

Policy #2026-[001]: Conflict of Interest Policy

1. Effective Date

The Métis Nation of Ontario (the “**MNO**”) Policy #2026-001: Conflict of Interest Policy (the “**Policy**”) was adopted by the Provisional Council of the Métis Nation of Ontario (“**PCMNO**”) on February 17, 2026 and is effective immediately. This Policy replaces all MNO previous policies on conflict of interest.

2. Purpose

The Purpose of this Policy is to ensure that the MNO can continue to provide responsible, fair, and accountable good governance by requiring that MNO Officials and MNO Employees are held to the highest standard of conduct in performing their duties, including in avoiding, reporting, and responding to real, potential, or perceived conflicts of interest.

This Policy outlines the duties and responsibilities of MNO Officials and MNO Employees in proactively working to prevent conflicts of interest as well as the procedures the MNO will follow for responding to situations when a real, potential, or perceived conflict may arise between MNO Officials or MNO Employee’s personal interests and those of the MNO.

3. Application

The Policy applies to all current and former MNO Officials and MNO Employees.

4. Definitions

“**Conflict of Interest**” means any situation “when the private interests of a councilor or citizen supersede or compete with the interests of the MNO or its related entities” and includes “real, potential or apparent” conflicts.”¹

“**MNO Employee**” means an employee of the MNO.

“**MNO Official**” means elected or appointed members (both volunteer and salaried), councilors, directors or trustees of any MNO governance institution, including the PCMNO, or, directors or officers of any MNO Economic Development Structure as defined in the *MNO Prosperity and Self Sufficiency Law*.

5. Background, Context, and Need for this Policy

The MNO was established as a unique, province-wide Métis government for its citizens and the communities comprised of those citizens based on the inherent right to self-determination and self-government held by all Indigenous peoples. The MNO is committed to upholding the principles included

¹ MNO Bylaws, Article 64.

in the *MNO Statement of Prime Purpose*, including the Métis values of honesty, truth, impartially, and acting with regard to the common good of all MNO citizens.²

As the MNO continues on its self-government journey, there is a need to put in place clear, transparent, and prudent policies for MNO Officials and MNO Employees about how to avoid, identify, and where required, respond to Conflicts of Interest.

The MNO Bylaws address Conflicts of Interests as follows:

A conflict of interest arises when the private interests of a councilor or citizen supersede or compete with the interests of the MNO or its related entities. Such conflicts of interests, whether real, potential or apparent shall be dealt with according to the MNO Conflict of Interest Policy as amended from time to time.³

Whenever a councilor has a real, potential or apparent conflict of interest in any matter coming before the PCMNO, that councilor shall fully disclose the nature of the interest and shall withdraw from discussion, lobbying, and voting on the matter. Whenever an MNO citizen has a real, potential or apparent conflict of interest in any matter coming before the General Assembly, the affected citizen shall fully disclose the nature of the interest and withdraw from discussion, lobbying, and voting on the matter.⁴

The obligation to disclose a conflict of interest is a continuing obligation.⁵

The procedures in this Policy are intended to ensure that the MNO is able to deal with any real, potential, or apparent Conflicts of Interest fairly and professionally. While it is impossible to outline all the possible situations that could give rise to a Conflict of Interest, the objective of this Policy is to clarify the MNO's expectations for MNO Officials and MNO Employees who become involved in situations which cause, or could potentially cause, a Conflict of Interest.

6. Responsibilities of MNO Officials and MNO Employees

MNO citizens and Métis communities in Ontario place their confidence and trust in the MNO, including trusting that MNO Officials and MNO Employees will perform their duties in a manner that is fair, impartial, and free of any concerns of bias or Conflict of Interest.

An MNO Official or MNO Employee has a Conflict of Interest if, among other possible examples, they exercise an official power or perform an official duty or function knowing that in so doing, there is the opportunity to further their private or personal interests including, but not limited to, personal financial benefit or financial benefit for family or friends, or anything resulting in interference with the objective of their duties and the goals of the MNO.

In carrying out their responsibilities in the best interests of MNO citizens, MNO Officials and MNO Employees are obligated to avoid, declare / report, and respond to any Conflicts of Interest at the earliest possible time they become aware of such conflict. This includes potential or perceived Conflicts of Interest.

² MNO Statement of Prime Purpose.

³ MNO Bylaws, Article 64.

⁴ MNO Bylaws, Article 65.

⁵ MNO Bylaws, Article 66.

a) *Avoiding Conflicts of Interest*

All MNO Officials and MNO Employees have a positive, pro-active duty to avoid real / actual, potential, or apparent Conflicts of Interest.

An MNO Official or MNO Employee must refrain from exercising an official power or performing an official duty or function if they have a Conflict of Interest or could reasonably be seen as having a Conflict of Interest. This includes, but is not limited to, that MNO Officials or MNO Employees:

- Should only use MNO property for the purposes of their duties or responsibilities as an MNO Official or MNO Employee (e.g., not using MNO equipment for outside business ventures, personal uses, etc.);
- Should not behave in a way that may place them, or be seen to place them, under obligation to persons or organizations seeking to gain privileged consideration for their own purposes (e.g., accepting private meetings or invitations to social events hosted by companies bidding on MNO contracts, etc.);
- Should not accept gifts or other benefits which could be viewed as payment or reward for services rendered, except as otherwise provided for in the Policy (see section on Gifts and Benefits below);
- Should avoid any real or perceived appearance of giving preferential treatment for family members or organizations in which they or their families hold interest (e.g., sitting on MNO committees that are deciding on funding or other benefits to be provided to a potential group that includes a spouse or other family member);
- Should avoid any real or perceived appearance of giving preferential treatment for themselves or organization in which they hold interest (e.g., providing advance information about potential contracts to companies or groups that they sit on the board of); and
- Should not perform private business affairs for which they receive a separate income during work hours, unless there is no impact on their regular duties and no other Conflict of Interest arises (e.g., the interests of the private business do not conflict with the interest of the MNO or role of the MNO Official or MNO Employee in question);

b) *Disclosing / Reporting Conflicts of Interest*

It's normal that real or apparent Conflicts of Interest may arise from time-to-time. If / when this occurs, the affected MNO Official or MNO Employee must identify and disclose the actual, potential, or apparent Conflict of Interest at the earliest opportunity.

Importantly, MNO Officials and MNO Employees should not wait until a real or actual Conflict of Interest arises to take action. Even a potential or perceived Conflict of Interest should be disclosed and reported under this Policy.

If you think you may have a real or potential Conflict of Interest, an MNO Official or MNO Employee must:

- i. Immediately disclose the particulars of the real or potential Conflict of Interest to their Director (in the case of MNO Employees) or to the MNO Chief Executive Officer (in the case of PCMNO members or other MNO Officials);
- ii. Withdraw from any discussion on the matter and from decision-making on any question relating to it; and
- iii. Follow any other direction, requirements, or rules put in place by the MNO to otherwise manage or address the Conflict of Interest (e.g., information screens, formally recording the conflict and withdrawal for the purposes of any minutes or decision, etc.).

As a part of the disclosure / reporting requirements for PCMNO, upon election or appointment, all MNO Officials shall provide a Conflict of Interest Disclosure Form to the MNO Chief Executive Officer. A copy of the form is attached to this Policy (**Appendix A**).

As outlined in the MNO Bylaws, the duty to disclose a real, potential, or apparent Conflict of Interest is a continuing obligation. Meaning that MNO Officials and MNO Employees have an ongoing responsibility to identify and proactively manage of their own Conflict of Interests. Full disclosure will be expected and required every time a real, potential, or apparent Conflict of Interest arises, even if it is regarding a matter that has previously been disclosed for a prior decision or action. The MNO Employee or Elected Official must follow *MNO's Gifts and Benefits Policy* when accepting and all gifts and/or benefits.⁶

c) Resolving Conflicts of Interest

Where a Conflict of Interest arises, an MNO Official or MNO Employee must remove themselves from any decision, recommendation, action, or work related to the Conflict of Interest.⁷

Even when an MNO Official or MNO Employee does not have a real / actual Conflict of Interest but feels that it would be inappropriate to participate in a decision, recommendation, action or work due to a perceived Conflict of Interest or other concerns, as a best practice they should remove themselves from the decision, recommendation, action, or work in question.

7. MNO's Role and Responsibility in Determining and Addressing Conflicts of Interest

As outlined above, all MNO Officials and MNO Employees have a pro-active and ongoing duty to avoid, declare / report, and work to resolve any Conflicts of Interest at the earliest possible time they become aware of such conflict. Where an MNO Official or MNO Employee believes that they may have a Conflict of Interest, or believes that another MNO Official or Employee may have, it is important that this be reported to the MNO as soon as possible.

⁶ Prior to the adoption of *MNO's Gifts and Benefits Policy*, the MNO Employee or Elected Official must seek permission from their people leader (in the case of the MNO Employee) or the PCMNO President (in the case of the Elected Official) prior to accepting any and all gifts or benefits.

⁷ Where an MNO Official or MNO Employee withdraws from discussion and decision-making upon declaring a Conflict of Interest, their absence will not be taken into account in determining whether a quorum is present for that meeting.

Quick reporting of any real, potential, or apparent Conflict of Interest will help the MNO to investigate and, where required, take any steps necessary to ensure the Conflict of Interest is dealt with fairly and professionally (e.g., implementing conflict screens on certain information, putting up internal firewalls, etc.).

Reports about real, potential, or apparent Conflicts of Interest under this Policy should be made to the Office of Ethics and Integrity, which is responsible for investigating Conflicts of Interests.⁸ The Office will review the complaint to determine if it falls within the scope of the Policy. If the Office determines that the matter falls within the scope of the Policy, they will initiate an investigation.

The Office may also initiate an investigation on their own initiative if they reasonably believe a Conflict of Interest has occurred.

Where an investigation determines that an MNO Official or MNO Employee has a Conflict of Interest and/or a breach of any of the duties or responsibilities outlined in this Policy has occurred, the following actions may be taken by the MNO:

- Verbal or written warning to the MNO Official or MNO Employee;
- Require that the MNO Official or MNO Employee undertake mandatory training on Conflicts of Interest, including avoidance, reporting, and the pro-active duty to remove oneself from situations involving a conflict;
- The MNO Official or MNO Employee may be placed on a temporary suspension (with or without-pay);
- Where an MNO Official or MNO Employee has been found to have breached this Policy, the MNO Executive Committee may choose from a range of corrective actions, commensurate with the seriousness of the breach, ranging from removing the individual to ordering they make restitution and/or pay a fine to the MNO; and
- For serious breaches of this Policy where there is a real / actual Conflict of Interest that resulted in not nominal benefits to the MNO Official or MNO Employee (or their direct family members) contrary to this Policy, the individual may be requested to resign or be terminated / removed from their position.⁹

The above list is non-exhaustive and additional steps may be taken, depending on what is required in the circumstances in order to address the breach and try and ensure that similar breaches of this Policy or Conflicts of Interest do not occur in the future.¹⁰

⁸ Prior to the Office of Ethics and Integrity being established by the MNO, Conflicts of Interest will be reported to the MNO Chief Executive Officer for investigation. All references in this Policy to the Office of Ethics and Integrity will be read as referring to the MNO Chief Executive Officer prior to the office of Ethics and Integrity being established. For greater certainty, the MNO Chief Executive Officer may be assisted by other MNO staff, consultants, and legal counsel in the investigation or for other supports in implementing this Policy.

⁹ For example: MNO Bylaws, Article 23 (h): "The office of a councilor may be deemed vacated: . . . (h) where the PCMNO determines that a councilor holds or takes a position on the board of directors of another provincial aboriginal organization and where by reason of holding the two positions the councilor may be placed in a conflict of interest."

¹⁰ In determining the appropriate action to take in response to a breach of this Policy, the MNO will consider the provisions in the MNO Bylaws as well as its employment related obligations.

8. Authority for the Policy

PCMNO is the democratically-elected and province-wide governing body of the MNO. In addition to the sections specifically on Conflicts of Interest noted throughout this Policy, the MNO Bylaws authorize the PCMNO with the authority to manage “the property and business of the MNO” and to “exercise all such other powers and do all such other acts and things as the MNO is, by its charter or otherwise by law, authorized to exercise and do.”¹¹ This includes adopting this Policy on Conflict of Interest.

9. Interpretation

The terms of this Policy shall be given such fair, large, and liberal construction and interpretation as best ensures the attainment of its Purpose. Nothing in this Policy shall be interpreted in a way that would result in a conflict with the MNO Bylaws.

10. Adoption, Implementation, and Review

This Policy was adopted by resolution of the PCMNO on February 17, 2026, based on the MNO’s inherent right of self-government as well as the authorities set out in the MNO Bylaws.

The MNO administration may review this Policy periodically, for the purposes of ensuring that it is best able to meet the needs of the MNO and advance its Purpose. For greater certainty, this Policy will be reviewed at such time as the MNO concludes a Constitution or Métis Government Law dealing with Conflicts of Interest.

¹¹ MNO Bylaws, Article 14 and Article 33.

APPENDIX A

MNO CONFLICT OF INTEREST POLICY

DISCLOSURE FORM

Upon recognizing the potential for a Conflict of Interest, MNO Officials and MNO Employees are required to disclose the conflict at the earliest opportunity and withdraw from any situations or discussions that would place them in conflict relative to the responsibilities of their relevant roles.

In light of this obligation, I, _____, in the Village/Town/City [circle one] of _____, in the Province of Ontario, voluntarily declare the following personal interests in accordance with the Conflict of Interest Policy and state my expressed desire to remove myself from any conflict relative to the responsibilities of my role.

Outside Organization Affiliations (list name of organization and interest/role):

Immediate Family Members' Interests (list name of person, organization(s) and interest/role):

Financial or Business Interests (list name of corporation, proprietorship, partnership or other business entity and interest/role):

Real Estate Interests:

In signing below I swear to the truth, accuracy, and completeness of the information contained herein. I understand and acknowledge that I have an ongoing obligation to keep this information up to date by filing a subsequent Disclosure Form whenever the information contained herein changes (e.g., the information is no longer true, accurate and complete).

Name of MNO Official:	Name of Witness:
Signature:	Signature of Witness:
Date:	Date:

Please return this form to the MNO's Head Office to the attention of the Chief Executive Officer.

APPENDIX B

MNO CONFLICT OF INTEREST POLICY

GIFT OR BENEFIT DISCLOSURE FORM

The MNO Bylaws outline that “PCMNO shall take such steps as they may deem requisite to enable the MNO to acquire, accept, solicit or receive legacies, gifts, grants, settlements, bequests, endowments, donations of any kind whatsoever for the purpose of furthering the objects of the MNO.”

To ensure that there is no actual or perceived Conflict of Interest in accepting or giving gifts or benefits in the course of their duties or as part of Indigenous protocol, all MNO Officials or MNO Employees are required to declare such gifts or benefits to the MNO at the earliest opportunity.

In light of this obligation, I, _____, in the Village/Town/City [circle one] of _____, in the Province of Ontario, voluntarily declare the following gift or benefit received/given [circle one] in accordance with the Conflict of Interest Policy for MNO Officials and MNO Employees:

Date gift / benefit was given / received:	
Description of gift / benefit:	
Estimate of monetary value of gift / benefit:	
Is the gift / benefit within the protocol or social standards associated with your office or duties?	Yes or No [circle one]
Is the gift / benefit within the usual range of exchanges common to ordinary business relationships or Indigenous protocols?	Yes or No [circle one]

In signing below I swear to the truth, accuracy, and completeness of the information contained herein. I understand and acknowledge that based on the information I provide, the MNO may require that the gift or benefit received be made the property of the MNO and I agree to abide by the MNO’s determination.

Name of MNO Official / MNO Employee:	Name of Witness:
Signature:	Signature of Witness:
Date:	Date:

Please return this form to the MNO’s Head Office to the attention of the Chief Executive Officer.