respective authority shall be obtained.

Relationships with Customers, Suppliers, and Competitors: The person should always follow BFF's bidding policies and procedures. The bidding process must be fair, impartial and in accordance with BFF policies. Any person may include a letter detailing positive experiences with the vendor along with the bid, but they must not influence the bid process or the outcome of the bid process, in any way which is not prescribed by the BFF policy. If needed, the person may consult with the compliance officers before the outcome of the bid process.

A person should proceed with caution when the relatives are involved and must disclose the relationship with the customer, supplier, or competitor to BFF. Disclosing the relationship can prevent any misunderstandings, appearance of nepotism or favoritism. That way, potential ill feelings or complaints can be avoided.

Business Courtesies: Individual shall never give or accept any item that could be construed as a bribe or kickback. A gift by a supplier for sharing among all member, officer & staffs of BFF, it's all right to accept. A general gratitude note shall be made to the supplier on behalf of BFF. Accepting cash or its equivalent is not permissible. Each person of BFF must be aware of "Conflicting Circumstances" and make declaration of the courtesies upon finding themselves in such situations.

7. VIOLATION OF THE CONFLICT OF INTERESTS AND DISCIPLINARY CONSEQUENCES

If the board or committee has reasonable cause to believe that any person has failed to disclose actual, potential or perceived conflict of interest, it shall inform to the person, the basis for such belief and afford the person an opportunity to explain the alleged failure to disclose.

If, after hearing the person's response and after making further investigation as warranted by the circumstances, the board or committee determines that the person has failed to disclose an actual, potential or perceived conflict of interest, it shall take appropriate disciplinary and corrective action.



Examples of Conflict-of-Interest situations,

- Significant financial interest from scope beyond BFF
- Outside employment that interferes with job duties
- Misuse of BFF's time and assets
- Work for customer, supplier, dealer, service provider, contractor, and competitor.
- Obtaining unfair benefits due to your employment.
- Arranging work for a relative or friend etc.

Conflicts of interest are not in themselves unethical or contrary to this policy. However, if an employee fails to identify (or, where required, manage/monitor) any actual, potential, or perceived conflict of interest including deliberate concealment, this may result in disciplinary action or, depending on the seriousness of the circumstances, termination of employment.

Employees need to also be aware of the various policies, guidelines and code of conduct referred to the BFF policy and, in this policy, which are relevant to conflict of interest.

8. DUTY TO DISCLOSE – DISCLOSURE FORM

In connection with any conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the authority of BFF considering the proposed transaction or arrangement.

See Annexure 1- Conflict of Interest Disclosure Form

Annual Declarations

HR shall share an email to all the member with an attachment (COI policy) and clearly state over the mail that each member to read and agree to the COI policy. It will be deemed as acceptance which can be stored in employee master file. However, at the time of signing off the policy correspondence mail, if there is any situation which needs to be disclosed, staff must disclose the matter through 'Conflict of interest disclosure form'. All persons of BFF must read, understand and comply with the policy with no exceptions.

9. CHECKLIST AGAINST CONFLICTS OF INTEREST

- a) Complete the Conflict-of-Interest Disclosure form or the Gift/Benefit Declaration form (BFF shall prepare a format for the GIFT Declaration form and this declaration must be made immediately when such situation occurs)
- b) Discuss circumstances of the conflict-of-interest situation with the concerned person of BFF.
- c) Follow the conflict-of-interest management plan decided upon by the BFF (See Annexure 2).
- d) Monitor the conflict-of-interest situation on an ongoing basis, informing the concerned officer (GS) of the BFF of any change to circumstances of the conflict-of-interest situation.



10. ANNEXURES

Annexure 1: Conflict of Interest Disclosure Form

Bangladesh Football Federation (BFF)

A conflict of interest arises if a person has, or appear to have, secondary interest that could influence his ability to perform his duties with integrity in an independent and purposeful manner.

The conflict-of-interest form indicates whether the person has an economic interest in entity whose financial interest would reasonably appear to be affected. The person should also disclose any personal, family business, or volunteer affiliations that may give rise to a real or apparent conflict of interest. Relevant federally and organizationally established regulations and guidelines in financial conflicts must be strictly followed.

Date _____

Name _____

Position _____

(Please describe below any relationships, transactions, positions you hold (Volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest.

_____ I have no conflict of Interest

_____ I have the following conflict of interest to report. (Please specify other nonprofit and for-profit boards you and your spouse sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a 25% shareholder, and any businesses you or your family member own)

1. _____
2. _____
3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Signature _____

Date _____



Annexure 2: Management Plan for Managing conflict of interest [For each scenario, a specific Management plan shall be made based on the below instructions]

If the authorized officer (General Secretary) of BFF determines there is a potential/actual conflict of interest, the General Secretary (GS) of BFF will prepare and propose a conflict-of-interest management plan. The employee has a responsibility to discuss any proposed conflict of interest management plan with the authorized officer of BFF.

The authorized officer of BFF will consider any input by the employee may have in relation to the proposed management plan, however, the employee is obliged to follow any conflict-of-interest management plan decided upon by the authorized officer of BFF.

The core activities of the COI management plan shall identify the exact conflict of interest, how it's going to impact BFF, addressing the matter and resolve it with reasonable and justifiable manner. A team of senior management (GS, CFO, HR,) shall be responsible to initiate and implement the plan and preserve the documentations on respective persons employee file. COI exceeding a threshold level(Must be decided by Ex-co) shall be brought forward to Ex-co to reach a conclusion.

There may be circumstances in which a potential/actual/perceived conflict of interest involves the authorized officer of BFF. In such a situation, the authorized officer of BFF will work with the President or Executive Committee of BFF to develop the conflict-of-interest management plan.

Conflict of interest management plans will ensure conflicts are managed and resolved based on the following strategies: -

Record and disclose: Ensure all information surrounding the conflict of interest has been disclosed and documented appropriately

Restrict: Restrictions are placed on the employee's involvement in the matter, or the scope of the work is reformulated or there is a restriction on access to certain information.

Recruit and monitor: A non-conflicted third party is used to oversee part or all the process that deals with the matter.

Remove: The employee removes themselves, or is removed, from the matter. For example, in a situation in which a job applicant is related to a member of the recruitment panel for that position, a conflict-of-interest management plan might be for that panel member to step down from their position during the selection process for that position only.



Relinquish: The employee relinquishes the private interest that is creating the conflict where relinquishing the interest is not possible (e.g., relationship with family) and the conflict cannot be managed using one of the other options above, the employee may consider removing themselves from the process.

Record of Proceeding during Managing Conflict of Interest:

The minutes of the board and all committee with board delegated powers shall contain: -

- a. The names of the persons who disclosed or otherwise were found to have a financial interest on connection with an actual, potential or perceived conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the boards or committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussion and votes relating to the transaction or arrangements, whether any alternatives to the proposed transaction or arrangement were considered, and a record of any votes taken in connection with the proceedings.

Compensation

- a. A voting member of the board or committee, officer or staff who receives compensation, directly or indirectly, from the organization for services is precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the organization for services is precluded from voting on matters pertaining to that member's compensation.



Annexure 3- SAMPLE SITUATIONS RELATED TO CONFLICT OF INTEREST

There are many situations where a conflict of interest may arise in BFF working environment. Some of the more common situations are outlined below: -

Other employment/paid activities: An employee undertaking other employment or paid activities may give rise to a potential/actual/perceived conflict of interest, particularly when the other work is related to work duties. Depending on the circumstances, an employee's ability to perform their work duties may be adversely affected by the other employment/activities.

Apart from ongoing obligations under this policy, an employee must meet certain conflict of interest obligations under their contract of employment. Namely, the employee must notify the concerned officer of BFF in writing of the other employment/activities. The BFF will then determine whether a potential/actual conflict of interest exists. All conflicts of interest are to be managed in the interest of BFF.

Disposal of BFF Assets: The disposal of BFF assets has potential conflict of interest implications such as fraud or unofficial use equipment. BFF employee's do not have priority to surplus access to surplus BFF's assets. The BFF reserves the right to notify the public of any assets sales. Employees may make an offer post-notification.

Accepting gifts and benefits: If a gift/benefit could constitute a potential conflict of interest, the employee should refuse the offer of the gift/benefit and declare the offer to authorized officer of BFF. The reason for this is to ensure that gifts and benefits are appropriately disclosed, and any perceived or real conflict of interest is managed appropriately.

The employee:

- a) Do not solicit gifts or benefit
- b) Refuse all offers of gifts or benefits that could reasonably be perceived as undermining the integrity of BFF or themselves.
- c) Refuse all offers of gifts or benefits from individuals or organizations about which they are likely to make decisions (e.g., tender process, procurement of goods and services).
- d) Refuse all offers of money or items easily converted to money.
- e) Refuse bribes and report of bribery report to the concerned officer of BFF,

Procuring Goods and Services: A potential or perceived conflict of interest may exist when a contractor/supplier used at the BFF is also engaged by an employee for private work. In some situations, a contractor/supplier may offer or provide private work at a discounted rate to ensure that they remain in good favor for future contract or supply. This may mean that an employee receives a private benefit which could become a potential conflict of interest if they are also involved in decisions for the procurement of goods or services for BFF.



If it could be perceived that the contractors or suppliers work performed for the employee/member in their private capacity is a conflict of interest, then the employee/member should ensure that the private work is charged at standard and published rates. Furthermore, the employee/member should declare the engagement of the contractor/supplier for private work and/or any relationship with the contractor prior to any future awarding of contracts for the procurement of goods or services for BFF.

Staff Recruitment: A conflict of interest exists in the recruitment of a person with whom an employee/member has a current or past professional/personal relationship or in whose recruitment they have a vested interest.

Where an employee/member is part of a recruitment panel/board and becomes aware of such a relationship to a job applicant, they should declare the conflict of interest to the authorized officer of BFF. The authorized officer of BFF then determines a conflict-of-interest management plan in consultation with the employee/member, for example the employee/member may remove himself/herself from the recruitment panel/board.



11. ENFORCEMENT

These policies were adopted by the BFF Executive Committee Meeting held on 31 December 2022 and come into force with immediate effect.

Dhaka, 31 December 2022

For Bangladesh Football Federation

President
Kazi Md. Salahuddin

General Secretary
Md. Abu Nayeem Shohag