



## **DRSSC Conflict of Interest, Anti-Corruption & Bribery Policy**

### **Purpose of this Policy**

DRSSC continually strives to protect our club's interests from real or potential conflicts of interest and/or criminal/unethical activity and has adopted this policy to outline procedures for avoiding and reporting various situations where a conflict of interest may arise.

### **Policy**

#### **The Transaction of Business**

Employees should avoid:

- Any interest, investment or association that creates a conflict of interest, or that interferes with their ability to perform their duties with DRSSC; and
- The creation of any personal direct or indirect interest or relationship with any company that competes with or provides products and/or services to DRSSC.

Additionally, where a situation arises where an employee is required to conduct business or provide services to a family member, or associate, this may create a real or perceived conflict of interest for both the company and the employee in question. Where our resources (including property, equipment and personnel) are used for unapproved purposes, they may create a negative impact on our business, and the community perception of the club. DRSSC prohibits the use of personnel (including volunteers) and/or equipment for non-club business, as their use may be improper, illegal or create a conflict of interest. If any employee has reason to believe that a conflict of interest has occurred, or is possible, it is their duty to report it to the DRSSC Board of Directors.

#### **Bribery**

Bribery is illegal under the Criminal Code of Canada.

DRSSC will not tolerate bribery or corruption, whether by an employee or by a supplier, customer or any other third party. Nor will we participate in any unethical business practices such as corrupt record-keeping or accounting practices. Employees of DRSSC may neither offer a bribe or accept a bribe while working at DRSSC.

#### **Acceptance of Gifts**

Employees are prohibited from accepting gifts (item, product or service offered by any current or potential customer or vendor), money, discounts, meals, tickets to events or favours including a benefit to family members, friends or business associates in return for completing any work that we pay them to do, with the exception of promotional gifts (i.e. promotional coffee mug, t-shirt, etc.) or gifts with a monetary value of less than twenty five dollars (\$25.00).

Employees are directed to report any customer attempt to create bias or offer of a gift with a monetary value in excess of \$25 to management. In the event that any employee receives a gift that carries a monetary value in excess of \$25, they are directed to notify management and return it to the sender with written acknowledgement of the gift and politely decline the acceptance of the gift citing this policy.

In the event that a return of the gift is not possible, any unreturned gifts must be forwarded to management. Unreturned gifts shall be donated for charitable purposes. Management will generate a letter to the individual or business that provided the gift to inform them of the decision to donate the gift to charity. A copy of this letter shall be kept on file.

## **Meals**

DRSSC recognizes that circumstances may arise where employees are required to conduct business over lunch or dinner. In these circumstances, employees are required to report these meetings to management to receive authorization. Employees should pay for their own meal and submit a Business Expense Form. Employees should not accept complimentary meals from any person or company that has a business interest with DRSSC as this may create a real, or perceived, conflict of interest.

## **Attendance at Events**

Typically, employees are prohibited from accepting tickets to, and/or attending cultural, social, charitable, political, recreational, or sporting events at the expense of any customer or vendor with a current business interest in DRSSC unless the event presents a potential benefit to our business interests. In such circumstances, the employee must direct a written request to attend the event to management with a detailed rationale for attendance. Where the request receives approval, DRSSC shall pay the cost of the ticket or entry fee for the event.

## **Responsibilities**

The employer will:

- Ensure employees have been informed about this policy and the dangers to themselves and the company for taking part in corrupt business practices or accepting bribes
- Ensure employees know the red flags to be on the lookout for when it comes to bribery and corruption such as transactions being done in secret, practices that are knowingly against the law, benefits or advantages being offered, favours being requested, and so on
- Complete risk assessments on an ongoing basis to examine dangerous situations or locations our employees may be exposed to, and implement solutions to mitigate these dangers
- Complete audits of records and accounting records every 2 Years
- Put in place a reporting system so that employees feel comfortable bringing concerns forward to management, including what to do if a senior member of the team is involved in a corrupt business practice

## **Employees are responsible for:**

- Following the rules laid out in this policy
- Familiarizing themselves with the laws and regulations within the areas they are doing business
- Looking for warning signs of illegal activities
- Immediately reporting any concerns regarding bribery, corruption, or their safety to management
- Complying and cooperating with any investigations surrounding bribes or corrupt business practices

## **Reporting and Investigating**

If an employee has any concerns about what they are transporting, where they are being asked to go, or what they are being asked to record, provide or accept, they must report this to a supervisor immediately. Employees who have concerns about the conduct or actions of other employees or supervisors are also responsible for reporting these instances.

If you are afraid to report an issue of bribery or perceived bribery, you may do so anonymously by sending a letter anonymously to the club address on the website.

DRYTC will investigate any reports of bribery or corruption, whether they are reported anonymously or not. DRSSC will involve the appropriate law enforcement authorities where applicable.

Employees who report a legitimate concern about bribery will not be retaliated against.

## **Outside Employment**

DRSSC generally allows outside employment where:

- The secondary employment causes no adverse effects to the employee's performance of job duties with us;
- The secondary work is performed after the employee's regularly scheduled working hours with us; and
- There is no conflict of interest.

Any employee that wishes to work part-time, or for any amount of time after their regularly scheduled work hours with us should discuss the matter with management prior to their acceptance of the secondary employment. The employee may be required to disclose information pertaining to the proposed secondary employment to allow a full review. The review will simply ensure that there is no conflict of interest.

It is recommended for the health and safety of our employees, that employees have eight (8) consecutive hours of time for rest/sleep prior to reporting for their regularly scheduled work at DRSSC.

## **Breach of Policy**

Employees who are in breach of this policy may face disciplinary action that may include termination of employment. Law enforcement may be notified if the situation calls for it.

## Definitions

As per the Criminal Code of Canada, the following refers to those who accept bribery, otherwise known as **“Secret commissions”**.

An individual commits a legal violation if they:

a) Engage in dishonest activities by giving, offering, demanding, accepting, or agreeing to any transaction involving something of value to or from an agent (or someone for the agent’s benefit) as compensation for performing or abstaining from an action related to the club’s business. This includes actions that show bias or impartiality concerning the club’s business operations; or

b) Attempt to deceive DRSSC by:

Providing a document such as a receipt or an account statement that:

- i) Is irrelevant to the club
- ii) Contains false information or significant inaccuracies
- iii) Is designed to mislead the manager/club.

**“Gift or other advantage”** means

- **(a)** any amount of money if there is no obligation to repay it; and
- **(b)** a service or property, or the use of property or money that is provided without charge or at less than its commercial value. Source: [Conflict of Interest Act](#)