

Break the Silence (1191438)  
**Conflict of Interest Policy**

**Purpose**

The purpose of this policy is to protect the interests of Break the Silence (Herein 'BTS'). In the regular course of business, agents and employees of BTS may have the opportunity to advance their own personal interests with or against the interests of BTS. Acting in such a manner is unacceptable and any party who acts outside of BTS's best interest may be subject to disciplinary action.

I. Definitions

- a. Employee – any person who is employed by BTS in a part or full-time capacity, This includes Volunteers.
- b. Agent – an owner, director, stakeholder, contractor or other third-party that is in the position to act on behalf of BTS.
- c. Financial Interest – The interest that any individual may have in the monetary transactions of BTS. In particular, any interest that could have a direct bearing on the financial gain/loss of said individual.

II. Procedure

- a. Duty to disclose  
Every employee/agent of BTS is obligated to disclose any known or potential conflicts of interest as soon as they arise. Failure to do so could result in termination of employment.
- b. Investigating potential conflicts  
When a possible conflict of interest arises, the board of Trustees along with the CEO will collect of the pertinent information and may question any concerned parties. If the investigating parties determines that a conflict exists, steps will be taken to address to conflict. If no conflict exists, the inquiry may be documented but no further action will be taken.
- c. Addressing conflicts of interest  
When an actual conflict of interest is found, any transactions that may have been affected will be reviewed retroactively. Affected parties both within and outside of the business, including shareholders, directors, employees, and contractors will be notified. An investigation will also be conducted by the board of Trustees & the CEO to determine the extent of the conflict and the intentions of the parties involved.

If the conflict in question involves a member or members of the investigating members, such a member will be excused from the deliberations.

d. Disciplinary action

As all conflicts of interest will be reviewed on a case-by-case basis, a review may result in disciplinary action. The board of Trustees has full discretion to deem what disciplinary action is both fitting and necessary, including suspension and/or termination of employment.

### III. Temporary Guidelines

Where situations come to light that other organizations or Charity's within our operating area are competing for the same resources, we reserve the right to refuse to allow volunteers or employees to volunteer/work both for Break the Silence and the other entity. This is solely a temporary measure put in place to protect our clients and donations. This will be reviewed at a manager level, depending on circumstances at the time.

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