

Harbour City Lakers Ringette Association

Conflict of Interest Policy

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Date of Last Review: n/a

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1. Definitions

The following terms have these meanings in this Policy:

- a) “HCL” – **Harbour City Lakers Ringette**
- b) “*Conflict of Interest*” – Any situation in which a Representative’s decision-making, which should always be in the best interests of HCL, is influenced or could be influenced by personal, family, financial, business, or other private interests.
- c) “*Pecuniary Interest*” - An interest that an individual may have in a matter because of the reasonable likelihood or expectation of financial gain or loss for that individual, or another person with whom that individual is associated.
- d) “*Non-Pecuniary Interest*” - An interest that an individual may have in a matter which may involve family relationships, friendships, volunteer positions or other interests that do not involve the potential for financial gain or loss.
- e) “*Representatives*” – Individuals engaged in activities on behalf of HCL including: coaches, volunteers, contract personnel, managers, administrators, trainers, committee members, evaluators, and Directors and Officers of HCL.

2. Background

Individuals who act on behalf of HCL have a duty first to HCL and second to any personal stake they have in the operations of HCL. For example, in not-for-profit organizations, Directors are required, by law, to act as a trustee (in good faith, or in trust) of HCL. Directors, and other stakeholders, must not put themselves in positions where making a decision on behalf of HCL is connected to their own personal interests. That would be a conflict-of-interest situation.

3. Purpose

HCL strives to reduce and eliminate nearly all instances of conflict of interest at HCL – by being aware, prudent, and forthcoming about the potential conflicts. This Policy describes how Representatives will conduct themselves in matters relating to conflict of interest, and will clarify how Representatives shall make decisions in situations where conflict of interest may exist. This Policy applies to all Representatives.

4. Obligations

Any real or perceived conflict of interest, whether pecuniary or non-pecuniary, between a Representative’s personal interest and the interests of HCL, shall always be resolved in favour of HCL.

Representatives will not:

- a) Engage in any business or transaction, or have a financial or other personal interest, that is incompatible with their official duties with HCL, unless such business, transaction, or other interest is properly disclosed to and approved by HCL.
- b) Knowingly place themselves in a position where they are under obligation to any person who might benefit from special consideration or who might seek preferential treatment.
- c) In the performance of their official duties, give preferential treatment to family members, friends, colleagues, or organizations in which their family members, friends, or colleagues have an interest, financial or otherwise.

- d) Derive personal benefit from information that they have acquired during the course of fulfilling their official duties with HCL, if such information is confidential or not generally available to the public.
- e) Engage in any outside work, activity, or business or professional undertaking that conflicts or appears to conflict with their official duties as a representative of HCL, or in which they have an advantage or appear to have an advantage on the basis of their association with HCL.
- f) Place themselves in positions where they could, by virtue of being a HCL Representative, influence decisions or contracts from which they could derive any direct or indirect benefit.
- g) Accept any gift or favour that could be construed as being given in anticipation of, or in recognition for, any special consideration granted by virtue of being a HCL Representative.

5. Disclosure of Conflict of Interest

- a) Representatives shall disclose real or perceived conflicts of interest to HCL's Board immediately upon becoming aware that a conflict of interest may exist.
- b) Representatives shall also disclose any and all affiliations with any and all other organizations involved with the same sport. These affiliations include any of the following roles: athlete, coach, manager, trainer, official, employee, volunteer, or Director.

6. Minimizing Conflicts of Interest in Decision-Making

Decisions or transactions that involve a conflict of interest that has been proactively disclosed by a HCL Representative will be considered and decided with the following additional provisions:

- a) The nature and extent of the Representative's interest has been fully disclosed to the body that is considering or making the decision, and this disclosure is recorded or noted.
- b) The Representative does not participate in discussion on the matter.
- c) The Representative abstains from voting on the decision.
- d) For board-level decisions, the Representative does not count toward quorum.
- e) The decision is confirmed to be in the best interest of HCL.

7. Conflict of Interest Complaints

Any person who believes that a Representative may be in a conflict of interest situation should report the matter, in writing (or verbally if during a meeting of the Board or any committee), to HCL's Board who will decide appropriate measures to eliminate the conflict. The Board may apply the following actions singly or in combination for real or perceived conflicts of interest:

- a) Removal or temporary suspension of certain responsibilities or decision-making authority
- b) Removal or temporary suspension from a designated position
- c) Removal or temporary suspension from certain teams, events and/or activities
- d) Expulsion from HCL
- e) Other actions as may be considered appropriate for the real or perceived conflict of interest

Any person who believes that a Representative has made a decision that was influenced by real or perceived conflict of interest may submit a complaint, in writing, to HCL to be addressed under HCL's Discipline Complaints Policy.

The Board may determine that an alleged real or perceived conflict of interest is of such seriousness as to warrant suspension of designated activities pending a meeting and a decision of the Board.

8. **Enforcement**

Failure to adhere to this Policy may permit discipline in accordance with HCL's Discipline Complaints Policy.