

## 1. POLICY STATEMENT

All Members of the Banff Centre Community have an obligation to conduct themselves in a manner that is consistent with Banff Centre's stated values regarding ethical conduct. As part of this obligation, all Members of the Banff Centre Community are encouraged to report conduct that does not meet Banff Centre's articulated ethical standards.

## 2. PURPOSE

2.1. The purpose of this policy is to:

2.1.1. describe the expectations concerning ethical conduct for Members of the Banff Centre Community;

2.1.2. confirm the rights of individuals reporting conduct that does not meet Banff Centre's ethical standards;

2.1.3. confirm Banff Centre's obligation to protect person(s) making a Good Faith Disclosure from Retaliation; and

2.1.4. confirm Banff Centre's obligation to protect the rights of Respondents.

## 3. SCOPE

Compliance with this policy applies to all Members of the Banff Centre Community.

## 4. POLICY ELEMENTS

### 4.1. Standards of Ethical Conduct

4.1.1. All Members of the Banff Centre Community shall maintain the highest standards of ethical conduct and shall act and behave in ways that uphold the principles of integrity, respect and accountability.

4.1.2. All Members of the Banff Centre Community shall become aware of and comply with all relevant Banff Centre policies and procedures, Collective Agreements, government legislation and relevant professional standards.

### 4.2. Failure to Comply

4.2.1. Failure to comply with this policy may result in, among other things, disciplinary action, up to and including termination of employment, participation in

a program or termination of other contractual agreements. In the event of criminal behaviour, failure to comply may also result in prosecution.

#### 4.3. Reporting

4.3.1. Members of Banff Centre Community are encouraged to report conduct that does not meet Banff Centre's ethical conduct standards.

4.3.2. All reports must meet the definition of Good Faith Disclosure and be submitted to the appropriate authority in the manner outlined in the Ethical Conduct and Safe Disclosure Procedure.

4.3.3. Banff Centre will maintain an environment free from Retaliation when a Good Faith Disclosure is made as follows:

4.3.3.1 the persons and offices that receive and/or investigate such reports shall protect the identity of the person making the report to the extent possible under applicable legislation, Banff Centre policies and procedures, and Collective Agreement in effect at the time of the alleged misconduct;

4.3.3.2 Banff Centre will not tolerate any Retaliation, directly or indirectly, against anyone who makes a Good Faith Disclosure; and

4.3.3.3 all individuals against whom allegations are made will maintain the rights, privileges and protections afforded to them through the *Freedom of Information and Protection of Privacy* (FOIP) Act and other applicable legislation, Banff Centre policies and procedures, and Collective Agreement in effect at the time of the alleged misconduct.

#### 4.4. Ethics Standards and Related Policies

4.4.1. At any given time, there may be other Banff Centre policies and procedures in force that pertain to ethical behavior. The absence of a particular policy or procedure covering a particular situation does not relieve an individual of the responsibility to apply the highest ethical standards in that situation.

4.4.2. In the event there is no policy that addresses an ethical question that arises during the execution of their Banff Centre responsibilities, individuals may seek clarification or guidance from the President and CEO, the Vice-President, Talent Management and Culture, or General Counsel.

## 5. DEFINITIONS

**Banff Centre Community.** Includes those persons involved in or associated with, Banff Centre or its affairs including all artists, contractors, consultants, employees, faculty, participants, volunteers, members of the Board of Governors, and members of the Board of Directors of The Banff Centre Foundation, while they are: on or using Banff Centre property; participating in Banff Centre programs, events or activities (whether virtual or in person); or acting on behalf of Banff Centre.

**Collective Agreement.** The Collective Agreement entered into between Banff Centre and the Canadian Union of Public Employees Local 4318, as amended and renegotiated from time to time.

**Disclosure.** When a person chooses to inform an Office of Administrative Responsibility about an incident that is in violation of this policy. A Disclosure is considered to have been made in **Good Faith** if the Disclosure is based on reasonable belief and is not malicious, frivolous or vexatious and is not made for the sole or primary purpose of imparting a personal benefit on the individual making the Disclosure.

**Members of the Banff Centre Community.** Those persons involved in conducting Banff Centre affairs including all registered participants, faculty, employees, volunteers, contractors, Directors and Governors.

**Office of Administrative Responsibility.** Area within Banff Centre's administration, as indicated in Banff Centre policies, that is ultimately responsible for administering a particular policy and/or procedure.

**Retaliation.** Taking, threatening or attempting to take any adverse action against a Member of the Banff Centre Community because that person has made a Disclosure, supported a Disclosure, disclosed information to the Banff Centre about a Disclosure, participated in an investigation of a Disclosure, or pursued their rights under this policy or applicable legislation. Retaliation includes, but is not limited to, social aggression, physical and psychological violence and attempts to adversely affect employment conditions.

**Respondent(s).** A party against whom an allegation has been made regarding conduct that does not meet Banff Centre's ethical standards.

## 6. ASSOCIATED POLICY / PROCEDURE

- Code of Conduct (Board); Code of Conduct (Employee); and Code of Conduct (Participant).
- Ethical Conduct and Safe Disclosure Procedure

**7. RELATED POLICIES, FORMS, AND OTHER DOCUMENTS**

- Fraud and Irregularity Policy and Procedure

**8. APPROVAL AUTHORITY**

Board of Governors

**9. ACCOUNTABILITY**

Chief Financial Officer

**10. POLICY HISTORY**

10.1 Approved: February 15, 2024  
10.2 Effective: February 15, 2024  
10.3 Review Frequency: Three (3) Years  
10.4 Next Review: February 2027

**Modification History**

| Date              | Modification   |
|-------------------|--|
| February 15, 2024 | Replaces the existing Safe Disclosure Policy and related procedures. |