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Code of Conduct Policy

Office of Accountability:	President, Calgary Polo Club
Office of Administrative Responsibility:	Vice-President, Calgary Polo Club
Approver:	Board of Directors
Scope:	Compliance with this Calgary Polo Club policy extends to all employees, contractors, grooms, guests, grooms, and volunteers of the Calgary Polo Club community .

1. Code of Conduct

It is the policy of the Calgary Polo Club to maintain the highest standard of ethics in its relationships with customers, governments, suppliers, competitors, its contractors / employee /guests /grooms /member /volunteers, and the community at large. The Calgary Polo Club, their employee /contractors /guests /grooms /member /volunteers must not only conduct, but must be seen to conduct, its business dealings in accordance with high ethical standards.

The following principles are to be used as a guide in carrying out their day-to-day duties:

1. Compliance with Laws

The Calgary Polo Club shall conduct each of their business operations in compliance with all laws, regulations, and other legal requirements applicable to the Club in whatever jurisdiction the Club is carrying on its business. The Calgary Polo Club will also endeavor to ensure that its agents, contractors, partners, and associates comply with such laws, regulations and other legal requirements in any jurisdiction in which they are working with or for the Club.

2. Conflict of Interest

The Calgary Polo Club require that no conflict exist between the personal interests of employee/member/guest/grooms and those of the Club. Contractor/employee/ member /guest /grooms and volunteers must disclose situations including personal relationships in which their private interests may affect their judgment in acting on behalf of the Club to the Vice-President or the President. In situations that may affect financial controls, approvals, confidential personal information or where an employee/member/guest/groom is able to influence the career of someone with whom he or she is engaged in a personal relationship, action may be required.



Conflict of interest, or the potential for conflict, can take many forms and should be avoided by all employee/guests/grooms/member/volunteers. Examples are as follows:

- Supervisor-subordinate romantic or close personal relationships. These can also lead to management and morale problems and claims of sexual harassment
- Outside business, personal interest or activities, and outside work for hire that detracts from job performance or good judgment on behalf of CPC., or
- Acceptance of gifts, entertainment, or other personal favours substantial enough to influence the contractor/employee/member/guest/grooms selection of goods or services for CPC or the proper performance of his or her duties.

A contractor/employee/member/guest/grooms/volunteers involved in any of the types of relationships or situations described in this policy should immediately and fully disclose the relevant circumstances to a CPC board member. CPC Board of Directors, or appointed subcommittee will approve or disapprove the arrangement and the employee/member/guest/grooms will be notified.

3. Confidential Information

In the course of employment, contractor/employee/guests/grooms/member/volunteers may have access to information that is confidential, privileged, or of value to competitors of CPC or might be damaging to the CPC if improperly disclosed. All contractor/ employee/ guests/ grooms/member/volunteers must protect the confidentiality of information concerning CPC and its members as well as information with respect to companies having business dealings with the CPC. In addition, any permitted or authorized use of confidential information must only be for CPC purposes as agreed after written approval by the owners of the confidential information.

4. Personal Harassment Policy

Harassment is a form of discrimination and an occupational hazard. The Calgary Polo Club is committed to ensuring that its contractor/ employee/guests/grooms/member/volunteers are provided with a work environment free from harassment in accordance with relevant legislation.

Harassment shall be defined as any unwelcome behaviour directed at an individual that is offensive to that individual. Harassment includes but is not limited to:

- a) A single incident or repeated incidents of objectionable comments or conduct that is known or ought to have been known to be unwelcome. This includes any written (e.g., email, cell phone text message, social media), verbal and/or physical behaviors, bullying or action by a person that the person knows or ought reasonably to know would cause offence or humiliation to a worker or adverse effects on a worker's health and safety.
- b) Any form of discrimination based upon one or more of the federally or provincially legislated prohibited discriminatory grounds.



- c) Any unwelcome conduct, comment, gesture or contact of a sexual nature which has the purpose, or the effect, of creating a work environment that is intimidating, humiliating or uncomfortable; any implied or expressed condition or promise for complying with a sexually oriented request. Examples of conduct or circumstances which may constitute sexual harassment include touching, patting, pinching, punching, leering, suggestive/compromising remarks, and the display of offensive pictures or other demeaning materials.

Sexual harassment includes behaviour that the employee/member/guest/grooms/member knows or should know is offensive. Sexual harassment does not refer to accepted social banter. However, tolerance for such behaviour varies and accordingly, good judgment must be exercised.

- d) A reprisal or threat of reprisal for the rejection of a sexual solicitation or advance made by a person who can grant or deny a benefit.

The legislation also prohibits employers, agents of employers and co-workers from engaging in any of these types of harassment with any contractor/employee/groom/guest/member/ volunteers. CPC also expects the understanding to protect members and guests of CPC.

Employee/groom/guest/member/volunteer who are found to be engaging in harassment will subject themselves to progressive disciplinary action up to and including discharge.

Steps to be followed for any harassment complaint:

- i. Immediately make your discomfort and disapproval known to the harasser.
- ii. Keep a written record of the alleged nature of the harassment, detailing dates, times, locations and witnesses and the harassment behaviour.
 - A. If the harassment continues, report the complaint in confidence to your, any board member of the Operations Manager.
 - B. Prepare a written report of the complaint, detailing the nature of the Incident, the dates, times, places, witnesses, and names of those involved.
- iii. On receipt of a complaint, the CPC Board of Directors who accepted the written complaint is responsible for forwarding a written, detailed account of the complaint to the rest of the Board.
- iv. The Board of Directors or appointed committee will take the necessary steps to investigate the complaint. The Board of Directors reserves the right to hire a lawyer to follow protocol in dealing with the complaint. All information will be treated as strictly confidential. If evidence or allegations are of a nature that warrants police involvement, such action may be directed by retained counsel.
- v. At the conclusion of this investigation if counsel is involved, the lawyer will advise only those parties concerned of the results of the finding. If no legal process is followed, VP or the Discipline committee will advise only those parties concerned.
- vi. If charges are substantiated, CPC will impose appropriate disciplinary action as presented by Counsel. If charges are not substantiated, there will be no negative consequences drawn against the complainant, witnesses or alleged harasser and no record of the complaint will appear on any employee/member/guest/grooms personnel file.

If the complainant is not satisfied with the action taken, she or he may submit a complaint to the Provincial Human Rights Commission or the Occupational Health and Safety Act. The complainant should be aware that this option is available to them at any point during the procedure. However, it is encouraged that there be serious attempts made to pursue resolution amongst the parties directly involved. The above policy is intended to facilitate such resolution.



2. Violence in the Workplace Policy

The safety and security of contractor/employee/guests/grooms/member/volunteers is significant to CPC. Acts of violence or threats of violence (including domestic violence) which occurs at or affects the workplace are prohibited by the Company and will not be tolerated. The purpose of this policy is to identify the types of violent behaviour by individuals that will not be tolerated and to establish procedures for responding to such behaviour.

For this policy, definitions are as follows for this policy:

- a) "Domestic violence" includes acts of violence committed between people who have an ongoing or prior intimate relationship, including without limitation, people who are married, live together or who have been married or lived together.
- b) "contractor/employee/guests/grooms/member/volunteers" for the purposes of this policy includes anyone directly in contact with and works for the Calgary Polo Club.
- c) "intimidation" includes, but is not limited to, stalking, or engaging in actions intended to frighten, coerce, or induce distress.
- d) "Physical attack" is unwanted or hostile physical contact such as hitting, pushing, kicking, shoving, throwing of objects, or fighting.
- e) "Property damage" is intentional damage to property owned by the Company, its contractor/employee/guests/grooms/member/volunteers, or visitors.
- f) a "threat" is the expression of intent to cause physical or psychological harm. Such an expression constitutes a threat without regard to whether the person communicating the threat can carry it out, and without regard to whether the threat is made on a present, conditional, or future basis. In determining whether the conduct constitutes a threat, including whether the action was intended as a threat, the totality of the circumstances will be considered.
- g) "violence" means the attempted, threatened, or actual conduct of a person that causes or is likely to cause physical injury and prohibited acts of violence include threats, intimidation, physical attack or property damage.
- h) a "weapon" includes guns, knives, explosives, and other items with the potential to inflict serious harm.
- i) "workplace" means any place where Company work is done or where a Company sponsored event is held; and
- j) "Workplace violence" includes acts of violence committed by Company contractor/ employee/ guests/grooms/member/volunteers, clients, customers, relatives, acquaintances or strangers against or affecting Company employee/guests/grooms/member/volunteers in the workplace or Company property.

It is a violation of this policy to:

- Engage in workplace violence as defined herein; or
- Use or possess a weapon in any building or in any motor vehicle located on Calgary Polo Club facilities.



- A contractor/employee/member/guest/grooms/member/guest who participates in a domestic violence situation is encouraged to inform a Board member when there is a potential that the situation could affect the workplace or other contractor/ employee/ guests/ grooms/member/volunteers.

A contractor/employee/guest/grooms/member/volunteer who believes he/she has been the victim of workplace violence whether from a co-worker, client or person employed with the Calgary Polo Club, or a contractor/employee/member/guest/grooms / volunteer who witnesses a threat or act of workplace violence, must report such violent acts or threats immediately to a CPC Board member.

When informed and Board Member will seek approval to retain Counsel on behalf of CPC to ensure investigation, response and resolution are conducted in an expeditious manner.

Contractor/ employee/member/guest/grooms/volunteers and complainant confidentiality will be maintained and involved parties will be treated with respect and dignity throughout the entire process.

3.0 Disciplinary Policy

It is the Calgary Polo Club's policy to administer equitable and consistent discipline for unsatisfactory performance or inappropriate conduct in the workplace through the Discipline Committee. Violations to this policy made by any contractor/employee/member/guest/grooms/ volunteer will be enforced using the following disciplinary steps.

1. One Verbal warning.
2. One Written warning.
3. Suspension (at Board of Directors or Disciplinary Committee's discretion).
4. Termination if employee/contractor or ban from CPC facilities and events if non-employee/contractor

Progressive Discipline is a step-by-step process designed to modify unsatisfactory employee/member/guest/grooms conduct, which also allows for discipline to start at a higher step based on the severity and conditions of the situation. For example, poor judgement in wearing inappropriate clothing in the workplace is different from overlooking a key safety procedure with potentially dangerous consequences. An CPC Discipline Committee should assess the employee/member/guest/groom's understanding of the rules and expectations, their willingness to follow them, any systems failures and workplace obstacles interfering with compliance and whether the action was the result of an excusable mistake, an inexcusable error, or deliberate action.

Certain violations may be viewed serious enough to warrant more severe discipline up to and including immediate termination as a contractor/employee, expulsion from CPC if member/guest / groom or volunteer

Violations of policies and procedures are among the most serious violations at CPC. If a violation occurs with it will be viewed as non-acceptable job performance if employee/member/guest/groom/volunteer. If a violation occurs, the Discipline Committee will assess the situation and apply the proper level of discipline as outlined in this company policy. The Discipline committee will make their findings available to the Board of Directors of CPC.



I have read and understand the Calgary Polo Club Code of Conduct policy. I will hold myself accountable and responsible to adhere to this policy.

Signed: _____

Print Name: _____

Dated: _____