



# Conflict of Interest Policy

Adopted Date	September 16, 2025
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## CONFLICT OF INTEREST POLICY

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### Policy

Nipissing First Nation (NFN) is committed to maintaining integrity, transparency, and trust in all aspects of its governance and operations. Employees and representatives must avoid situations where personal interests conflict, or appear to conflict, with the interests of NFN.

### Purpose

The purpose of this policy is to:

- a) Define conflict of interest and provide examples.
- b) Establish clear expectations for disclosure and conduct.
- c) Protect NFN, its members, and employees from reputational or operational risk.

### Scope

This policy applies to all NFN employees, volunteers, students, contractors, Council members acting in an employment capacity, and volunteers engaged with NFN.

### Definitions

“Conflict of Interest” means any situation where an individual’s personal, financial, or family interests could improperly influence, or be perceived to influence, their decisions, duties, or responsibilities at NFN.

### Policy Requirements

Employees shall:

- a) Perform duties in the best interests of NFN.
- b) Disclose any real, potential, or perceived conflicts promptly to their supervisor or Human Resources.
- c) Remove themselves from decisions where a conflict exists

Conflicts may include but are not limited to:

- a) Engaging in contracts, services, or financial dealings with NFN for personal gain.
- b) Accepting gifts, benefits, or favours that could influence decision-making.
- c) Supervising or being supervised by a family member.
- d) Using NFN property, resources, or information for personal advantage.
- e) **Personal, romantic, or familial relationships between employees where one individual may supervise, influence, or evaluate the other, or where the relationship could reasonably be perceived to affect workplace impartiality.**



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### Gifts and Hospitality

All gifts, benefits, or items must be reported to the employee's direct supervisor. Items greater than \$50 in value, offered to employees, regardless of size or type, must be turned over to Human Resources. These items will be collected and distributed by the Social Committee for staff events, prize draws, or giveaways. Employees are not permitted to retain such gifts for personal use.

Employees must immediately report offers of gifts or benefits perceived as intended to influence decision-making.

Prizes or awards of a personal nature (for example, door prizes, raffle draws, or random contest winnings) are not considered gifts under this policy. Employees are not required to declare these types of prizes to the employer.

### **Administrative Management**

#### Disclosure:

- a) All employees must complete a Conflict-of-Interest Disclosure Form upon hire and annually thereafter.
- b) Employees must also disclose any new real, potential, or perceived conflicts—including the development of a personal, romantic, or familial relationship with another employee, especially where reporting relationships exist—as soon as they arise.

#### Annual Declaration:

- a) Each year, all employees will be required to complete and sign an Annual Conflict of Interest Declaration (Appendix A).
- b) Human Resources will collect, record, and maintain all signed declarations in employee personnel files.
- c) Failure to submit the annual declaration may be considered a breach of this policy and subject to corrective action.

#### Compliance:

- a) Violations of this policy may result in corrective or disciplinary action up to and including termination.
- b) Serious violations may also result in referral to law enforcement.

### **Alignment with the Canada Labour Code**

This policy supports the Canada Labour Code by reinforcing fairness, accountability, and transparency in employment and decision-making.

### **Review and Updates**

This policy will be reviewed periodically and updated to reflect changes in legislation or organizational practices.



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### Appendix A – Annual Conflict of Interest Declaration

I have no personal, financial, familial, or other relationships that create a real, potential, or perceived conflict of interest in my role.

I do have a personal, financial, familial, or other relationship that may create a real, potential, or perceived conflict of interest. Details are as follows:

I acknowledge my ongoing responsibility to disclose any future conflicts of interest that may arise during my employment.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_