

## **Toronto Seniors Housing Corporation (TSHC) Employee Conflict of Interest Policy**

**Policy Sponsor:** Director, People and Culture

**Approver:** Board of Directors

**Initial Approval Date:** April 28, 2022

**Date of Last Revision:** October 17, 2024

**Effective Date:** December 11, 2025

### **Policy Statement**

Toronto Seniors Housing Corporation (TSHC) is committed to enhancing public confidence in what we do. In performing their duties and responsibilities, employees are expected to promote shared values and observe the highest possible standards of professionalism and service.

### **Our Commitment**

With a focus on the unique needs of seniors, we are committed to being a leader in the delivery of quality, affordable housing for seniors. Our commitment includes engaging and collaborating with our tenants, our staff, and our partners towards providing excellent service for the well-being of our tenants.

### **Our Shared Values**

Toronto Seniors Housing Corporation policies, procedures, and directives, including the Employee Code of Conduct, are based on our shared values. These values inform our decision-making and guide our behaviour in all activities related to our work.

**Respect** – Our culture is built on respect, trust and open and honest communication among tenants, staff, and service providers. We respect each tenant’s independence and privacy. We will assist tenants to find the services they prefer.

**Inclusion** – Quality of life for seniors is enhanced by living in vibrant and diverse communities. We strive for inclusion and equity.

**Accountability** – We are accountable to our tenants, our shareholder (the City of Toronto), and the public. We are committed to transparency. We are clear on our goals. We set targets and report our results. We demonstrate integrity and responsible stewardship of our resources.

**Innovation** – We are creative, innovative, adaptive, and flexible to meet the needs of our current and future tenants. We are a catalyst for positive change, energizing communities, and partners to join us to achieve our mandate.

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

We take pride in conducting ourselves with personal integrity, ethics, honesty, and diligence in performing our duties and ensuring we are protecting the public trust and confidence in TSHC.

## **Policy Objective**

Promoting public confidence in Toronto Seniors Housing Corporation is the responsibility of every employee. Therefore, in performing their job duties, employees are expected to promote Toronto Seniors Housing Corporation's shared values and to observe a high standard of honesty, integrity, accountability, and ethics. This Policy provides guidance on expectations of Toronto Seniors Housing Corporation related to conflicts of interest, including how to identify and resolve a conflict of interest.

## **Scope**

This Policy applies to every employee of Toronto Seniors Housing Corporation and students on academic placements.

The standards outlined in this Policy are of particular importance to employees who can make or influence decisions of the organization (managers and senior leaders).

## **Out of Scope**

Third parties who have business dealings with Toronto Seniors Housing Corporation, including contractors and vendors of Toronto Seniors Housing Corporation, are expected to comply with provisions of their contracts related to conflicts of interest. The Board of Directors Conflict of Interest Policy governs Members of the Board of Directors. Tenant volunteers must follow the Tenant Volunteer Code of Conduct.

## **Definitions**

**Conflict of interest:** Any situation in which an employee's personal or business interests may compete or appear to compete with their duties as an employee of Toronto Seniors Housing Corporation or may cause the employee to act contrary or appear to act contrary to the best interests of Toronto Seniors Housing Corporation.

A conflict of interest can also be a situation where an employee can use their

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

A conflict of interest can be one or more of the following types:

**Actual conflict:** a conflict of interest that the employee has, or may have, at the present time.

**Potential conflict:** any situation which may lead or have the potential to lead to a conflict of interest in the future.

**Apparent conflict:** any situation which could be perceived as a conflict of interest by others, regardless to whether there is an actual conflict of interest.

An apparent conflict of interest may arise where the employee (or the employee's family, friends, or business associates) stands to benefit personally from their own actions, or from a decision of Toronto Seniors Housing Corporation that they are able to influence.

**Personal or Business Interest:** Includes any personal gain, benefit, privilege, or advancement the employee, and/or the employee's family, friends, or business associates (past and present) may receive or expect to receive, whether monetary or non-monetary. Examples of conflicts of interest include, but are not limited to:

- using information learned during an employee's employment for personal benefit
- making a decision that may result in a benefit for a personal business partner
- being on the hiring panel for a close friend or family member
- being the employee, owner, or shareholder of, or having a financial interest in a company submitting a 'bid' application to Toronto Seniors Housing Corporation
- accessing the information of a friend or family member who is a tenant of Toronto Seniors Housing Corporation
- an employee 'exchanging hospitality' with a contractor or supplier, in which the employee uses their position to benefit the contractor or supplier in exchange for something that may personally benefit the employee or the employee's family, friends or business associates (past or present)
- entering a business or legal relationship with a tenant, such as agreeing to be the executor of a tenant's will

## Roles and Responsibilities

It is the responsibility of all Toronto Seniors Housing Corporation employees to be familiar with and understand the provisions of the Employee Conflict of Interest Policy and avoid placing themselves in situations where their private or personal

interests may conflict with or perceived to conflict with the interests of TSHC.

All employees must disclose any actual or perceived conflicts of interest to their manager or department director.

It is the responsibility of managers and department directors to engage with People and Culture to determine how employees can continue to perform their duties in a way that does not contravene this Policy. Recommendations will be reviewed and approved by department directors.

## **Compliance with this Policy**

The rules which follow do not cover all situations of a conflict of interest. Employees should always use proper judgment and act in the spirit of this Policy. If employees have any questions about this Policy or need any clarification about what is expected of them, they are expected to consult with their manager or department director for guidance.

Contravention of this Policy is a serious matter. Non-compliance with this Policy may lead to discipline, up to and including dismissal for cause. Non-compliance includes failing to declare a conflict of interest in accordance with this Policy. In some cases, non-compliance can also lead to legal action by Toronto Seniors Housing Corporation.

## **Policy Details**

### **Avoiding a Conflict of Interest**

- Employees must not enter any situation, arrangement or agreement that results or could result in a conflict of interest (actual, potential, or apparent) and should arrange their personal affairs to ensure that any conflicts of interest are avoided.
- Employees should consider any advantage their position at Toronto Seniors Housing Corporation may give them, whether it be the power to influence decisions, their ability to use company resources, or their access to information about others.
- In deciding whether their actions could result in a conflict of interest, employees are expected to consider how their actions will be seen by their colleagues or the public.
- Should an employee have any questions or need any clarification about this Policy, they are expected to consult with their manager or department director.

### **Gifts or donations**

Employees may not solicit or accept any fees, advances, gifts, money, personal discounts, donations, personal benefits, meals, tickets, personal loans or the like from a tenant or any other person or entity that has, or might have, business

dealings with Toronto Seniors Housing Corporation where it could result in a conflict of interest.

The exceptions are gifts of a nominal value of less than five dollars such as a greeting card, hat, token, memento, fridge magnet, or occasional coffee, which do not influence or would not be perceived as influencing the performance of the employee's duties. Other exceptions are accepting money where doing so is required as part of the employee's job (e.g., collecting rent or a fee established by Toronto Seniors Housing Corporation).

For example (but not intended to be a complete list), this means that an employee should never accept:

- a cash tip or in-kind gifts
- a gift that could be viewed as an exchange for a favour
- any meals unless the employee pays their own expenses
- offers to donate to a charitable cause on the employee's behalf
- an invitation to an event at the expense of the other person
- tickets to a sporting event or concert from a vendor or supplier

If you are unsure, decline the gift and consult with your manager.

An employee should never solicit donations for a charitable cause on behalf of a contractor or supplier, unless it is for a program/initiative established by Toronto Seniors Housing Corporation.

## **Outside Activities and 'Moonlighting'**

Employees are not permitted to engage in outside work (which includes being self-employed) or other similar activities outside of working hours unless the outside work or activity is not in conflict with their work for Toronto Seniors Housing Corporation. This includes having another job if the work demands will conflict with the employee's position at Toronto Seniors Housing Corporation or if the employee could use information they learn while working at Toronto Seniors Housing Corporation for the benefit of the other company or themselves.

If an employee:

- wishes to engage in outside work, or
- be a director for any board or committee which may deal with issues affecting Toronto Seniors Housing Corporation, the employee must first declare a potential conflict to their manager or department director in writing and receive authorization for the engagement or appointment

It is the responsibility of managers and department directors to engage with People and Culture to ensure that the outside work or activity is not in conflict with their responsibilities with Toronto Seniors Housing Corporation.

Recommendations will be reviewed and approved by department directors.

### **Business Interests (Examples)**

If the employee is, or seeks to be, an employee, director, or officer of a company (or the employee has a financial interest in the company) that has business dealings with Toronto Seniors Housing Corporation, this is a conflict of interest.

If an employee (or a family member, friend, or business associate of the employee) has a financial interest in a company that has business dealings with Toronto Seniors Housing Corporation, and the employee engages in any process related to a business transaction involving the company, this will be a conflict of interest.

The employee must declare the conflict or potential conflict of interest to their manager or department director in writing and seek advice on their role in such circumstances. The manager or department director, in consultation with People and Culture, will review the circumstances to determine what other actions, if any, should be taken to resolve the conflict.

### **Personal Relationships**

Employees should always maintain a professional relationship with other employees and all persons with whom Toronto Seniors Housing Corporation has dealings. This includes tenants, commercial tenants (tenants), contractors, suppliers, and vendors.

However, Toronto Seniors Housing Corporation acknowledges that some employees will develop or have existing relationships with such individuals.

Employees must take all reasonable steps to manage these relationships, so the employee is not placed in a conflict-of-interest position (actual, potential, or apparent).

An example is if an employee works at, or has access to, a Toronto Seniors Housing Corporation owned or operated building and has direct contact with a friend or family member who is a tenant at that building (or access to the information of friends or family because of their job at Toronto Seniors Housing Corporation) as this will usually result in a conflict of interest. A friend includes someone the employee is dating or has a relationship with.

If an employee participates in the hiring process for, or will supervise, family, friends, or business associates (past/current) this will also be a conflict of interest.

Employees must declare any conflicts or potential conflicts of interest to their manager or department director. The manager or department director, in consultation with People and Culture, will review the circumstances to determine what actions, if any, should be taken to resolve the conflict, such as making changes to a reporting relationship or work location. Recommendations will be reviewed and approved by department directors.

## **Confidentiality of Information**

In performing their duties and responsibilities for the organization, employees will learn information about Toronto Seniors Housing Corporation and its operations which is not known to the public. Employees are prohibited from trying to access such information if it is not associated with their work. Employees are also expected not to use or disclose such information for any purpose that is not associated with their work (unless authorized by their divisional head or when required by law).

For more information regarding the responsibilities that employees must protect the property and information of Toronto Seniors Housing Corporation, please see the Employee Code of Conduct.

## **Reporting and Resolving a Conflict of Interest**

All employees shall receive a copy of this Policy. Employees are required to declare any conflict of interest (real, potential, or apparent) they may have under this Policy upon hire. If, during their employment, an employee is in or will be in a conflict-of-interest situation, the employee must immediately report/declare the conflict of interest in writing to their manager or department director.

Employees are expected to fully cooperate in any discussion or investigation related to the resolution of a conflict of interest. The manager or department director, in consultation with People and Culture, will review the circumstances to determine what actions, if any, should be taken to resolve the conflict. Recommendations will be reviewed and approved by department directors.

## **Annual Review of Obligations**

Toronto Seniors Housing Corporation employees and managers and executives shall review their obligations under this Policy on an annual basis, including the requirement to declare a conflict of interest.

## **Related Legislation, Regulations, and TSHC Policies:**

- *Employment Standards Act, 2000*
- *Municipal Freedom of Information and Protection of Privacy Act, 1990*
- *Ontario Human Rights Code, 1990*
- Acceptable Use of Information Technology Policy (TCHC)
- TSHC Elections Policy
- TSHC Employee Code of Conduct Policy
- TSHC Fraud Prevention Policy
- TSHC Media and Issues Protocol

## **Amendments (Revision History):**

Initial policy approved by Board of Directors on April 28, 2022.

Policy reviewed on October 7, 2024, with minor revisions further clarifying the roles and responsibilities of employees, managers, and directors regarding the disclosure, review, and approval of conflicts of interest, with approval by the Board of Directors on October 17, 2024.

Policy reviewed in October 2025, with minor edits and a change to the review schedule from annual to every 3 years.

**Next Scheduled Review Date: 2028**

This Policy will be reviewed once every three years.

**Policy Contact**

Director, People and Culture

**Appendices**

- Appendix – Conflict of Interest Policy Questions and Answers
- Declaration of Conflict of Interest Form

## **Appendix - Conflict of Interest Policy Questions and Answers**

### **Why do we have a Conflict-of-Interest Policy?**

The Employee Conflict of Interest Policy is important to us as a public sector organization. Promoting public confidence in Toronto Seniors Housing Corporation (TSHC) is the responsibility of every employee. We are all expected to promote Toronto Seniors Housing Corporation's shared values and to follow a high standard of honesty, integrity, accountability, and ethics. The Employee Conflict of Interest Policy makes these expectations clear and consistent across the organization.

This Policy is also intended to protect you by setting out steps that you can take to protect yourself against allegations of a conflict of interest. Most conflicts can be resolved to the satisfaction of both the employee and Toronto Seniors Housing Corporation.

### **What is a conflict of interest?**

A conflict of interest is any situation where an employee's personal or business interests compete or appear to compete against their duties as an employee and against the best interests of Toronto Seniors Housing Corporation. A conflict of interest can be one or more of the following types:

**Actual conflict:** a conflict of interest that the employee has, or may have, at the present time.

**Potential conflict:** any situation which may lead to or have the potential to lead to a conflict of interest in the future.

**Apparent conflict:** any situation which could be perceived as a conflict of interest by others, regardless as to whether there is an actual conflict of interest.

### **Example of a business interest conflict**

**Employee A** works at Toronto Seniors Housing Corporation and has responsibilities for procurement activities. Employee A's close relative (a family member) is a co-owner of XYZ Roofing Company Ltd. and sometimes does work repairing Toronto Seniors Housing Corporation roofs. Employee A oversaw the procurement process through which XYZ Roofing Company Ltd. was hired to complete a roofing contract.

This is a conflict of interest because Employee A's close relative (a family member) stands to benefit personally from a decision of Toronto Seniors Housing Corporation that Employee A was able to influence.

### **Example of a personal relationship conflict**

**Employee B** is a manager at Toronto Seniors Housing Corporation. Employee B is

hiring a new team member and recommends that their niece apply. Employee B interviews their niece in the hiring process.

This is a conflict of interest because Employee B participates in the hiring process for their niece.

**How do I declare a conflict of interest?**

You must complete the Declaration of Conflict of Interest Form and send it to your manager or department director. Instructions on how to submit the form confidentially are set out on the form.

**When should I report that I have a conflict of interest?**

You must declare all conflicts of interest when you become aware of them. If you have any doubt about whether you have a conflict of interest, you should declare the conflict immediately. Each year, Toronto Seniors Housing Corporation will review obligations with employees and managers under the Policy, including requirements to declare any conflicts of interest and to complete the Declaration of Conflict of Interest Form.

**Do I have to tell my manager?**

If you are not comfortable declaring your conflict of interest to your manager, you may declare it to your department director.

**To whom does this Policy apply?**

The Employee Conflict of Interest Policy applies to every employee of Toronto Seniors Housing Corporation, and students on academic placements. The Policy is especially important to employees who can make or influence decisions of the organization.

**Who is not covered by this Policy?**

Third party contractors and vendors, Tenant Volunteers and TSHC Board members are not covered by this Policy. Contractors and vendors must follow any conflict-of-interest guidelines in their contracts. TSHC Board members must follow the Board of Directors Conflict of Interest Policy. Tenant Volunteers must follow the Tenant Volunteer Code of Conduct.

**Can I work at another job outside of Toronto Seniors Housing Corporation?**

Employees may engage in outside work or be appointed to a board (paid or volunteer) if the work is not in conflict with their duties at Toronto Seniors Housing Corporation. If you plan to work a second job or join a board of directors, you must first complete the Declaration of Conflict of Interest Form and receive approval before you accept the position.

**What if I already have another job outside of Toronto Seniors Housing**

**Corporation?**

If you already have another job, or an appointment to a board, you must still consider whether the second job places you in a conflict of interest with your job at Toronto Seniors Housing Corporation and submit a Declaration of Conflict of Interest form.

**Example of a conflict of interest that could exist when you work at a second job:**

**Employee C** works at a second job outside of Toronto Seniors Housing Corporation. Their shift at Toronto Seniors Housing Corporation ends at 4 p.m., but their second job starts at 4:15 p.m. To make it to their second job on time, Employee C leaves their Toronto Seniors Housing Corporation job at 3:30 p.m.

This is a conflict of interest because the work demands of Employee C's second job conflict with their responsibilities at Toronto Seniors Housing Corporation.

**What will happen when I declare a conflict of interest?**

Your situation will be reviewed to determine if there is a conflict of interest under the Policy. The purpose of the Employee Conflict of Interest Policy is not to punish employees for declaring a conflict of interest. The Policy is meant to help employees resolve conflicts of interest by encouraging them to declare any situation that may be an actual, potential, or apparent conflict of interest.

**Can I declare a conflict of interest on behalf of someone else?**

No, but if you think there is wrongdoing that needs to be reported, we encourage you to make a report under the Whistleblower Protection Policy or our Fraud Prevention Policy.

**Does the Employee Conflict of Interest Policy apply to how I use Toronto Seniors Housing Corporation property?**

The Employee Conflict of Interest Policy has some guidelines for the use of Toronto Seniors Housing Corporation property, but the Employee Code of Conduct covers the use of Toronto Seniors Housing Corporation property in more detail. If you use Toronto Seniors Housing Corporation property for anything other than its intended use as a Toronto Seniors Housing Corporation employee, or you use or try to access information that is unrelated to your duties and responsibilities, the Employee Conflict of Interest Policy may apply.

If you are unsure if you have a conflict of interest, please reach out to your manager or department director for guidance. Employees must always follow the Acceptable Use of Information Technology Policy when using Toronto Seniors Housing Corporation cell phones, computers, email, Internet, and other information technology.

**Example of a conflict of interest that could exist if you try to access information**

**that is unrelated to your duties and responsibilities as an employee:**

**Employee D** knows someone who lives in a Toronto Seniors Housing Corporation owned or operated building. Employee D uses their position at Toronto Seniors Housing Corporation to access the information of tenants in the company database and uses this information for personal reasons. Employee D does not need to access this information for a purpose associated with their duties and responsibilities while at work.

This is a conflict of interest because Employee D has accessed or used information that they learned while working at Toronto Seniors Housing Corporation for their own personal benefit and not their job.

**As an employee and a tenant of TSHC who is living in a rent-geared-to-income unit, do I have to declare my TSHC income and report any changes to my salary, and am I required to report if someone else is living in my unit?**

Yes. Under the Rent-Geared-to-Income (RGI) program, you are required to report who is living in your unit and you must also always report your income. This includes your salary as TSHC employee and any changes to your salary during the year (i.e. if you are promoted or receive a pay increase). This information is used to determine if you are eligible to be an RGI tenant and in the calculation of your rent. There could be an impact on your tenancy if you do not accurately report this information, and you may be required to repay amounts if your rent is recalculated. As a TSHC employee, you would be in violation of both the Employee Code of Conduct and Employee Conflict of Interest Policy if you do not accurately report your income and who is living in your RGI unit. TSHC will the income being reported by TSHC employees who are also tenants under the RGI program.