

<b>Conflict of Interest</b>	<b>Section: Procurement Number: 1.24</b>
<b>Approved: April 11, 2022</b>	<b>Page: 1 of 3</b>
<b>Revised:</b>	<b>Scope: All Employees, volunteers, advisors</b>

**POLICY:**

To ensure persons engaged in any aspect of the purchasing function appropriately manage conflict of interest concerning the avoidance of conflict of interest situations.

**SCOPE:**

This policy applies to all employees, volunteers, advisors, external consultants or suppliers who participate in any phase of the purchasing process/activities. Any individual involved in supply chain-related activities must declare all actual or potential conflicts of interest.

**GENERAL:**

Any person engaged in purchasing who has assumed, or is about to assume, a financial or other outside business relationship that might involve a conflict of interest, must immediately inform the Executive Director or designate of the circumstances involved. This information is to be reviewed at an appropriate level for decision on whether a conflict of interest is present and if so, what course of action is to be taken.

**SUPPLIERS:**

The following provisions must be implemented when dealing with suppliers in procurement activities:

- Define conflict of interest, to include situations or circumstances that could give a supplier an unfair advantage during a procurement process or compromise the ability of a supplier to perform its obligations under the agreement
- CLO reserves the right to solely determine whether any situation or circumstance constitutes a conflict of interest
- CLO reserves the right to disqualify prospective suppliers from a procurement process due to a conflict of interest

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- Require prospective suppliers participating in a procurement process to declare any actual or potential conflict of interest
- Require suppliers to avoid any conflict of interest during the performance of their contractual obligations for the organization
- Require suppliers to disclose any actual or potential conflict of interest arising during the performance of an agreement
- Reserve the right of the organization to prescribe the manner in which a supplier should resolve a conflict of interest
- Allow CLO to terminate an agreement where a supplier fails to disclose any actual or potential conflict of interest or fails to resolve its conflict of interest as directed by the organization
- Allow CLO to terminate an agreement where a conflict of interest cannot be resolved

### **Consultants:**

Where a consultant is involved in the development of procurement documents, they will not be allowed to bid on the associated procurement needs either in full or part.

### **Employees, Volunteers and Advisors:**

Consideration must also be given when there may be conflicts of interest where our own employees, volunteers or advisors may be involved. The employee or advisor is ultimately responsible and accountable for using good judgement in the exercise of the organization's duties and must:

- Disclose conflicts of interest to his/her department supervisor or designate in writing
- Avoid situations that may present conflicts of interest while dealing with person or organizations doing business or seeking to do business with the organization

### **Situations that might result in a conflict of interest include the following:**

- Engaging in outside employment
- Not disclosing an existing relationship that may be perceived as being a real or apparent influence on their objectivity in carrying out an official role

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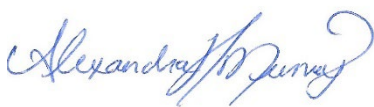
- Providing assistance or advise to a particular supplier participating in a competitive process
- Having an ownership, investment interest, or compensation arrangement with any entity participating in a competitive process
- Having access to confidential information
- Accepting favours or gratuities from those doing business with the organization.
- CLO needs to consider situations where there may be an employee or advisor conflict of interest and those situations must be dealt with accordingly

### Evaluation Team Members

In addition to the situations that might result in a conflict of interest for all employees and advisors, CLO must be aware of and identify any additional conflicts of interest that may arise as a result of Evaluation Team members participating in the selection of products or services.

Evaluation Team members must also sign a “Non-Disclosure Agreement” before each evaluation committee commences work.

### Approved by:



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**Executive Director**

April 11, 2022

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**Date**



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**Board President**

April 11, 2022

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**Date**