



EDMONTON SOUTHWEST UNITED

soccer club | established 1982

POLICY GOV-25-01 | CONFLICT OF INTEREST

Approved July 6, 2025

Review on July 6, 2026 or before, as required

Policy Purpose

The purpose of this policy is to ensure that any actual, potential, or perceived conflicts of interest arising from the activities of Edmonton Southwest United Soccer Club ("SWU") employees or members of the SWU Board of Directors (collectively referred to as "Club Representatives") are disclosed promptly to the Board of Directors and managed transparently, fairly, and in the best interests of the Club.

Policy Scope

This policy applies to all Club Representatives, including employees, members of the SWU Board of Directors, committee members, and other individuals acting on behalf of the Club.

Policy Statement

SWU is committed to ensuring that decisions made by Club Representatives are carried out with integrity, transparency, and in the exclusive interest of the Club. Club Representatives must proactively identify and disclose any actual, potential, or perceived conflicts of interest to the Board of Directors as soon as they become aware of such conflicts.

To uphold the Club's integrity:

- Club Representatives must offer to recuse themselves from any discussions, decision-making, or activities where a conflict of interest exists or may be perceived.
- Both actual conflicts and the appearance of conflicts must be avoided.
- The interests of SWU must always take precedence over personal, professional, or organizational interests that may compromise impartiality.

Definition of Conflict of Interest

A conflict of interest occurs when the personal interests, relationships, affiliations, or actions of a Club Representative could compromise, or appear to compromise, their objectivity, judgment, loyalty, or ability to act in the best interests of the Club.

Conflicts of interest may be:

- Actual: A direct conflict exists between a Club Representative's duties and personal interests.
- Potential: A situation could reasonably be expected to result in a conflict.
- Perceived: A third party could reasonably believe a conflict exists, even if no actual conflict is present.



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POLICY GOV-25-01 | CONFLICT OF INTEREST | Page 2

Prohibited Conduct

To safeguard against conflicts of interest, Club Representatives must not:

1. Provide preferential treatment to any individual, organization, or entity in the course of their official duties.
2. Influence or attempt to influence decisions or votes that could result in personal or associated benefit.
3. Use confidential, privileged, or non-public information obtained through their role with the Club for personal gain.
4. Use or share Club resources (property, equipment, data, services) for non-Club activities without Board approval.
5. Place themselves in a position to influence decisions or contracts from which they, their family, or associates may benefit, directly or indirectly.
6. Accept gifts, benefits, or favours that could be perceived as influencing their impartiality or decision-making.
7. Knowingly place themselves in a position where:
 - They owe obligations to individuals or entities that may benefit from special consideration.
 - Their judgment could be impaired due to past or existing negative relationships.
 - Their loyalty to SWU is compromised due to involvement with other organizations or competing interests.

Duty to Disclose

1. **Annual and Ongoing Disclosure:** All Club Representatives must complete the attached Conflict of Interest Disclosure Form annually and update it immediately upon becoming aware of any new actual, potential, or perceived conflict.
2. **Disclosure by Senior Representatives:** Any employee or director with substantial influence over the Club must disclose all relevant facts regarding any actual, potential, or perceived conflict of interest to the Club President promptly upon discovery.
3. **Disclosure During Board Proceedings:** If a Club Representative (other than employees covered under clause 2) has an actual, potential, or perceived conflict of interest related to a matter under Board consideration, they must:
 - Declare the conflict at the earliest opportunity.
 - Disclose all relevant facts to the Board.
 - Refrain from participating in discussions or decisions related to the matter, unless otherwise directed by the Board.

Resolution of Conflicts

In all situations where a conflict arises, whether actual or perceived, the conflict must be resolved in favour of the Club's interests. The Board of Directors retains the authority to determine appropriate actions, which may include:

- Requiring the individual to withdraw from discussions or decision-making.
- Prohibiting participation in specific activities.
- Taking disciplinary measures where warranted.



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CONFLICT OF INTEREST DISCLOSURE FORM

Purpose

All SWU employees, Board members, committee members, and other designated Club Representatives must disclose any actual, potential, or perceived conflicts of interest annually, and as they arise, to support transparency, accountability, and the integrity of the Club.

Personal Information

Name _____

Position/Role _____

Date _____

Disclosure of Conflicts

Please respond to the following questions. If you answer "Yes" to any, please provide details in the space provided below or attach additional pages if necessary.

1. Do you, your family members, or individuals with whom you have a close personal or professional relationship have any financial interest, ownership, or investment in an organization that does business or competes with SWU? ☐ Yes ☐ No
2. Do you hold any position (volunteer, employee, consultant, director, etc.) with another organization that may present an actual, potential, or perceived conflict of interest with your role at SWU? ☐ Yes ☐ No
3. Have you received, been offered, or expect to receive gifts, favours, or benefits from any person or organization doing business with, seeking to do business with, or competing with SWU, which could be perceived as influencing your judgment? ☐ Yes ☐ No
4. Are you aware of any other personal, financial, professional, or organizational interest, relationship, or circumstance that could present an actual, potential, or perceived conflict of interest with your duties at SWU? ☐ Yes ☐ No

Details of Disclosed Conflicts (If Applicable)

Please provide details of any actual, potential, or perceived conflicts of interest identified above, including names of involved individuals or organizations, the nature of the relationship, and any relevant facts:





Conflict of Interest Disclosure Form | Page 2

DECLARATION

I declare that:

- ✓ The information provided in this Disclosure Form is true and complete to the best of my knowledge.
- ✓ I understand my ongoing obligation to promptly disclose any new actual, potential, or perceived conflicts of interest to the SWU Board of Directors as they arise.
- ✓ I agree to comply with SWU's Conflict of Interest Policy and understand that failure to do so may result in disciplinary action or other consequences as determined by the Board.

Signature: _____

Date: _____

for SWU use only

Reviewed by _____

Date of Review _____

Action Taken (if Required) _____
