



**CONFLICT OF INTEREST POLICY FOR CMHA LAMBTON KENT
BOARD OF DIRECTORS, MEMBERS OF BOARD COMMITTEES, EMPLOYEES,
RESEARCHERS, STUDENTS, VENDORS AND VOLUNTEERS**

PURPOSE

In order to maintain the highest standard of public trust and integrity, it is expected that all individuals associated with CMHA Lambton Kent will carry out their duties honestly, responsibly and in full accordance with the highest ethical and legal standards. It is recognized that potential and actual conflicts of interest may arise as individuals perform their duties and carry out related activities. As a first step in identifying and resolving conflicts of interest, all employees, appointees shall immediately disclose any perceived potential or actual conflict of interest. In addition, all vendors providing goods and services to CMHA Lambton Kent shall also be required to disclose any perceived or actual conflict of interest.

POLICY

An individual has a potential conflict of interest when that individual or member of his or her immediate family has the ability to influence directly or indirectly a decision or action of CMHA Lambton Kent (hereinafter referred to as the Organization) that leads or could lead to a personal, financial or professional benefit for the individual or his or her family or when an individual's interest or actions are adverse to the interests of the Organization.

The following are examples only and are not intended to be exhaustive. A situation or action does not need to occur as described to constitute a conflict of interest. Further, a potential as well as an actual conflict must be reported and it is important to consider the potential for conflict in each situation.

- i) using privileged or confidential information for personal gain
- ii) accepting or offering personal rewards in order to influence business transactions affecting the Organization
- iii) requesting or accepting money, gifts, gratuities, loans or service for personal or family benefit without full payment for value received, from an enterprise which does business with the Organization
- iv) conducting business on behalf of the Organization with an enterprise which the employee or member of his or her immediate family has a personal or financial interest
- v) using discoveries, inventions or other intellectual property rights of the Organization or in which the Organization has an interest for personal benefit without the prior, written permission of the Organization

- vi) using discoveries, inventions, information, ideas or data of Organization researchers or other employees of the Organization for personal benefit without the prior, written permission of such researcher or employee
- vii) seeking or receiving funding or other considerations in regard to Organization related activities without the prior, written permission of the Organization
- viii) participating in actions that would deprive the Organization of the time and attention of staff required to perform their duties properly
- ix) use of Organization equipment, services or materials, personnel or trainees for personal gain or benefit
- x) use of Organization name or logo, for personal gain or benefit
- xi) using one's position, influence or authority to promote the purchase, lease or use of goods or services used by the Organization where the employee or member of his or her immediate family stands to gain financially from such promotion

An individual's failure to properly disclose an actual or potential conflict of interest may be grounds for corrective action, up to and including termination of his/her affiliation with CMHA Lambton Kent.

PROCEDURE FOR DECLARATION OF CONFLICT OF INTEREST

1. Whether a conflict of interest exists will depend upon the circumstances of each case.
2. It is the responsibility of all individuals associated with CMHA Lambton Kent to declare situations of actual or potential conflict of interest.
3. Board of Directors and individuals participating in, or having influence over, any purchasing process (including vendors) will be required to sign a declaration at the time of appointment and on an annual basis.