

Protein Industries Canada

Conflict of Interest Policy – Personnel

Introduction

A conflict of interest, be it actual or potential, whether financial or otherwise, may arise when the private interest(s) of an individual is/are or may be in conflict with the interests of PIC, or where an individual has an opportunity to further their own private interests and/or those of related parties.

Accordingly, “conflict of interest” generally means any situation in which an employee or other member of PIC personnel has or promotes an interest that results in, or may be reasonably perceived to result in:

- Interference with the exercise of their responsibilities and duties to and on behalf of PIC; and/or
- An advantage or gain to the individual, or their relatives, by virtue of their role in PIC.

Application

This Policy applies to all employees and personnel of PIC, including without limitation project selection committee members, consultants and contractors (“Personnel”), and is an extension of PIC’s Code of Conduct. All Personnel must familiarize themselves with, and adhere to, the principles and rules set out in this Policy.

Policy

Personnel must avoid any interest, influence, or relationship which might conflict or appear to conflict with the best interests of PIC, and promptly disclose any situation where an actual or potential conflict may exist.

Conflicts of Interest include, but are not limited to, situations involving:

- a commitment or an interest, either actual or perceived, direct or indirect, that benefits the individual Personnel or a member of their immediate family¹;
- organizations with which individual Personnel or a member of their immediate family, has an official governing responsibility, or organizations in which individual Personnel or a member of their immediate family has an ownership or investment interest, or organizations which employ or otherwise have a compensation arrangement with individual Personnel or a member of their immediate family; or
- actual or perceived potential to compromise the best interests of PIC.

¹ Immediate Family encompasses parents, siblings, spouse and children.

To that end:

1. Personnel and members of their immediate family shall not receive services, materials, or other compensation from individuals or organizations that are in a position to benefit financially from PIC, other than incidental gifts, customary hospitality, and other benefits of nominal value.

Examples of this include but are not limited to:

- opportunities for personal gain through any other volunteer or freelance or part time employment opportunities should not conflict with the individual's responsibility on behalf of PIC;
- Individual Personnel must not use their PIC position to influence the employment, purchases from, or awarding of contracts in favour of an immediate family member, or organization in which the individual Personnel or an immediate family member has a financial interest;
- gifts, fees, or honoraria received for speaking engagements in excess of token amounts should be declined where possible, but if accepted, the amount must be redirected as a donation to a not-for-profit organization of the individual Personnel's choice.

2. Personnel shall not use their PIC position or step out of their official PIC roles to assist other organizations or persons where this would result in giving preferential information or treatment that would conflict with PIC's interests. For example, Personnel must not give confidential and preferential advice to a person or entity that would result in unfair advantage in a project selection or funding process.

3. Personnel who discover they are in a position of conflict of interest must take steps to disclose the conflict to PIC management and take all reasonable steps to remove themselves from any deliberation or decision-making process related to the situation that presents the conflict of interest. PIC management will review the potential areas of conflict with the individual Personnel and mutually agree on practical arrangements to address or resolve the situation.

4. Even where a technical conflict of interest (as defined in this Policy) does not exist, the possibility of the perception of a conflict of interest should be considered by all relevant parties, in consultation with PIC management.

Failure to declare a potential, actual or perceived conflict of interest or to take remedial action directed by PIC in a timely manner will result in disciplinary action up to and including termination of employment in the case of employees, or in termination of their engagement with PIC in the case of other Personnel. In instances where the conflict of interest has or may cause harm to PIC, PIC reserves its rights to pursue other remedies.