



CONFLICT OF INTEREST AND DISCLOSURE POLICY

1. Purpose

All Board members and employees are expected to carry out their duties and conduct their personal affairs in such a way as to protect and maintain public trust in the integrity of G.R.O.W. They will display loyalty and convey a positive image of G.R.O.W. They will avoid any situation that could knowingly result in a conflict between their personal interests and their duties, including:

- i. No Board member or employee shall accept gifts or tips of material value if there is an expectation of preferential treatment from the participant or participant's family offering the gift or tip. Any gifts from a participant or participant's family that is greater than \$100 in value must be disclosed to the Executive Director.
- ii. No Board member or employee should profit personally from G.R.O.W. as a result of external business interest nor will they use their position with G.R.O.W. to obtain personal gain from those doing or seeking to do business with.
- iii. No Board member or employee will bid on any goods or services being purchased by G.R.O.W. without first disclosing their interest in writing to the Board. The Board member declaring their interest shall not take part in the discussion of or vote on any question in respect to the matter, and shall not in any way influence the voting on any such question.

In accordance with G.R.O.W.'s Service Purchase Agreement with the Province of Manitoba, G.R.O.W. may not knowingly allow any member of the Legislature of the Province of Manitoba to either directly or indirectly derive any financial gain or benefit arising from any dealing with G.R.O.W.

Every declaration of interest and the general nature of that interest shall be recorded in the minutes of the Board meeting.

2. Definition

A conflict of interest is any situation in which a Board member or employee has an employment, business or personal interest which results or appears to result in an improper material interest or an advantage by virtue of the person's position or interference with the objective exercise of the person's duties. A material interest includes any matter or situation where a Board member or an employee has direct or indirect financial or other interest beyond the interest of an ordinary citizen.

As the perception of a conflict of interest is a concern for any organization which is accountable to the public, the interests of immediate family members will be deemed to be those of the Board member or employee. Immediate family members will include any person living with the Board member or employee.

3. Requirements for Disclosure

A copy of the Conflict of Interest and Disclosure Policy will be provided to every Board member and employee of G.R.O.W. and be utilized in their orientation. A promise to act in compliance with the policy will be signed by Board members at the outset of their involvement with G.R.O.W. and by employees at the beginning of their employment with G.R.O.W. or updated immediately:

- Where an actual, potential or perceived conflict arises where none existed previously; or,
- A change occurs which alters the nature or degree of the conflict subsequent to a declaration being made.

At the start of all Board meetings, the Chair will request that any conflicts of interest be disclosed for any/all meeting agenda items. Any board member or employee having a conflict of interest will disclose details of that conflict and in the case of a conflict, make themselves absent from that portion of the meeting. If unsure about a potential conflict, a ruling should be sought from the President of the Board.

4. Enforcement of Standards

The enforcement of these standards is the responsibility of every Board member and employee of G.R.O.W. Non-compliance which cannot be resolved through normal channels should be reported to the Executive Director in the case of employees and to the President of the Board in the case of Board members. The Executive Director or the President of the Board, as the case may be, will assess the circumstances, make a recommendation, and take appropriate action. The Executive Committee shall be consulted as deemed appropriate.

5. Review

This policy and its related procedures will be reviewed every three (3) years or as required in the event of legislative changes.

Date Approved *March 12, 2025*

Approved By *Board of Directors*

Next Date For Review *March 2028*

To be Reviewed by *Governance Cttee*

CONFLICT OF INTEREST DISCLOSURE

I have read and understood the G.R.O.W. Conflict of Interest and Disclosure Policy dated _____ and support its intent.

I agree to:

- i. Acknowledge my responsibility to G.R.O.W. and agree to avoid conflicts of interest or the appearance of conflicts of interest;
- ii. Acknowledge that at times I may have access to confidential information and agree to protect the confidentiality of that information;
- iii. Disqualify myself and absent myself from participating in any G.R.O.W. matters which are, or which may give the appearance of, a conflict of interest;
- iv. Update this form as needed to keep it current and accurate.

I hereby declare and certify that I have no real or apparent conflict(s) of interest, except those detailed below:

Name (print) _____

Signature _____

Date _____

Date Approved *March 12, 2025*

Approved By *Board of Directors*

Next Date For Review *March 2028*

To be Reviewed by *Governance Cttee*