



Policy #/Name: **Conflict of Interest Policy**

Date of Board Approval: **March 20, 2015**

Policy Statement

The World Curling Federation as the governing body for curling has a duty to ensure that all aspects of their business dealings with members, suppliers and individuals are carried out with the utmost honesty and integrity.

Directors

The Directors of the WCF have a legal obligation to act in the best interests of the WCF and it's members and by adopting this policy they confirm that they understand their obligations.

Conflicts of Interest

There are three types of conflict of interest:

1. An **apparent conflict of interest** arises where a Director does not have a conflict of interest, but someone would be justified in thinking one exists. Apparent conflicts can be as damaging as potential or actual conflicts, because they cause suspicion, and should therefore be resolved wherever possible.
2. A **potential conflict of interest** occurs when a Director has a conflict with respect to a certain judgement, but is not yet in a position where that judgement must be exercised.
3. A potential conflict becomes an **actual conflict of interest** when a Director is in a position to exercise that judgement.

Upon appointment each Director will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated annually or as appropriate.

In the course of meetings or activities, Directors will disclose any interests in a transaction or decision where there may be a conflict between WCF's best interests and the Director's best interests or a conflict between the best interests of two organisations that the Director is involved with. If in doubt the potential conflict must be declared anyway and clarification sought.

In the case of a conflict of interests arising for a Director because of a duty of loyalty owed to another organisation or person and the conflict is not authorised by virtue of any other provision in the memorandum or the articles, the unconflicted directors may authorise such a conflict of interests where the following conditions apply:

1. the Director who has declared the conflict of interest withdraws from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person;

2. the Director who has the conflict of interest does not vote on any such matter and is not to be counted when considering whether a quorum of Directors is present at the meeting;
3. the other Directors who have no conflict of interest in this matter consider it is in the interests of the WCF to authorise the conflict of interest in the circumstances applying.
4. Any such disclosure and the subsequent actions taken will be noted in the minutes.

Potential Breaches/Violations of the Policy

1. If the board has reasonable cause to believe that a person has failed to disclose actual or possible conflicts of interest, it shall inform the person of the basis for such belief and afford the person an opportunity to explain the alleged failure to disclose.
2. If, after hearing the response of the person and making such further investigation as may be warranted in the circumstances, the board determines that the person has in fact failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action which may 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.

CONFLICT OF INTEREST FORM

I as a Director of the World Curling Federation have set out below my interests in accordance with WCF's conflict of interest policy
Category <i>Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family or some other close personal connection</i>
Current employment and any previous employment in which you continue to have a financial interest
Appointments, voluntary or otherwise, e.g. Trusteeships, directorships, local authority memberships, tribunals etc.
Any financial interests that are relevant to your position with the WCF
Any contractual relationship with the WCF
Any conflicts not covered by the above
To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis in line with the WCF's Conflict of Interest Policy. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose. Signed
Position Date