

1. POLICY STATEMENT

Banff Centre is committed to the highest standards of ethical conduct and fiduciary responsibility and therefore treats matters of Fraud and Irregularity with the utmost seriousness.

2. PURPOSE

The purpose of this policy is to state Banff Centre's position on Fraud and Irregularity.

3. SCOPE

This policy applies to all Members of the Banff Centre Community but is limited in scope to activities related to, or funds or property owned by or in the care of, Banff Centre.

4. POLICY ELEMENTS

- 4.1 Fraud, including fraud that benefits Banff Centre, will not be tolerated.
- 4.2 Employees who commit an act of Fraud or Irregularity will be subject to disciplinary action up to and including termination of employment and prosecution, if appropriate.
- 4.3 Banff Centre, to the extent reasonably possible, will recover any losses incurred through financial improprieties.
- 4.4 All staff have an obligation to report suspected Fraud or Irregularity.
- 4.5 Banff Centre will adhere to the principles of ethical conduct and reporting of wrongdoing contained in the Banff Centre's Ethical Conduct and Safe Disclosure Policy. When responding to allegations of Fraud or Irregularity Banff Centre will follow the protocol outlined in the Fraud and Irregularity Procedure.

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.

Fraud. A deliberate and/or unlawful deception, misrepresentation or concealment of facts practiced to secure advantage, benefit or gain and/or to cause loss to another. Examples of fraud for the purposes of this policy include: misrepresentation of material facts;

concealment of material facts; bribery; undeclared conflict of interest; theft of money or property; theft of intellectual property; theft of identity including inappropriately identifying as an indigenous person; breach of fiduciary duty; statutory offences.

Irregularity. An activity or potential activity that deliberately disregards Banff Centre policies or procedures including, but not limited to, the Code of Conduct: Employees or Code of Conduct: Board of Governors. Irregularity includes concerns regarding questionable accounting or auditing matters within Banff Centre.

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

6. ASSOCIATED POLICY / PROCEDURE

- Fraud and Irregularity Procedure

7. RELATED POLICIES, FORMS, AND OTHER DOCUMENTS

- Code of Conduct (Board); Code of Conduct (Employee); and Code of Conduct (Participant).
- Ethical Conduct and Safe Disclosure 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**
Review Frequency: **Three (3) Years**
Next Review: **February 2027**

11. Modification History

Date	Modification
February 15, 2024	Replaces Unlawful Activity Policy and Procedure (effective date sometime January 2017. Approval status unknown).