

BIATHLON CANADA CONFLICT OF INTEREST POLICY

June 2014

GENERAL

Conflicts of interest may arise from time to time in the affairs of Biathlon Canada where the private interests of an individual interfere with their official duties and responsibilities. Conflicts may be real or perceived. In either case, volunteers and employees should protect themselves and Biathlon Canada from potential legal and public relations difficulties by observing the following policy statement, principles and procedures and by using good judgment.

DEFINITIONS

A conflict of interest involves a conflict between a personal interest and an official responsibility of a person in a position of trust. A conflict of interest includes:

- a. *pecuniary interest*: an interest that a person has in a matter because of the reasonable likelihood or expectation of appreciable financial gain or loss to the person or another person with whom the person is associated (relatives, partners, employers); and
- b. *non-pecuniary interest*: includes family relationships, friendships, positions in associations, and other interests that do not involve financial gain or loss.

A conflict of interest exists where a Board member, Committee member, or Staff member:

- a. engages in any business or transaction or has a financial or other personal interest which is incompatible with the discharge of their duties and obligations;
- b. knowingly place themselves in a position where they are under obligation to any person who might benefit from special consideration or favour on their part or who might seek, in any way, preferential treatment;
- c. accord, in the performance of their duties and obligations, preferential treatment to relatives or friends or to organizations in which they or their relatives or friends have an interest, financial or otherwise;
- d. benefit from the use of information acquired during the course of their official duties, which is generally not available to the public;
- e. engage in any outside work, activity, or business undertaking that conflicts or appears to conflict with their duties as a Board member, Committee member, or Staff member of Biathlon Canada;
 - i. in which they have an advantage or appear to have an advantage derived from their association with Biathlon Canada; or

- ii. in a professional capacity that will or might appear to influence or affect the carrying out of their duties as a Biathlon Canada Board member, Committee member, or Staff member;
- f. use Biathlon Canada property, equipment, supplies or services of consequence for activities not associated with the discharge of official duties;
- g. place themselves in a position where they could derive any direct or indirect benefit or interest from any contracts, the decisions with respect to which, they could influence; or
- h. accept any gift that could reasonably be construed as being given in anticipation or recognition of special consideration by Biathlon Canada.

POLICY STATEMENT

Biathlon Canada is committed to ensuring that its Board of Directors, Committee members, and Staff are aware of and avoid any opportunity where their interests, or those of people close to them, conflict with the impartial performance of their duties.

PRINCIPLES

1. Board members, Committee members, and Staff members shall perform their official duties in a manner that will conserve and enhance public confidence and trust in the integrity, objectivity and impartiality of Biathlon Canada.
2. Board members, Committee members, and Staff members should not have private interests that would be affected by Biathlon Canada actions in which they participate.
3. Board members, Committee members, and Staff members shall not solicit or accept transfers of economic benefits, other than incidental gifts, customary hospitality, or from personal or organizations having dealings with Biathlon Canada unless the transfer is pursuant to an enforceable contract or property right of the Board member, Committee member-or Staff member. Such benefits may be accepted with the express consideration and consent of Biathlon Canada.

DISCLOSURE

1. For those who are elected and/or appointed, they will disclose prior to beginning their term their potential conflict of interest. Staff members will disclose their potential conflicts of interest prior to being hired or as they arise.
2. Each Board member, Committee member, and Staff member shall make verbal disclosure of their interests at the Board of Directors meeting prior to the Annual General Meeting, to be recorded.

3. In addition to the foregoing, whenever a Board member, Committee member, or Staff member considers that they could be, or could potentially be, in a conflict of interest, as defined within this policy, they shall disclose this conflict to the Board of Directors.
4. If any other Board member, Committee member, or Staff member feels that another Board member, Committee member, or Staff member is in a conflict of interest, they are obligated to raise the matter with the Board of Directors.

If a Board member, Committee member, or Staff member is in doubt as to whether or not a conflict of interest situation exists, they should provide disclosure to the Board of Directors.

POST - DISCLOSURE

1. Once a Board member, Committee member, or Staff member has provided disclosure of a conflict of interest with respect to a particular decision, the following sanctions may be taken:
 - a. the individual in conflict of interest may not participate in discussion of this decision as an advocate on their own behalf, either formally at the meeting or informally through private contact, communication and discussion, unless such participation is approved by a unanimous vote of the Board;
 - b. Except where participation in discussion has been properly approved as per paras. 1-4 (Disclosure), the Board member, Committee member, or Staff member shall not be present at that portion of a meeting when matters in which they have an interest are considered; and
 - c. The individual in a conflict of interest shall not participate in any vote on the matter.

EDUCATION AND COMMUNICATION

All Biathlon Canada Board members, Committee members, and Staff members will be supplied with a copy of the Conflict of Interest policy on election to the Board, appointment to a Committee, or at the time of hiring.

RESPONSIBILITY

1. The Chair of the Human Resources and Compensation Committee and the Executive Director of Biathlon Canada are responsible for the implementation of this policy.

APPROVAL

This policy was approved by Biathlon Canada's Board of Directors on June 20, 2014 at the Board of Directors meeting held in Ottawa, ON.