

CONFLICT OF INTEREST POLICY

DEFINITIONS

For the purposes of this Policy:

"Business" includes individuals, corporations, limited partnerships, general partnerships, joint stock companies, joint ventures, associations, companies, trusts or other organizations, whether or not legal entities, that carry on a business

"College" means Seneca College of Applied Arts and Technology;

"Dependant", in relation to an Employee, means a person other than the Employee's Spouse, who is dependent in whole or in part on the Employee or the Employee's Spouse for support;

"Employee" means in Employee of the College;

'Related Person' includes all blood relations of Employees and shall also include in laws of the Employee;

"Spouse", in relation to an Employee, means a person to whom the Employee is married or with whom the Employee is living in a conjugal relationship outside marriage, but does not include a person to whom the Employee is married if the Employee and that person have made a separation agreement or if their support obligations and family property have been dealt with by a court order;

"Vendor" means a person, corporation, partnership or business entity that sells goods or services to the College;

1. CONFLICT OF INTEREST

An Employee has a conflict of Interest when the Employee makes a decision, or participates in making a decision in the execution of his or her employment by the College and at the same time knows, or ought reasonably to know, that in the making of the decision there may be the opportunity to further his or her private interest.

2. INSIDER INFORMATION

An Employee shall not use information that is gained in the execution of his or her employment by the College to seek to influence a decision made by another person which may further the Employee's private interest or benefit the Employee, his or her Dependants and/or Related Persons.

3. ARM'S LENGTH

The College shall not conduct business with Vendors who are Employees of the college.

4. INFLUENCE

An Employee shall not, in the performance of his or her duties as an Employee of the College, exercise influence for the benefit of, or provide preferential treatment to, friends, Dependents, Related Persons or their Spouse.

5. FEES/PERSONAL BENEFITS

An Employee shall not accept a fee or personal benefit that is connected directly or indirectly with the performance of his or her duties as an Employee of the College.

6. DISCLOSURE OF CONFLICT

- (a) An Employee who has reasonable grounds to believe that he or she has a conflict of interest in a matter that is before the College, or a committee or sub-committee of the College, shall if present at any meeting considering the matter:
 - (i) disclose the general nature of the conflict of interest; and
 - (ii) withdraw from the meeting without voting or participating in the consideration of the matter.
- (b) All Employees who are engaged in a business or are employed by another organization apart from their employment by the College must file a disclosure statement with the College. The disclosure statement shall contain the exact name of the business or the employer and where applicable, the Employee's interest in the business.
- (c) If an applicant who is given an offer of employment by the College also has a business, the applicant shall file a disclosure statement which shall include the exact name of the business and the applicant's interest in that business. This disclosure statement shall be forwarded to the applicant together with the offer of employment and it must be completed and returned with the applicant's letter of acceptance.

All disclosure statements shall be filed with the Expense Department.

7. NO USE OF COLLEGE ACTIVITIES, ETC.

No Employee of the College shall make reference to the name, address or telephone number of the College in any business or other venture of the Employee when that Business is not within his or her scope of employment with the college.

8. PENALTIES

Where the College finds that an Employee has contravened the policies as described herein, the College may:

- (a) reprimand the Employee; or
- (b) dismiss the Employee from his employment with the College.