

Code of Conduct, Confidentiality and Conflict of Interest Policy

Introduction

As the officers, directors and employees of the New Brunswick Equestrian Association (NBEA), 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, NBEA requires its officers, directors and staff to conduct business with integrity, and to maintain a standard of ethical conduct consistent with the mission statement of NBEA. 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 NBEA Code of Ethics when representing or participating in NBEA activities.

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

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

CONFIDENTIALITY

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

Conflicts of Interest

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

• NBEA defines a conflict of interest as any personal or financial relationship (both direct and indirect), 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 NBEA.

- NBEA 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.
- NBEA defines a substantial appearance of a conflict of interest as occasions when 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 NBEA 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 NBEA activity giving rise to the substantial appearance of a conflict
 of interest unless and until it is determined by the appropriate NBEA entity that no conflict exists.
- Following appointment or election, each NBEA Board member, or committee member, must fulfill his/her obligation to disclose any conflict to the Board. After fulfilling terms on boards, committees and commissions, all confidential matters that are provided to you shall remain confidential.

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

- NBEA 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, NBEA prohibits the receipt or giving of personal gifts exceeding the value of \$25.00.

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 NBEA Board 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 review.

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 NBEA as follows:

New Brunswick Equestrian Association 900 Hanwell Road, Unit 13 Fredericton NB E3B 6A2

> Approved by the New Brunswick Equestrian Association Board of Directors August 27, 2019