
C4T Policy # 001

Conflict of Interest and Divided Loyalty

1. Purpose

Because C4T members and leadership may be associated with organizations that, from time to time, seek to engage in partnerships, or to serve as suppliers, vendors or contractors, members recognize the importance of scrupulously avoiding real or perceived conflicts of interest with respect to their involvement as a member of the C4T Network. The purpose of this policy is to establish guidelines regarding Conflict of Interest for members of the C4T Network.

2. Scope and Definitions

This policy shall apply to all members of the C4T Network.

- 2.1 *"Conflict of interest"* means a situation where, to the detriment or potential detriment of the Network, an individual participating in the C4T Network is, or may be, in a position to use research, knowledge, authority or influence for personal or family gain (financial or other). The following examples, although not comprehensive, illustrate situations that may lead to an indirect or direct conflict of interest:
- 2.1.1 employment in any capacity by another employer outside the participant's, administrator's or director's university, institution or company signing and agreement with C4T, including self-employment;
 - 2.1.2 holding an office that puts the individual in a position to affect decisions, such as manager with executive powers, within a company, or member of a board of directors;
 - 2.1.3 participating in a research contract or consultancy relationship with a company, or serving on the board of a company;
 - 2.1.4 entering into a research contract with a company in which the participant, or a member of their immediate family, has a financial or other interest;
 - 2.1.5 carrying out supplementary professional scientific activities in accordance with the disclosure requirements of the participant's or director's employing organization;
 - 2.1.6 ownership of equity or other financial participation in a corporation (including stock options and shares). Participants, administrators and members should abstain from activity in which they would have inside advantage (e.g., purchase of shares) based on the information they are privy to through membership in C4T.

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- 2.1.7 accepting gifts (other than some minor hospitality) or special favours for themselves or a member of their family from private organizations with which C4T does business; and/or
 - 2.1.8 influencing the purchase of equipment or materials for C4T from a company in which the participant, the administrator or the member has a financial or other interest.
 - 2.2 “Divided Loyalty” means that an individual holds any office or employment or relationship which may conflict with or reasonably be perceived to potentially conflict with their duty of loyalty to the Network.
 - 2.3 “Disclosure” means the act of notifying in writing the C4T Steering committee, through the C4T Executive Director, of any direct or indirect financial interests and positions of influence held by an individual participating in the Network which could lead to a potential, apparent or actual conflict of interest or divided loyalty.
 - 2.4 “Member” means any individual engaged in the Network.
 - 2.5 “Network” means the collection of individuals that comprise the membership of the Canadian Collaborative for Childhood Cannabinoid Therapeutics Group.

3. Policy

- 3.1 While it is recognized that members may work for or have associations with organizations relevant to the work of the Network, they are participating in the Network with a duty of loyalty to the Network and not as representatives of those other organizations.
- 3.2 Members having a direct association with an applicant or supplier organization, or who may directly benefit from a decision of the Network, which in the normal course of affairs could give rise to a conflict of interest, must declare their interests.
- 3.3 Members will disclose all interests that may give rise to an actual conflict of interest, and will not attend related parts of any meeting, participate in discussions, or vote on any matter in which they have an actual conflict.
- 3.4 Members who have a potential conflict of interest or potential divided loyalty should use their best discretion in determining whether the extent of the potential conflict is so serious that they should:
 - 3.4.1. take part in the discussion but not the decisions or votes (if applicable); or
 - 3.4.2. not take part in the discussions, decisions or votes (if applicable); or

- 3.4.3. take part in the discussion, decisions or votes, but declare and ensure that their potential conflict is noted for the record.
- 3.5 A Member who, in the context of any office, employment or relationship he or she holds which may conflict with their duty of loyalty to the Network, will not participate in the decision in respect of any matter under consideration by the Network in which the Member may have a duty to the Network as well as a duty as an office-holder, employee or participant in a relationship.

4. Procedures

- 4.1 At the commencement of their engagement as a member of the Network, C4T's Policy on Conflict of Interest, and following such review, complete the Conflict of Interest and Divided Loyalty Declaration Form ("Declaration").
- 4.2 In addition to the written Declaration, Members shall declare their interests orally at every meeting, with respect to any actual or potential conflict relating to the specific items to be considered during that meeting. Disclosure of Members' interests will be noted during which disclosure occurs.
- 4.3 Members shall update their written Declarations annually. If circumstances change during the period of their Membership in the Network, they shall immediately inform the Steering Committee by way of the Executive Director of the change in their situation.
- 4.4 A Member in conflict of interest and/or with divided loyalty shall excuse themselves from that part of the meeting during which related matters are discussed, considered and/or decided on.
- 4.5 A Director who has a potential conflict of interest and/or divided loyalty must declare it and seek the advice of the Chair as necessary in exercising their discretion in regards to the potential conflict. If any Director objects that another Director is in an actual, potential conflict of interest and/or divided loyalty or is at the risk of perception of same, and/or is not taking the appropriate steps to deal with the circumstances, the Chair will call for a vote of the Board to determine the appropriate course of action.

5. Monitoring

The C4T leadership will review this policy annually, including monitoring adherence to its provisions and determining whether or not any changes or revisions are required.

6. Documentation

C4T Conflict of Interest and Divided Loyalty Declaration form.

7. Document Control



Version	Author/Reviewer	Status (Date)
1.0	Stephen Barbazuk	Initial Draft Final Draft (November 21, 2019)
1.1	Jessica Steer/Zina Zaslowski	Revised Final Draft (February 12, 2024)



C4T Conflict of Interest and Divided Loyalty Declaration

Interactions between university researchers, the health care delivery system and the private sector are an essential component Canadian Collaborative for Childhood Cannabinoid Therapeutics (C4T) Network activities. For the Network's objectives to be achieved many kinds of interactions among the individuals participating in C4T must occur. These interactions may lead to financial and other gains and benefits to the individuals participating in the C4T Network and may be desirable and natural outcomes of being involved in C4T. Such interactions, however, may place individuals participating in the C4T Network in a position of potential, apparent or actual conflict of interest and/or divided loyalty.

Name: _____

Address: _____

Affiliation with C4T (please specify your role in the Network e.g. Investigator, Partner, Patient/Parent Stakeholder etc):

Please review C4T's **Conflict of Interest and Divided Loyalty Policy**, a copy of which is attached. Following review of the Policy, please complete the Declaration form on the reverse of this page.



Declaration Form

I, the undersigned, (print full name) _____

- a) have read and understand the C4T **Conflict of Interest and Divided Loyalty Policy** and will adhere to the Policy during my affiliation with C4T. Specifically, if any circumstances change and/or come to my attention regarding any actual or potential Conflict(s) of Interest or Divided Loyalty, I will make disclosure to C4T immediately. (initial) _____

AND

- b) hereby declare and make Disclosure of the following actual or potential Conflict(s) of Interest and Divided Loyalty which may arise in the conduct of my duties and responsibilities on behalf of C4T (attach additional sheet if required):

OR

- c) am not aware of any actual or potential Conflict(s) of Interest or Divided Loyalty with respect to my involvement with C4T. (initial) _____

Signed: _____

Dated: _____