

TAF POLICY: CONFLICT OF INTEREST AND CONFIDENTIALITY

1. Policy Statement

Toronto Atmospheric Fund (TAF) employees are expected to conduct themselves with personal integrity, ethics, honesty and diligence in performing their duties. TAF employees are required to support and advance the interests of TAF and avoid placing themselves in situations where their private interests may be in conflict with, or be perceived to be in conflict with the interests of TAF.

In certain circumstances, the duties and obligations imposed by this Policy will continue after the employee leaves TAF including that a TAF employee will not directly or indirectly use or disclose confidential information unless required by law or authorized by TAF after the employee leaves the public service.

2. Definitions

Conflict of Interest

A conflict of interest refers to a situation in which a public servant has private interests that could compete with or that may be perceived to compete with their duties and responsibilities as an employee.

A conflict of interest can also be a situation where an employee can use their position for private gain or expectation of private gain, non-monetary or otherwise. A conflict may also occur when the private interest benefits an employee's family, friends or organizations in which the employee or their family or friends have a financial interest.

Private Interest

Private (or personal) interest means a relationship, obligation, duty, responsibility or benefit unique to the employee or a person related to the employee.

Confidential Information

Confidential information includes, but is not limited to, privileged information, draft by-laws or staff reports, third party information, personal information, technical, financial or scientific information and any other information collected, obtained or derived for or from City records that must or may be kept confidential under the Municipal Freedom of Information of Privacy Act, 1990, the Personal Health Information Protection Act, 2004 or the City of Toronto Act, 2006.

Insider Trading

Insider trading is an illegal activity and refers to a situation where an employee breaches a relationship of trust and confidence through buying or selling a company's securities while in possession of non-public information about the company or securities.

POLICY NUMBER	
POLICY TITLE	Conflict of Interest and Confidentiality
ISSUED BY	CEO with Board Approval

EFFECTIVE DATE	11/02/2016
REVISION NO.	1
REVISION DATE	04/28/2023

TAF POLICY: CONFLICT OF INTEREST AND CONFIDENTIALITY

3. Requirement to Report Conflict of Interest

Employees of TAF may seek advice in relation to the application of this Policy from, and must report any conflict of interest or perceived conflict of interest to, their immediate supervisor/manager or the TAF CEO.

4. Conditions

The rules and examples that follow do not exhaust the possibilities for conflict of interest, but they identify obvious situations covered by these provisions. The obligations and duties applicable to a TAF employee resulting from these provisions do not replace, remove or supersede the duties and obligations required by applicable professional designations or regulatory bodies.

5. Preferential Treatment

TAF employees are not allowed to use their positions to give any one preferential treatment that would advance their own interest or that of any party where such advance is contrary to the interests of TAF, or would be otherwise contrary to the expectations set out in this policy.

6. Gifts

A TAF employee will not accept, arrange to accept, give or request to be given a reward, gift, advantage or benefit of any kind from any person or entity that influences or could be perceived to influence the performance of the employee's duties.

A TAF employee, who receives a gift in the performance of their duties, will immediately notify their manager/supervisor.

A TAF employee may accept a gift of nominal value given as an expression of courtesy or hospitality if doing so does not influence, or would not be perceived to influence, the performance of the employee's duties. The CEO of TAF may pre-determine that no gift may be accepted under any circumstance.

7. Employment of Relatives

TAF will maintain a policy that governs the employment of relatives. The Policy at a minimum must outline the rules restricting supervisory relationships between relatives, and the recruitment and appointment of a relative.

8. Use of TAF Property

A TAF employee may not use, or permit the use of, TAF property, including facilities, equipment, supplies or other resources, for activities not associated with the proper performance of their duties. Any exceptions must be approved by TAF's CEO.

9. Use or Disclosure of Confidential Information

A TAF employee may not, during the term of their employment or any time thereafter, directly or indirectly use or disclose any confidential information obtained by him or her during the course of their employment with TAF to another person or entity unless the employee is required by law, or authorized

POLICY NUMBER	
POLICY TITLE	Conflict of Interest and Confidentiality
ISSUED BY	CEO with Board Approval

EFFECTIVE DATE	11/02/2016
REVISION NO.	1
REVISION DATE	04/28/2023

TAF POLICY: CONFLICT OF INTEREST AND CONFIDENTIALITY

by TAF. The obligation to maintain confidentiality, except as required or permitted by law or TAF, continues after the employee leaves the employment with TAF.

10. Disclosure of Financial Interests

A TAF employee involved in a decision-making process related to a contract, sale, or business transaction who knowingly has a financial interest in the TAF contract, sale or business transaction, or has family members, friends or business associates with such interests, must disclose their interest to their immediate supervisor/manager and remove themselves from any decision-making process.

11. Insider Trading

A TAF employee may not, during the term of their employment or any time thereafter, directly or indirectly use confidential information obtained by him or her during the course of their employment with TAF for the purpose of buying or selling a company's securities. A TAF employee is prohibited from using confidential information to base personal investment decisions, even if such confidential information is unlikely to have an effect on the market price or value of a company's securities or affect an investor's decision to buy, sell, or hold a company's securities.

12. Participating in Decision-Making

A TAF employee will not participate in a decision-making process with respect to a matter that they are able to influence in the course of their duties if they could benefit from the decision, unless they are authorized by TAF's CEO.

13. Engaging in Outside Work or Business Activities

A TAF employee may not engage in any outside work or business activity that conflicts with their duties to TAF; or could benefit from confidential information obtained during the course of their employment.

14. Appearing Before City or Agency Committees

A TAF employee may not appear before a City or Agency committee on behalf of a private citizen or third party other than for themselves or a family member.

TAF employees must identify themselves as such if they are making a deputation to a City or Agency committee, unless they appear as a private citizen on matters that do not relate to their employment.

15. Conduct Respecting Lobbyists

All TAF employees should be familiar with the requirements and expectations for dealing with lobbyists as outlined in Toronto Municipal Code Chapter 140, Lobbying.

16. Failure to Comply with the Policy

Individuals who fail to comply with the conflict of interest provisions may be subject to disciplinary action up to and including dismissal and, where warranted, legal proceedings.

POLICY NUMBER	
POLICY TITLE	Conflict of Interest and Confidentiality
ISSUED BY	CEO with Board Approval

EFFECTIVE DATE	11/02/2016
REVISION NO.	1
REVISION DATE	04/28/2023