

## CONFLICT OF INTEREST POLICY

Propeller Dance is committed to assisting employees in recognizing real and/or perceived conflict of interest situations so that they can take the initiative to disclose, manage and resolve such situations.

The purpose of this policy is to protect the integrity of Propeller Dance's decision-making process, to enable our constituents to have confidence in our integrity, and to protect the integrity and reputations of volunteers, employees and board members.

A Conflict of interest may occur when a Propeller Dance employee, board member, or volunteer makes a decision or participates in making a decision that they should reasonably know may result in a real or perceived opportunity to further their private interests.

Those involved with Propeller Dance are obligated to comply with the following requirements during the performance of their duties and responsibilities:

1. An employee, volunteer, or board member shall avoid making/participating in a decision or engaging in any activity that creates a conflict of interest for them.
2. Full- and/or part-time employees or volunteers cannot be supervised directly or indirectly by a member of his/her family or by an individual with whom they have a personal relationship. Supervisory activities include the granting or denying of a benefit; assignment of work; providing direction or instructions to members of a work group; assigning or coordinating projects; or engaging in disciplinary or evaluative functions. Exceptions may be considered in extenuating circumstances by the Co-Directors.
3. An employee, volunteer or a board member shall not use or permit the use of Propeller Dance property for activities not associated with the proper performance of their duties. This includes facilities, equipment, supplies and other resources.
4. An employee, volunteer, or board member shall not use privileged information that is gained during the course of their involvement with Propeller Dance to seek to influence a decision made by another person that may further the person's private interest or benefit the employee, volunteer, or board member and/or their related persons.
5. Propeller Dance shall not conduct business with suppliers who are also employees or board members or accept former employees and board members as suppliers or as supplier representatives for a period of one (1) year after their role ends with Propeller Dance. This includes if they are in a direct negotiating position with Propeller Dance, have a relationship with Propeller Dance decision makers, or have had access to significant information that was not fully disclosed to all suppliers.
6. An employee, volunteer, or a board member shall not exercise influence for the benefit of, or provide preferential treatment to, related persons or friends.
7. An employee, volunteer, or a board member shall not accept a fee or personal benefit that is connected directly or indirectly with their performance and not typically compensable.

8. An employee, volunteer, or board member shall not refer to Propeller Dance's name, address, or telephone number in any business when it does not fall within the scope of their responsibility at Propeller Dance.

### **Disclosure of Non-Compliance with this Policy**

1. An employee, volunteer, or board member who has reasonable grounds to believe that they are non-compliant with the requirements of this policy must file a statement of disclosure describing the nature of the non-compliance and shall withdraw from making decisions or engaging in activities related to the matter.
2. An employee, volunteer, or board member must file a disclosure statement if they are engaged in a business or employed by another organization apart from Propeller Dance. The disclosure statement shall contain the exact name of the business or employer and the employee's interest in the business or organization.
3. The Co-Directors shall require an applicant to file a disclosure statement if they have a business or will continue to be employed by another organization apart from Propeller Dance. The disclosure statement must contain the exact name of the business or employer and the applicant's interest in the business or organization.
4. All disclosure statements must be filed with Propeller Dance's Directors.
5. If appropriate approval is obtained, a disclosed matter shall no longer be considered non-compliant.

### **Non-Compliance**

Where Propeller Dance finds that an employee, volunteer or board member has violated the requirements as described in this policy, disciplinary actions on the employee or the board member may be taken. These may include the dismissal of the employee from their employment with Propeller Dance or removal of the board member's duties and responsibilities and, in certain circumstances, legal proceedings.

### **Roles and Responsibilities**

*Employees and Board Members shall:*

1. File a disclosure statement with the Co-Directors when engaged in a business or employed by another organization apart from Propeller Dance.
2. Recognize possible non-compliance with this policy and file a disclosure statement with the Co-Directors that describes the nature of the non-compliance.
3. Establish, together with the Co-Directors solutions to monitor and manage any issues of non-compliance.

*The Co-Directors shall:*

1. Investigate and evaluate non-compliance issues as reported

2. Establish, together with employees and board members, solutions to manage and monitor issues of non-compliance
3. Advise the Board Executive of the disclosure of non-compliance and obtain approval from the President of the Board of Directors for the recommended solution.

### **Appendix A: Examples of Non-Compliance**

The following list is a set of examples of employee non-compliance and should not be considered comprehensive of all potential situations in the course of one's responsibilities and duties:

- Entering into a contract with a supplier with whom an employee, volunteer, or a board member or one of their related persons has a personal interest
- Purchasing or influencing the purchase of goods and services for Propeller Dance from a supplier with whom an employee, volunteer, or board member or one of their related persons has a personal and/or financial interest
- Accepting significant gifts or special favours for personal gain from suppliers or organizations with which Propeller Dance does business
- Hiring Propeller Dance vendors for personal work without filing a disclosure statement and receiving the appropriate approval
- Receiving payment from an outside source for work that is part of an employee's duties and responsibilities
- Unauthorized use of Propeller Dance's resources or facilities to benefit a private matter in which the employee, volunteer, or board member has a personal interest
- Using confidential information acquired as a result of an employee's, volunteer's, or board member's duties and responsibilities for personal gain or other unauthorized purposes
- Disclosing information; sharing technology; or selling, licensing and/or distributing proprietary research and intellectual property without the appropriate authorization
- Undertaking external consulting activities, professional or other, which prevents an employee, volunteer, or a board member from fulfilling their obligations to Propeller Dance due to the time commitment involved
- Failure to file a disclosure statement and obtain the appropriate approval for professional activities as required by this policy
- Participating in the hiring, performance evaluation, or promotion of a related person or an individual with whom the employee, volunteer, or board member has, or recently had, a close personal relationship
- Disposing Propeller Dance's assets for personal and financial benefit