

Conflict of Interest Policy

1 - Purpose

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

This Policy will assist all Board Trustees, other volunteers, sponsored employees, and all employees of United Way Greater Toronto (UWGT) 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 UWGT.

2 - Scope

This Policy applies to all Board Trustees, other volunteers, sponsored employees, and all employees.

3 - Policy

Each Board Trustee, volunteer, sponsored employee, or employee of UWGT 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.

A conflict of interest is any situation where a UWGT Board Trustee, volunteer, sponsored employee or employee, or a member of that person's family, has the ability to influence, directly or indirectly, a decision or action in their favour, or in the favour of an organization they represent in another capacity, or be in a competing interest with UWGT. A "family member" shall include but not be limited to a spouse, partner, parent, caregiver, child, or sibling.

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 or which employ the individual or a member of their family;
- real or perceived potential to compromise the best interests of UWGT.

To that end:

1. Individuals shall not receive services, materials or other compensation from individuals or organizations that are in a position to benefit financially from UWGT, or from donors and agencies - other than incidental gifts, customary hospitality, and other benefits of nominal value.

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Examples of this include but are not limited to:

- Opportunities for personal gain through any other volunteer or freelance or part time employment opportunities should not conflict with the individual's responsibility on behalf of UWGT;
 - Employees and volunteers must not use their UWGT 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 token 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 UWGT organization may only be accepted at the discretion of the President & Chief Executive Officer (CEO) and/or the Chair of the Board.
2. Individuals shall not use their UWGT position or step out of their official UWGT roles to assist other organizations or persons where this would result in giving preferential information or treatment that would conflict with UWGT's interests.

Examples of this include but are not limited to:

- Individuals should not participate as a volunteer in situations where it will be challenging to maintain separation of UWGT knowledge, decisions and interest from their duties and interests in another organization;
 - When volunteering for another organization, UWGT donor practices, specific solicitation techniques and methodologies, and intellectual property are not to be shared with other organizations;
 - Individuals must not give confidential and preferential advice to an agency that would result in unfair advantage in a granting process;
 - Individuals must not redirect or promote the designation of donor gifts to anything other than the strategic work of UWGT and the agencies we fund to enable it; or
 - Individuals must not identify and research donors on behalf of another organization using knowledge or any information gained from UWGT.
3. To be a Board Trustee in good standing of UWGT requires that the individual has no family relationship with another Board Trustee or employee of UWGT.
4. UWGT employees may not be employed by any UWGT funded agency, nor participate as a volunteer Board member or in any other governance or fiduciary capacity with any UWGT funded agency. While UWGT recognizes that its employees may engage in outside professional activities, employees must ensure that those activities are consistent with UWGT's mission and values since these arrangements may also create or have the potential to create Conflicts of Interest.

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5. A UWGT Board Trustee or Board Committee member, volunteer, sponsored employee, or employee who volunteers with an agency seeking UWGT funding must not be involved in any discussion or decision related to the funding application. UWGT may request written confirmation from the agency that the individual was not involved or present in related discussions. If the agency were selected for funding, the individual would need to adjust their relationship in accordance with this policy.
6. Individuals who discover they are in a position of conflict of interest must take steps to disclose and restrain their participation in the conflict of interest:
 - Individuals 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 UWGT and where reasonable steps can be taken to ensure any other party cannot be advantaged to the detriment of UWGT.
 - When individuals 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 from the decision-making process as it relates to their official UWGT 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) 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 Trustees understand and comply with this Policy;
 - the CEO to ensure that employees and other volunteers understand and comply with the Policy.
2. Where any employee feels that they may be in a conflict of interest, such individual shall immediately notify the Vice President, People and Culture, or, if the Vice President, People and Culture is involved, to the CEO. Declarations of conflict will be stored in UWGT's Human Resources Information System (HRIS). Where a Board Trustee, or other volunteer feels that they may be in a conflict of interest, such individual shall immediately notify the Chief of Staff and Corporate Secretary of the potential conflict. It is in the sole discretion of the CEO, Vice President, People and Culture or Chief of Staff and Corporate Secretary 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 of

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Trustees outlining the circumstances of the situation and the reasons for the granting of the exemption.

To protect the interest of those individuals giving notice, confidentiality shall be maintained throughout the process to the extent practical and appropriate under the circumstances.

3. If it is believed that a Board Trustee 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, their Vice President, the Chief of Staff and Corporate Secretary or Vice President, People and Culture or CEO may conduct an investigation. In the event of a disagreement, the Chief of Staff and Corporate Secretary or Vice President, People and Culture or the CEO will determine the final resolution. If the matter involves the Chief of Staff and Corporate Secretary or Vice President, People and Culture, it will be escalated directly by the concerned party to the CEO. If the matter involves the CEO, it will be referred to the Chair of the Board for review.
5. The Chief Financial & Operating Officer will establish the prevailing nominal amount that UWGT considers to be acceptable for personal gifts from sponsors, donors, volunteers, or suppliers. Currently, any gift in excess of \$50.00 is not permitted.
6. Any breach of this Policy will be considered a serious matter and dealt with immediately. Any UWGT employee who knowingly violates the Conflict of Interest Policy will be subject to appropriate disciplinary action up to, and including, termination of employment. UWGT will also take appropriate action in relation to any Board Trustee, other volunteer or sponsored employee who is found to have knowingly violated this Policy.

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