



## **CONFLICTS OF INTEREST (REAL, APPARENT, OR POTENTIAL) POLICY**

### **The International Pacific Halibut Commission (IPHC),**

**RECOGNISING** the need to uphold the public's trust by ensuring that our work is conducted impartially and following the highest scientific and ethical standards;

**RECOGNISING** the need for comprehensive details regarding Conflicts of Interest (COI) and Financial Conflict of Interest (FCOI) to be provided on the IPHC website for public inspection;

**ADOPTS** in accordance with Regulation 12 (Internal Controls), paragraph 9 of the IPHC Financial Regulations (2024), that:

1. Employees have an obligation to conduct business within guidelines that prohibit real, apparent, or potential conflicts of interest. This policy establishes only the framework within which IPHC wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Executive Branch for more information or questions about conflicts of interest.
2. A real, apparent or actual conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of IPHC's business dealings and research. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.
3. No "presumption of guilt" is created by the mere existence of a relationship with outside firms or individuals. However, if employees have any influence on transactions involving purchases, contracts, grants, research, or leases, it is imperative that they disclose to their Branch Manager and the Executive Branch, as soon as possible the existence of any real, apparent or potential conflict of interest so that safeguards can be established to protect all parties.
4. If conducting research that is grant funded, additional Financial Conflict of Interest (FCOI) documentation may be required if financial gain through monetary compensation, paid travel, honorarium payment etc. exceeds a Significant Financial Interest (SFI) of \$5,000. IPHC in partnership with federal grant administrators is committed to preserving the public's trust that the research is conducted without bias and with the highest scientific and ethical standards. Information of this nature will be kept on file for a period no less than three (3) years.
5. Disclosures for those working within the purview of a grant will be collected on an annual basis per FCOI regulation. If a FCOI is found, the employee will work with the Executive Branch to mitigate bias, and the public will be made aware of the disclosure via the IPHC



website in compliance with FCOI reporting regulations administered by the National Institute of Health (NIH), the federal governments' grant reporting authority.

6. Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which IPHC does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving the IPHC.
7. Where there is any question of the existence of, or potential for a conflict of interest, the employee is required to submit a Confidential Report to the Executive Branch **via the Executive Director**, for review. The Executive Branch may consult with other managers as deemed necessary. The Executive Branch may determine that there is no conflict of interest in some cases, and as a result, no action will be required beyond the disclosure. In other cases, mitigation plans can be developed with adequate measures put in place to protect the decision-making integrity of the IPHC, the public confidence in the IPHC, and the employee's reputation.
8. The situation can sometimes be arranged so that outside obligations, financial interests or other activities do not impede the exercise of an IPHC employee's duties and responsibilities (e.g. transfer of duty, divestment of assets, abstaining from decision-making on related issues, withdrawing from discussions, non-receipt of relevant information, etc.). In more serious cases, the employee may need to abandon the activity giving rise to the conflict or consider resigning from the IPHC.
9. All IPHC employees must:
  - within 60 days of your first appointment or any subsequent appointment, transfer or deployment, report all outside activities, assets, and direct and contingent liabilities that might give rise to a conflict of interest with respect to your official duties;
  - upon receipt or as soon as possible afterwards, report the receipt of gifts, hospitality or other benefits;
  - as soon as possible, report any changes to their participation in any outside employment or activities that could give rise to a real, apparent or potential conflict of interest;
  - review your obligations under the IPHC Code of Conduct (Section 103: Business Ethics and Conduct) every time a major change occurs in your personal situation or official duties. If a real, apparent or potential conflict of interest exists, submit a new COI Declaration Report to the Executive Branch.