

3.15 CONFLICT OF INTEREST AND NON-SOLICITATION

The purpose of this policy is to provide general direction so that PRAMP Directors and workers can avoid actual or potential conflicts of interest. Workers and Directors are expected to act in the best interests of PRAMP while performing services for PRAMP.

3.15.1 EXPECTATIONS

Conflict of Interest

A **Conflict of Interest** is a situation in which an individual (who has multiple interests, financial or otherwise), in serving one of their personal interests could mean they are working against the interests of PRAMP. This relates to situations in which the personal interest of an individual might adversely affect their duties to make decisions for the benefit of PRAMP.

It would be deemed as a conflict to the interest of PRAMP when conditions that include but not limited to the following are present:

- A worker is actively marketing their own business (where the business is unrelated to the business of PRAMP) while in the process of fulfilling their contractual obligations to PRAMP.
- Taking actions that negatively impact PRAMP's reputation, reputation with stakeholders and/or reputation in the communities which it operates.
- An actual or potential conflict of interest may occur when a worker or Directors is in a position to influence a decision that may result in a personal gain for that worker or for a relative, or when a worker acts against the interest of PRAMP, including violations of confidentiality.

Any worker, subject to regulations or code of conduct governing their profession, shall comply with the requirements of this policy as well as those of their professional governing body in all matters and areas of conflicts of interest.

When workers have questions concerning a possible conflict of interest, they should request advice from the PRAMP Executive Director or a Board of Directors Chair.

Board Directors are expected to self-disclose any potential conflicts of interest prior to participating in a Board or Working Group decision.

Gifts and Entertainment

PRAMP workers and Directors should not accept gifts or entertainment or other benefits or favour from a third party if it is more than nominal value and might influence, or appear to influence, the worker or Director's judgement in acting in the best interests of PRAMP while performing services for PRAMP. Personal judgement is always required when considering the appropriateness of gifts, benefits or favours. One should consider the context in which it is being offered, whether there is an explicit or implied expectation of favour in return, and the value of the item.

Non-Solicitation

Non-solicitation refers to an agreement between PRAMP and its contractors that prohibits workers from directly soliciting PRAMP's contacts for personal gain.





The preservation of PRAMP's relationships and its goodwill are proprietary rights PRAMP is entitled to protect. While providing services for PRAMP, a worker may learn the identity and contact information for PRAMP stakeholders and that, absent their worker relationship at PRAMP, the worker may not otherwise provide services to.

PRAMP expects workers not to exploit their relationship with PRAMP for personal gain. Workers will not solicit business from any contacts they make while delivering services for PRAMP. Solicitation may include and is not limited to:

- Directly or indirectly persuading or offering to provide services through their own company (for workers who operate their own company that offer services different from PRAMP).
- Making themselves available to render services to a PRAMP contact, either in general or on a timelier basis, at or for one's own practice outside of PRAMP, but not making oneself adequately available to render services for PRAMP.

