

CONFLICT OF INTEREST POLICY

PURPOSE

The purpose of this policy is to establish a standard of conduct to ensure that staff and volunteers act in the best interests of Parya Trillium Foundation (“Parya”) and its clients and, in pursuing this goal, maintain standards relating to conflict of interest. These standards are intended to enhance public confidence in the integrity of Parya and its personnel. Parya benefits from the expertise of individuals with a multiplicity of interests; however, those interests must not conflict with the interests of Parya nor impair the public support and respect necessary for the operation of Parya.

SCOPE

This policy applies to staff and volunteers.

DEFINITIONS

A conflict of interest is a situation where an individual, or the organization he/she represents or has an interest in, has a direct or indirect competing interest with that organization’s activities. This competing interest may result in the individual being in a position to benefit from the situation or in Parya not being able to achieve a result in the best interest of Parya.

A conflict may arise where an individual is a party to a contract with Parya or has an interest in an enterprise, or is related to a person who is party to such a contract; or where an individual receives payment by Parya for services rendered to Parya other than reimbursement for reasonable out-of-pocket expenses measured according to Parya’s policies on expense reimbursement.

Conflict of interest for Parya also includes conduct which is not in keeping with Parya’s mission. In particular, the principles of neutrality and impartiality cannot be comprised.

Conflict of interest includes, but is not limited to situations

- Where an employee or volunteer’s private affairs or financial interests are in conflict with their work duties, responsibilities and obligations, or result in a public perception that a conflict exists
- Which could impair the employee or volunteer’s ability to act in the public interest
- Where the actions of an employee or volunteer would compromise or undermine the trust that the public places in Parya.

DISCLOSURE

All employees and volunteers shall immediately disclose to their supervisor/ manager, in writing, any business, commercial or financial interest where such interest might be construed as being in real, potential or apparent conflict with their official duties.

PERFORMANCE OF DUTIES

An employee or volunteer will not vote on, or participate in, any discussion about a resolution to approve a contract in which he/she has an interest, nor will an employee or volunteer approve and/or sign off on such circumstances.

In the performance of their duties, employees and volunteers must not:

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- Place themselves in a position of obligation to persons who might benefit or appear to benefit from special consideration with respect to Parya business
- Have a monetary interest that would conflict with the discharge of the duties owed to Parya
- 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 Parya duties
- Communicate with any level of government, or with any elected or appointed government official in relation to the business of Parya, unless they have specific Parya authorization
- Assist private entities or persons in their dealings with Parya where this could result in preferential treatment to any person
- Directly or indirectly use, or allow the use of, Parya property or information for anything other than officially approved activities

OUTSIDE EMPLOYMENT

Staff members may engage in remunerative employment with another employer, volunteer activity, carry on a business, or receive remuneration from public funds for activities outside their position provided that:

- It does not interfere with the performance of their duties
- It does not bring Parya into disrepute
- They do not have an advantage derived from their employment as a Parya employee
- It is not performed in such a way as to appear to be an official act or to represent the organization's public positions or policies
- It does not involve the use of Parya premises, services, equipment or supplies to which the staff member has access by virtue of their employment, unless official authorization is secured.

GIFTS

Staff and volunteers must avoid the appearance of favouritism in all of their dealings on behalf of Parya and not accept personal gifts from those doing business or seeking to do business with Parya.

FINANCIAL

Staff and volunteers must not commit Parya to any unauthorized expenditure or other liability and must ensure that all commitments are approved in accordance with the appropriate by-laws, regulations and policies including all appropriate consultations and approvals. Vendor relationships Staff and volunteers in leadership roles will not perform fee for service responsibilities for Parya in addition to their responsibilities as an employee or leadership volunteer of Parya. Nor will employees sell goods to Parya, unless by specific approval of the board.

Goods shall not be purchased from a volunteer or relative of an employee without consultation with the manager and a determination made as to whether the correct processes were undertaken and the impact of the decision. Where there is doubt on the subject, the issue is to be referred to the board.

CLIENT RELATIONSHIPS

All employees and volunteers are to understand the client's vulnerability and dependence on the employee/volunteer to provide assistance, and to act accordingly. This includes recognition that personal relationships outside the scope of their professional roles are not in the best interest of either party or Parya. Conflict of interest situations between employees/volunteers and clients are investigated immediately and resolved as appropriate.

BREACH OF CONFLICT OF INTEREST

Employees and volunteers are required to consult with their supervisor/manager whenever they have any question as to whether a particular circumstance may place them in a conflict of interest. Persons who fail to comply with these standards during the course of their employment will be subject to such appropriate measures as may be determined by Parya including dismissal from employment. Persons who fail to comply with these standards following termination of employment with Parya hereby acknowledge that the disclosure of confidential information will result in irreparable harm to Parya and Parya shall have the right to enforce its lawful rights and remedies against any offending person.

RESERVATION OF RIGHTS

Where an individual fails to disclose a conflict or an interest according to this policy or according to other laws or regulations in Canada, Parya reserves all rights it may have to deal with the contract, conflict and individual involved.

RESPONSIBILITY

The manager is responsible for advising stakeholders, maintaining, monitoring, and revising this policy; and for authorizing exceptions. The manager is also responsible for applying and implementing this policy among staff and volunteers. The manager responsible for presenting a recommendation on any potential or actual conflicts to the president. The president is responsible for final decisions on any potential or actual conflicts of interest. If the manager or the president is the individual who is in a conflict of interest, a disinterested senior employee shall act in the place of the manager, and disinterested executive of the board shall act in the place of the president.