Conflict of Interest Policy



HR managers in any part of the country can adapt this Model Policy for use at their own workplace.

To use this template, fill in the blanks indicated by square brackets, and delete the introductory and explanatory text in dark grey.

1. **Purpose**

Employees have a responsibility to act in the best interests of [company name], and according to our company's ethics and values. However, situations may arise where an employee may face, or currently faces, a conflict of interest or the appearance of a conflict of interest between personal/private goals and the company. [Company name] expects our employees to report any such conflicts. This policy outlines how to identify a conflict of interest, examples of conflict of interest, and reporting procedures.

2. **Scope**

This policy applies to all employees of [company name].

3. **Definitions**

Conflict of Interest: Any situation where an individual's personal or private interest influence his or her professional judgment or are at odds with his or her professional duties or interests. This includes actual as well as apparent or potential conflict of interest situations. A conflict of interest need not involve financial gain but can also include private or personal benefit including direct personal benefit or indirect such as the benefit of another person, company or entity with whom the employee has a relationship.

Disclosure: Notifying in writing a direct manager such as supervisor, department or HR manager, senior leadership or the board of directors of any direct or indirect personal/private or financial interests, positions or relationships which could lead to a potential, apparent or actual conflict of interest.

4. **General Policy**

The conflict itself is not in and of itself unethical or corrupt, nor is recognizing or encountering a conflict of interest; it is the action taken after the fact hat a conflict of interest may exist that dictates whether a conflict of interest becomes an issue of concern. Such conflicts of interest at work could arise through:

- Access to information that is not accessible to the public
- Personal or business relationships
- Endorsements
- Financial, personal or professional interest in another company
- Employment
- Employment relationships
- Accepting gifts above [dollar amount]
- Using personnel, connections or resources for personal interest or gain
- Influencing the purchase of equipment or services that benefit the employee or an entity with which the employee is affilliated
- Hiring, terminatin, promoting, transferring and employee
- [Insert other examples]

5. **Conflict of Interest Reporting Procedure**

[Company name] expects that if at any time an employee recognizes they are faced with a conflict of interest at work, or recognize the potential for one to arise, it is their responsibility to advise their [supervisor/manager/department name, e.g. HR department] in writing of the potential or actual conflict of interest. The employee's [supervisor/manager/department name, e.g. HR Department] will deliberate on the next steps and advise if an alternative arrangement can be reached, or how the situation can be resolved, without negatively affecting the employee or company.

A notification of conflict of interest will be maintained on file during the employee's period of employment or until such time as no conflict of interest had been found or remains.

6. **Avoidance/Withdrawal**

When an employee becomes aware of a potential conflict of interest situation the employee will take active steps to avoid involvement in the conflict of interest and withdraw from any opportunity to influence or impact decisions and actions related to the conflict of interest situation. This should be undertaken as soon as possible and may precede a formal written notification of a potential or actual conflict of interest.

If the potential conflict of interest is declared and it is determine that a conflict of interest does not exist or the conflict of interest is deemed non significant the employee may be granted permission to re-engage.

7. **Authorization of Exception**
    - The CEO/President (or delegate) may permit/authorize exceptions to the application of the provisions of this policy if the interests of the [company name] are clearly well served by the participation of the employee in the process.

- All requests for exceptions must be accompanied by reasons and be submitted in writing to the CEO/President (or delegate).
- Reasons for granting, or refusing exceptions, will be made to known to the affected parties, in writing, including the period of time for which the exception is authorized.
- Documents concerning exceptions shall be kept in the CEO/President’s office.

8. **Employee Declaration**

I _____ _____, hereby acknowledge that I have read and understand the [company name] Conflict of Interest Policy. I agree to abide by the terms and conditions of this policy and ensure that persons working under my supervision abide by the terms and conditions of this policy. I understand that if I violate or fail to comply with this policy, I may face legal or disciplinary action according to applicable laws or [company name] policies.

_____
_____

Employee
Signature
Date

_____
_____

Manager
Signature
Date

9. **Revision History**

Version	Change	Author	Date of Change