REDEEMERS HEALTH VILLAGE

Human Resources Department

CONFLICT OF INTEREST POLICY

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Date Approved:	—		

Relevant Standards

- Labour Act of Nigeria (Cap L1 LFN 2004)
- Nigeria Data Protection Act (NDPA) 2023
- RHV Code of Professional Conduct
- ILO Standards on Ethical Conduct in the Workplace
- Whistleblowing best practices in healthcare governance

Amendment History

Issue	Status	Date	Reason for Change	Authorised
1	Draft	May 27, 2024	New Policy Implementation	
2	Final	June 2025	Policy Review & Update	CHRO
3	Final	April 28, 2026	Board Submission Revision	CHRO/CEO

1. Purpose

The purpose of this policy is to ensure that all employees of Redeemers Health Village (RHV) discharge their professional responsibilities in the best interest of the hospital, its patients, and the communities it serves. Real or perceived conflicts of interest — if unmanaged — can compromise objectivity, ethical decision-making, institutional trust, and patient safety. This policy provides a clear framework for identifying, disclosing, and managing such situations with transparency and integrity.

2. Scope

This policy applies to all persons engaged with RHV in any capacity, including full-time and part-time employees, locum and contract staff, management, executives, consultants, board members, volunteers, students, and third-party service providers.

3. Definition

A conflict of interest arises when an employee's personal, financial, professional, or relational interests — or those of a close associate — interfere with, or could reasonably be perceived to interfere with, the objective and impartial exercise of their professional duties to RHV. Both actual conflicts and perceived conflicts must be disclosed. The standard for disclosure is not certainty of bias but reasonable appearance of a conflict.

Examples of situations that may give rise to a conflict of interest include, but are not limited to:

- Holding a financial stake — directly or through a related party — in a supplier, vendor, contractor, or competitor of RHV
- Using RHV's time, equipment, information, premises, or brand for personal or external business purposes
- Favouring family members, romantic partners, or close personal associates in recruitment, promotion, procurement decisions, patient referrals, or resource allocation
- Receiving gifts, hospitality, payments, or benefits from patients, vendors, contractors, or business partners above the permitted threshold
- Engaging in outside employment, self-employment, or professional consultancy that competes with RHV's interests, creates a reputational risk, or materially affects the employee's performance or availability at RHV
- Participating in a procurement, tender, or contract evaluation process in which the employee or a close associate has a financial or personal interest
- Research sponsorships, clinical trial funding, or industry engagements that create undisclosed financial incentives in clinical decision-making

4. Policy Provisions

4.1 Duty of Loyalty and Integrity

All RHV employees owe a duty of loyalty to the institution. They must at all times prioritise RHV's interests — and the welfare of its patients — above any personal, financial, or external interests when performing their official duties.

4.2 Mandatory and Proactive Disclosure

Every employee must promptly disclose any actual, potential, or perceived conflict of interest to their line manager and HR as soon as it arises. Disclosure must not be delayed pending the annual cycle. An employee who is uncertain whether a situation constitutes a conflict should err on the side of disclosure. Delayed, incomplete, or omitted disclosure will be treated as an aggravating factor in any subsequent disciplinary action.

4.3 Gifts and Hospitality

No employee may accept gifts, benefits, or hospitality with a combined value exceeding ₦10,000 from any single patient, vendor, contractor, business partner, or third party in any 12-month period. Any gift above this threshold must be reported to HR within 24 hours and either formally declined on RHV's behalf or surrendered for institutional use. Gifts of any value that are offered in connection with a business decision, tender, or contract award must always be reported, regardless of value.

4.4 Procurement, Contracting, and Vendor Evaluation

Employees involved in any aspect of procurement, vendor evaluation, tender assessment, or contract negotiation must immediately disclose and formally recuse themselves from any process in which they — or a close associate — have a financial, personal, or relational interest in any of the bidders or suppliers. Recusal must be documented in writing and acknowledged by HR.

4.5 Employment and Supervision of Relatives

The recruitment or direct managerial supervision of an immediate family member (spouse, parent, child, sibling, or partner) must be declared to HR before any hiring decision is made or any supervisory relationship is established. Such arrangements require written approval from a senior manager with no connection to the relationship. Undisclosed familial employment or supervisory arrangements constitute a breach of this policy.

4.6 Outside Employment and External Professional Engagements

Any external employment, self-employment, professional consultancy, or directorship must be conducted strictly outside of RHV's contracted working hours. Under no circumstances may external work be conducted during RHV working hours, using RHV resources, or in a manner that conflicts with the employee's duties to RHV. Employees must obtain prior written approval from HR for any external engagement that is within the healthcare or hospital management sector, or that may affect their availability, performance, or RHV's interests.

4.7 Research, Clinical Trials, and Industry Sponsorships

All staff involved in clinical research, trials, or any industry-sponsored professional activity must fully disclose all sponsorships, financial relationships, funding sources, and external interests to their Head of Department and HR. Non-disclosure of research-related financial interests is a serious breach of professional and institutional ethics.

4.8 Consequences of Non-Compliance

Failure to disclose a conflict of interest, failure to manage a declared conflict appropriately, or acting in bad faith in a conflict situation may result in formal disciplinary action — up to and including summary dismissal — in accordance with the RHV Disciplinary Action Policy. The matter may additionally be referred to the relevant professional regulatory authority or to law enforcement where the circumstances warrant.

5. Disclosure and Management Procedure

1. All employees complete a Conflict of Interest Declaration Form at the time of appointment to RHV.
2. Any new or changed conflict arising between annual cycles must be disclosed on an updated form within five (5) working days of the conflict arising.
3. HR, in consultation with the relevant Head of Department and, where necessary, the CHRO or CEO, reviews each disclosure and determines the appropriate management action — which may include formal recusal, reassignment of duties, conditional approval with controls, or other proportionate measures.
4. All disclosures, management actions, and outcomes are documented and retained confidentially in the employee's personnel file.

6. Roles and Responsibilities

Employees

Proactively identify and disclose conflicts; avoid actions that compromise RHV's integrity; complete annual declarations honestly and on time.

Supervisors and Managers

Monitor staff activities and work relationships; promptly escalate any identified or suspected conflicts to HR; model the conduct this policy requires.

HR Department

Administer the disclosure process; maintain records; provide training and guidance; enforce this policy and coordinate disciplinary action where required.

Executive Management and Board

Approve high-level conflict disclosures (particularly those involving senior staff or Board-level relationships); ensure institutional compliance and a culture of integrity across RHV.

7. Training and Awareness

RHV provides annual mandatory training on conflict of interest awareness and declaration for all staff, with enhanced training for those in leadership, procurement, finance, clinical decision-making, and research roles. New staff receive training on this policy as part of their induction.

8. Whistleblowing

Employees who become aware of another individual's undisclosed or mismanaged conflict of interest are encouraged to report it through RHV's whistleblowing channel or directly to the CHRO. Reports made in good faith will be protected from retaliation. Malicious or false reports will themselves be treated as a disciplinary matter.

9. Monitoring and Review

This policy is reviewed annually by the CHRO. All material updates are communicated to staff and incorporated into annual training. The CHRO reports on conflict of interest compliance to the Board's People & Governance Committee as part of the annual HR governance report.