



ONTARIO EQUESTRIAN FEDERATION

Code of Conduct, Confidentiality and Conflict of Interest Policy

Introduction

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

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

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

CONFIDENTIALITY

- Officers, Directors and Committee Members shall comply with the OEF confidentiality agreement.

Conflicts of Interest

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

- The OEF defines a conflict of interest as any personal or financial (both direct and indirect) relationship 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 the OEF.

- The OEF 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.
- The OEF defines a substantial appearance of a conflict of interest as whenever 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 OEF 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 the OEF activity giving rise to the substantial appearance of a conflict of interest unless and until it is determined by the appropriate OEF entity that no conflict exists.
- Following appointment or election, each OEF Board member, Budget and Finance Committee member, Ethical Practice Review Board member, Internal Audit Committee member, Legal Review Committee, Market Development and Promotion Committee members, Probable Cause Panel member, or any OEF Commission member, must fulfill his/her obligation to disclose any conflict by submitting the appropriate form attached (A and B) to the Executive Vice President. These Conflict of Interest forms will be in effect forever or until updated as situations change, then the updated forms will supersede the previous forms and will be in affect forever. After fulfilling terms on boards, committees and commissions, all confidential matters that are provided to you shall remain confidential forever. Any disclosures that you made on these forms will also remain confidential, unless disclosure is required by law or the EPRB process.

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

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

Questions regarding the application of the OEF’s hospitality and gift policies must be addressed to the Executive Director.

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 Executive Director 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 determination if the matter should be forwarded to the the Ethical Practice Review Board for any disciplinary that should be taken, or (b) as to staff, sanction the individual in accordance with the OEF’s standard employment practices.

Approved by the OEF Board of Directors – May, 2014

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 the OEF as follows:

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