



MONDO INTERNATIONAL ACADEMY

Mondo International Academy, s.r.o.
Záhradnícka 60
Bratislava 821 08

IČO: 48 082 295
DIČ: 2120044916
IČ DPH: SK2120044916

CONFLICT OF INTEREST POLICY

Mondo International Academy (further MIA) has an obligation to demonstrate and document good governance in order to protect the integrity and credibility of the Academy, and to maintain the trust and confidence of our constituents.

The purpose of the MIA's conflict of interest policy is to address potential conflicts that may arise when an employee is in a position to influence a Academy's decision that may result in direct or indirect personal benefit and to ensure transparency of related party relationships. This policy is also intended to resolve conflicts that arise when the personal interests or relationships of an academic staff member conflict with the ability of such staff member to act in a neutral manner with respect to a complaint against an academic member, staff member, or student.

The purpose of this policy is to:

- formally outline the obligation employees have to avoid actual and perceived conflicts of interest;
- provide assistance to employees in understanding conflicts of interest so that they may disclose situations which may give rise to actual or perceived conflicts of interest; and
- provide processes and mechanisms for the Academy to evaluate potential conflicts of interest and resolve actual or perceived conflicts of interest.

Accepting Gifts, Hospitality and Benefits

MIA Academy does not permit the acceptance of gifts or benefits in any kind by Academy employees from anyone who is in a business relationship with the Academy, or as a business applicant, from students or subordinates, which may lead to a real or perceived conflict of interest.



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This includes, but is not excluded, the addition of:

- acceptance of cash or other non - monetary assets (for example, real estate, gift vouchers, etc.)
- Event tickets, sponsorships, memberships
- Tickets or accommodations
- Personal discounts
- Personal commissions
- Tangible objects

This rule is exempt for intangible gifts. Courtesy gifts not exceeding EUR 20 may be accepted subject to any obligation.

Employees are advised to consult with the Academy director about the seriousness and, if in doubt, should refuse the gift. In approving a gift as irrelevant, the MIA Academy takes into account the timing or benefits of the gift, any cultural or symbolic factors, and any other relevant circumstances.

Conflicts of loyalty - External activity

A conflict of interest may arise because, although the employee concerned does not receive any benefits, the employee's decision-making at the academy may be influenced by his or her other interests.

For example, an employee's loyalty to the academy could conflict with his or her loyalty to the academy.

- another organisation, such as their employer
- another charity or academy of which they are a trustee
- a religious or political group
- a member of their family
- another connected person or organisation e.g. trade union, charity



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The MIA Academy will always examine the motivation to determine if there is a conflict of interest in which the employee's other interests could (or would obviously) interfere with the employee's ability to make decisions only in the best interests of the academy.

No employee may engage in any outside employment or work without the written consent of the Academy that affects the employee's ability to perform his or her duties to the full and could lead to actual or perceived conflicts of interest.

The College's management must be informed of all external posts and jobs (voluntary or paid) that may cause a real or perceived conflict of interest.

No staff member may associate the name or address of the academy with any external activity or company without the prior written consent of the academy.

The use of the Academy and its resources or relationships to promote a personal religious, political, business or other agenda is prohibited, as is the use of students or staff to promote external employment, work, or other activities.

Identifying low risk conflicts of loyalty

Deciding that a conflict of interest is low risk, and that the affected employee can participate in the decision, is a judgement for the leadership of the academy. It will depend on the particular decision and relevant circumstances. The employee must take all relevant factors into account and be ready to explain their approach if asked.

Each employee's legal duty to act only in the best interests of the academy means in practice that individual employees who fail to declare any conflicts of interest may be subject to disciplinary procedures.

e) Withdrawing from decision making where there is a conflict of loyalty

Where there is a conflict of loyalty and the affected employee does not stand to gain any benefit:



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- the affected employee should declare the interest. Mia Academy decide what level of participation, if any, is acceptable on the part of the conflicted employee. Ultimately MIA decide whether withdrawal is in the best interests of the academy when this type of conflict has been declared. The options might include deciding whether the employee:
 - having registered and fully declared the interest, can otherwise participate in the decision.
 - can stay in the meetings where the decision is discussed and made but not participate
 - must withdraw from the decision-making process completely

MIA can, before their discussion, ask a employee who is withdrawing to provide any information necessary to help make a decision.

Any conflicts of interest will be documented, usually in the minutes of meetings. Where there is a conflict of interest, MIA will ensure that the written record of the decision shows:

the nature of the conflict

- which employee were affected
- whether any conflicts of interest were declared in advance
- an outline of the discussion
- whether anyone withdrew from the discussion and where relevant:
- how the employee took the decision in the best interests of the academy.

Relationship

Relationship between the student and employees who have a close personal relationship must avoid actual or perceived conflicts of interest. Student's obligations that may arise for:



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1. educational obligations,
2. influence evaluations, or
3. prefer the student.

Potential conflicts must be disclosed and should normally be resolved by limiting work responsibilities to rule out any actual or perceived conflict.

The Academy's policy is that no individual may secure employment benefits arising from a family or close personal relationship with another employee.

According to:

- no employee may have a direct or indirect relationship with another family member of an individual with whom he or she has a close personal relationship;
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- Individuals who wish to be considered for a position at the academy and who are interviewed for that position must identify each staff member of the academy who is a family member or a person with whom they have a close personal relationship.

3. RECORD conflicts of interest.

Declared interests will be recorded in a register and updated annually. If interests change the academy should be advised (via the Academic Director).

Any conflict of interest which arises in the course of business must be declared at the relevant meeting and will be recorded (normally in minutes).