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Title: **Conflicts of Interest Policy,  
CSAWCC-2024-005**

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and Executive Assistant to the President  
and CEO

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Purview: Board of Directors

Date of Approval: 15 January 2024

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## **Conflicts of Interest Policy**

BE IT RESOLVED that 14855086 CANADA ASSOCIATION (hereinafter "the Corporation" or "CSAWCC") do adopt the "CONFLICTS OF INTEREST POLICY" effective upon a successful vote by the Board of Directors.

### **1. Overview**

- 1.1 Whereas the Corporation recognizes that conflicts of interest may arise with board members, employees, and volunteers of the Corporation.
- 1.2 Whereas the Corporation recognized its responsibility to educate about conflicts of interest and to give guidance of the proper steps to undertake a conflict of interest, (or potential perception of a conflict of interest), arises.
- 1.3 Adherence to this policy will ensure employees will act fairly, equitably, and ethically in their actions, and the integrity of neither the company nor its employees be compromised

### **2. Adoption**

- 2.1 Be it therefore resolved, that the Board of Directors adopt the following Conflicts of Interest Policy.
- 2.2 Be it further resolved, that no provisions of this policy shall override the foundational principles present in the By-laws, and where there is a discrepancy between this policy and the Corporation's By-laws, the By-laws shall prevail.

### **3. Defining Conflict of Interest**

- 3.1 A conflict of interest arises when an individual is entangled in a situation where their personal, financial, professional interests impact their ability to act impartially. In the workplace, several types of relationships can give rise to such conflicts: These relationships have the capacity to influence an individual's professional decisions, leading to bias and jeopardizing the integrity of their role.



## 4. Possible Conflicts

4.1 Types of relationships that have the capability to cause conflicts of interest include:

- **Familial Relationships:** Employees can face conflicts of interest if they are working with a family member.
- **Romantic Relationships:** Romantic relationships between employees will impact an employee's bias.
- **Personal Relationships:** Close personal friendships between employees will impact an employee's bias.
- **Outside Employment:** Holding a second job or being involved in outside business activities that compete with or are related to CSAWCC's interests will impact an employee's bias.
- **Gifts, Favors, and Hospitality:** Accepting substantial gifts or extravagant hospitality from clients that exceed a value of \$200.00 can compromise an employee's ability to maintain objectivity.
- **Board Memberships:** Employees who serve on the boards of other organizations, especially if those organizations have relationships with CSAWCC, will impact an employee's bias.

## 5. Impact on the Workplace

5.1 A conflict of interest in the workplace will have any of the following impacts:

- **Erosion of Trust:** If a conflict of interest is allowed to persist without proper reporting, affiliates of CSAWCC can lose trust in the integrity and impartiality of the organization. This erosion of trust can lead to a toxic work environment, decreased employee morale, a lack of commitment to the organization's goals, and reputational damage.
- **Unfair Advantages:** Employees or individuals with conflicts of interest can gain unfair advantages over others in the workplace. This looks like: Unequal opportunities, unfair promotions, or preferential treatment, causing dissatisfaction among other employees and damaging team dynamics.
- **Legal and Regulatory Risks:** Failure to address conflicts of interest can expose the organization to legal and regulatory risks.
- **Employee Disengagement:** When employees believe that favoritism or nepotism is prevalent due to conflicts of interest, they can become disengaged and lose motivation to perform at their best. This disengagement can affect overall productivity and the quality of work.
- **Loss of Talent:** Employees who feel that they are not treated fairly due to conflicts of interest may choose to leave the organization, leading to a loss of valuable talent and institutional knowledge.



## 6. Responsibilities of CSAWCC

6.1 Employers have a crucial role in upholding a conflict-of-interest policy as a means of ensuring fairness, transparency, and ethical behavior.

- **Communication:** It is CSAWCC's responsibility to communicate the policy effectively to all employees, ensuring that everyone understands the requirements and implications of the policy. Note: CSAWCC ensures that any changes or updates to this policy will be communicated in a timely and direct manner to all employees. The updated policy will always be accessible and can be found in the HR Hub on Civconnect's SharePoint.
- **Training:** CSAWCC will conduct training sessions to educate employees about identifying and managing conflicts of interest.
- **Disclosures:** CSAWCC will provide conflict of interest forms that employees are required to use if they are in a situation in which they need to disclose any potential conflicts of interest.
- **Confidentiality and Non-Retaliation:** CSAWCC ensures that the disclosure process is confidential and that employees feel comfortable reporting conflicts of interest without fear of retaliation.
- **Evaluation and Assessment:** CSAWCC commits to reviewing disclosed conflicts of interest on a case-by-case basis and to assess whether they pose a risk to the organization's integrity, reputation, or performance.
- **Conflict Resolution:** CSAWCC commits to taking appropriate steps to address conflicts of interest, which include recusal from decision-making, reassignment of duties, or implementing mitigation measures.
- **Enforcement:** Employers will enforce the conflict of interest policy consistently and impartially. If violations occur, appropriate disciplinary actions will be taken.
- **Disciplinary Actions:** In cases when a conflict of interest is deliberately concealed or when a solution cannot be found, disciplinary action will be invoked by CSAWCC. Up to and including termination.
- **Regular Review and Update:** Conflict of interest policies will be periodically reviewed and updated to ensure they remain relevant and effective in addressing potential issues.

## 7. Responsibilities of the Employee

7.1 Employees also have important responsibilities in upholding CSAWCC's Conflict of Interest Policy. These responsibilities include:

- **Awareness:** Employees will familiarize themselves with the conflict-of-interest policy and understand what constitutes a conflict of



interest. This includes recognizing situations where personal interests interfere with their professional duties.

- Disclosure: If an employee becomes aware of a potential conflict of interest, they have a responsibility to disclose it to their immediate supervisor or HR.
- Suspected Conflict of Interest: If an employee suspects a conflict of interest impacting the workplace, they have a responsibility to disclose it to their immediate supervisor or HR.
- Timely Reporting: Employees will promptly report any actual or potential conflicts of interest as soon as they become aware of them, allowing the organization to address the issue promptly.
- Honesty and Transparency: When disclosing a conflict of interest, employees are responsible for honest and relevant accounting of information to enable CSAWCC to assess the situation accurately.
- Cooperation: Employees will cooperate with CSAWCC's efforts to manage and resolve conflicts of interest. This involves providing additional information, adhering to mitigation measures, and complying with recusal from certain activities.
- Avoiding Inappropriate Influence: Employees will refrain from using their positions or relationships to influence decisions in a way that benefits their personal interests or those of their close associates.
- Professional Conduct: Employees will conduct themselves professionally and avoid engaging in activities that could create conflicts of interest or undermine the organization's reputation.
- Training and Awareness: Employees will actively participate in conflict of interest training sessions provided by the employer to enhance their understanding of the policy and its implications.
- Compliance: Employees must comply with any conflict of interest management measures or restrictions implemented by the organization to address disclosed conflicts.

## 8. Reporting of Conflicts of Interest

8.1 A conflict of interest should be reported as soon as possible via the Conflict of Interest Reporting Form and then submitted to the Human Resources Department.

8.2 A conflict of interest may be disclosed at the start of any meeting of the Corporation if it relates to the business at hand during that meeting. The employee must recuse themselves from that discussion or agenda item when it arises and may not vote on the matter if applicable.



## 9. **Miscellaneous**

- 9.1 | This policy shall only be subject to amendment by the Board of Directors.
- 9.2 | This policy shall be subject to amendment, review, or striking every one (1) year following its ratification by the Board of Directors.

## 10. **Application**

- 10.1 | This policy shall apply to the entire Corporation, its subsidiaries, the National Council, and Board of Directors, and any members who come into contact with the Corporation by any means.