



<b>Policy Name:</b> Conflict of Interest Policy	<b>Policy Number:</b> AP006
<b>Original Date of Approval:</b> December 2022	<b>Policy Type:</b> Board
<b>Last Revision Date:</b>	<b>Review Cycle:</b> 3 years
<b>Date of Last Review:</b> December 2022	

### 1.0 Purpose:

Employees, Board members and other volunteers are required to support and advance the interests of the organization and avoid placing themselves in situations where their personal interests (direct or perceived) conflict with the interests of the organization.

The ESIO expects employees, Board members and other volunteers to carry out their business and personal activities in a prudent manner, to be objective in decision-making and refrain from enhancing their personal position by virtue of their association with the ESIO.

### 2.0 Definitions

Immediate family: includes spouse/domestic partner (a person with whom the individual's life is interdependent and who shares a common residence); children, including foster children, legal wards, sons-in-law, daughters-in-law; parents, including foster parents, stepparents.

### 3.0 Guidelines

Employees, Board members and other volunteers are prohibited from taking personal advantage of opportunities resulting from their access to ESIO assets, property or information.

#### 3.1 Personal Gifts

- An ESIO employee, Board member or Board committee volunteer, and their immediate family, must never place themselves in a position of obligation resulting from accepting personal gifts. In general, the following personal gifts will not be accepted:
  - Cash and cash equivalents (e.g. gift cards, discounts)
  - Gifts delivered to the employee's personal residence
  - Items with a value of \$250 or greater

- Employees cannot accept tickets to events, golf, etc. without written approval from the CEO
- Any other item/experience that may be perceived to have a personal benefit must be approved in writing by the CEO for employees, the Board Chair for the CEO and Board members
- The Finance Director must be informed in writing of any personal gifts received and the estimated value.

### **3.2 Apply for ESIO funding**

- Employees, Board members or Board committee volunteers, and their immediate family, are not eligible to apply for any grants or other funding available through the ESIO.
- Employees, Board members or Board committee volunteers, and their immediate family cannot have ownership interest in any organization that applies for grants or other funding from the ESIO.
- Employees, Board members or Board committee volunteers cannot be sitting board members of any organization that applies for grants, loans or ESMF investments from the ESIO.
- Employees, Board members or Board committee volunteers cannot prepare or assist to prepare applications for ESIO funding on behalf of another individual, collective, or organization.
- Past employees and their immediate family must wait 2 years after departure before being eligible to apply for ESIO grants, rebates or ESMF investments. Past Board members and Board committee volunteers, and their immediate family, must wait 1 year after departure before being eligible to apply for ESIO grants, rebates or ESMF investments.

### **3.3 Outside Business Activities and Board Memberships**

#### Board members and committee volunteers

- Board members and committee volunteers shall not engage in any outside business or activity that is detrimental to ESIO in any way. Board Members and committee volunteers may not participate in secondary involvements when the secondary involvement interferes with their performance of their duties, availability or performance of ESIO's requirements, results in any personal benefit or causes them to act in any capacity for a supplier, contractor, sub-contractor, customer, competitor or any other entity with which ESIO does business or creates the appearance of an ethical or legal conflict of interest. Board Members and committee volunteers shall not use their affiliation with ESIO to further their non-ESIO-related activities or business relationships.
- Board members and committee volunteers shall not serve as a Board Member, officer, partner, consultant or any other role in unaffiliated profit-making organizations or not-for-profit organizations if that activity is detrimental to ESIO.
- An activity is detrimental to ESIO if it may adversely affect the reputation of ESIO or its associated entities.

## Employees

- Employees may accept outside contracts for their services (compensated and volunteer) with written permission from the CEO. These contracts must not place the employee in a conflict of interest or detract from the employee's ability to fulfill their duties at the ESIO. Employees are not permitted to accept contracts with screen media organizations.
- Employees are not permitted to accept Board Member positions, or any position with decision making authority with screen media organizations.

### **4.0 Declaring a Conflict**

- Employees, Board members and other volunteers must recognize, declare, and take active steps to avoid or manage any potential conflicts of interest that arise as a result of their activities or personal relationships in the community. Those steps may include, but are not limited to:
  - Discussing and declaring conflicts as soon as they come to light.
    - Employees must inform Management.
    - CEO must inform Board Chair or designate
    - Committee volunteers must inform Committee Chair or designate
    - Board members must inform Board Chair or designate
    - Other volunteers must inform ESIO volunteer liaison
  - Recording potential conflicts in writing through systems that may be established by the ESIO from time to time for transparency and record keeping.
  - Isolating themselves from any involvement with ESIO processes that expose them to those conflicts.
  - Isolating themselves from situations in the community that might make them appear to be in a conflict of interest.
- It will be determined whether associations are such that they might affect the individual's capacity to properly fulfill their responsibility to the ESIO or whether it might adversely affect the ESIO's reputation. In the event that such conflict(s) is/are considered material, the individual may be asked to:
  - terminate their association with that organization;
  - have that organization withdraw its application; or
  - resign from their position with the ESIO.