



## WCF Code of Conduct Policy

### 1. Introduction

The WCF's Code of Conduct Policy outlines how to act when in a role for the WCF. It brings to life the values of the World Curling Federation and will help role incumbents maintain trust and build strong relationships. The policy represents the WCF's commitment to uphold ethical business practices as well as meeting or exceeding applicable legal requirements. This policy helps the WCF stay true to the "spirit" of curling.

Staying true to this Code of Conduct policy supports a culture where real respect is shown, what is right is done and where actions are carried through.

Role incumbents are encouraged to act if a potential breach of conduct is seen or if there is an opportunity to improve behaviour.

The Code establishes a standard of conduct with which all role incumbents 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, clear guidance on expected behaviour can be found within the Code. By taking on a role within the WCF, the individual concerned 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 Federation.

### 2. Code of Conduct

The following categories are types of codes of conduct (see Appendix A for a detailed listing).

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| 1. Commission Members   | 9. Political contributions and activities |
| 2. Member Association Representatives                         | 10. Anti- Corruption                      |
| 3. Health & Safety  | 11. Engaging with Stakeholders / Members  |
| 4. Tobacco, Illegal Drug usage, excessive Alcohol consumption | 12. Environments                          |
| 5. Equality in Employment                                     | 13. Business Partner relationships        |
| 6. Harassment & Bullying                                      | 14. Protecting WCF assets                 |
| 7. Personal information / Privacy & Accuracy of Data          | 15. Communicating externally              |
| 8. Working with Governments                                   | 16. Intellectual Property                 |



### **3. Potential Breaches / Violations of the Policy**

All queries in relation to the interpretations and application of the Code will be treated seriously, respectfully and dealt with in a timely and confidential manner. Failure to comply with this Code may result in 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 breach / violation. The following information will be collated:

- Nature of the breach / violation
- Names of those involved
- Steps taken to date in addressing the situation

If the situation requires referral, mediation or investigation, the complainant will be advised on the next steps and the process for receiving feedback.

Individuals are accountable for their own behaviour as well as the business conduct 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 severity of the breach and other relevant circumstances.

Examples of disciplinary action include, but are NOT limited to:

- Discussions with the relevant individual about expected behaviours
- A verbal or written warning
- Suspension from the role
- Dismissal from the role

Legal action may be taken if there is a need to recover WCF assets. Breaches which constitute criminal conduct may be referred to the appropriate law enforcement authorities.



## APPENDIX A: A Detailed Listing of Code of Conduct Types

| <b>Member Association Representatives and Commission Members</b> |  |
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| <b>Commission Member</b>   | <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><b>Expectations of a Commission Member are to act:</b></p> <ul style="list-style-type: none"> <li>• in the best interests of all Member Associations of the WCF and to do what is best for the sport of curling. Personal biased views need to be set aside</li> <li>• with respect, including the avoidance of excessive alcohol consumption where it impairs ability to perform the role</li> <li>• by dressing in business attire unless the occasion has different requirements</li> <li>• accordingly when handling confidential material or material that is time sensitive</li> <li>• in recognition that all members are volunteers and time should be effectively managed</li> <li>• prepared by attending meetings having read the materials in advance</li> <li>• by respecting each person's contribution and viewpoints, allowing all members time to speak and listening to the conversation</li> <li>• by fulfilling commitments to action items</li> <li>• by attending meetings, but if unable to do so, to make every effort to catch up on what is missed and to provide input prior to meetings</li> <li>• by keeping all members informed with the same information in order to make a decision</li> <li>• as one voice once a decision has been reached by the majority</li> <li>• in accordance with the expense reimbursement policy and timelines; disclosure agreement (s)</li> </ul> |
| <b>Member Association Representatives</b>                        | <p>The WCF is governed by the General Assembly of the Member Associations who provides input into the affairs of the Federation as well as takes decisions. The Representatives from the Member Associations have a duty to represent and act accordingly.</p> <p><b>Expectations of a Member Association Representative are to act:</b></p> <ul style="list-style-type: none"> <li>• with respect, including the avoidance of excessive alcohol consumption where it impairs ability to perform the role</li> <li>• by dressing in business attire unless the occasion has different requirements</li> <li>• accordingly when handling confidential material or material that is time sensitive</li> <li>• in recognition that all members are volunteers and time should be effectively managed</li> <li>• prepared by attending meetings having read the materials in advance</li> <li>• by respecting each person's contribution and viewpoints, allowing all members time to speak and listening to the conversation</li> <li>• by fulfilling commitments to action items</li> <li>• by attending meetings, but if unable to do so, to nominate a proxy able to express the views of your Nation</li> <li>• by keeping all members informed with the same information in order to make a decision</li> <li>• as one voice once a decision has been reached by the</li> </ul>  |



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|   | <p>majority</p> <ul style="list-style-type: none"> <li>• in accordance with the expense reimbursement policy and timelines</li> <li>• by expressing the views of your Nation in Open Meetings or ahead of these meetings, in writing or verbally, to the President. All views should be expressed professionally about ideas or topics under consideration</li> <li>• by following the election process</li> </ul>   |
| <b>Our People</b>   |  |
| <b>Health &amp; Safety</b>  | <p>The WCF is committed to achieving industry best practices in Health &amp; Safety.</p> <p>Safe operations depend on technically effective environment and equipment as well as every person taking responsibility for preventing environment / event-related injuries and illnesses. The WCF will only be successful when every person goes home safe and well every day and lives a life free from illness caused by environment / event exposures.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• across the organisation, health &amp; safety practices are governed by standards and procedures that apply to all people</li> <li>• everyone is aware of, and adheres to, the relevant standards and procedures so that a safe environment can be enjoyed</li> <li>• staff are accountable for the implementation of these standards and procedures and for ensuring that the appropriate support mechanisms are in place</li> <li>• everyone understands and follows health &amp; safety requirements and reports any threats to the safety of others or to themselves promptly</li> </ul>  |
| <b>Tobacco, Illegal Drug Usage and Excessive Consumption of Alcohol</b> | <p>The WCF puts Health &amp; Safety first. As such, all WCF environments / events are to be free from the use of illegal drugs and the misuse of other substances. The WCF is committed to providing its employees and volunteers with a safe and healthy environment. All employees and volunteers are expected to function at an acceptable level of performance and not be affected by excessive alcohol, legal or illegal drugs. Excessive alcohol must not be offered or consumed at any WCF environment / event. Smoking / vaping is only permitted in designated areas. The possession or use of illegal substances at WCF environments / events or in conjunction with WCF business is strictly prohibited.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• the Code is always followed</li> <li>• if an individual consumes excessive amounts of alcohol in the workplace or at a WCF event, they must not return to their role until they are totally fit to do so</li> <li>• smoking / vaping areas are clearly defined, sealed off from adjacent areas and adequately ventilated</li> <li>• anyone having a drug or alcohol dependency seeks support and undertakes the necessary rehabilitation treatment</li> </ul> |
| <b>Equity in Employment</b>   | <p>The WCF is committed to developing and maintaining a diverse and inclusive environment where everyone is treated fairly, with respect and has the opportunity to realise their full potential and contribute to the WCF's success. Employment, development opportunities and promotion within the WCF are offered 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, e.g., race, gender, sexuality or family responsibilities, constitute unlawful discrimination and are prohibited. Where local laws may conflict with WCF standards, local employees are required to provide</p>   |



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|  | <p>clear instructions in relation to acceptable behaviours and the application of the law. The WCF will strive to meet both its standards and legal obligations but where this is not possible, the law will take precedence.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• employees know what is expected of them in their role</li> <li>• employees have open and constructive performance discussions</li> <li>• employees are supported in developing their volunteering / work – related capabilities</li> <li>• employees are treated fairly, with respect, dignity and without discrimination</li> </ul>  |
| <b>Harassment &amp; Bullying</b>                             | <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 to the recipient. Bullying is repeated verbal, physical, social or psychological abuse by a person or a group of people at work. Harassment and bullying are illegal behaviours in many countries and, as such, if found guilty, could result in penalties for an individual and / or the WCF.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• no individual should engage in activity that may constitute harassment or bullying.</li> <li>• behaviour is inclusive, collaborative and supportive</li> <li>• consideration should be given to different cultures particularly when travelling to different countries</li> <li>• it abides by the law and country regulations regarding the fair and proper treatment of others</li> </ul>  |
| <b>Personal Information / Privacy &amp; Accuracy of Data</b> | <p>The WCF will only collect, use, disclose and retain personal information that is necessary to meet business requirements, as permitted legally. Personal information means any information which could identify an individual and which will be collected in a lawful and fair manner which is not unreasonably intrusive. The WCF will not use or disclose such information that is incompatible with the purpose for which it was collected, except as permitted by law. Within the parameters of the law, the WCF reserves the right to monitor or audit employees' use of it information systems, access electronic communications or information stored on systems, devices or equipment for maintenance, business needs or to meet a legal / policy requirement.</p> <p>The WCF should always demonstrate accuracy of its data and information. This may include financial, operational, project, health &amp; safety, environmental, time keeping or other information and in all formats. Once created, data must be retained appropriately, protected and disposed of according to the WCF records and document management requirements, applicable laws and regulations.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• the WCF's standards and procedures relating to personal information / privacy and accuracy of data are understood</li> <li>• if there are doubts about the handling of information, the Secretary General be contacted in the first instance</li> <li>• information on WCF computers / within emails may be accessed for legal / regulatory reasons</li> <li>• the information and privacy of others are treated with respect</li> <li>• the Federation will not tolerate any individual falsifying, concealing, altering, destroying or tampering with information or creating misleading information</li> </ul> |



| <b>Governments and Communities</b>              |   |
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| <b>Working with Governments</b>                 | <p>The WCF respects the authority of governments wherever it conducts its operations. The WCF will maintain honest relationships with governments, their agencies, officials and personnel.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• where information is provided to governments on behalf of the WCF, all such information is accurate and fit for purpose. Errors or omissions could damage the WCF's reputation and could be illegal</li> <li>• where a Member Association is required to make a representation to their government on behalf of the WCF, there must be compliance with all applicable laws and regulations and the Secretary General must be advised</li> </ul>  |
| <b>Political Contributions &amp; Activities</b> | <p>The WCF adopts a global and straightforward approach to corporate participation in political activities – the WCF will not make political contributions in cash or in kind anywhere in the world. It is acceptable, however, for the WCF to express its views to governments on subjects that affect the WCF's interests and operations.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• if an individual is participating in political processes, it is clearly understood that they are NOT representing the WCF</li> <li>• an individual may be involved in events or activities organised by a political party, politician, elected official or candidate for public office provided that: <ul style="list-style-type: none"> <li>- involvement is for business briefing purposes only</li> <li>- such activity is formally registered with and approved in advance by the Secretary General</li> </ul> </li> <li>• employees' rights are recognised and their choices to participate in the political process are respected</li> <li>• such activity is undertaken in personal time and political opinions are not presented as those of the WCF</li> </ul>  |
| <b>Anti-Corruption</b>                          | <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 to a government official to influence official action, or to any person to encourage them to perform their work disloyally or improperly. Corruption is 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 require that all transactions are recorded accurately and in reasonable detail in the WCF's records. Facilitation payments are prohibited by the WCF in line with the anti-corruption laws of most countries. Any requests for facilitation payments must be reported to the Secretary General immediately.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• anti-corruption requirements are read and their importance understood</li> <li>• pre-approval is sought before: <ul style="list-style-type: none"> <li>- offering certain things of value to an external person</li> <li>- engaging a supplier who will interact with others on behalf of the WCF</li> <li>- offering to undertake a community donation or project</li> <li>- offering to provide sponsorship of an event</li> </ul> </li> </ul> |
| <b>Engaging with Stakeholders / Members</b>     | <p>The ability to build relationships and work collaboratively and transparently with communities is critical to the long-term</p>  |



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|                                       | <p>success of the WCF. It is an aim of the WCF 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 affected by its operations and by taking their views and concerns into account in its decision making. The WCF understands that its business can impact local communities both positively and negatively, either through its own activities or as a result of its business relationships with other parties. All development projects and donations should be approved in accordance with applicable WCF standards and operate according to documented, approved and transparent procedures.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• Member Associations read and understand the Code in relation to development projects and donations</li> <li>• in relation to the above point, due diligence is carried out before engaging any partner or agency to ensure said organisation is reputable</li> <li>• where a role involves business dealings with other countries, the incumbent should be aware of the laws and customs of those countries as well as ensuring behaviour reflects positively on the WCF's reputation</li> </ul>   |
| <b>Environment</b>                    | <p>The WCF seeks to be environmentally responsible.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• the potential environmental impacts of tasks must be understood and avoidance or minimisation of any impact should be explored</li> <li>• irrespective of the severity, actual or potential environmental incidents must be reported</li> <li>• any improvements to environmental sustainability and associated benefits to be discussed with the Secretary General</li> </ul>  |
| <b>Third Party Relationships</b>      |  |
| <b>Business Partner Relationships</b> | <p>Most countries in which the WCF operates have developed competition laws (also known as Anti-trust 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 abuse of a dominant position. Relationships with suppliers, who provide the WCF with goods or services, can make a significant contribution to the success of the Federation. Through their actions, suppliers can directly impact the financial performance of the WCF as well as its reputation.</p> <p>The WCF operates a fair and equitable procurement process which aims to clearly inform potential suppliers of the expectations, standards and requirements of the Federation.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>• members conduct themselves in a professional manner in all dealings with the WCF's competitors, customers, suppliers and business partners</li> <li>• when selecting a business partner, they are encouraged to uphold the WCF's standards and to contribute positively to the WCF's reputation</li> <li>• suppliers 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 and to provide a safe and healthy environment</li> <li>• 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</li> <li>• the performance of the business partner is monitored and assessed including the checking of invoices and raising any queries that may arise</li> </ul> |





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|                                 | <ul style="list-style-type: none"> <li>any suspect inappropriate behaviour is reported immediately</li> </ul>   |
| <b>Using Company Resources</b>  |   |
| <b>Protecting WCF Assets</b>    | <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, company information and data.</p> <p>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; production and maintenance data; data relating to WCF equipment; research and other technical data. This information must not be shared unless authorised to do so. Appropriate precautions are to be taken to prevent theft, misappropriation, damage or misuse of any WCF assets.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>Members are responsible for using and safeguarding WCF assets appropriately</li> <li>Members are expected to respect the physical and non-physical assets of others and never knowingly damage or misappropriate them</li> </ul> |
| <b>Communicating Externally</b> | <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 one of its employees may amount to a public disclosure.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>Members feel equipped to speak positively about the WCF when asked</li> <li>Members ensure they are not speaking on behalf of the WCF unless previously authorised to do so by the Secretary General in line with public disclosure guidance and the WCF Media policy</li> <li>external communication materials must be approved by the Secretary General or the Board</li> <li>Members should behave according to applicable legal requirements including Spam laws and the terms of any social media services</li> </ul>  |
| <b>Intellectual Property</b>    | <p>The WCF needs all of its members to safeguard the WCF's intellectual property from unauthorised use. The WCF also expects its members to respect the intellectual property rights of others.</p> <p>Intellectual property can be an invention, trademark, original design or the practical application or expression of an idea that has commercial value, all of which can be highly valuable. As markets become increasingly competitive, the protection of the WCF's intellectual property is essential. Any intellectual property that has been developed by the WCF may be protected under law relating to copyright, patents and trademarks.</p> <p><b>The expectations of the WCF are that:</b></p> <ul style="list-style-type: none"> <li>Members protect intellectual property and never disclose anything confidential</li> <li>where there is a legitimate reason to share intellectual property with a third party, this must not happen until the Secretary General has approved the request and a Non-Disclosure Agreement (NDA) has been signed</li> </ul>  |