



CONFLICT OF INTEREST POLICY

The mission of the Royal Canadian Golf Association, operating as Golf Canada (“Golf Canada”), as the governing body of golf in Canada, is to increase Canadian participation and excellence in golf.

Golf Canada has earned a reputation for trustworthiness and respect and expects that each of its directors, staff, council and committee members recognize and abide by Conflict of Interest principles that will protect the integrity and respectability of Golf Canada.

Definitions

1. The following terms have these meanings in this Policy:
 - a) “*Associates*”- All individuals employed with Golf Canada and volunteers who sit on any Golf Canada committee or council.
 - b) “*Conflict of Interest*” – A situation where an individual, or the organization they represent, has a real, potential or perceived direct or indirect interest competing with Golf Canada’s interests, resulting in a real or seeming conflict between one’s private interests and one’s fiduciary duties to Golf Canada.
 - c) “*Perceived Conflict of Interest*” – *A perception by an informed person that a conflict of interest exists or may exist.*
 - d) “*Person*” – Any Associate, family member, friend, customer, business associate, client, sponsor, colleague, corporation, institution or partnership.

Purpose and Application

2. The purpose of this Policy is to describe how Associates will conduct themselves in matters relating to real or perceived conflicts of interests, and to clarify how Golf Canada will make decisions in situations where conflicts of interest may exist.
3. This Policy applies to all Associates as defined in the Definitions section.

Obligations

4. Associates will fulfill the requirements of this policy. Associates **will not**:
 - a) Engage in any business or transaction, or have a financial or other personal interest that conflicts with their official duties with Golf Canada;
 - b) Knowingly place themselves in a position where they are under obligation to any Person who might benefit from special consideration, or who might seek, in any way, preferential treatment;
 - c) In the performance of their official duties, accord preferential treatment to any Person in which Golf Canada’s Associates have an interest, financial or otherwise;
 - d) Derive personal benefit from information that they have acquired during the course of fulfilling their official duties with Golf Canada, where such information is confidential or is not generally available to the public;
 - e) Engage in any outside work, activity or business or professional undertaking that conflicts or appears to conflict with their official duties as a representative of Golf Canada, or in which they have an advantage or appear to have an advantage on the basis of their association with Golf Canada;
 - f) Use Golf Canada property, equipment, supplies or services for activities not associated with the performance of official duties with Golf Canada without the permission of Golf Canada;

- g)** Place themselves in positions where they could, by virtue of being an Associate, influence decisions or contracts from which they could derive any direct or indirect benefit or interest; or
- h)** Accept any gift or favor that could be construed as being given in anticipation of, or in recognition for, any special consideration granted by virtue of being an Associate.

Disclosure of Conflict of Interest

- 5.** On an annual basis, all Associates will complete a written statement disclosing any real or perceived conflicts that they might have.
- 6.** At any time that an Associate becomes aware that there may exist a real or perceived conflict of interest, they will disclose this conflict to the Board of Directors immediately.

Reporting a Conflict of Interest

- 7.** Any Associate who is of the view that another Associate may be in a position of conflict of interest shall report this matter to the Golf Canada Ethics Commissioner. Such a complaint must be signed and in writing. Anonymous complaints may be accepted upon the sole discretion of the Golf Canada Ethics Commissioner.
- 8.** The Golf Canada Ethics Commissioner will coordinate any necessary Golf Canada action and if they decide that a conflict of interest may exist, they shall refer the matter to the Board of Directors.

Resolving Complaints of a Real or Perceived Conflict of Interest

- 9.** Upon receipt of a complaint from the Golf Canada Ethics Commissioner, the Board of Directors will determine whether or not a conflict of interest exists provided the alleged Associate has been given notice of and the opportunity to submit evidence and to be heard at such meeting.
- 10.** After hearing the matter, the Board of Directors will determine whether a real or perceived conflict of interest exists and if so what appropriate actions will be imposed.
- 11.** Where the Associate accused of being in a real or perceived conflict of interest acknowledges the facts, he or she may waive the meeting, in which case the Board of Directors will determine the appropriate actions.
- 12.** If the Associate accused of being in a real or perceived conflict of interest chooses not to participate in the meeting, the meeting will proceed in any event.
- 13.** For a conflict of interest involving an employee, the Board of Directors may apply the following actions singly or in combination for real or perceived conflicts of interest:
 - a)** Removal or temporary suspension of certain responsibilities or decision making authority;
 - b)** Removal or temporary suspension from a designated position;
 - c)** Termination of employment with Golf Canada; or
 - d)** Other actions as may be considered appropriate for the real or perceived conflict of interest.
- 14.** For a conflict of interest involving a volunteer, the Board of Directors may apply the following actions singly or in combination for real or perceived conflicts of interest:
 - a)** Removal or temporary suspension of certain responsibilities or decision making authority;
 - b)** Removal or temporary suspension from a designated position;
 - c)** Removal or temporary suspension from certain Golf Canada teams, events and/or activities; d) Expulsion from Golf Canada; or
 - d)** Other actions as may be considered appropriate for the real or perceived conflict of interest.

15. The Board of Directors may determine that an alleged real or perceived conflict of interest is of such seriousness as to warrant suspension of designated activities pending a meeting and a decision of the Board of Directors.

Resolving Conflicts

16. Decisions or transactions that involve a real or perceived conflict of interest that have been disclosed by an Associate may be considered and decided upon by the Golf Canada Board of Directors provided that:
 - a) The nature and extent of the Associate's interest has been fully disclosed to the body that is considering or making the decision, and this disclosure is recorded in the minutes;
 - b) The Associate may participate in discussion on the matter giving rise to the conflict of interest but that Associate may be asked to leave the meeting in which the matter is being considered and the Associate will not be present when the Board of Directors makes its decision in respect of the matter;
 - c) The Associate abstains from voting on the proposed decision or transaction
 - d) The Associate is not included in the determination of quorum for the proposed decision or transaction; and
 - e) The decision or transaction is in the best interests of Golf Canada.

Declaration

17. Volunteers wishing to obtain a position as a director, officer or committee/council member within Golf Canada must declare their professional interests and any potential conflict of interest prior to being declared eligible by the Board of Directors for any such position.
18. In the event that an Associate neglects to disclose a professional interest or any potential conflicts of interest, this Policy will apply.

Confidentiality

19. Associates acknowledge and agree that they will maintain in strict confidence and that they will not use confidential or proprietary information about Golf Canada gained through their association with Golf Canada for any purpose other than in connection with fulfilling their duties and responsibilities as an Associate of Golf Canada. The requirement to maintain confidentiality shall continue even after an Associate ceases their association with Golf Canada.

Decision Final and Binding

20. Any decision of the Board of Directors in accordance with this Policy shall be considered final and not subject to appeal.

Declaration regarding Conflict of Interest

I have read Golf Canada's Conflict of Interest Policy, I agree to be bound by the obligations contained therein, and I commit to avoid any real or perceived conflict of interest. During my time with Golf Canada, I also commit to disclosing the existence of any real or perceived conflict of interest to the Board of Directors which may arise, as soon as it is known to me.

I declare the following interests which may represent a potential conflicting interest:

1. Description of the situation giving rise to the actual or potential conflict of interest:

2. Name of the Person(s) or individual(s) involved with the actual or potential conflict of interest:

3. Nature of interest of involvement with Person(s) or individual(s):

I also pledge to inform Golf Canada and the Board of Directors of any other Associate of Golf Canada who I feel is in a position of any real, perceived or potential conflict of interest.

Name

Signature

Date