

Conflict of Interest Policy

of the Coast Sirens Artistic Swimming Club

Policy Number	COI-001
Version	1.0
Adopted by	Board Resolution
Adoption date	May 14 th , 2026
Review cycle	Every 2 years
Owner	Board of Directors

1. Purpose

This Conflict of Interest Policy supports the statutory duty of Directors of Coast Sirens Artistic Swimming Club (the "Society" or "CSAS") to act honestly and in good faith, with a view to the best interests of the Society, under the Societies Act of British Columbia. It is operationalized through Bylaw 6.9.

2. Scope

This Policy applies to Directors, Officers, employees, contractors, standing and ad-hoc committee members, and volunteers with authority to commit Society resources or influence decisions on behalf of the Society ("Covered Persons").

3. Definitions

In this Policy:

- "Conflict of Interest" exists where a Covered Person has a direct or indirect personal, family, employment, financial, or business interest that could reasonably be expected to influence, or be perceived to influence, the Covered Person's judgment or actions on a matter before the Society.
- "Related Party" means a spouse, common-law partner, parent, child, sibling, household member, or a person or entity in which the Covered Person has a material financial interest or a position of control.
- "Material interest" means any interest that would reasonably be regarded as capable of influencing the Covered Person's judgment.

4. Types of Conflict

Conflicts may be:

- (a) Actual — where the interest is presently influencing or could influence a decision;
- (b) Potential — where the interest may arise in the future or in a related matter;
- (c) Perceived — where a reasonable person informed of the facts could perceive a conflict regardless of the Covered Person's actual intention.

All three are governed by this Policy.

5. Duty to Disclose

5.1 Annual declaration. Each Director, Officer, employee, and committee member will complete and sign an Annual Conflict of Interest Declaration in the form appended to this Policy,

within 30 days of election, appointment, or engagement, and thereafter at the first Board meeting of each fiscal year.

5.2 Ongoing disclosure. A Covered Person must disclose any new or changed conflict, as soon as they become aware of it, to the Chair of the meeting (for Board matters), the President (for other matters), or, in the case of the President, to the Vice-President.

5.3 Disclosure content. Disclosure must identify the nature of the interest, the matter to which it relates, and the Related Party (if any). Where the matter is sensitive, a high-level disclosure (enough for the Board to apply this Policy) is sufficient; detail may be shared in camera.

5.4 Recording. The Secretary records the disclosure in the minutes of the meeting and in a Conflict of Interest Register maintained by the Society.

6. Managing a Disclosed Conflict

Once a conflict has been disclosed, the following applies to the matter to which the conflict relates:

- (d) The conflicted Covered Person may answer questions and provide information to help the Board or committee understand the matter;
- (e) The conflicted Covered Person must not participate in deliberation or discussion of the matter once they have been heard and questions have been answered;
- (f) The conflicted Covered Person must not vote on the matter and must leave the meeting (including any electronic breakout) while the vote is taken;
- (g) The fact of disclosure, absence, and outcome is recorded in the minutes;
- (h) The conflicted Covered Person must not be counted in the quorum for the vote on the matter (in accordance with Bylaw 6.9).

7. Related-Party Transactions

7.1 Prohibition on preferential benefit. The Society will not enter into a transaction with a Covered Person or a Related Party on terms more favourable than the Society could reasonably obtain from an arm's length third party for comparable services or goods.

7.2 Board approval. Any transaction between the Society and a Covered Person or Related Party with aggregate annual value exceeding \$1,000 requires Board Resolution after full disclosure and with the conflicted person excluded from the vote.

7.3 Market benchmarking. Before approving a related-party transaction, the Board should obtain comparable pricing from at least one arm's length third party where practical, and record the benchmarking in the minutes.

8. Gifts, Hospitality, and Benefits

Covered Persons must not solicit or accept from any person or organization doing business, or seeking to do business, with the Society, any gift, hospitality, benefit, or favour that could reasonably be perceived to influence the Covered Person's judgment. The following is permitted:

- Gifts or hospitality of nominal value (approximately \$100 or less) offered in the ordinary course of business.
- Customary meals and refreshments at meetings or events.
- Promotional items of nominal value.

Anything above these thresholds, or any cash or cash-equivalent of any value, must be declined or, where declining would cause offence, surrendered to the Society and recorded in the Conflict of Interest Register.

9. Outside Activities

Directors, Officers, employees, and contractors who hold positions with, or have significant involvement in, other artistic swimming or sport organizations (including but not limited to BCAS, CAS, other clubs, and commercial service providers) must disclose those positions annually and promptly on any change. The Board will determine whether any such position constitutes a disqualifying conflict.

10. Confidentiality

Information obtained by a Covered Person in the performance of their duties must be used only for the purposes of the Society and must not be used for personal benefit, the benefit of a Related Party, or a purpose adverse to the Society.

11. Breach

Breach of this Policy may result in:

- For a Director — a request for voluntary resignation or a recommendation to Members under Bylaw 5.12 (Removal).
- For an Officer — removal from office under Bylaw 7.4.
- For an employee or contractor — disciplinary action up to and including termination.
- For a committee member or volunteer — removal from the committee or volunteer role.

Any sanction must respect procedural fairness, including notice, an opportunity to respond, and a written decision.

12. Register and Disclosure

The Society maintains a Conflict of Interest Register recording each disclosure, each related-party transaction, and each gift or hospitality item surrendered to the Society. The Register is accessible to Directors on request. An aggregated, non-personal summary may be included in the annual report at the discretion of the Board.

13. Review

This Policy will be reviewed every 2 years, or sooner on material change.

Appendix A — Annual Conflict of Interest Declaration

I, _____ (name), in my capacity as a
_____ (role) of Coast Sirens Artistic Swimming Club, declare
as of _____ (date):

1. Positions, employment, and material interests

I currently hold the following positions, employment, directorships, memberships, or material financial interests that may intersect with the interests of the Society. Enter "None" if not applicable.

2. Related parties

I identify the following Related Parties whose positions or interests may intersect with the Society. Enter "None" if not applicable.

3. Attestation

I have read the Conflict of Interest Policy. I will promptly disclose any conflict that arises after the date of this declaration. I will comply with the management procedures in Section 6 and the related-party rules in Section 7.

Signature

Date (YYYY-MM-DD)