

Policy Name	Conflict of Interest Policy
Source	Oxfam Canada
Responsibility	Governance, Anti-Racism, Reconciliation and JEDI Committee of the Oxfam Canada Board of Directors
First approved by the OCA Board of Directors	2013
Last update / revision	2022, 2025
Next review date	2028

BACKGROUND

In 2020, Oxfam International introduced a One Oxfam Conflict of Interest Policy, which was adopted by all affiliates, including Oxfam Canada. This policy sets minimum standards regarding conflict of interest and supersedes individual affiliates' policies regarding conflict of interest, except where the affiliate's own conflict of interest policies are more restrictive. Affiliates may implement the One Oxfam policy using their own procedures and forms.

To be accredited through the Imagine Canada Standards Program, Oxfam Canada is required to have conflict of interest policies for Board members, staff, students and volunteers that provide for disclosure, review and decision on actual or perceived conflicts of interest. This policy is intended to address conflict of interest situations that arise with respect to staff, students, volunteers and members of the Board of Directors, but it also sets out ethical principles that inform decisions with respect to potential conflicts of interest among supporters.

This document encompasses the One Oxfam Conflict of Interest Policy standards and Oxfam Canada's Conflict of Interest policy and procedures. It also reflects best practice among Canadian NGOs working in the international cooperation sector.

PURPOSE

Oxfam Canada must meet high ethical standards in order to safeguard its integrity and merit the confidence and trust of its partners, supporters, donors, institutional funders, the public and - most importantly - the people and communities we work to support. Oxfam Canada's Board of Directors, staff, students and volunteers are expected to make decisions and carry out their responsibilities with diligence, honesty, and personal integrity.

Organizations can take steps to prevent many conflict of interest situations from arising. However, in the course of organizational decision-making and action, certain conflict of interest situations may be unavoidable. Oxfam Canada's Conflict of Interest Policy thus has three objectives:

1. To reduce the occurrence of conflict of interest situations
2. To be transparent about conflicts or potential conflicts of interest
3. To manage successfully and resolve fairly those conflict of interest situations that do arise

DEFINITION

A conflict of interest is a situation in which an individual has a private or personal interest¹ that is sufficient to either influence or appear to influence the objective performance of their responsibilities with Oxfam Canada. A conflict of interest situation may be:

- Actual or real, in which the individual's official duties definitely are or definitely will be influenced by their private or personal interest;
- Perceived or apparent, in which the individual's official duties appear to other people to be influenced by that individual's private or personal interest (regardless of whether the conflict is actual or not); or
- Foreseeable or potential, in which the individual's official duties may be influenced in the future by their private or personal interest.

SCOPE

This policy applies to Oxfam Canada's Board of Directors, staff, students and volunteers ("Oxfam Individuals") given the authority of their decision-making and impact of their actions on the organization.

The ethical principles that underlie this policy include:

- Integrity (action in line with our policies and values)
- Transparency (including honesty in disclosing the issue)
- Respect (for communities, partners, supporters, donors, etc.)

POLICY STATEMENT

Oxfam Canada will seek to reduce the occurrence of conflict of interest situations and will implement practical preventative measures accordingly. These measures are intended to provide clear direction and guidance to Oxfam Individuals in their work, promote timely communication that enables individuals to foresee possible conflicts, and support assessment of the opportunities and risks of Oxfam Canada involvement in new initiatives.

To reduce actual, perceived or potential conflict of interest, Oxfam Canada's Board of Directors, staff, and volunteers:

- May not use their positions to extend special treatment that would advance their own interests or those of any family member, friend, or associate.
- May not accept gifts, money, discounts, or favours (including a benefit to any family member, friend or associate) that create indebtedness on the part of the recipient. It is

¹ "Private or personal interest" refers to an individual's self-interest (e.g. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage); the interests of the individual's immediate family, friends or work colleagues; or the interests of another organization in which the individual holds a paid or voluntary position.

important to distinguish such gifts and favours from those that represent good will and friendship.

- May not use, or permit the use of, Oxfam property, facilities, equipment, supplies or other resources for activities not associated with the individual's Oxfam work without the express permission of the Executive Director or delegate.
- May not use confidential information to advance personal or others' interests, and may not disclose confidential or privileged information about Oxfam Canada's affairs unless provided for under Oxfam Canada's Whistleblower Protection Policy;
- May not try to influence decisions or transactions regarding any financial or other interests that the individual or any family member, friend or associate may have in an Oxfam contract or other Oxfam business transaction.
- May not engage in any outside work or business activity that conflicts or potentially conflicts with the individual's duties with Oxfam Canada.

As conflicts of interest may result in serious consequences, any conflict - whether actual, perceived, or potential - must be disclosed as soon as the individual becomes aware of it.

Oxfam Canada will work toward managing and resolving those conflict of interest situations that do arise. It will implement measures that:

- Encourage individuals to self-declare a conflict of interest
- Enable individuals to respectfully raise real, perceived or foreseeable conflicts faced by others in the organization
- Disclose and document all pertinent information related to the situation
- Deal fairly and effectively with the situation according to its nature and severity. Options include restricting the involvement of the individual in the issue, recruiting a third party to assist with managing the situation, having the individual relinquish the private interest that is causing the conflict, or removing the individual completely from duties affected by the conflict.
- Document the outcome and the steps taken to implement the outcome

Oxfam Canada's Board of Directors, staff, students in addition, as per the requirement in the One Oxfam Conflict of Interest policy, designated positions must complete the Conflict of Interest Disclosure Statement form (Annex A) on an annual basis. These designated positions include, but are not limited to, Oxfam Canada Board members and Oxfam Canada Senior Leadership Team. Please refer to clause 5-2 Annual Disclosure Statement of One Oxfam Conflict of Interest Policy for details.

POLICY IMPLEMENTATION

1. Informing Oxfam individuals about the policy and obtaining their written agreement

The Conflict of Interest policy will be included in the orientation materials for Board members, staff, students and volunteers. Managers and supervisors will make a copy of the policy available to each employee, student and volunteer and discuss the policy with them, highlighting any

provisions that have particular relevance to the nature of the employee's work. Board members, staff, students and volunteers will be required to expressly acknowledge in writing their understanding of and agreement with the policy by signing the Conflict of Interest Disclosure Statement form.

The policy will be placed on Oxfam Canada's website.

2. Procedures to determine and disclose a conflict of interest situation

Members of the Board of Directors must report any conflict of interest situation to the Board Co-chairs or Chair (or delegate) in writing, or publicly declare their interest or potential interest at a Board or Board committee meeting. Any such declaration in a meeting will be recorded in the minutes of that meeting. If the Board Co-chairs or Chair have a conflict of interest, they must report it to the Vice Chair. Board Directors should consult with the Board Co-chairs or Chair if they need assistance in interpreting whether a situation they have experienced or are confronting puts them in a conflict of interest.

All staff, students and volunteers must complete the Conflict of Interest Disclosure Statement form (Annex A) as part of their onboarding process. While working or volunteering for Oxfam Canada, employees and volunteers must report any perceived or possible conflict of interest to their direct supervisor. This can be done by completing the Conflict of Interest Disclosure Statement form. Further details on reporting requirements can be found in clause 7-2 Minimum Procedure for Addressing Conflict of Interest of the One Oxfam Conflict of Interest Policy. Staff and Oxfam Canada volunteers should consult with their direct supervisor if they need assistance in interpreting whether a situation they have experienced or are confronting puts them in a conflict of interest.

If the Executive Director has a conflict of interest, they must report to the Board Co-chairs or Chair (or delegate).

3. Responsibility for addressing conflict of interest situations

- The Board Co-chairs or Chair are specifically responsible for attending to any conflict of interest situation involving the Board as a whole, individual Board member or the Executive Director. The Board Vice-Chair will attend to any conflict of interest situation involving the Board Co-chairs or Chair.
- The Executive Director is responsible for the ongoing application of the policy among staff, students and volunteers, and may consult the Board Co-chairs or Chair as necessary.

4. Reporting on conflict of interest situations

- The Board Co-chairs or Chair will report to the entire Board the nature and disposition of any conflict of interest situation involving the Board as a whole, individual Board member(s), or the Executive Director.
- The Board Vice-Chair will report to the entire Board the nature and the disposition of any conflict of interest situation involving the Board Co-chairs or Chair.

- The Executive Director will report to the Board the number and general nature of conflict of interest situations having arisen among staff, students or volunteers.

5. Failure to comply

Member of the Board of Directors, staff, students and volunteers who fail to comply with this policy are subject to disciplinary action up to and including termination of employment/engagement.

ANNEX A**CONFLICT OF INTEREST DISCLOSURE STATEMENT**

In order to be more comprehensive, this statement of disclosure requires you to provide information with respect to certain parties that are related to you. These persons, described as families, friends or associates include the following:

- Your spouse, domestic partner, child, mother, father, brother or sister;
- Any corporation or organization of which you are a board member, an officer, a partner, participate in management or are employed by, or are, directly or indirectly, a debt holder or the beneficial owner of any class of equity securities; and
- Any trust or other estate in which you have a substantial beneficial interest or in which you serve as a trustee or in a similar capacity.

1. NAME: (Please print)

2. Have you or any family, friends or associates provided services or property to Oxfam Canada in the past year?

_____ YES _____ NO

If yes, please describe the nature of the services or property and, if an individual is involved, the identity of that individual and your relationship with them:

3. Please indicate whether you or any family, friend or associates had any direct or indirect interest in any business transaction(s) in the past year to which Oxfam Canada was or is a party?

_____ YES _____ NO

If yes, describe the transaction(s) and, if an individual is involved, the identity of that individual and your relationship with them:

4. In the past year, did you or any family, friend or associate receive, or become entitled to receive, directly or indirectly, any personal benefits from Oxfam Canada or as a result of your relationship with Oxfam Canada that in the aggregate could be valued in excess of \$1,000, that were not or will not be compensation directly related to your duties to Oxfam Canada?

____ YES ____ NO

If yes, please describe the benefit(s) and, if an individual is involved, the identity of the that individual person and your relationship with them:

5. Are you or any family, friend or associates a party to or have an interest in any pending legal proceedings involving Oxfam Canada?

____ YES ____ NO

If yes, please describe the proceeding(s) and, if an individual is involved, the identity of that individual and your relationship with them:

6. Are you aware of any events, transactions, arrangements or other situations that have occurred or may occur in the future that you believe should be considered in accordance with the terms and intent of Oxfam Canada's Conflict of Interest Policy?

____ YES ____ NO

If yes, please describe the situation(s) and, if an individual is involved, the identity of that individual and your relationship with them:

I HEREBY CONFIRM that I have read and understand Oxfam Canada's Conflict of Interest Policy and that my responses to the above questions are complete and correct to the best of my knowledge. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with this policy, I will notify the Executive Director, Board Co-chairs or Chair or the Board Vice Chair immediately.

Name

Signature

Date