



## **Code of Conduct, Confidentiality and Conflict of Interest Policy**

### **Introduction**

As the officers, directors and employees of Ontario Equestrian (OE), and because we operate in the public spotlight, we are expected to conduct our affairs on a basis consistent with the great trust that has been placed in us. This requires our behaviour to conform to the highest ethical principles. For these reasons, OE requires its officers, directors and staff to conduct business with integrity, to maintain a standard of ethical conduct consistent with the mission statement of OE. Furthermore, because the appearance of impropriety can be just as damaging as actual impropriety, conduct, which appears to be improper, is also unacceptable. (See definitions below.) Accordingly, officers, directors and staff are required to comply with OE Code of Ethics when representing or participating in OE activities.

Additionally, officers, directors and staff should at all times:

1. Conduct all dealings with honesty and fairness
2. Know, understand and comply with the laws, regulations, and codes of conduct governing the conduct of OE competitions and business.
3. Ensure that all transactions are handled honestly and recorded accurately.
4. Protect information that belongs to OE, or donors, sponsors, suppliers, and fellow workers.
5. Avoid conflicts of interest, both real and perceived.
6. Never use OE assets or information for personal gain.
7. Recognize that even the appearance of misconduct or impropriety can be very damaging to the reputation of OE and act accordingly.

### **CONFIDENTIALITY**

- Officers, Directors and Committee Members shall comply with OE confidentiality agreement.

### **Conflicts of Interest**

These principles provide a framework of integrity for interactions with or on behalf of OE. However, given the unique makeup of OE family, more in depth questions may arise regarding conflicts of interest. For this reason, the following guidance is provided:

- OE defines a conflict of interest as any personal or financial (both direct and indirect) relationship including relationships of family members (see definition below) that could influence or be perceived to influence your objectivity when representing or conducting business for, or on behalf of OE.

- OE defines “family” for the purpose of this policy only as follows: spouse, parent, child, or spouse of a child, brother, sister, spouse of a brother or sister, a cohabitating companion or any other individual with a significant familial or familial-like relationship.
- OE defines a substantial appearance of a conflict of interest as whenever others may reasonably infer from the circumstances that a conflict exists. Because the appearance of impropriety can be just as damaging as actual impropriety, conduct that appears to be improper must be disclosed so that the appropriate OE entity may determine whether such substantial appearance of a conflict is deemed to be a prohibited conflict of interest. For these reasons, an individual must recuse himself/herself from participating in OE activity giving rise to the substantial appearance of a conflict of interest unless and until it is determined by the appropriate OE entity that no conflict exists.
- Following appointment or election, each OE Board member, Budget and Finance Committee member, Ethical Practice Review Board member, Internal Audit Committee member, Legal Review Committee, Market Development and Promotion Committee members, Probable Cause Panel member, or any OE Commission member, must fulfill his/her obligation to disclose any conflict by submitting the appropriate form attached (A and B) to the Executive Vice President. These Conflict of Interest forms will be in effect forever or until updated as situations change, then the updated forms will supersede the previous forms and will be in affect forever. After fulfilling terms on boards, committees and commissions, all confidential matters that are provided to you shall remain confidential forever. Any disclosures that you made on these forms will also remain confidential, unless disclosure is required by law or the EPRB process.

Inappropriate hospitality or gift giving between individuals can also create a conflict of interest.

- OE defines inappropriate hospitality as the offering or receiving of accommodations, tours, event tickets, entertainment, meals or other similar personal benefits except as specifically provided for by applicable policies.
- Similarly, OE prohibits the receipt or giving of personal gifts exceeding the value of \$25.00.

Questions regarding the application of OE’s hospitality and gift policies must be addressed to the Executive Director.

## **Enforcement**

Any person who violates or condones the violation of the Code of Ethics or this agreement is subject to disciplinary measures, which may include termination of membership, employment, and expulsion from the board or committee. The Executive Director shall review all violations of the Code of Ethics and, if appropriate, (a) as to officers, directors and committee members, refer the matter to the Complaints Committee for determination if the matter should be forwarded to the to the Ethical Practice Review Board for any disciplinary that should be taken, or (b) as to staff, sanction the individual in accordance with OE’s standard employment practices.

Approved by the OEF Board of Directors – May, 2014

This code serves as a framework for ethical conduct but does not cover every situation. If you are unclear about the requirements of this code, please consult your supervisor or contact the Executive Director at OE as follows:

**Ontario Equestrian**

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