



## Supplement B: Employment Candidates and Employees

Please be advised that this supplement has not been developed as a standalone document and is a subsection of the [Supplemental Conflict of Interest Guidance Document](#).

### Section 1: Employment Candidates

#### General

1. Compliance with the Conflict of Interest policy (the “policy”) is a condition of employment with CDA-AMC. Candidates are obliged to disclose details related to all matters that may affect their objectivity or fairness, or that may create the appearance of a conflict of interest (see sections 7 and 8 of the policy for additional information).
2. Any conflicts must be resolved or an appropriate management plan must be put in place before an offer of employment can proceed.

#### Disclosure

3. At time of offer, the finalist candidate for a CDA-AMC position will be provided with the policy and required to complete and submit a declaration form, as directed by CDA-AMC.
4. If the candidate is uncertain about whether an activity constitutes a conflict of interest, they should seek guidance from the CDA-AMC recruiter or hiring manager.
5. Candidate declarations will be confidential to the following CDA-AMC designates (unless otherwise determined by CDA-AMC):
  - a) recruiter and/or relevant People and Culture team member(s)
  - b) hiring manager
  - c) Executive Director, People and Culture, if required
  - d) President and CEO, if required.
6. If the employment offer proceeds, declaration forms, management plans, and any other related documents will be retained in CDA-AMC's COI Risk Manager platform. If the employment offer does not proceed, the declaration and any related documents will be destroyed.

#### Assessment of Disclosures

7. Where the recruiter or hiring manager identifies a conflict that has not been declared, the matter will be raised with the candidate. It may be necessary for the candidate to respond to clarifying questions and submit an updated declaration form.



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8. Depending on the disclosure, next steps are as follows:
  - a) No conflicts are identified. The offer of employment may proceed.
  - b) A conflict is identified. The recruiter or hiring manager will communicate with the candidate to discuss if the conflict can be resolved.
    - i. The candidate confirms in writing that the conflict has been resolved. If CDA-AMC is satisfied by the resolution, the offer of employment may proceed.
    - ii. In cases where a conflict of interest is identified but cannot be resolved, the hiring manager is responsible for developing a management plan.
9. If required, the declaration and management plan may be escalated to the Executive Director, People and Culture, for review and/or approval.

### Management of Disclosures

10. Where conflict of interest matters are extensive and ongoing, CDA-AMC may request that the candidate conclude involvement in those matters within a specified time frame. Where this is not possible or amenable to the candidate, it will preclude the candidate's employment with CDA-AMC, and an offer of employment will not proceed.
11. Where the reported conflict of interest can be addressed by recusing the prospective employee from specific CDA-AMC work files for a limited period of time, or other limited action as outlined in the developed management plan, the offer of employment may proceed. The candidate will be provided with a copy of the management plan.
  - a) If the management plan is not acceptable to the candidate, it will preclude the candidate's employment with CDA-AMC, and an offer of employment will not proceed.
  - b) If the management plan is acceptable to the candidate, they will be asked to confirm in writing and the offer of employment may proceed.

## Section 2: Employees

### General

12. Compliance with the policy is a condition for continued employment of CDA-AMC employees. Disclosure requirements oblige all employees to disclose details related to all matters that may affect their objectivity or fairness, or that may create the appearance of a conflict of interest (see sections 7 and 8 of the policy for additional information).



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13. CDA-AMC employees shall act at all times in the best interests of CDA-AMC, meaning that employees will perform their work in pursuit of CDA-AMC's mandate in such a manner that promotes public confidence and trust in the integrity and objectivity of the organization.
14. Where a CDA-AMC employee becomes aware that a CDA-AMC colleague may be involved in a conflict, the employee will follow the steps outlined in section 15 of the Guidance Document.

### Disclosure

15. At a minimum, employees are required to complete a declaration form and update their declaration form annually; however, employees are required to consult their direct manager and update their declaration form as soon as a conflict arises, or in cases of uncertainty regarding whether an activity constitutes a conflict of interest.
16. Where a direct manager becomes aware of a conflict that has not been disclosed, the matter will be raised with the employee. It may be necessary for the employee to respond to clarifying questions and submit an updated declaration form.
17. Employee declarations will be confidential to the following CDA-AMC designates (unless otherwise determined by CDA-AMC):
  - a) relevant People and Culture team member(s)
  - b) direct manager
  - c) Executive Director, People and Culture, if required
  - d) President and CEO, if required.
18. Declaration forms, management plans, and any other related documents will be retained in CDA-AMC's COI Risk Manager platform.

### Assessment of Disclosures

19. Depending on the disclosure, next steps are as follows:
  - a) No conflicts are identified. No additional action is required.
  - b) A conflict is identified. The direct manager will communicate with the employee to discuss if the conflict can be resolved.
    - i. The employee will confirm in writing that the conflict has been resolved.
    - ii. In cases where a conflict of interest is identified but cannot be resolved, the direct manager is responsible for developing a management plan.
20. If required, the declaration and management plan may be escalated to the Executive Director, People and Culture, for review and/or approval.



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### Management of Disclosures

21. In cases where a declaration(s) has been made, the results of the disclosure assessment will be communicated to the employee in writing by their direct manager. The options are:
  - a) No relevant conflict of interest is identified; therefore, no management measures are required. In the case of an outside activity or engagement, the employee's activity may proceed.
  - b) A conflict of interest is identified and can be managed. The employee will be provided with a copy of the management plan for acceptance.
  - c) A direct or significant conflict of interest is identified but cannot be managed. In cases where a conflict arises from an outside activity or engagement, the activity may not proceed. The employee may be required to discontinue or decline participation in order to resolve the conflict. The employee will formally acknowledge and accept the decision in writing. Where a conflict of interest cannot be managed or resolved, the declaration will be escalated to the Executive Director, People and Culture, and/or the President and CEO for further assessment and decision.
22. The People and Culture team will be consulted where an employee is found to be willfully noncompliant with the policy, or where the employee chooses not to comply with CDA-AMC's management plan for an identified conflict. Termination of employment with CDA-AMC may result.

### Publication

23. Conflict of interest declarations may be made publicly available, as identified in sections 19 and 20 of the policy.
24. Declarations may be made publicly available for CDA-AMC employees in the following positions:
  - a) President and CEO
  - b) vice-presidents and executive members
  - c) directors
  - d) managers.
25. Declarations of employees that have contributed expertise or authored a CDA-AMC publication may be included in associated publications, where applicable.



### Additional Requirements for Employees

26. **Employment or activities:** Subject to the terms of the policy and any specific terms of an employment contract with CDA-AMC, CDA-AMC employees may engage in employment and/or consulting services outside of CDA-AMC unless the outside employment will or is likely to give rise to a conflict of interest.
- a) Employees may not accept employment, contract, or consulting assignments with any drug or medical device manufacturer (including parent corporations, subsidiaries, affiliates, and consulting organizations providing services to these firms). Work with other organizations may also create a conflict with CDA-AMC's interests. In certain cases, involvement with work related to CDA-AMC products and services could also create a conflict (e.g., working on a scientific advice project and involvement with subsequent work downstream). Any uncertainty about whether the outside employment or activity will or is likely to give rise to a conflict of interest should be raised immediately by the employee with their direct manager.
  - b) Where a CDA-AMC employee undertakes employment or other activities outside of their employment with CDA-AMC:
    - i. the CDA-AMC employee is not permitted to use any CDA-AMC resources in association with performing those duties
    - ii. the time commitment must not conflict with regular CDA-AMC work hours or create excessive demands on the employee's time and effort
    - iii. the outside employment or other activities must not create a conflict of interest in the form of an obligation, interest, distraction, or participation that will interfere with the independent exercise of judgment and obligation of the employee to act in the best interests of CDA-AMC (i.e., private interest activities should not influence or be perceived to influence the employee's role and work with CDA-AMC).
  - c) If the outside employment or activity is later deemed to be in conflict, the direct manager shall inform the employee that the outside employment must be curtailed, modified, or terminated and the employee must advise the direct manager when the directed action to resolve the conflict has been completed.
27. **Employment of family members:** Friends and family may work at CDA-AMC with the following exceptions:
- a) Reporting relationships between family members of those with close personal relationships are not permitted.



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- b) CDA-AMC will not hire family members of those with close personal relationships with any member of the Executive team or the People and Culture team.
  - c) CDA-AMC employees must disclose the appointments and external positions held by immediate family members and those with close personal relationships if their roles are likely to create a real or perceived conflict of interest with CDA-AMC.
28. **Political activism:** CDA-AMC employees may be politically active to the extent that their involvement does not impair their ability to perform their CDA-AMC employment duties in a politically impartial manner or create a real or perceived conflict of interest.
29. **Funding, honorariums, and financial support (past, current, or future):** This section applies to compensation received in the course of employment with CDA-AMC, to compensation received for activities outside of employment with CDA-AMC while a CDA-AMC employee, and, with respect to candidates for employment, to compensation received or due.
- a) If a financial honorarium has been accepted and received by an employee for providing a service as a CDA-AMC employee, the honorarium must be returned to CDA-AMC. This applies regardless of whether the service was performed during working hours or not.
  - b) If the service was provided as a result of expertise provided by the employee independent from and unrelated to their CDA-AMC work, any honorariums received are the property of the CDA-AMC employee. The time to provide this expertise must be outside of regular CDA-AMC work hours or accounted for using accrued leave. All employees should consult with their direct manager in order to ensure that they understand their obligations to CDA-AMC and are in compliance with CDA-AMC's terms.
  - c) In general, if a financial honorarium, funding, or financial support is offered or received by a CDA-AMC employee from an organization or individual, the CDA-AMC employee must consult with their direct manager to ensure that there is no conflict of interest. Completion of an updated declaration form may be required. Examples of honorariums, funding, or financial support include:
    - i. receipt of payment as an advisor or consultant or for academic appointments (including endowed chairs)
    - ii. receipt of funding or honorariums for personal education, writing a publication or participating in the development of a publication, research grants, organizing conferences, giving educational lectures, being a speaker, or payment of travel.
30. **Gifts and hospitality:** CDA-AMC employees may accept gifts or hospitality from suppliers or those doing or interested in doing business with CDA-AMC that fall under normal business practices and are of nominal value, such as the cost of a regular lunch or dinner. Gifts or hospitality in excess of a nominal value create the optic of a conflict of interest and may not be



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accepted. Similarly, CDA-AMC managers or staff in a position to offer gifts or extend hospitality shall do so consistent with the previously set out provisions.