CONFLICT OF INTEREST POLICY

Purpose:
This policy is designed to assist employees/contractors of Golf Ontario to identify situations that present potential conflicts of interest and to provide procedures to follow in disclosing potential conflicts of interest.

Situations may arise where a Golf Ontario decision maker is faced with a conflict of interest, or where the process of making a decision creates an appearance of favoring a Golf Ontario employee, volunteer or Golf Ontario member. The good judgment of employees/contractors is essential, and no list of rules or policies can provide direction for all circumstances that may arise.

Conflicts of interest must be eliminated and are not permitted on an ongoing basis.

Policy:

The Golf Ontario policy is to:

- Disclose potential conflicts
- Withdraw employees/contractors from decisions in which they are, or may be, the subject of a conflict. Withdrawal includes not participating in the discussion and the entire decision process.

When confronted with a potential conflict of interest, the individual must take an objective look at the situation and determine whether a reasonable disinterested observer would have good reason to believe that the interests of Golf Ontario would suffer or that the individual or an associate would benefit unfairly.

What constitutes a conflict of interest?

A potential conflict of interest occurs when a person's judgment in acting in the best interest of Golf Ontario affects a decision that:

- Could result in that person, a relative, a close associate, or that person's company, receiving the expectation of financial gain or advancement, such as a contract, grant, or some other honour. A close associate refers to a close personal friend, a colleague or a party with whom you have personal animosity. It includes using confidential information, using the person's position, GO assets or in the case of a staff member, using Golf Ontario time for the

expectation of financial gain or advancement.

Employees/contractors may not engage in any outside work or business activity that conflicts with or impacts negatively on their duties at Golf Ontario or which interferes with their ability to fulfill their responsibilities with Golf Ontario.

Personal Gifts and Favours

All personal gifts and favors with value of more than $200 from individuals and organizations with whom Golf Ontario has a business relationship shall be declared.

There are three courses of action for any gift or favour over $200:

1. Accept the gift or favour if confident it would not be a conflict of interest and inform the Executive Director;
2. Politely and diplomatically decline the gift or favour; or
3. When in doubt, before accepting the gift or favour, inform the Executive Director who will review and advise as to whether there is a conflict of interest.

Disclosure and Declaration

All employees/contractors are required to complete a Conflict of Interest Attestation annually.

Throughout the term of employment, each employee/contractor shall provide full disclosure of any business or activity in which they are involved which might influence or might appear to have the ability to influence their decisions or actions involving matters of Golf Ontario.

If an employee/contractor believes that his or her conduct or activities may conflict or appear to conflict with this policy, the individual has an obligation to disclose the details of their situation to their direct Leader at of Golf Ontario as soon as they become aware.

Failure to adhere with this policy will result in disciplinary action up to and including dismissal.