

# CFDC CONFLICT OF INTEREST POLICY & PROCEDURE

## CFDC CONFLICT OF INTEREST POLICY

The Canadian Fossil Discovery Centre (CFDC) is committed to the highest ethical standards. It does this by conducting its business with maximum integrity and by achieving full compliance with all applicable laws, rules, and regulations. In line with this commitment, and in recognition of the rights of the Museum's Board of Directors, its Executive Director, employees, adjuncts and volunteers to participate as private citizens in their communities, the CFDC provides standards of conduct to ensure they do not use or appear to use their positions in the CFDC for personal gain or undue influence. Potential conflict of interest situations include, but are not limited to: participation in another business, organization, or activity that has a direct or indirect financial interest in a matter involving the CFDC; use of confidential CFDC information for personal gain or advantage.

All institutional activities and individual transactions on behalf of the CFDC will be conducted in a legal, open, honest, and ethical manner. No employee will be asked, or expected, to compromise these standards. Behaviours that compromise these standards will not be condoned.

Any Board Director, employee, adjunct or volunteer who has reason to believe that this Conflict of Interest Policy has been breached in any way is expected to bring his or her concerns to the Chair of the Board of Directors or the Executive Director through the appropriate reporting authority as identified in the Conflict of Interest Procedure.

Those who report this evidence under this Policy must act in good faith. Any person who in good faith reports a violation of this Policy will not be subject to retaliation, harassment, or discrimination. Any allegations that prove to be both unsubstantiated and made with malicious intent will constitute a serious offence punishable by disciplinary action, which may include termination of employment or volunteer activity.

## CONFLICT OF INTEREST PROCEDURE

If a conflict of interest emerges through a potential or actual situation in violation of the CFDC's Conflict of Interest Policy, the situation must be disclosed to the appropriate individual as soon as it is discovered. For the purposes of this procedure, the appropriate individual will be referred to as the "reporting authority" and is defined below.

### Disclosure

- The CFDC's Board of Directors, Executive Director, employees, adjuncts and volunteers must disclose to his/her reporting authority (defined below) any conflict of interest or potential conflict of interest that arises during their association with the CFDC.
- Any reporting authority who believes that a Board member, Executive Director, employee, adjunct or volunteer may be in a conflict of interest situation must request that individual to provide full disclosure in writing of his/her relevant interests.
- Anyone other than a reporting authority associated with the CFDC, whether as a Board member, Executive Director, employee, adjunct or volunteer, who believes they have encountered a conflict of interest situation involving another Board member, the Executive Director, employee, adjunct or volunteer is obliged to report this situation immediately to his/her reporting authority.

Supervisors, managers, directors or Board members will take immediate and appropriate action to resolve the issue. Failure to satisfactorily resolve the issue may result in disciplinary action up to and including discharge.

### Reporting Authority

- Employees report potential or actual conflict of interest situations to their immediate supervisor, or the Executive Director in the case of situations involving their immediate supervisor. In the case of supervisors reporting potential or actual conflict of interest situations involving the Executive Director, reports are to be made to the Chair of the Board.

- Volunteers report potential or actual conflict of interest situations to the supervisor responsible for volunteers.
- Members of the Board, the Executive Director and adjuncts report potential or actual conflict of interest situations to the Chair or Vice-Chair of the Board.

All potential or actual conflict of interest situations reported by employees or volunteers must be brought to the attention of the Executive Director in writing by the appropriate reporting authority. In situations involving the Executive Director, the reporting authority would bring it to the attention of the Chair or Vice-Chair of the Board.

All potential or actual conflict of interest situations involving Board Members and adjuncts must be brought to the attention of the Chair or Vice-Chair of the Board in writing by the appropriate reporting authority and the Executive Director.

Reporting situations for clarification in order to avoid a potential conflict of interest situation is strongly encouraged. To request clarification from the Executive Director for situations where it is unclear if a conflict of interest exists, all employees and volunteers are encouraged to provide details of the situation in question to the Executive Director through their appropriate reporting authority, so that a recommendation on how to proceed based on corporate policies can be made.

### **Resolution**

After a disclosure of potential or actual conflict of interest, resolution of the issue will follow in consultation with the appropriate reporting authority. The actions or activities under question will cease or not begin until the issue is resolved.

Resolution of disputes is as follows:

- An employee and their immediate supervisor shall first consult to try to resolve the issue. Failure to resolve will be brought to the Executive Director.
- A volunteer shall first consult with the supervisor. Failure to resolve will be brought to the Executive Director.
- The Executive Director, Board member or adjunct shall first consult with the Chairperson of the Board of Directors. Failure to resolve will be brought to the full Board of Directors for resolution by a vote of the Board.

### **Compliance Reporting**

To ensure all individuals associated with the CFDC are aware of the Conflict of Interest Policy and Procedures of the CFDC, copies will be presented to them and a Compliance Acknowledgement (Appendix 1) will be signed at the following times:

- Employees including the Executive Director: When starting employment and at their yearly performance evaluation meeting with their supervisor, if they are already employed. The Compliance Acknowledgement will be kept in their Personnel File.
- Volunteers: When starting their volunteer service and every two years, in May, by their supervisor. The Compliance Acknowledgement will be kept in their Volunteer File.
- Adjuncts: After their initial appointment and annually thereafter each May. The Compliance Acknowledgement will be kept in their Adjunct File.
- Board Members: Upon joining the Board of Directors and annually thereafter each May. The Compliance Acknowledgement will be held in the files of the Nominating & Governance Committee of the Board.

### **Board Conflict of Interest Guidelines:**

- Adjuncts are permitted to serve as Board members.
- Permanent employees (to a maximum of 2 at any time) are permitted to serve as Board members but not as Officers.
- Immediate family members of employees are permitted to serve as Board members but not as Officers.
- Board members, adjuncts and employees serving on the Board or immediate family members of employees serving on the Board are required to recuse themselves on any matter deemed to be a conflict of interest in accordance with the Conflict of Interest Policy and Procedure

**APPENDIX 1**

**Canadian Fossil Discovery Centre (CFDC)**

**CONFLICT OF INTEREST  
COMPLIANCE ACKNOWLEDGEMENT**

I, \_\_\_\_\_, have carefully reviewed the Canadian Fossil Discovery Centre's Conflict of Interest Policy and Procedures.

\_\_\_\_\_ (*initial*) No activities or financial interest that I have pose a Conflict of Interest with the CFDC. Should a conflict arise in the future, I will immediately inform the appropriate CFDC reporting authority.

\_\_\_\_\_ (*initial*) Activities and financial interests that I have had during this year, or presently have, which might create or be viewed as a possible Conflict of Interest are listed below:

Signed \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, in recognition of the Conflict of Interest Compliance Acknowledgements:

\_\_\_\_\_ (*signature*)

Board of Directors: April 8, 2021  
Please sign and return to Executive Director