

CONFLICT OF INTEREST POLICY

POLICY STATEMENT:

The Society must ensure the highest public confidence in the integrity of the organization and its personnel. The Society benefits from the expertise of individuals with a multiplicity of interests, however, those interests must not impair or appear to impair the public support and respect necessary for the sustained operation of the Society.

The employer relationship with employees, volunteers, delegates, students, and third party services is founded upon trust and commitment to the Society's mission and activities. Individuals must therefore remain cognizant of the Fundamental Principles, and in particular, those of neutrality and impartiality. Individuals must refrain from undertaking any activities that are perceived to be or are in conflict of interest with the Society's mission or activities.

PURPOSE:

The following standards have been developed to ensure employees, volunteers, delegates, students, and third party contractors understand situations that could constitute a conflict of interest and to ensure they conduct themselves in a manner that ensures the best interests of the Society and its clients.

This policy cannot endeavour to conceive of all potential situations of conflict of interest and therefore relies on employees, volunteers, delegates, students, and third party contractors to monitor their own actions and seek guidance and direction from appropriate sources including, but not limited to, General Counsel and the Senior Director of People Services.

SCOPE:

This policy applies to all employees, volunteers, delegates, students, and third party contractors of the Society.

DEFINITIONS:

Conflict of Interest refers to a situation where an individual or the organization with which he/she works demonstrates an interest in, or has a direct or indirect competing interest with the Society's activities. This competing interest may result in the individual being in a position to benefit from the situation or in the Society not being able to achieve an expected result. For the purposes of this policy, real and perceived conflicts of interest are of equal concern.

PROCEDURE AND APPLICATION:

A. Acknowledgment of 2.6 - Conflict of Interest:

Before or upon assuming their official duties, individuals will sign *2.6-Conflict of Interest* certifying they have read and agree to abide by the standards as defined in this policy.

B. Disclosure of Conflict of Interest:

The Society encourages the right of individuals to be involved in activities as citizens of their community. However, a conflict of interest exists where there is a divergence between an individual's personal interests and his/her professional obligations to the Society. Therefore, all individuals will refrain from all conflicts of interest and will disclose to their supervisor any business, commercial, financial, or personal interests where such interest might be construed as being in real, potential, or apparent conflict with their official duties with the Society.

Individuals who have a material interest in, or with, any organization or individual who is a party to a contract or proposed contract with the Society shall, within a reasonable time frame, disclose in writing to their supervisor, the nature and extent of such interest.

Individuals are required to consult with their supervisor whenever they have a concern as to whether a particular circumstance may place them or may give the appearance of placing them in a conflict of interest with their official duties to the Society.

C. Conflict of Interest in the Performance of Duties:

During the course of their employment or engagement with the Society, individuals will not participate in the following acts that may constitute a real or perceived conflict of interest:

- i. place themselves in a position of obligation to persons who might benefit or appear to benefit from special consideration with respect to Society business, or assist private entities or persons in their dealings with the Society where this could result in preferential treatment;
- ii. disclose, discuss, use, take advantage of, benefit or appear to benefit from the use of information not generally available to the public and which has been acquired during their official Society duties; or directly or indirectly use, or allow the use of, Society property or information for anything other than officially approved activities;
- iii. communicate with any level of government, or with any elected or appointed government official in relation to the business of the Society, unless they have specific authorization from the Society;
- iv. have inappropriate involvement or influence in the appointment, hiring, promotion or evaluation by the Society of an immediate family member or individual with whom they are involved in a romantic relationship. Refer to *5.15- Employment/Engagement of Relatives & Fraternalization* for more information.

- v. vote on, or participate in, any discussion about a resolution to approve a contract in which he/she has a direct or indirect monetary interest, nor approve and/or sign off in such circumstances.

D. External Interests:

Subject to the terms and conditions of their employment agreement, engagement, or contract, individuals may engage in remunerative employment with another employer, volunteer activity, carry on a business, or receive remuneration from public funds for activities outside their employment, engagement, or contract with the Society, provided that such action does not constitute a conflict of interest and:

- i. does not interfere with the performance of their duties or be against the interests of the Society;
- ii. does not bring the Society into disrepute;
- iii. does not provide any advantage to the individual as a result of their employment, engagement, or contract with the Society;
- iv. is not performed in such a way as to appear to be an official act or to represent the Society's public positions or policies, including the Fundamental Principles; or
- v. does not involve the use of Society premises, services, equipment or supplies to which the individual has access by virtue of their employment, engagement, or contract unless official authorization is secured.

E. Client/Beneficiary Relationship:

All delegates, employees and volunteers are to understand the client/beneficiary vulnerability and dependence on the delegate/employee/volunteer to provide assistance, and to act accordingly. This includes recognition that personal relationships outside the scope of their professional roles as delegates, employees and/or volunteers are not in the best interest of either party or the Society.

F. Gifts:

Individuals must avoid the appearance of favouritism in their dealings on behalf of the Society and must not accept personal gifts from entities where such gifts are offered under circumstances where it might be inferred that such action was intended to influence the individual in the performance of their duties.

G. Additional Conflict of Interest Directives:

Employees and volunteers in Director and Officer positions may be required to sign more detailed and specific Conflict of Interest Policy as a condition of their employment/engagement.

BREACH OF POLICY:

Individuals who fail to comply with this policy during the course of their employment, engagement, or contract with the Society will be subject to disciplinary action, up to and including termination of employment, engagement, or contract with the Society, and/or legal action, as applicable.

RESPONSIBILITIES:

1. Employees, volunteers, students, delegates, and third party service providers are responsible for conducting themselves in a manner which ensures the best interest of the Society and its clients, avoiding situations in which there may be a direct or indirect competing interest with the Society's activities.
2. Supervisors are responsible for promoting adherence to this policy and must notify People Services of any conflict of interest issues involving individuals under their supervision.
3. The Senior Director of People Services, in consultation with the General Counsel, is responsible for advising stakeholders, maintaining, monitoring, and revising this policy; and for authorizing exceptions.
4. Members of the Organizational Leadership Team (OLT) are responsible for applying and implementing this policy in each of their respective areas.

INQUIRIES:

All questions regarding this policy or whether a situation constitutes a conflict of interest must be directed to People Services.