

Conflict of Interest Policy

United Way of Greater Moncton and Southeastern New Brunswick

1 – Purpose

This policy is intended to define Conflict of Interest, describes instances where it may occur, and outline internal processes to deal with real or potential conflict of interest.

This policy will assist Board Members, other volunteers and employees of United Way of Greater Moncton and Southeastern NB (UWGMSNB) to identify and avoid conflicts of interest and to allow the same individuals to deal with conflicts of interest as they arise. This policy is created to ensure the highest standard of public trust and integrity in the work of UWGMSNB.

2 – Scope

This policy applies to all UWGMSNB Board members, other volunteers, and all employees.

3 – Policy

Each employee, Board member, or other volunteer of UWGMSNB is obligated to avoid conflicts of interest as they arise. They should also take care to avoid the potential for a conflict of interest or appearance of a conflict of interest at all times where possible.

A conflict of interest is any situation where a UWGMSNB Board member, other volunteer or employee or a member of that person's family, has the ability to influence, directly or indirectly, a decision or action in his or her favour, or be in a competing interest with UWGMSNB. A "family member" shall include but not be limited to a spouse, partner, natural or adoptive parent, natural or adoptive child, brother or sister.

Conflicts of interest include, but are not limited to, situations involving:

- An interest, either real or perceived, that benefits the individual or the individual's family;
- Organizations with which an individual has an official governing responsibility which employ the individual or a member of his or her family'
- Real or perceived potential to compromise the best interest of UWGMSNB.

To that end:

1. Board members, other volunteers and all employees shall not receive services, materials or other compensation from individuals or organizations that are in a position to benefit financially from UWGMSENB, or from donors and agencies – other than incidental gifts, customary hospitality, and other benefits of nominal value.

Examples of this include but are not limited to:

- Opportunities for personal gain for Board members, other volunteers and employees through any other volunteer or freelance or part time employment opportunities should not conflict with the individual's responsibility on behalf of UWGMSENB;
 - Employees and volunteers must not use their UWGMSENB position to influence the employment, purchases from, or awarding of contracts in favour of a family member, or organization in which the individual or a family member has a financial interest
 - Gifts, fees or honoraria received for speaking engagements in excess of nominal amounts should be declined where possible, but if accepted, the amount must be redirected as a donation to a not-for-profit organization of the recipient's choice.
 - Gifts, fees or honoraria given for the use and benefit of the UWGMSENB organization may only be accepted at the discretion of the Executive Director and/or the Chair of the Board.
2. Individuals shall not use their UWGMSENB position or step out of their official UWGMSENB roles to assist other organizations or persons where this would result in giving preferential information or treatment that would conflict with UWGMSENB interests.
 3. To be a Board Member in good standing UWGMSENB requires that the individual have no spousal or other family relationship with another Board member or employee of UWGMSENB.
 4. UWGMSENB employees may not be employed by any UWGMSENB member or funded agency, nor participate as a volunteer in any governance or fiduciary capacity with any UWGMSENB member or funded agency.
 5. Board members, other volunteers and all employees who discover they are in a position of conflict of interest must take immediate steps to disclose and restrain their participation in the conflict of interest.
 - Board members, other volunteers and employees who have a conflict of interest, in which they may derive personal financial

benefit, either personally or through their families, shall at the first opportunity disclose the nature of that conflict of interest. A decision will be made on whether the conflict must be avoided or the declared conflict can continue where arrangements provide obvious benefits to UWGMSENB and where reasonable steps can be taken to ensure any other party cannot be advantaged to the detriment of UWGMSENB.

- When Board members, other volunteers or employees are in a real or perceived conflict of interest on a particular matter to be discussed and decided upon, they shall take all reasonable steps to remove themselves immediately from the decision-making process as it relates to their official UWGMSENB roles and/or their roles in the community.
- Even where a technical conflict of interest as defined in this policy does not exist, the possibility of the perception of a conflict of interest should be considered by all relevant parties, in consultation with the Chair (for Board), Executive Director for volunteers other than Board members or one's supervisor (for employees). It may be advisable to take additional steps to avoid a perceived conflict of interest.

4 – Procedures

1. It is the responsibility of:
 - The Chair of the Board to ensure that Board Members understand and comply with this policy;
 - The Executive Director to ensure that employees and other volunteers understand and comply with the policy.
2. Where any Board Member, volunteer or employee feels that he or she may be in a conflict of interest, such individual shall immediately give notice of the potential conflict to the Executive director, or if the Executive Director is involved, to the Chair of the Board. It is in the sole discretion of the Executive Director or the Chair of the Board to determine whether an exemption to this policy shall be granted. Should such a determination be made, a report shall be tabled at the next meeting of the Board outlining the circumstances of the situation and the reasons for the granting of the exemption.

To protect the interest of the Board member, volunteer or employee giving notice to the Executive Director or Chair of the Board, confidentiality shall be maintained throughout the process to the extent practical and appropriate under the circumstances.

3. If it is believed that a Board Member has not been in compliance with this policy, an investigation will be conducted under the auspices of the Chair of the Board.
4. If it is believed that an employee or other volunteer has not been in compliance with this policy, the Vice-President or the Executive Director may conduct an investigation. In the event of disagreement, the Executive Director will determine the final resolution. If the matter involves the Executive Director, it will be referred to the Chair of the Board for review.
5. The Executive director will establish the prevailing nominal amount that UWGMSENB considers to be acceptable for personal gifts from sponsors, donors, volunteers or suppliers. Currently, any gift in excess of \$25.00 is not permitted.
6. Any breach of this policy will be considered a serious matter and dealt with immediately. Any individual knowingly violating the Conflict of Interest Policy may be subject to disciplinary action, up to and including termination.