



Confidentiality and Conflict of Interest Policy for Officers, Directors and Employees

Introduction

Officers, directors and employees of the New Brunswick Equestrian Association (NBEA) are bound by the Equestrian Canada Code of Conduct and Ethics, as all NBEA members are. In addition, NBEA officers, directors and staff shall conduct business with integrity and transparency, and maintain a high standard of confidentiality, when representing or participating in NBEA activities. 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.)

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

- Comply with the adopted Equestrian Canada Code of Conduct and Ethics
- Ensure that all transactions are handled honestly and recorded accurately.
- Protect information that belongs to NBEA, and its 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 [Privacy Policy](#), and respect the confidentiality of member information, financial transactions, and private correspondence.

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 this agreement is subject to disciplinary measures, which may include termination of membership, employment, and/or expulsion from the board or committee. The NBEA Board shall review all violations of the Confidentiality and Conflict of Interest policy and, if appropriate, refer complaints to the [NBEA Dispute Resolution policy](#).

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 31
 Fredericton NB
 E3B 6A2

Approved by the New Brunswick Equestrian Association Board of Directors
 March 27, 2022