



LTABC Conflict of Interest Policy

A conflict of interest arises when “insiders” such as LTABC directors, employees, volunteers or service providers are in a position, or perceived to be in a position, to benefit financially (or create an improper benefit to a family member or other organization to which they are associated) by virtue of their position within the LTABC. “Insiders” may also include parties related to the above, contributors with an ability to influence decisions of the LTABC, and those with access to information not available to the general public.

A conflict of interest may exist in different forms:

- **Self-Dealing:** any situation in which an insider has a financial interest in a transaction or is in or perceived to be in a position to be able to benefit personally from a decision they could make, or create a benefit to a family member or other organization with which they are associated.
- **Opposing loyalties:** any situation in which an insider finds themselves with competing or opposing loyalties separate from LTABC due to other business, organizational, or personal relationships. Membership in or serving as a Director of another organization is not by definition a competing loyalty.
- **Loss of public credibility:** a situation in which an insider’s actions in professional or personal roles not associated with LTABC may create a perception of conflict of interest or cause the loss of public credibility for LTABC.

Real and perceived conflicts of interest will be considered using the following guidelines:

- LTABC directors shall exercise due diligence carefully to avoid any real, perceived or potential conflicts of interest to the very best of their capabilities.
- All parties covered by this policy shall disclose to the LTABC Board the existence of any real, perceived or potential conflict of interest using the form attached as Schedule A.

- Directors and employees shall absent themselves from Board or Committee discussions where such person has a conflict of interest unless the Board or Committee requests specific information from the director or employee.
- No director shall vote on any issue where the director has a real or perceived conflict of interest. All declarations of conflicts of interest, and the subsequent treatment of such declarations, will be recorded in the minutes of the Board meetings.
- No director or other party covered by this policy shall otherwise attempt to inappropriately influence decisions of the LTABC where a conflict of interest or perceived conflict of interest has been declared or has been discovered to exist.
- If a director is uncertain regarding a potential conflict of interest, they shall review the matter with the Chair. The Chair may consult the Board and provide advice in writing or otherwise as recorded to the director.

In the event that behaviour which is not consistent with this policy is observed, it is expected that the concerned party will raise the issue directly with the relevant parties and that the issue be resolved in compliance with policy.

In the event that direct conflict of interest resolution is not adequate or effective, then the behaviour of concern will be escalated to the Chair for directors, and to the Executive Director for employees, contractors and volunteers, who will bring the matter to the attention of the Board to consider and determine an appropriate decision and directed resolution action on the matter.

At any time, an LTABC employee, director, member, associate, volunteer or service provider may report suspected violations of this policy, to the Board Chair for resolution by the LTABC Board to ensure full compliance with bylaws, policies or law.

Failure to comply with this policy could result in disciplinary action up to and including possible revocation of appointment, direction for change or improvement in behaviour or possible termination of employment, subject to applicable laws and approved LTABC bylaws, policies, principles, standards and related guidelines on addressing violations.

All directors, employees, volunteers and contracted service providers must sign a statement affirming understanding of and requirement for compliance with this Conflict of Interest Policy as may be approved from time to time by the Board of Governors. Signed confirmations may be in a separate document or included as part of job agreements for the LTABC Board, Employees, volunteers or other contracted service providers.

Guidelines and procedures for administration and interpretation of this policy and for investigating and resolving issues may be determined as needed by the LTABC Board for administrative process.

Schedule A – Conflict of Interest Disclosure Form

Name:

Date:

At this time, I am a Board member, a committee member, or an employee of the following organizations:

I certify, to the best of my knowledge, that except as described below, I am not now, nor at any time during the past 12 months have been:

1. A participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any vendor, supplier, or other party doing business with the LTABC which has resulted or could result in personal benefit to me;
2. A recipient, either directly or indirectly, of any salary payments, loans (other than loans provided by a Canadian chartered bank or credit union), or gifts of any kind from or on behalf of any person or organization engaged in any transaction with the LTABC;
3. In a position of a real, perceived or potential conflict of interest with the LTABC.

Any exceptions are stated below with a full description of the nature of the transaction and of the interest, whether direct or indirect, which I have (or have had during the past 12 months) in person or organizations having transactions with the LTABC.

X

Signature

Title