



POLICY

POLICY MANUAL SECTION Human Resources	POLICY NAME Conflict of Interest	POLICY NUMBER HR - 505
POLICY MANUAL SUBSECTION	RESPONSIBILITY Senior Director, People and Culture	APPROVED BY CEO
LAST REVIEW DATE December 2025	LAST APPROVAL DATE December 2025	NEXT REVIEW DATE December 2027

SCOPE

This policy applies to employees, students and non-Board volunteers¹ of Lumenus Community Services (Lumenus). It provides guidelines and procedures for avoiding and reporting situations where a conflict of interest or potential for a conflict of interest may arise.

POLICY

Lumenus values honesty and integrity in our relationships with employees, clients and community partners. All employees, students and volunteers have a duty to ensure that the trust, confidence and integrity of the organization's decision-making processes are maintained by ensuring that they are free from actual, potential or perceived conflicts of interest.

A conflict of interest refers to a situation in which the personal or private interests of an employee, student or volunteer conflict with the interests of Lumenus, or where there is a reasonable basis for the perception of such a conflict.

A conflict of interest is defined as real, perceived, or potential breach by employees, students or volunteers of ethical standards or principles which:

- May place in question their objectivity and /or impartiality;
- May impair their independence of judgment, or influence their decisions or actions concerning Lumenus business as a result of maintaining a relationship with, or engaging in any activity, or having personal financial interest with individuals or other organizations having a relationship with Lumenus;
- Jeopardize their ability to act in the best interest of the organization;
- May or may not constitute inappropriate or unlawful activities; and,
- May compromise Lumenus's reputation.

¹ Conflict of interest requirements for members of the Board and its committees are set out in a separate policy approved by the Board



PROCEDURE

Reporting a Real, Perceived or Potential Conflict of Interest

As soon as an employee, student or volunteer becomes aware of a real, perceived, or potential conflict of interest, they are expected to notify the Senior Director, People and Culture in writing.

Since a conflict of interest is often difficult to determine, if there is a question whether a conflict exists, then it should be reported, regardless whether the individual personally believes a conflict of interest exists. Individuals failing to declare such conflicts of interest will be subject to disciplinary action up to and including termination.

Receiving of Gifts

Employees may not accept compensation or monetary gifts from recipients of Lumenus services, as this action could put them in a position of a conflict of interest.

Supplementary and/or Self-Employment

Lumenus generally allows employees to engage in outside employment where:

- The secondary employment causes no adverse effects on the employee's performance of job duties with Lumenus;
- The secondary work is performed outside of the employee's regularly scheduled working hours with Lumenus;
- Lumenus time, resources, materials, facilities or contacts are not used to promote independent work;
- There is no conflict of interest as determined by Lumenus.

Where an employee does engage in supplementary or self-employment outside Lumenus, the nature and extent of the employment or self-employment must be disclosed in writing to the Senior Director, People and Culture at the time of hire or when accepting the supplementary employment or self-employment.

The determination of whether a conflict of interest exists will be the responsibility of the Chief Executive Officer (CEO). Decisions will be communicated to the employee and a copy will be retained in a confidential file retained by the CEO.

Employees of Lumenus are permitted to work in private practice in their professional capacity, provided they do not accept as clients for a fee, any individual and/or their family who lives in Toronto and who are eligible for the same professional service free of charge through Lumenus. Employees and volunteers must refrain from soliciting any individuals related to Lumenus or its partners to promote a private practice.



Clients who fall within the definition above may be accepted for a fee in a private practice, provided:

- The client or family was referred directly to the private practitioner by an independent referral source, and;
- The prospective client or family have been made fully aware of their eligibility for service free of charge through Lumenus and have declined, and;
- The service is offered at a location other than Lumenus.

It is considered at all times to be a conflict of interest for an employee to accept referrals for their private practice from the clientele or prospective clientele of Lumenus.

It is important that there be no confusion in the client's mind as to whether they are a client of Lumenus or a client of the private practitioner. This ensures different lines of accountability and avenues of complaint.

Services to Family Members

Situations where a Lumenus employee is required to conduct business or provide services to a family member or associate may create a real or perceived conflict of interest for both the organization and the employee. As such, an employee must not have any professional contact with a family member including but not limited to providing services as a clinician, participating in case discussion or accessing client records. A relative is a person who is part of your family including but not limited to parents, siblings, uncles, aunts, grandparents, cousins, nieces and nephews. Lumenus requires any employee who has or questions whether a conflict of interest exists under this section must immediately notify the Senior Director, People and Culture.

Reporting a Conflict of Interest

Lumenus must be made aware of all conflicts of interest in order to take the appropriate action.

Employees who believe they have witnessed a conflict of interest, or where they reasonably believe that they may be engaged in any activity which could present a conflict of interest must report the matter immediately to the Senior Director, People and Culture who will inform the CEO who will then provide direction.

Supervisors and managers must take all appropriate steps to prevent and stop conflicts of interest in their area of responsibility. Any manager who is subject to, witnesses, or is given a written or verbal complaint of conflict of interest shall work to minimize or eliminate the issue at hand and report the conflict of interest to the Senior Director, People and Culture.

This policy will not be used to bring fraudulent or malicious complaints against employees. Any complaint found through convincing evidence to be in bad faith will result in disciplinary action being taken against the individual lodging the complaint.



Investigation

Lumenus will resolve claims of conflict of interest as expediently as possible. Investigations shall be initiated within 10 days of the query or complaint. The Senior Director, People and Culture shall retain the findings report for as long as any administrative or legal action arising out of the complaint is pending.

No Retaliation

This policy encourages employees to report a conflict of interest encountered in their employment at Lumenus. Retaliation against the complainant is strictly prohibited and will result in appropriate disciplinary action. Retaliation by the respondent, or anyone acting on their behalf, against any witnesses providing information about a conflict of interest, is also strictly prohibited. Acts of retaliation include (but are not limited to) interference, coercion, threats and restraint.