

Code of Conduct

Confidentiality and Conflict of Interests

1) Introduction

The following Policy and Code of Conduct is designed to preserve and protect the tradition of credibility, integrity, and respect that Pharmacists Manitoba, has long held within the community of pharmacy, and among the stakeholder groups that it interacts with. Additionally, this policy addresses the importance of avoiding and/or managing perceived and actual conflicts of interests as well as matters of confidentiality on the part of members of the Board of Directors, Committees, and associated staff. This policy applies to all Pharmacists Manitoba office staff, the Chief Executive Officer, the Board of Directors, all members and volunteers, Board Committees and to Liaisons. It sets out principles that must be adhered to in any dealings with, or on behalf of Pharmacists Manitoba.

Philosophy

The fundamental principles of the Code of Conduct are credibility, integrity, respect and a commitment to uphold ethical standards while conducting the work of the organization. This policy provides basic guidelines for situations in which ethical issues arise.

Acknowledgement of Policy

Members serving on the Board of Directors, new committee members, new liaisons and new staff members will review the policy and sign the declaration on Code of Conduct, Confidentiality and Conflict of Interests. Board members will be required to renew their declaration annually at the annual board orientation meeting.

2) Values

Integrity:

- Always act with fairness, honesty and openness. Treat all persons equally, with dignity and without bias.
- Communicate to others in a professional manner both clear and courteous.
- Assume positive intent and good will from others.
- All actions and communication should reflect a positive commitment to the pharmacy profession generally.

Accountability:

- Take responsibility for your actions and decisions in fulfilling your duties and obligations to Pharmacists Manitoba.

- Act in accordance with all by-laws, governing laws, policies and legislation that apply to the responsibilities of your position with, or on behalf of Pharmacists Manitoba.
- All activities conducted will be consistent with the vision, mission, and strategic priorities of the organization.

Diversity

- Pharmacists Manitoba values, first and foremost, diversity of idea and perspective with acknowledgment that different backgrounds and experiences yield a stronger organization.

Inclusivity

- Pharmacists Manitoba seeks to include all members regardless of race, ethnicity, gender identity, physical shape, or other characteristics that are deemed sensitive to discrimination, so long as they are deemed competent, capable and/or committed to the organization's vision, mission and strategic goals.

Equity

- Pharmacists Manitoba endeavors to employ and appoint individuals to roles based on principles of fairness and equality of opportunity. All active members are eligible to run for election and this is not restricted based on an individual's personal beliefs, race, ethnicity, gender identity, physical shape or other characteristics that are deemed sensitive to discrimination.

3) Conflict of Interest

- A person may have a conflict of interest when they, a business or professional partner, employee, employer, family member, or other associate is in a position to benefit from a relationship with a third party, where such benefit arises from their position with Pharmacists Manitoba. This benefit may be direct or indirect and need not be financial in nature.
- If any member of the Board of Directors, a Committee, Liaison or associated staff member believes or becomes aware that they may have an interest which conflicts with their fiduciary duty towards Pharmacists Manitoba, they must at that time, or as soon as possible thereafter, declare fully the conflict and its nature and shall thereafter refrain from participating in the formal or informal consideration of any matter to which the possible conflict relates until such time as the interest has been satisfactorily resolved. Final resolution shall be by the Board of Directors.
- The President of Pharmacists Manitoba will review and bring forward all declared conflicts of interest to the Board of Directors annually or as they are declared, and the Board of Directors will determine appropriate action thereafter. If a person is in a position or relationship that poses, or may be seen to pose, a conflict of interest with their fiduciary role in Pharmacists Manitoba while serving in such a role, the Board of Directors shall consider whether a conflict of interest exists and shall require the individual to recuse themselves from all deliberations and actions, both formal and informal, affecting said interest. In addition, the Board of Directors shall take one or more of the following actions:

1. Determine that there is no conflict of interest and/or no danger of a perceived conflict;
 2. Determine that such individual's disclosure of the interest is sufficient and that no further action is required.
 3. Require that the individual be denied access to any and all confidential information, including written documents and oral and written reports relating to issues affecting said interest.
 4. Ensure any declared interest is reflected in the minutes of the appropriate meeting of the Board of Directors.
- A financial conflict of interest arises or is perceived when a Director or a group of Directors is offered an inducement with an aggregate value of one hundred dollars (\$100) or more for a single occasion; below this threshold, disclosure is optional unless a quid-pro-quo arrangement is suspected.

4) Confidentiality

- All information gained while acting with, or on behalf of Pharmacists Manitoba is considered confidential and should be respected and maintained as such. This includes but is not limited to, all computer software and files, business documents, printouts, volunteer records, employee membership, donor and supporter records.
- Personal or contact details of staff, clients, spokespeople, ambassadors or board members will not be provided without prior consent.
- Any information gained during Board or Committee meetings (either in-person or virtual) is to be assumed to be confidential amongst the participants.
- Board members remain bound to these principles of confidentiality even after their tenure with the association has ended as per the declaration agreement at the end of this policy.

5) Code of Conduct

Personal or Sexual Harassment:

- Sexual harassment is any conduct, comment, gesture or contact of a sexual nature that one would find to be unwanted or unwelcome by any individual, or that might, on reasonable grounds, be perceived by that individual as placing a condition of sexual nature on an employment or career development.
- Personal harassment means any conduct whether verbal or physical that is discriminating in nature, based upon another person's race, color, ancestry, place of origin, political beliefs, religion, marital status, physical or mental disability, sex, age or sexual orientation. It is discriminatory behavior, directed at an individual that is unwanted or unwelcome and causes substantial distress in that person and serves no legitimate work-related purpose.

- Pharmacists Manitoba has a zero-tolerance policy with respect to Personal/Sexual Harassment. Personal/Sexual Harassment in any form is strictly prohibited and may be grounds for termination as a volunteer, or, in the case of an employee, immediate dismissal for just cause without notice or pay in lieu of notice. In addition, criminal prosecution may result.

Use of Assets of Pharmacists Manitoba:

- Company assets, e.g., supplies, cash and business records, premises, are to be used only for the benefit of the organization and must always be protected from theft, misuse or damage.
- Limited personal use of computers, phones and other communication equipment is permitted on an occasional basis, but must not negatively impact your productivity, or interfere with normal operations of Pharmacists Manitoba.

Workplace Safety:

- Safety is not just about procedures and equipment – it’s about how we do our jobs every day. We cannot provide excellent service if our judgment and productivity are impaired.
- Comply with the law and safe work practices and procedures and act in a way that won’t endanger your safety.
- Consumption of alcohol, cannabis or illegal drugs is prohibited when engaging in any capacity as a volunteer, representative or professional on behalf of Pharmacists Manitoba regardless of location (home or office) with the exception of responsible alcohol use at events where the organization has sanctioned alcohol consumption.

Reporting of Illegal or Unethical Conduct (i.e Whistleblower Protection):

- Discuss any question or concern you have about the propriety of a particular course of action with your President or Chief Executive Officer.
- Report any actual or potential act of fraud or theft immediately, within 24 hours of becoming aware of it and any other violation or suspected violation of the Code or any unethical or suspected unethical conduct as soon as possible.
- Reports may be made anonymously to the President or CEO of Pharmacists Manitoba.
- There will be no reprisals for reports made in good faith.
- Anyone who retaliates in any manner against a person who reports any act of fraud or violation of the Code will be subject to disciplinary action, up to and including termination.
- Nothing in this Code prevents you from exercising any rights under provincial or federal legislation

Initial Committee Approval
Board Approval
Committee Review
Approved by Board
Committee Review
Approved by Board

November, 2014
December, 2014
March, 2016
April, 2016
September, 2020
February, 2021

Declaration on Code of Conduct, Confidentiality and Conflict of Interests

1. In consideration of my election/appointment, I hereby promise and agree to abide by the following:
2. I agree not to use or reference any past, present or future Association position or relationship to promote my personal business interest or to promote the business interest of any other entity
3. I agree not to make any express or implied statement of endorsement of any product or service by Pharmacists Manitoba unless such statement has been authorized by the Pharmacists Manitoba Board of Directors.
4. I agree that I shall keep private and confidential any and all information received, and I undertake not to disclose any such information unless or until made public by the Association.
5. I agree that I shall not capitalize on, or profit directly or indirectly from any information gained as a result of my past, present or future association, position or relationship with Pharmacists Manitoba.
6. I agree to promptly disclose any perceived, actual or potential conflict of interest of which I have knowledge, in writing addressed to the Pharmacists Manitoba Board of Directors, care of the President at their regular business address with a copy to the Pharmacists Manitoba office by email, by regular mail or facsimile and the President shall circulate the same to the Board of Directors.
7. I agree to be bound by the decision of the Board of Directors of Pharmacists Manitoba in regard to such conflicts of interest.

I acknowledge the following (please check all that apply):

- I have read the Pharmacists Manitoba Policy on Code of Conduct, Conflict of Interest and Confidentiality for Board and Committee Members and Staff.
- I have no significant direct or indirect interest, beneficial affiliation or any other factor(s) to disclose.
- I have the following significant direct or indirect interest, beneficial affiliation or other factor(s) to disclose as listed below or as attached hereto:

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*This Declaration must be renewed (i.e signed and dated) by each board member annually during Board Orientation day

Date: _____

Signature: _____