

CONFLICT OF INTEREST POLICY FOR IMPACT STAFF

PURPOSE OF THIS POLICY

The purpose of this policy is to provide guidance to all staff in identifying and handling potential and actual conflicts of interest involving the organization. In most instances, conflicts of interest can be avoided simply by exercising good judgment.

IMPACT staff are obligated to avoid and disclose ethical, legal, financial, or other conflicts of interest involving the organization, and remove themselves from a position of decision-making authority with respect to any conflict situation involving IMPACT.

DEFINITION

Generally, a conflict of interest may occur if an endeavour or activity influences or appears to influence the ability of an IMPACT staff member to exercise objectivity or impairs the staff member's ability to perform their employment responsibilities in the best interests of the organization.

The following activities illustrate types of potential or actual conflicts of interest that should be avoided and disclosed, as applicable, in accordance with this policy. The list is **not** exhaustive and is intended only to provide guidance.

- Self-benefit: Using your position or relationship within the organization to promote your own interests or those of a family member¹, including use of confidential or privileged information acquired in the course of employment at IMPACT for benefit or gain of yourself or your family members.
- Soliciting benefits: For yourself or your family from outside organizations in exchange for using your influence to advance the interests of that organization within IMPACT.
- Other business relationships and dealings: Approving grants or contracts with organizations in which you or your family have a significant financial or other interest or relationship, particularly if you are in a position to influence major decisions, are responsible for review, negotiation and approval of the grants or contracts, or otherwise direct the organization's business dealings with that business or entity.

¹ For purposes of the Conflict of Interest Policy, the term "family member" means any partner/spouse, parents, siblings, children, any other relative who resides in the same household and any other familial relationship that could create the appearance of a conflict.

The whole text of the present Policy, as well as the documents derived from it, have been written in French and English, both versions being deemed authentic, but for legal purposes the text in English is to be given priority of interpretation.

- Outside commitments: Participating in social or political activities² is not restricted as long as you participate as an individual and not as a representative of the organization.
- Property transactions: Directly or indirectly leasing, renting, trading, or selling real or personal property to or from IMPACT.
- Use of IMPACT property for personal advantage: Using or taking IMPACT resources, including facilities, equipment, personnel, time, and supplies, for private use or other unauthorized non-IMPACT activities.
- Recording or reporting false information: Misrepresenting, withholding, or falsifying relevant information required to be reported to external parties or used internally for decision-making purposes, in order to derive personal benefits.

RECEIPT OF GIFTS

IMPACT staff members, together with consultants and volunteers, may occasionally receive small gifts of limited value in relation to their involvement with IMPACT in the following circumstances:

- It is the normal exchange of reasonable hospitality or a customary courtesy between persons doing business together;
- The exchange is lawful and in accordance with local ethical practice and standards, and;
- The gift cannot be construed by an impartial observer as a bribe, payoff, or improper payment.

Where a payment is received for services rendered – for example, an honorarium for speaking about IMPACT’s work at a conference – the payment should be reported to the Executive Director and be given to IMPACT.

OFFER OF GIFTS

IMPACT staff members, as well as consultants and volunteers, may on occasion offer small gifts of limited value in relation with their involvement with IMPACT. Such gifts should be agreed by the Board of Directors in the case of Board members and the Executive Director, or by the Executive Director in the case of staff members, consultants, and volunteers.

All gifts shall be entered into a registry set up for the purposes of recording such gifts.

POLITICAL ACTIVITIES

The organization is strictly prohibited from engaging in electoral politics or lobbying activities. IMPACT staff members are free to engage in these types of political activities on a **personal basis** provided the activities do not conflict with their ability to carry out their IMPACT responsibilities or create confusion between positions or actions that are taken by them personally, versus as an IMPACT representative.

² See the section “Political Activities” on pages 2 - 3.

IMPACT staff members themselves are not permitted to participate as **candidates** in any electoral processes.

Before an IMPACT staff member becomes actively involved in a political campaign or activity, they should discuss appropriate actions with the Executive Director, the Communications Director, and the Field Operations Director where appropriate, to avoid or minimize the risk of the staff member's personal actions being attributed to the organization³, and also review any other unintended potential impacts such activity could have on IMPACT. Individual political activities should only occur during off-duty hours, at the staff member's own expense, and without use of the IMPACT's name, resources, facilities, or equipment.

ACCEPTING COMPENSATED WORK OUTSIDE THE ORGANIZATION

IMPACT staff members at the level of manager, or higher, may not conduct outside business or other activities for which they receive remuneration if it is related to their expertise as an IMPACT employee without prior approval from the Executive Director, and in the case of the Executive Director, from the Board President. In requesting permission, the staff member should disclose the organization for which the work will be done, the nature of the work, the expected time commitment, and remuneration to be received, as well as an evaluation of any potential conflicts of interest that could arise with the IMPACT as a result of their engagement in such activity.

All other staff members may accept compensated work outside IMPACT provided that such work is performed solely on personal time, without the use of IMPACT resources, and provided that the time commitment required for such outside work does not affect the staff member's ability to perform their work for the organization.

DISCLOSURE

It is the duty of all IMPACT staff to be aware of this policy, and to identify conflicts of interest and situations that may result in the appearance of a conflict and to disclose those situations, conflicts or potential conflicts to (i) their direct supervisor (ii) the Executive Director, (iii) the President of the board, or (iv) other designated person, as appropriate. Advance disclosure must occur so that a determination may be made as to the appropriate plan of action to manage the conflict.

CONFLICT OF INTEREST DISCLOSURE

Upon commencement of employment and annually thereafter, all staff members must complete a Conflict of Interest Disclosure Form. Staff members are also required to update their Conflict of Interest Disclosure whenever there has been a change in their affiliations.

³ This includes activities and communications on social media platforms such as Facebook, Twitter, Instagram, LinkedIn, etc.

REPORTING POSSIBLE VIOLATIONS

IMPACT maintains an “open door” policy to receive information about possible violations of any IMPACT policy. All communications of this nature will be kept in strictest confidence and will be investigated by the Executive Director, or the board (should the Executive Director be involved in the violations) thoroughly and fairly.

DISCIPLINARY CONSEQUENCES

In cases when a conflict of interest is deliberately concealed, or when a solution cannot be found, disciplinary action may be invoked up to and including termination.

CONFLICT OF INTEREST DISCLOSURE FORM

Name: _____ Date: _____

Position (employee/volunteer/contractor): _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between IMPACT and your personal interests, financial or otherwise:

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report

Please specify other non-profit and for-profit boards you or an immediate family member sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by IMPACT's Conflict of Interest Policy.

Signature: _____ Date: _____