

Conflict of Interest Policy



1 PURPOSE

- 1.1 The Canadian National Institute of Business (CNIB) is committed to maintaining the highest standards of integrity, accountability, and transparency. This policy is intended to:
 - 1.1.1 Define what constitutes a conflict of interest.
 - 1.1.2 Establish procedures for identifying, disclosing, and managing conflicts of interest.
 - 1.1.3 Protect the integrity of CNIB's decision-making processes and operations.

2 SCOPE

- 2.1 This policy applies to all employees, board members, contractors, and affiliates of CNIB.

3 DEFINITION OF CONFLICT OF INTEREST

- 3.1 A conflict of interest arises when an individual's personal, financial, or other interests interfere or appear to interfere with the best interests of CNIB. Examples include, but are not limited to:
 - 3.1.1 Holding a financial interest in a competitor, supplier, or contractor.
 - 3.1.2 Engaging in outside employment that affects job performance at CNIB.
 - 3.1.3 Receiving gifts, favors, or benefits from a third party that may influence decision-making.
 - 3.1.4 Using CNIB resources for personal gain.

4 DISCLOSURE REQUIREMENTS

- 4.1 All employees and board members must disclose any actual, potential, or perceived conflicts of interest by completing a Conflict of Interest Declaration Form (see Appendix A). Disclosures must be:
 - 4.1.1 Made at the time of hiring or appointment.
 - 4.1.2 Updated annually.
 - 4.1.3 Reported whenever a new conflict arises.

5 MANAGEMENT OF CONFLICTS OF INTEREST

- 5.1 Upon disclosure, CNIB will take the following steps:
 - 5.1.1 Assess the conflict to determine its nature and severity.
 - 5.1.2 Implement appropriate measures, which may include:
 - 5.1.2.1 Recusal from decision-making.
 - 5.1.2.2 Divestment of conflicting interests.
 - 5.1.2.3 Reassignment of duties.



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5.1.3 Maintain records in the Conflict of Interest Register (see Appendix B).

5.1.4 Ensure compliance through monitoring and enforcement.

6 NON-COMPLIANCE

6.1 Failure to disclose a conflict of interest or comply with this policy may result in disciplinary action, up to and including termination of employment or removal from the board.

7 PERIODIC REVIEW AND AMENDMENTS

7.1 This Policy shall be reviewed every three years to ensure alignment with updated regulations, best practices, and institutional values.

7.2 Amendments shall be approved by the Board of Directors/Senior Management and communicated to all institutional members.

8 APPROVAL AND REVIEW DETAILS

Version	Date	Approved by	Comments/Changes	Status
V0.1	21/03/25			Draft

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Appendix A

Conflict of Interest Declaration Form			
Name			
Position		Date	
Email		Phone	
Description of Actual/Potential Conflict			
Steps Taken to Mitigate Conflict			
Declaration			
I declare that the information provided is accurate and complete. I will update this declaration if circumstances change.			
Signature		Date	
Compliance Use ONLY			
Does a conflict exist? Are any mitigations acceptable? Has the Register been updated?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	Assessor Name	
		Position	
		Signature	
		Date	

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Appendix B

Date	Name	Position	Nature of Conflict	Actions Taken	Status
DD/MM/YYYY	Jane Doe	Board Member	Financial interest in supplier	Recused from procurement decisions	Resolved
DD/MM/YYYY	Jim Deer	Employee	Close relative employed by competitor	Disclosure recorded	Ongoing