

Shooting Federation of Canada

Board of Directors and Staff Conflict of Interest Policy

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Part 1: Definition

1.1 A “conflict of interest” is any situation where

- (a) Your personal interests, or
- (b) Those of a close friend, family member, business associate, corporation or partnership in which you hold a significant interest, or a person to whom you owe an obligation could influence your decisions and impair your ability to
 - (i) Act in the Shooting Federation of Canada’s best interests, or
 - (ii) Represent the Shooting Federation of Canada fairly, impartially and without bias.

It is important to note that a “conflict of interest” exists if the decision could be influenced – it is not necessary that influence takes place.

Part 2: General Duties

- 2.1. Unless authorized to do so by the Shooting Federation of Canada Board, or by a person the Board designates, you may not
 - (a) Act on behalf of the Shooting Federation of Canada, or deal with the Shooting Federation of Canada, in any matter where you are in a conflict of interest or appear to be in a conflict of interest, nor
 - (b) Use your position, office or affiliation with the Shooting Federation of Canada to pursue or advance your personal interests or those of a person described in paragraph 1.1(b).
- 2.2 The “appearance of a conflict of interest” occurs when a reasonably well informed person properly could have a reasonable perception that you are making decisions on behalf of the Shooting Federation of Canada that promote your personal interests or those of a person described in paragraph 1.1(b).

- 2.3 You must immediately disclose a conflict of interest to the Board of Directors either in writing or as minuted at a Board of Directors' meeting. It is important to make the disclosure when the conflict first becomes known. If you do not become aware of the conflict until after a matter is concluded, nevertheless you must still make the disclosure immediately.
- 2.4 If you are in doubt about whether you are or may be in a conflict of interest, you must request the advice of the Board of Directors or a person the Board designates.
- 2.5 Unless otherwise directed, you must immediately take steps to resolve the conflict or remove the suspicion that it exists, by
- Promptly declaring to the Board of Directors any conflict of interest as defined by this policy and asking that such declaration be recorded in the minutes.
 - Excusing yourself from the portion of the meeting where the matter giving rise to the conflict of interest is being discussed.
 - Refraining from all discussion of the matter giving rise to the conflict of interest, at any meeting of the Board of Directors, or elsewhere.
 - Refraining from voting on the matter giving rise to the conflict of interest, at any meeting of the Board of Directors.

Part 3: More About Avoiding a Conflict of Interest

3.1 You must not

- (a) Use your relationship with the Shooting Federation of Canada to confer a benefit on a person described in paragraph 1.1(b). This duty does not prevent you or anyone else from conducting business with other situations, as authorized by the Board.
- (b) Personally benefit from any business activity involving the Shooting Federation of Canada except in unique situations, as authorized by the Board.
- (c) Indirectly benefit from any business activity involving the Shooting Federation of Canada except in unique situations, as authorized by the Board.

3.2 An "indirect benefit" is

- (a) A benefit derived by a close friend, family member, business associate, or a corporation or partnership in which you hold a significant interest, or
- (b) A benefit which advances or protects your interests although it may not be measurable in money.

Part 4: Using Shooting Federation of Canada's Property and Trade Information

- 4.1 You must have authorization from the Board, or from a person that Board designates
 - (a) To use, for personal purposes, property owned by the Shooting Federation of Canada or
 - (b) To purchase Shooting Federation of Canada property unless it is through channels of disposition equally available to the public. Even then you may not purchase the property without authorization if you are involved in some aspect of the sale.
- 4.2 You may not take personal advantage of an opportunity available to the Shooting Federation of Canada unless
 - (a) It is clear that the Shooting Federation of Canada has irrevocably decided against pursuing the opportunity and
 - (b) The opportunity is equally available to members of the public.
- 4.3 You may not use your position with the Shooting Federation of Canada to solicit any Shooting Federation of Canada's stakeholder(s) for personal business or one operated by a close friend, family member, business associate or a corporation or partnership in which you hold a significant interest. This duty does not prevent you or anyone else from transacting business with other people connected with the Shooting Federation of Canada.
- 4.4 "Shooting Federation of Canada information" is information that is acquired solely by reason of involvement with the Shooting Federation of Canada and which the Shooting Federation of Canada is under an obligation to keep confidential.
- 4.5 You may use Shooting Federation of Canada's information only for SFC purposes.
- 4.6 You must not use SFC information for your own personal benefit or for those of a close friend, family member, business associate or a corporation or partnership in which you hold a significant interest.
- 4.7 You must protect SFC information from improper disclosure.
- 4.8 You must report to the Board, or to a person the Board designates, any incident of abuse of SFC information.

4.9 You may only divulge SFC information if

- (a) You are authorized by the Board,
- (b) You are a designated spokesperson,
- (c) The person or agency that has a lawful right to the information.

Part 5: Rules About Gifts

5.1 You may accept a gift made to you because of your involvement in the SFC in the following circumstances only if:

- (a) The gift has no more than token value.
- (b) It is the normal exchange of hospitality or a customary gesture of courtesy between persons doing business together.
- (c) The exchange is lawful and in accordance with local ethical practice and standards, and
- (d) The gift could not be constructed by an impartial observer as a bribe, pay off or improper or illegal payment.

5.2 You may not use SFC property to make a gift, charitable donation or political contribution to anyone on behalf of the SFC. Any gift must have the authorization of the Board of Directors or a person the Board designates.

Part 6: Guidelines for Authorizing a Transaction From Which a Member May Derive a Benefit

6.1 Even if you are not a Director, if you are in a position to influence decisions made on behalf of the SFC, the Board must treat you as if you are a Director.