

Conflict of Interest Policy

Introduction

This policy establishes consistent guidance for disclosing, reviewing and mitigating financial and academic conflicts of interest. It applies to all staff and consultants employed by Evident.

Purpose

Evident is committed operating in a highly ethical manner and in compliance with legal and regulatory requirements. Undisclosed or inappropriate Conflicts of Interest can compromise our integrity and result in financial and other sanctions.

It is expected that conflicts between the private and professional commitments of staff and consultants of Evident will be rare. However in the event that an actual, potential or appearance of conflicts between private interests and professional obligations, the staff member will promptly disclose and resolve any issues before engaging in the activities.

This policy provides guidance regarding the types of situations that may require disclosure and review, and provides guidance on the procedural steps that should be taken.

Definitions

A **Conflict of Interest** means any circumstance in which the personal, professional, financial or other interests of an individual (including the Immediate Family Members of the individual) may potentially or actually diverge from, or may be reasonably perceived as potentially or actually diverging from their professional obligations to Evident. A Conflict of Interest may exist whenever an independent observer might reasonably question whether the individual's professional actions or decisions are determined by considerations of personal gain, financial or otherwise.

Immediate Family Members include an individual's spouse or domestic partner or person in a civil union or similar relationship, dependent children, and any other family members residing in the same household.

Employment means performing activities for a salaried or consultancy based contract for Evident.

Outside Activities include any external or other business activities and external professional or academic endeavors, such as public service or pro bono work, performed outside of the individual's employment with Evident.

Ownership Interest means holding a financial or ownership interest in a business or entity, including stock, stock option, warrant, convertible debt, partnership interest, or LLP/LLC interest, or other ownership interest or right to obtain an ownership interest. The value of an Ownership Interest is determined through reference to public prices or other reasonable measures of fair market value where public prices are not available.

Types of Conflict of Interest

A Conflict of Interest can arise in numerous situations. The following discusses some of the more common types, although Conflicts of Interest may arise in varying circumstances not encompassed here.

The following types of Conflict of Interest must be disclosed by all personnel:

1. Outside Activities

- a. Competing, directly or indirectly, with Evident in the provision, purchase or sale of any property, goods or services or in other activities in which Evident is or might reasonably and appropriately become engaged; and
- b. Appropriating or diverting a business or financial opportunity that the person knows or should know that Evident is pursuing; and
- c. Soliciting business that the person knows or should know would or might disturb an existing professional or business relationship that Evident has.

2. Outside Research Activities

- a. Full-time Evident staff may not act as a principal investigator under the auspices of another institution. Consultants should disclose to Evident as per procedures in this policy any roles as principal investigators.

3. Other Activities Creating a Conflict of Interest

- a. Improper use of Evident resources, facilities, personnel. These resources may not be used for personal use, including Outside Activities, except in a purely incidental manner.
- b. Obtaining, using or disclosing Evident confidential information or intellectual property for direct or indirect personal interest, profit or advantage or for a purpose that is not authorized by Evident.
- c. Holding, directly or indirectly, an ownership or other financial interest in an enterprise that is a competitor of Evident.
- d. Accepting gifts (including entertainment), a loan or a favor of more than nominal value from any person or entity with a business relationship, or seeking to have a business relationship with Evident.

Procedures

1. Disclosures

The responsibility in the first instance for determining whether an activity presents a Conflict of Interest rests with the staff member or consultant.

If there is any reasonable doubt as to whether an activity may constitute such a conflict, or there is a question about whether an activity is permitted under this policy, the staff member or consultant must disclose the actual, potential or appearance of conflict to the Director. Conflicts must be disclosed in writing; and any waiver of the conflict or management plan must be reduced to writing.

2. Review

Responsibility for reviewing Conflicts of Interest lie with the Director. The decision to waive the conflict or to implement a management plan will be at the discretion of the Director. All decisions will be recorded and retained in the Conflict of Interest register.

3. Enforcement

Violations of this policy are subject to disciplinary action, up to and including termination of employment.