

Title: Conflict of Interest Policy

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Category: Governance

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Approver: Board

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Conflict of Interest Policy

1. POLICY STATEMENT

Genome Canada is committed to maintaining the highest standards of integrity and transparency. This policy aims to prevent real or perceived conflicts of interest among employees, service providers, review and advisory committee members, and other representatives of Genome Canada, ensuring that all decisions and actions are made in the best interest of the organization, and that there is no personal gain from their involvement. Individuals shall, at all times during the term of service to Genome Canada, refrain from being in a position of conflict between their own interests and their duties.

2. PURPOSE

The purpose of this policy is to establish clear guidelines for the disclosure and management of potential, apparent, or actual conflicts of interest for all employees, service providers, review and advisory committee members, and other representatives of Genome Canada. The policy requires members to disclose any personal interests that could influence their decisions. This ensures that all interactions and decisions are conducted with integrity and transparency, helping to maintain trust among stakeholders while ensuring compliance with legal regulations.

3. SCOPE

This policy applies to all employees, service providers, review and advisory committee members, and other representatives of Genome Canada. It covers any situation where personal interests, financial or otherwise, could interfere with their duties and responsibilities to the organization.

4. DEFINITIONS

Conflict of interest. A situation where an individual's personal interests, financial or otherwise, could interfere with their duties and responsibilities to Genome Canada. This includes when they, either personally or by the means of members of their immediate family, have an interest, directly or indirectly, in a business or organization therefore leading to a conflict between their own interests and that of the Genome Canada, or have a claim or cause of action against Genome Canada.

Positions of influence. Roles or relationships that could potentially affect an individual's decision-making process.

5. IMPLEMENTATION

Disclosure of potential conflicts

- **Initial disclosure:** All employees, service providers, review and advisory committee members, and other representatives of Genome Canada must disclose in writing any direct or indirect financial interest and/or positions of influence that could lead to a potential, apparent, or actual conflict of interest. This disclosure must be updated whenever the individual's circumstances change, and the individual has the responsibility to amend their conflicts of interest disclosure statement as soon as new potential conflict of interest arise or old potential conflict of interest disappear.
- **Active disclosure:** The chair of the meeting must request a declaration of conflict at the opening of each meeting. In addition, individuals must actively disclose any potential, apparent, or actual conflict of interest when it arises in the course of their duties or during meetings. This ensures that the committee or relevant parties are aware of the situation and can take appropriate action, and fosters a culture of transparency and accountability.

Management of conflicts

- **Evaluation:** Employees, service providers, review and advisory committee members, and other representatives of Genome Canada are responsible to identify and declare their conflicts of interest, both real and perceived. Management is responsible for ensuring processes are in place for individuals to identify and declare their conflicts of interest, and will decide on the appropriate course of action, such as recusal, and document each case.
- **Documentation:** Management will ensure that all disclosures and the corresponding actions taken are documented and handled with confidentiality, sharing information only as necessary to relevant parties.

Meeting protocol

- Individuals in a situation of conflict of interest must:
 - Disclose the conflict to the relevant committee or management.
 - Retire from meetings during discussions related to the conflict.
 - Refrain from voting on matters related to the conflict.
 - Avoid influencing other members regarding the conflict.

Confidentiality

- All documents and information provided for the purpose of managing conflicts of interest must be treated as strictly confidential and may not be used for any purpose beyond that for which they were originally intended.
- Confidentiality guidelines are established and must be active in all situations where there is a risk of exposing sensitive information. These guidelines apply to both internal and external individuals who may access any form of protected data, including personal and research-related information.

Enforcement

- **Responsibility:** Management is responsible for the interpretation and implementation of this policy.
- **Removal:** Individuals who violate this policy may be subject to disciplinary action, up to and including termination of employment or contract, and/or removal from their position or appointment.

- **Validity of decisions:** Decisions made by Genome Canada while an individual is in a situation of conflict of interest are not null and void, provided the conflict was disclosed and the individual complied with this policy.

6. ROLES AND RESPONSIBILITIES

Board of Directors

- Approve and oversee the implementation of the Conflict of Interest Policy.

Management

- Champion the Conflict of Interest Policy and demonstrate commitment through actions and decisions.
- Ensure the Conflict of Interest Policy is communicated and enforced across the organization, and that employees and contractors are aware of their responsibilities under the policy.
- Provide resources, processes and support for the effective declaration, management and documentation of conflicts of interest.
- Address and resolve conflict of interest issues promptly and effectively.

Employees, contractors, and other representatives of Genome Canada

- Adhere to the Conflict of Interest Policy and actively disclose any potential, apparent, or actual conflicts of interest.
- Participate in training and development opportunities related to conflict of interest management.
- Report any conflict of interest issues or concerns to their supervisors or through established reporting channels.

Human Resources

- Review and update recruitment, retention, and talent management practices to ensure they align with the Conflict of Interest Policy.

7. POLICY HISTORY

Action

Policy issued

Date

December 2024