

**Policy Title:** 1.5 Conflict of Interest  
**Section:** 1.0 Roles and Responsibilities  
**Last Approved:** January 2020

### BACKGROUND

The purpose of this policy is to define policies with regard to conflict of interest, in a manner consistent with encouraging the highest ethical standards within our organization.

### APPLICATION

The SSBA is committed to establishing and maintaining a high standard of ethical practices in the workplace and encourage practices that support integrity and honesty and are in compliance with Canadian and Provincial laws, rules and regulations.

The purpose of this policy is to provide direction to all current and former employees, and Executive members regarding the communication of events/occurrences or concerns, with respect to issues of integrity and honesty and, in particular, of questionable financial or operational matters.

### POLICY STATEMENT

1. The SSBA is committed to conducting itself with honesty and integrity at all times. If, at any time, this commitment is not followed or appears in doubt, SSBA will seek to identify and remedy such situations.
2. A conflict of interest is a situation where a reasonable person would consider an employee or Executive member to have an interest that may conflict with the person's ability to act in good faith and in the best interest of the Association.
3. A conflict of interest exists when an employee or Executive member or a member of their family has an existing or potential interest in any entity, transaction or arrangement with the Association also has an existing or potential interest, or where the person will derive a financial or other benefit directly or indirectly from the Association.
4. An employee or Executive member shall avoid financial transactions between themselves and the Association, themselves and a third party, or the Association and third party that may adversely affect the performance of their duties. This includes transactions involving entities of which an employee or Executive member has substantial financial interest through ownership or control. This includes all manners of interest, direct or indirect, including but not limited to profit sharing arrangements, rebates, commissions, compensation in any form, etc. Examples include, but not limited to:
  - 4.1. Self-benefit: Using your position or relationship within the SSBA to promote your own interests, including using confidential or privileged information gained in the course of involvement with the SSBA for personal benefit or gain.
  - 4.2. Influence peddling: Soliciting benefits for yourself from outside organizations or individuals in exchange for using your influence to advance the interests of that organization or individual within the SSBA.

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- 4.3. Other business relationships and dealings: Approving grants or contracts with organizations or individuals in which you have a significant financial or other interest or relationship, particularly if you are in a position to influence major decisions, are responsible for review, negotiation and approval of the grants or contracts, or otherwise direct the SSBA's business dealings with that organization or individual.
- 4.4. Dealings with grantees: Personally accepting anything of value from organizations or individuals that have grant proposals pending before the SSBA or have received grants from the SSBA.
- 4.5. Property transactions: Directly or indirectly leasing, renting, trading, or selling real or personal property to or from the SSBA.
5. An employee or Executive member must make a timely and full disclosure in any situation where they have a conflict of interest or an appearance of a conflict of interest.
  - 5.1. The employee or Executive member shall not participate in any formal or informal discussion of, any decision or vote on, or attempt to exert influence over the contract, relationship, person or organization with respect to which the conflict or appearance of a conflict may relate.
  - 5.2. Unless invited to answer questions or participate in discussions, the employee or Executive member shall temporarily recuse himself/herself from meetings in order to allow the remaining persons or members to engage in a full discussion regarding the contract, relationship, individual or organization in question. If the covered person is an Executive member and a vote is taken, then such Executive member shall abstain from voting and the minutes of the meeting shall record this fact.
6. An employee or Executive member has a duty to report suspected violations of the Policy. Dependent on the employee/Executive member involved in the financial or other wrongdoing, a written statement must be submitted to the following individuals:
  - 6.1. If the violation is with respect to any SSBA employee or party acting on behalf of SSBA, the statement must be submitted to the Executive Director and a copy sent to the Director of Corporate Services.
  - 6.2. If the violation is with respect to a member of the Senior Management Team, the statement must be submitted to the Executive Director with a copy sent to the President.
  - 6.3. If the violation is with respect to the Executive Director, the statement must be submitted to the President and a copy sent to the Audit and Investment Committee.
  - 6.4. If the violation is with respect to a member or members of the Executive, the statement is to be submitted to the President and a copy sent to the Executive Director.
  - 6.5. If the violation is with respect to the President, the statement must be submitted to the Vice-President and a copy sent to the Executive Director.
7. Procedure for investigation
  - 7.1. Once an occurrence or concern is brought forward to the appropriate individual an investigation will commence. The designated individual may enlist the assistance of one or more employees and outside legal, accounting or other advisors, as may be appropriate to conduct the investigation.

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- 7.2. A report will be prepared by the designated individual and any legal or other action will be taken as appropriate.
- 7.3. Each occurrence/event or concern will be treated as confidentially as possible and with due care. The results of the occurrence or concern investigation will be shared with the reporter. This will not include details of any disciplinary action, which will remain confidential to the individual concerned.

### REFERENCES

SSBA Bylaw 4.2 - Executive – Powers and Duties  
Audit and Investment Committee Terms of Reference  
Financial Policy 1.4 – Disclosure of Wrong Doings (Whistleblower)  
Staff and Human Resources Policy 2.0