

## Conflict of Interest Policy

### Overview

Members of the **Alberta Post-Secondary Application Systems (APAS)**, its Board of Directors, and all staff members are expected to reveal any personal, family, or business interests that they have that, by creating a divided loyalty, could influence their judgment and hence the wisdom of decisions. A **conflict of interest** exists wherever an individual could benefit, disproportionately from others, directly or indirectly, from access to information or from a decision over which they might have influence, or where someone might reasonably perceive there to be such a benefit and influence.

Conflicts of interest (real and perceived) are unavoidable and should not prevent an individual from serving on the Board of Director or as a staff member, unless the extent of the interest is so significant that the potential for divided loyalty is present in a large number of situations.

The Conflict of Interest section of the Society's By-Laws will at all times take precedence over this policy.

### Purpose

The purpose of this policy is to reduce the incidence or the potential of incidence of conflict of interest and appropriately manage any permitted conflict.

### POLICY

#### 1. GENERAL

APAS encourages all members of the Board of Directors and staff to disclose any real or perceived conflict of interest as soon as they become aware of it.

### PROCEDURE

1. Members of the Board of Directors and staff have a duty to disclose any personal, family, or business interests that may, in the eyes of another person, influence their judgment.
2. The Board of Directors as a whole has a duty to disclose specific conflicts of interests to Society members, staff and external stakeholders where that interest may, in their judgment, affect the reputation or credibility of the organization, and to disclose the Board's procedure for operating in the presence of such conflicts.
3. Members of the Board of Directors and staff have a duty to exempt themselves from participating in any discussion and voting on matters where they have, or may be perceived as having, a conflict of interest. Such exemptions should be recorded in minutes of meetings.
4. Any business relationship between an individual (or a company where the individual is an owner or in a position of authority) and the Society, outside of their relationship as a member of the Board of Directors or staff member must be formalized in writing and approved by the Board.

**DEFINITIONS**

<b>Conflict of Interest</b>	An actual or perceived conflict of interest arises when a Society, members of the Board of Directors, or staff member is placed in a situation in which their personal or financial interests or the interests of their immediate family, or persons with whom the employee has a personal or business relationship, conflict or appear to conflict with their duties and responsibilities.
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