



Policy #/Name: Code of Conduct Policy

Date of Board Approval: March 20, 2015

Policy Statement

Our Code of Conduct outlines how to act when in a role for the WCF. It brings to life our values and will help you maintain trust and build strong relationships. It represents the WCF's commitment to uphold ethical business practices and meet or exceed applicable legal requirements. It helps us stay true to the 'spirit' of curling.

Staying true to the Code supports a culture where we show real respect for one another, do what is right and do what we say we will do.

Also speak up and step up if you see a potential breach or if there is an opportunity for us to improve how we behave.

The Code establishes a standard of conduct with which all are expected to comply. It applies equally to board members, employees, member association representatives, contractors and consultants. Regardless of role, location or level of decisions made, personnel will find clear guidance on expected behaviour within the Code. By taking on a role with the WCF the individual agrees to be held to this code of conduct.

The Secretary General is responsible to the Board of the WCF for breaches to the ethics and culture of the WCF.

Code of Conduct

The following are types of codes of conduct (see appendix A for a complete listing in detail of these areas):

1. Commission Members
2. Member Association Representatives
3. Health and Safety
4. Tobacco, Illegal Drug, excessive Alcohol use
5. Equality in Employment
6. Harassment and bullying
7. Personal information/Privacy and Accuracy of Data
8. Working with Governments
9. Political Contributions & Activities
10. Anti-Corruption
11. Engaging with Stakeholders/ Members
12. Environments
13. Business Partner Relationships
14. Protecting WCF Assets
15. Communicating Externally
16. Intellectual Property

Potential Breaches/Violations of the Policy

All queries about the interpretations and application of the Code will be treated seriously, respectfully and assessed in a timely and confidential manner. Failing to comply with this Code will be addressed and may lead to disciplinary action.

If a concern is raised with the Secretary General or a Board Member, the course of action will depend on the nature and severity of the issue. The following details will be sought out: nature of the issue, who is involved, and what steps have been taken so far to address the issue. If it requires referral, mediation or

investigation, the complainant will be advised on the next steps, expected timeframes and the process for receiving feedback.

All persons are held accountable for their own behaviour and also for the business conduct behaviour of their representatives.

If a breach has occurred, the nature of any disciplinary or corrective action will be determined in consultation with appropriate experts, including the Secretary General and Board. Corrective actions depend on the seriousness of the breach and other relevant circumstances. Examples of disciplinary action include but not limited to:

- a. discussions with the person about desired behaviours;
- b. a verbal or written warning to the person;
- c. suspension from the role;
- d. dismissal from the role.

An example of legal action may be the requirement to recover WCF assets. Breaches which constitute criminal conduct may also result in criminal prosecution. If the breach includes a violation of the law, the matter may be referred to the appropriate law enforcement authorities.



Policy #/Name: Appendix A: A Detailed listing of Code of Conduct Types

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Member Association Representatives and Commission Members	
Commission Member	<p>The WCF has commissions to solicit input from member associations and provide input into the affairs of the federation. Members of these commissions have a duty to represent and act accordingly.</p> <p>Our expectations of you is to act:</p> <ol style="list-style-type: none"> 1. in the best interests of the All the World Curling Federation’s Member Associations. You are expected to do what is best for the sport of curling. Personal biased views need to be set aside while in this role. 2. with respect, including the avoidance of excessive consumption of alcohol where it impairs your ability to perform your role, 3. by dressing in business attire unless the role requires different requirements, 4. accordingly when handling confidential materials or ones which are time sensitive, 5. in recognition that all members are volunteers and time should be effectively managed, 6. prepared by coming to the meetings having read the materials in advance, 7. by respecting each person’s contribution and viewpoints, allow all members time to speak, listen to the conversation, 8. by fulfilling your commitments to action items, 9. by attending meetings, and if unable to attend to make every effort to catch up on what is missed and to provide input prior to meetings expressing your views, 10. by keeping all members informed with the same information to make a decision, 11. as one voice once a decision has been reached by the majority, 12. in accordance with the expense reimbursement policy and timelines, disclosure agreement(s).
Member Association Representatives	<p>The WCF is governed by the Member Associations who provide input and decisions into the affairs of the Federation. The representatives from the Member Associations to represent and act accordingly.</p> <p>Our expectations of you is to act:</p> <ol style="list-style-type: none"> 1. with respect, including the avoidance of excessive consumption of alcohol where it impairs your ability to perform your role, 2. by dressing in business attire unless the role requires different requirements, 3. accordingly when handling confidential materials or ones which are time sensitive, 4. in recognition that all members are volunteers and time should be effectively managed, 5. prepared by coming to the meetings having read the materials in advance, 6. by respecting each person’s contribution and viewpoints, allow all members time to speak, listen to the conversation, 7. by fulfilling your commitments to action items, 8. by attending meetings, and if unable to attend to make every effort to catch up on what is missed and to provide input prior to meetings expressing your nations views, 9. by keeping all members informed with the same information to make a decision, 10. as one voice once a decision has been reached by the majority, 11. in accordance with the expense reimbursement policy and timelines, 12. by expressing your nations concerns in the open meetings or before in writing or verbally to the president. All opinions should be expressed professionally about ideas or topics rather than personal character attacking comments. 13. the election process allows candidates and their supporters to express why someone should be elected rather than why someone else should not be.
Our people	
Health and Safety	<p>The WCF is committed to achieving industry practice in health and safety. In all cases, the WCF aims to meet or exceed applicable legal and other requirements as the WCF believes all accidents and occupational illnesses and injuries are preventable.</p> <p>Safe operations depend on technically sound plant and equipment and on every person taking responsibility for</p>

	<p>preventing workplace/event-related injuries and illnesses. We will only be successful when every person goes home safe and well every day and lives a life free from illness caused by workplace/event exposures.</p> <p>Our expectations of you Across the organisation, health and safety practices are governed by standards and procedures that apply to all people. For a safe workplace we can all enjoy, please be aware of all relevant standards and procedures and adhere to them. Staff are accountable for the implementation of these standards and procedures and for ensuring that supporting systems are in place. You must understand and follow health and safety requirements, and promptly report any circumstances that represent a threat to your safety or the safety of others.</p>
Tobacco, Illegal Drug and Excessive Alcohol Use	<p>The WCF puts health and safety first. All WCF workplaces/events are to be free from the use of illegal drugs and the misuse of other substances. Workplaces will shift based on where the WCF member is attending to perform their duties. We are committed to providing our employees with a safe and healthy work environment and therefore expect all people to any of our workplaces to be able to function at an acceptable level of performance and not to be affected by excessive alcohol, legal or illegal drugs. Excessive alcohol must not be offered or consumed at any WCF workplace/events. We prohibit smoking in our offices. At some workplaces/events, smoking may be permitted in designated smoking areas. The possession or use of illegal substances at WCF workplaces, functions or in conjunction with WCF business is strictly prohibited. Alcohol and drug dependency is recognised by the WCF as an illness.</p> <p>Our expectations of you Always follow the Code. If you consume excessive alcohol at an authorised designated area, or off-site during a workday, you should not return to your role until you are fully fit for work. Remember you are a representative of the WCF. To prevent passive smoking and prevent smoke entering work areas, a designated smoking area must be clearly defined, sealed off from adjacent areas and adequately ventilated. You should only smoke in these areas. If representing the WCF at a site you should not be intoxicated and must be free of illegal drugs. If you have a drug or alcohol dependency you are expected to seek help and undertake appropriate rehabilitation treatment.</p>
Equity in Employment	<p>The WCF is committed to developing and maintaining a diverse and inclusive workplace where every person is treated fairly and with respect, has the opportunity to realise their full potential and contribute to the WCF's success. Employment, development opportunities and promotion at the WCF are offered and provided on merit. All people will be treated and evaluated according to their job-related skills, qualifications and capabilities. Decisions based on attributes unrelated to job performance, such as race, gender, sexuality or family responsibilities, constitute unlawful discrimination and are prohibited. Where local laws may conflict with WCF standards, local staff are required to provide clear instructions to people regarding acceptable behaviours and the application of laws. The WCF will seek to meet both its standards and legal obligations. Where this is not possible, the law will take precedence.</p> <p>Our expectations of you Together, you and your supervisor are responsible for ensuring that you:</p> <ul style="list-style-type: none"> – know what is required of you in your job; – have open, constructive performance discussions; – are supported to develop your volunteer/work-related capabilities; – are treated fairly, with respect and dignity and without discrimination.
Harassment and Bullying	<p>The WCF does not tolerate any form of harassment or bullying in any of its workplaces/events.</p> <p>Harassment is an action, conduct or behaviour that is viewed as unwelcome, humiliating, intimidating or offensive by the recipient. Bullying is repeated verbal, physical, social or psychological abuse by a person or group of people at work. Harassment and bullying are illegal in many countries and may lead to penalties for individuals and for the WCF. Workplace/event harassment and bullying should not be confused with constructive feedback or coaching on performance or work-related behaviour of an individual or group for development.</p> <p>Our expectations of you You must never engage in actions or behaviours that involve harassment or bullying. You are expected to be inclusive, collaborative and supportive. It is important that you consider the implications of your behaviours, and support your colleagues to speak up and raise concerns. The WCF is governed and abides by each country's laws and regulations regarding the fair and proper treatment of others. Always be aware of cultural considerations and demonstrate respect, particularly when travelling to different operations or countries.</p>
Personal Information/	<p>The WCF will only collect, use, disclose and retain personal information that is necessary to meet business requirements, as permitted by law in places where it operates. Personal information means any information which could identify an individual, either from that information alone or in combination with other information</p>

Privacy and Accuracy of Data	<p>which is reasonably likely to come into the possession of the WCF. Personal information will be collected in a lawful and fair manner and in a way which is not unreasonably intrusive. The WCF will not use or disclose such information in a manner that is incompatible with the purpose for which it was collected, except as permitted by law. To the extent permitted by law, the WCF reserves the right to monitor or audit employee use of its information systems, and access electronic communications or information stored on systems, devices or equipment for maintenance, business needs or to meet a legal or policy requirement.</p> <p>The WCF should always demonstrate accuracy of its data and information concerning the WCF or its business activities. This may include financial, operational, project, health, safety, environmental, time keeping or other information and in all formats. Once created, data must be appropriately retained, protected and disposed of according to WCF records and document management requirements and applicable laws and regulations.</p> <p>Our expectations of you It is important you understand the WCF’s standards and procedures on personal information/privacy and accuracy of data. If you have any doubts about the handling of information, consult the Secretary General. Information on our computers and within emails may be accessed for legal or other reasons. Always treat the information and privacy of others with respect. Falsifying, concealing, altering, destroying or otherwise tampering with information, or creating misleading information will not be tolerated by the WCF.</p>
Governments and communities	
Working with governments	<p>The WCF respects the authority of governments wherever it conducts its operations. The WCF will maintain honest relationships with governments and their agencies, officials and personnel.</p> <p>Our expectations of you If you provide information to governments on behalf of the WCF, you must ensure that all information is accurate and appropriate for the purpose. Errors or omissions may damage the WCF’s reputation and could be illegal. If you are required to make representations on behalf of the WCF on government matters and with government officials, you must comply with all applicable laws and regulations, and advise the Secretary General.</p>
Political Contributions and Activities	<p>The WCF’s approach to corporate participation in political activities is straightforward and applies globally: the WCF will not make political contributions in cash or in-kind anywhere in the world. It is acceptable for the WCF to express our views to governments on subjects that affect the WCF’s interests and operations.</p> <p>Our expectations of you You may participate as an individual in political processes provided it is understood, and made clear, that in doing so you are not representing the WCF. You may also be involved in events or activities organised by a political party, politician, elected official or candidate for public office provided that: – your involvement is for business briefing purposes only; – the activity is formally registered with and approved in advance by the Secretary General.</p> <p>We recognise employees’ rights and respect their choices to participate as individuals in the political process. You will need to apply for leave if you are running for office or carrying out the duties of public office during normal working hours. Such participation, including contributions of time and money, must be conducted entirely on your own account and your political opinions must not be presented as being those of the WCF.</p>
Anti-Corruption	<p>Compliance with anti-corruption laws is essential to protect the WCF’s reputation and to preserve its social licence to operate. The WCF prohibits authorising, offering, giving or promising anything of value directly or indirectly (via a third party) to a government official to influence official action, or to anyone to encourage them to perform their work disloyally or otherwise improperly. Corruption is also a criminal offence under laws that apply to the WCF worldwide. These laws also prohibit bribery of individuals in a position of trust. Anti-corruption laws also require that all transactions are recorded accurately and in reasonable detail in the WCF’s books and records. Facilitation payments are prohibited by the WCF in line with the anti-corruption laws of most countries. Requests for facilitation payments must be reported to the Secretary General immediately.</p> <p>Our expectations of you Ensure you read and understand our anti-corruption requirements and their importance. Our policies and procedures require pre-approval before: – offering certain things of value to an external person; – engaging a supplier who will interact with other on our behalf; – offering to undertake a community donation or project; – offering to provide sponsorship of an event.</p>
Engaging with Stakeholders/ Members	<p>The ability to build relationships and work collaboratively and transparently with communities is critical to the long term success of the WCF. The WCF aims to be valued and respected by the communities in which it operates. The WCF builds relationships with its communities by engaging regularly, openly and honestly with people</p>

	<p>affected by its operations and by taking their views and concerns into account in its decision making. We build relationships with by engaging regularly, openly and honestly with people affected by our operations and by taking their views and concerns into account in our decision-making. We understand that our business can impact local communities both positively and negatively, either through our own activities or as a result of our business relationships with other parties. If you are unsure, guidance can be sought from the Secretary General. In all cases, development projects and donations should be approved in accordance with applicable WCF standards and operate according to documented, approved and transparent procedures.</p> <p>Our expectations of you If you are responsible for development projects or donations, you need to read and understand the Code. This includes the conduct of appropriate due diligence before engaging any partner or agency to implement a program. This will ensure the organisation is reputable, aligned with the Code and has appropriate governance processes. When accepting an international assignment, or if your role involves business dealings with other countries, you should always be aware of and understand the norms, laws and customs of those countries. As ambassadors for the WCF, you must ensure that your behaviour always reflects positively on your own reputation and the WCF. Advice should always be sought from relevant persons on questions about particular actions, words, customs and local practices.</p>
Environment	<p>The WCF is to be environmentally responsible.</p> <p>Our expectations of you You must understand the potential environmental impacts of the tasks you perform and look at ways you can avoid and minimise these impacts. Where actual or potential environmental incidents occur you must report these, irrespective of severity. If you have a suggestion as to how the WCF can contribute to enduring environmental benefits discuss them with the Secretary General.</p>
Third party relationships	
Business Partner Relationships	<p>Most countries in which the WCF operates have developed competition laws, also known as antitrust or anti-monopoly laws. These laws are designed to prohibit a range of practices that restrain trade or restrict free and fair competition, such as price fixing, market sharing, bid rigging or abuses of a dominant position. Relationships with suppliers providing the WCF with goods or services can make a significant contribution to the success of the WCF. Through their actions, suppliers can directly impact the financial performance of the WCF, as well impacting our reputation. The WCF takes great care in operating a fair and equitable procurement process. Our selection process aims to clearly inform potential suppliers of our expectations and standards and the requirements applicable to them.</p> <p>Our expectations of you In all dealings with the WCF’s competitors (including competing joint venture partners), customers, suppliers and business partners, you are required to conduct yourself in a professional manner. The WCF will always exercise care when selecting a business partner and encourage them to uphold the WCF’s standards and contribute positively to the WCF’s reputation. Always seek suppliers who share the WCF’s commitment to: lawful business practices; management practices that respect the rights of all employees and the local community; minimising the impact on the environment; providing a safe and healthy workplace. You should be satisfied that the business partner is reputable, competent and qualified to perform the work for which they are being hired and that the compensation sought is reasonable. If you engage a business partner you need to take steps to ensure that the performance of the business partner is monitored and assessed. This will require, at a minimum, carefully checking invoices and raising queries with the business partner about any unclear or excessive charges. If you suspect inappropriate behaviour by a WCF employee, contractor or third party, you must report it immediately.</p>
Using company resources	
Protecting WCF Assets	<p>Members of the WCF have an obligation to protect the WCF’s assets and use them for their intended purpose. WCF assets exist in various forms and include physical and non-physical property, such as facilities, equipment, inventory information technology, funds, intellectual property and company information and data. Sensitive and proprietary information must be treated as an asset and protected from unauthorised use or disclosure. This may include: strategic and marketing plans; information used in trading activities; operational data, such as production and maintenance data, master data and data related to our equipment, sensors and process control systems; research and other technical data. You should not share any of this kind of information unless authorised to do so. If you are not sure what you can share, ask your supervisor or the Secretary General. Appropriate precautions should be taken to prevent theft, misappropriation, damage or misuse of any WCF assets. This includes not allowing physical assets to be destroyed, disposed of, sold, loaned or donated without appropriate approvals. Non-physical assets should also not be provided externally without appropriate approvals.</p>

	<p>Our expectations of you You are responsible for appropriately using and safeguarding WCF assets, both physical and non-physical. You are also expected to respect both the non-physical and physical assets of others, and never knowingly damage or misappropriate those assets.</p>
<p>Communicating Externally</p>	<p>WCF public disclosures must only be made by authorised spokespersons. Any public written or verbal communication that can be attributed to the WCF or to one of its employees may amount to a public disclosure.</p> <p>Our expectations of you It is important that you feel equipped to speak positively about the WCF when asked in both formal and informal settings. It is natural to express pride in the WCF’s heritage and its broader social contribution. However, in today’s networked world, care must be taken to ensure that you are not speaking on behalf of the WCF unless authorised to do so by the Secretary General or the Board, in line with public disclosure guidance and our media standards. As a general rule, all external communication materials must be approved by the Secretary General or Board. If you associate yourself with, or are likely to be associated with, the WCF when you communicate externally, the Code applies, including provisions relating to harassment, privacy, our information technology, insider trading, intellectual property and this section on communicating externally. Apply the same principles of media to social media, and only respond on behalf of the WCF if you are authorised to do so. You should also behave in line with all applicable legal requirements including spam laws and the terms of any social media services.</p>
<p>Intellectual Property</p>	<p>The WCF needs all of its employees to safeguard the WCF’s intellectual property from unauthorised use by outsiders. The WCF also expects its members to respect the intellectual property rights of others. Intellectual property can be an invention, trademark, original design or the practical application or expression of an idea that has commercial value. Intellectual property is WCF property in the same way as physical assets belong to the WCF. It is often highly valuable. As markets become increasingly competitive, protecting our Intellectual property is essential. Also, as it has been developed by the WCF, it may be protected under law relating to copyright, patents, trademarks and the like.</p> <p>Our expectations of you You must protect Intellectual property in the same careful way that other WCF property is protected and never disclose WCF intellectual property that is confidential. This expectation applies throughout your role and continues after your role ends. On occasion you may need to share our Intellectual property with persons outside of the WCF to allow a third party to work effectively with us. Even when there seems to be a legitimate reason to do so, you should never disclose this information without the Secretary General’s prior approval and then under a written confidentiality and/or non-disclosure agreement(s).</p>