

[Company Name]
Conflict of Interest Policy

| | | |
|---------------|----------------|------------------|
| Approval Date | Effective Date | Last Review Date |
| Pending | Pending | April 2023 |

| | |
|----------------|--|
| Policy Number: | |
|----------------|--|

| | |
|-----------------|--|
| Approved by: | xx Executive Board |
| Responsibility: | xx Executive Board |
| Applies to: | All Representatives of [Company Name] including affiliates ([Company Name] Executive Board, Stewards, Committee Persons, Members, and Authorized Designates) |

1. PURPOSE

- a. The purpose of this policy is to define the Local Unions position on conflict of interest, the associated intents of the policy, the definitions of the term and procedures for implementation and enactment for intervening, and associated penalties which may be served under the authority of the Business Manager or Authorized Designate of [Company Name] all persons associated with the Local Union, whether professionally affiliated or not from conflict of interest.
- b. This policy clarifies the duty of the [Company Name] of acting honestly and in good faith with a view to the best interests of the Union, including perceptions.

2. APPLICATION OF THE POLICY

- a. This policy applies to all xx Employees, Executive Board Members, Stewards, Committee Persons, and Members.

3. DEFINITIONS

- a. Employees
 - i. Persons hired or appointed by the Business Manager or Authorized Designate to perform work specifically or related to servicing the membership and who receive remuneration in the form of a payroll check from the Local Union.

- b. Executive Board Members
 - i. Those elected by the membership or otherwise appointed to the Board as may be permitted by the International Constitution or By-Laws of the Local Union. An Executive Board is a fiduciary. This means that the member must avoid putting themselves in a situation in which there is a conflict between his or her duty to the Union and their own personal or financial interest.
- c. Stewards
 - i. Any person elected or appointed to the volunteer position or appointment as Steward to the membership, Collective Agreement, Constitution, and related Union policies where they exist defines them.
- d. Committee Persons
 - i. Any person elected to or appointed to any committee by the authority of the Business Manager of the Local Union. f) Members: Any person who is an employee of the Local Union or an Employer signatory to a Collective Agreement with the [Company Name].
- e. Authorized Designate
 - i. Any person is given authority in writing by the Business Manager to act on his/her behalf for a defined period; or in the case of a permanent absence of a Business Manager, the person appointed as per the Constitution, or in a permanent absence of either of the aforementioned the President of the Executive Board unless no other person has been properly appointed.
- f. Conflict of Interest
 - i. A conflict of interest arises when one influences or is in a position to influence any activity for personal gain or benefit, either directly or indirectly. Where a matter comes before an individual has a personal or financial interest, the individual must declare their interest, and the individual shall leave the room during any discussion relating to the particular item without comment and not participate in any vote concerning the issue about which the individual has a conflict of interest.

4. ROLE AND RESPONSIBILITY

- a. It is simply insufficient to declare the interest casually or privately. It must be declared openly and in a manner such that the other members are fully informed of the real state of things. They should know not merely that the member has an interest but what it is and how far it goes, and the member must see to it that they are informed.

- b. Matters will frequently come before the member in which individuals have an interest in common with the membership of the Union as a whole.
- c. A member is allowed to participate in discussions or votes related to such issues. However, it is a different matter where the member has an individual financial interest in the matter under discussion, which is different from all other members in a bargaining unit.
- d. Likewise, a member may not participate where the member has a personal interest; for example, as the spouse or a close friend of a person with an interest in a matter under discussion. In those circumstances, the member of the Board will breach his or her fiduciary duties to the Union by failing to declare the interest and exclude themselves from the discussion and vote.

SIGN-OFF ([Company Name] - Conflict of Interest Policy)

Employee / Executive Board Member
(Please Print)

Employee / Executive Board Member
(Signature)

Witness

Date