

POLICY OVERSEEING: CONFLICT OF INTEREST

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 the Board of Director members, other volunteers and employees of the Colorectal Cancer Resource & Action Network (herein 'CCRAN') 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 CCRAN.

2. SCOPE

This Policy applies to all CCRAN Board of Directors, other volunteers, and all employees.

3. POLICY

Each employee, Board member, or other volunteer of CCRAN 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 possible.

To that end:

- i) Individuals shall not receive services, materials or other compensation from individuals or organizations that are able to benefit financially from CCRAN, or from donors and agencies.
- ii) Individuals shall not use their CCRAN position or step out of their official CCRAN roles to assist other organizations or persons where this would result in giving preferential information or treatment that would conflict with CCRAN'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 CCRAN knowledge, decisions, and interest from his/her duties and interests in another organization.
 - When volunteering for another organization, CCRAN 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 CCRAN.
 - Individuals must not identify and research donors on behalf of another organization

using knowledge or any information gained from CCRAN.

iii) 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 CCRAN and where reasonable steps can be taken to ensure any other party cannot be advantaged to the detriment of CCRAN.
- 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 CCRAN 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

i) It is the responsibility of:

- the Chair of the Board to ensure that Board Members understand and comply with this Policy.
- the CEO to ensure that employees and other volunteers understand and comply with the Policy.

ii) Where any employee, Board Member, or other volunteer feels that they may be in a conflict of interest, such individual shall immediately give notice of the potential conflict to the CEO or, if the CEO is involved, to the Chair of the Board. It is in the sole discretion of the CEO 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 of 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 to the CEO or Chair of the Board, confidentiality shall be maintained throughout the process to the extent practical and appropriate under the circumstances.

iii) 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 or the Governance and Human Resources Committee.

iv) If it is believed that an employee or other volunteer has not been in compliance with this Policy, the President, the Chief Operating Officer or CEO may conduct



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an investigation. In the event of a disagreement, the Chief Financial & Operating Officer or the CEO will determine the final resolution. If the matter involves the Chief Financial & Operating Officer, 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 of Trustees for review.

v) The Chief Operating Officer will establish the prevailing nominal amount that CCRAN considers to be acceptable for personal gifts from sponsors, donors, volunteers or suppliers. Currently, any gift in excess of \$25.00 is not permitted.

vi) 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.