

HUMAN RESOURCES POLICY HANDBOOK

September 2020



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A. INTRODUCTION:

This human resource policy manual is a summary of policies, procedures and practices related to human resource management at Curling Canada.

The Chief Executive Officer (CEO) is accountable for leading an effective staff team and is thereby accountable for the policies outlined in this manual. Managers are responsible for human resource management within their own staff teams and should reference this manual to ensure organizational consistency in the application of these practices.

The Chief Operating Officer (COO) is responsible for maintaining the procedures and systems which support human resource management for the development and organization and is available to answer any questions or provide clarification on any content of this handbook.

Curling Canada reserves the right to modify, change, amend or update the policies and procedures herein and to apply and interpret them as Curling Canada deems to be appropriate.

STATEMENT OF PHILOSOPHY:

Curling Canada wishes to maintain a work environment that fosters personal and professional growth for all employees. Maintaining such an environment is the responsibility of every staff person. Because of their role, managers and supervisors have the additional responsibility to lead in a manner which fosters an environment of respect for each person.

It is the responsibility of all staff to:

- Foster cooperation and communication among each other.
- Treat each other in a fair manner, with dignity and respect.
- Promote harmony and teamwork in all relationships.
- Strive for mutual understanding of standards for performance expectations and communicate routinely to reinforce that understanding.
- Encourage and consider opinions of other employees or members and invite their participation in decisions that affect their work and their careers.
- Encourage growth and development of employees by helping them achieve their personal goals and beyond.
- Seek to avoid workplace conflict, and if it occurs, respond fairly and quickly to provide the means to resolve it.
- Administer all policies equitably and fairly, recognizing that jobs are different, but each is important; that individual performance should be recognized and measured against predetermined standards; and that each employee has the right to fair treatment.



MISSION & VISION

Purpose

To create more Canadian curlers, more Canadian curlers curling better and more Canadian curling fans.

Mission

We inspire and lead all Canadians, from playground to podium, to make curling a part of their lives in the way that they enjoy it most by fostering an environment and system that allows them to achieve their personal goals.

Values

Inclusivity through curling

Fairness in Play

Excellence in Performance

Authentic Stakeholder Engagement

Genuine Fun

Personal Growth

Strategic Targets

1. **Curling Growth:** More people are playing or watching curling in places and at times that best suit their lifestyle
2. **Podium Excellence:** Canada's position as the World's #1 Curling Nation is maintained
3. **Sustainability:** A financial model that invests in and supports our national goals and whose strength is based in understanding and delivering curling growth and excellence.

Strategic Priorities

Financial Health and Sustainability:

- Create reserve and investment posture that reflects the inherent risks in our business model
- Data-driven strategic investments in the curling system health and decisions based on same.
- Diversify revenue base to protect from changes in curling broadcast consumption

Healthy Participation in Curling:

- Invest in youth and new Canadians to capture next generation of curlers. World class feeder system
- National future-facing infrastructure strategy
- Competition structure supporting healthy participation across all disciplines

Delivery of Exceptional Curling Experiences

- Strategy to ensure consistent high quality club experiences
- Event revenue growth based on exceptional entertainment and sport value
- Broadcast strategy that delivers curling experiences to fans when and where they want to have them.

Strengthen the Brand of Curling

- Brand architecture to develop unique & compelling engagement platform
- Marketing strategy to drive both playing the game and attending events reaching new targets
- Create safe, inclusive and positive environment of every curler

Organizational Excellence

- Leader in Canada's sport system in both sport delivery and risk management
- Skills based board to develop strategy and manage risk
- Employer of Choice

Deliver Exceptional Podium Results

- Invest to achieve world leading results across disciplines
- Integrated partnership with WCF COC/CPC and Own the Podium

Operating Outputs

- Growth in curling participation
- Thriving curling centres
- Well attended and financially successful events
- More broadcast fans
- Success on the international podium
- High employee engagement
- Stakeholder success and support
- Strong financial position

B. HUMAN RESOURCES POLICIES

EMPLOYMENT EQUITY

Curling Canada is an equal opportunity employer and employs personnel without regard to race, ancestry, place of origin, colour, ethnic origin, language, citizenship, creed, religion, gender, sexual orientation, age, marital status, physical and/or mental handicap or financial ability. While remaining alert and sensitive to the issue of fair and equitable treatment for all, we have a special concern with the participation and advancement of members of four designated groups that have traditionally been disadvantaged in employment: women, visible minorities, aboriginal peoples and persons with disabilities.

ORIENTATION

All new employees shall receive an orientation session which will encompass an overview of general policies, procedures and operations. This will also provide employees, new to either a position or Curling Canada an opportunity to learn the performance expectations management has with regard to the position in question. Employees will be given the opportunity to ask any questions they have about this policy manual and will be expected to learn its contents.

PERSONAL APPEARANCE / UNIFORM

Uniform Standards

Curling Canada staff shall dress in an appropriate manner as to respect the professional environment of their office and their peers. Casual business attire is preferred on an ongoing basis.

In addition to the above, when attending any Curling Canada Championship or event, or international competition, either on Curling Canada business or as a spectator, if applicable, staff shall wear the official Curling Canada staff uniform items as provided/available and applicable to their role for these occasions. Whenever possible, Curling Canada uniform items and accreditation should be removed if not working or attending the 'Patch' on a social basis.

EMPLOYEE DUTIES

Employees will be provided a job description upon hire. Their manager will review this document with the new employee. This document along with a work plan will be used to evaluate performance both during the probation period and after. If an employee is unsure of its contents, they should not hesitate to ask their manager for clarification.

From time to time, it may be necessary to amend an employee's job description. These amendments will be discussed with the employee in advance, however the final decision on implementation will be made by management.

PERSONNEL FILE

Curling Canada does collect personal information for inclusion in personnel files. This information is available to the employee, the Chief Executive Officer, their Manager, the Chief Operating Officer and external auditors. This information is kept in a secure location, and is not shared with members of the Board of Governors or with funders. Information which is contained in an employee's personnel file includes the following: résumé, letter of offer, performance reviews, amendments to job descriptions, signed acknowledgement and agreement of the HR policy manual, disciplinary notices, salary and pay raises, tax forms, copies of enrolment forms for benefits and approved exceptional leave requests. Routine leave is tracked and recorded in Purely HR (attendance management software).

NEPOTISM

No candidate shall be hired for a position where they may report to, or supervise a member of their immediate family. Immediate family is defined as: parent(s), step parent(s), foster parent(s), sibling(s), grandparent(s), spouse {including common law and/or same sex partner}, step child(ren) or ward of the staff member, father-in-law or mother-in-law (including parent of same sex partner). Personal relationships with other employees or members of the Curling Canada's Board of Governors or Committees should be disclosed prior to accepting any offer from the employer.

NON-FRATERNIZATION

Curling Canada is committed to providing a work environment as free as possible from conflicts of interest, favoritism and exploitation. All managers, supervisors and employees should be aware that entering into a consensual romantic relationship with another employee, especially one in which one of the parties exercises direct supervision over the other, creates the potential for risk to both parties as well as for Curling Canada. In particular, such a relationship will limit that manager/supervisor/employee's ability to direct work or promote that employee's career and creates conflicts of interest and perceptions of undue advantage.

For this reason, Curling Canada desires to avoid situations where there is a romantic, personal or marital relationship between a supervisor and a subordinate or between co-workers.

Employees with, or who develop, such relationships must immediately notify and disclose all relevant circumstances to their immediate supervisor, manager, COO or CEO. Although Curling Canada has no absolute prohibition regarding such relationships, we reserve the right to take appropriate action, on a case-by-case basis, according to the relevant circumstances. Any failure to disclose the nature of the relations as contemplated in this policy may result in disciplinary action up to and including termination.

Curling Canada strictly prohibits sexual harassment. In the event that a romantic relationship is consensual, and verified by both parties, this shall not constitute sexual harassment. In the event that the relationship ends for any reason, or is not consensual, any actions intended to coerce or otherwise harass an employee shall constitute sexual harassment.

POLICE RECORDS CHECK

Curling Canada will comply with all federal and provincial legislation regarding the protection of human rights for applicants when conducting any type of record check.

Curling Canada shall only request that a candidate consent to a record check following standard hiring procedures, and after providing the candidate with a written job offer, conditional upon a satisfactory outcome.

Existing employees of Curling Canada may be required to obtain a Criminal Record Check upon request by the Chief Executive Officer. All employees working with vulnerable persons must obtain a Vulnerable Sector Record Check upon request by the Chief Executive Officer. The cost of any such check will be borne by the Employer

If during the time of employment, a criminal charge is brought against an employee or an employee is convicted of a criminal offence, it is the employee's responsibility to report this information immediately to their supervisor (via phone followed immediately by a confirmation email) and no later than 48 hours after they are first made aware of the charges.

SALARY ADMINISTRATION

Purpose

The purpose of this policy is to maintain consistent treatment of salaries within Curling Canada (CC). The policy provides a framework for the Senior Leadership Team to make salary decision and to exercise discretion in determining what increases should be awarded as part of a total compensation package.

Salary Structure

Curling Canada has established a salary structure. Positions are assigned to an alpha Classification Grade and are paid in accordance to the salary grid assigned to each Grade.

Across the Board Adjustments

Changes to number, size and components of the salary ranges are considered adjustment to the salary structure and will be made as required, based upon internal and external factors. Adjustments may be determined after taking into consideration the rise in the cost of living, CC's financial circumstances, and market data. Curling Canada will from time to time (targeting every 4 years), participate in market salary research to assess competitiveness within the external market. When an adjustment to the structure is

approved, the new salary structure normally will come into effect at the beginning of that fiscal year (May 1st).

Approval Process

The COO will undertake any market salary research at least every four years and make appropriate recommendations to the Chief Executive Officer (CEO).

The CEO will recommend to the Human Resources Committee whether there will be across the board adjustments and /or changes to the salary ranges, and the percentage amount of adjustments. The Board of Directors will be presented with the Human Resources Committee recommendation for ratification.

Starting Salary for New Hires

The starting salary of new Curling Canada employees will normally fall within the first two levels of the salary range for the grade the position is assigned to and is determined based on the employee's skills, competencies, qualifications and relevant experience as well a labour market conditions.

Placement at a higher level within the range may be made on the basis of competence attained through directly applicable education, possession all required qualifications, directly related experience and training.

In order to maintain internal equity and to ensure consistency with the salary administration system, the recommended hiring range for all new employees falling above the first two levels of the salary range will be reviewed with the COO.

Promotions and Reclassifications

If an employee is promoted to a position in a higher classification grade, or the position they occupy is reclassified to a higher classification grade, (i.e. from Coordinator classification to Manager) their salary will be adjusted to reflect the first level of the new classification grade. If the employee's current salary is higher than the first level of the new classification grade, then they will be placed at the next higher level that reflects a minimum of 4% increase to their current salary.

Performance Increases (movement within the grid)

Performance increases are designed to compensate employees who have successfully fulfilled their duties throughout the past performance year (May 1-April 30) as documented in their annual Performance Review. Upon receipt of a completed Performance Review by Corporate Services, increases to the next level in the employee's classification grade are processed. Employees hired from outside Curling Canada from Nov. 1st to April 31st, will not be eligible for movement within the grid in that year and will enter the normal cycle for the following year.

Cost of Living Increases (COL): Employees on the payroll for 12 continuous months will receive a COL increase effective July 1 based upon the federal government COL provided to its retirees the preceding January. The COL is not performance based.

Off Cycle Salary Increases

Off-cycle increases (those that occur at times of the year other than the beginning of the fiscal year) are exceptions and must be presented to the COO for approval by the CEO.

All staff will have their pay automatically deposited into a savings or chequing account. Employees will receive records of deductions each pay period via Ceridian, payroll provider.

CONFLICT OF INTEREST AND UNETHICAL CONDUCT

Policy and Purpose

It is expected that the employees of Curling Canada (CC), conduct themselves with integrity and to the highest standards of conduct, in accordance with CC's values.

Employees are expected to conduct themselves in all matters involving or impacting CC, and where they may be seen to be representing CC, in a manner that is fully consistent with the highest standards of behaviour upon which CC's reputation rests. At all times, Curling Canada employees' behaviour must reflect and not compromise the trust of CC's stakeholders and Canadians.

To this end, Curling Canada Employees will:

- Acquaint themselves with CC's mission, vision, values and policies and behave accordingly;
- Not participate in, condone, or engage in dishonesty, fraud, deceit, misrepresentation or illegal activities; and,
- Comply with CC's policies.

The purpose of this Policy Statement on Conduct (this "Policy") is to foster a positive, safe and respectful work and sport environment where:

- Curling Canada values are understood, communicated, championed and lived by all Curling Canada employees;
- There is adherence to all applicable laws, regardless of where the work of Curling Canada is being conducted;
- The expected standards of behaviour by Curling Canada employees are clear, communicated, championed and lived; and
- The conduct of Curling Canada employees is ethical, transparent and maintains public confidence in the integrity of Curling Canada.

The purpose of this Policy is also

- To define certain behaviours that are not permitted so that they are known to Curling Canada employees and are avoided;

- To the extent prohibited behaviour does occur, to outline a duty to report, a clear reporting process and mechanism to address the wrongful conduct; and
- To ensure that the decisions and actions of Curling Canada employees are consistent with the vision and values of Curling Canada

In furtherance of the purposes of this Policy, all Curling Canada employees are expected to raise any concerns about behaviour, to report any prohibited behaviour, or any breach, or potential, or suspected breach of this Policy and to work together to ensure a positive, safe and respectful work and sport environment. Curling Canada employees are expected to exercise responsible judgment in complying with both the language and the spirit of the Policy.

Applicability

This Policy applies at all times, wherever Curling Canada work takes place, which includes Curling Canada offices as well as external locations in Canada and abroad and includes all Curling Canada events.

Behaviour Expectations and Standards

1. The Role of the COO and CEO

The Chief Operating Officer (COO) shall have an integral role in furthering the purposes of this Policy and in the effective implementation of the Policy. In the event the COO is unable to perform the duties or responsibilities described in this Policy for a particular matter, or if the COO is the subject of the Complaint or has a material personal interest in such matter, the COO's duties and responsibilities for such matter, shall be performed by the Chief Executive Officer.

2. Confidentiality

During the course of working with CC, individuals will have access to sensitive, Confidential Information. Every Curling Canada employee has a duty to take reasonable steps to secure Confidential Information and to not disclose such Confidential Information, including, once the Curling Canada Employee ceases to work for Curling Canada "Confidential Information" is information known to Curling Canada employee by virtue of his or her connection to CC, whether or not marked "confidential", but does not include:

- Information available to Curling Canada employees on a non-confidential basis;
- Information demonstrably independently developed by, or known to employee outside of his or her connection to Curling Canada (except from a source whom the employee knew or ought to have known was bound by confidentiality at the time of disclosure);
- Information known or available to the general public other than as a result of disclosure by the employee; or

- Information which becomes non-confidential through no fault of the employee.

Confidential Information that employees receive through their relationship with Curling Canada must not be divulged to anyone other than persons who are authorized to receive such information. An employee must not use information that is gained due to his or her relationship with CC, in order to further any personal, private and/or public interest. Employees must not engage in any financial transactions, contracts, or private arrangements for personal profit, which accrue from, or are based upon, Confidential Information that they gain by reason of their position with CC, with the exception of employees in the context of their employment with Curling Canada. These restrictions remain in effect following the termination or expiration of employee's employment with CC, for so long as the information remains confidential.

Any intentional or negligent disclosure of Confidential Information to persons who the employee knew or ought to have known should not have received the Confidential Information, or misuse, may result in sanctions under this Policy.

CONFLICT OF INTEREST/UNETHICAL CONDUCT

Requirement to Avoid Conflict of Interests

All employees are obligated to avoid conflicts of interest and the appearance of a conflict of interest. Employees must avoid situations where their or their Family Members' personal interests could interfere or may conflict, directly or indirectly, with their obligations to Curling Canada. Employees must not allow their personal interests or the interests of their Family Members to take precedence over the interests of Curling Canada. No Curling Canada employee shall have an undisclosed direct or indirect interest in or relationship with any outside organization or person that might affect the objectivity or independence of his or her judgment in carrying out the duties and responsibilities he or she has with Curling Canada. Anything that could constitute a conflict of interest or unethical conduct on the part of an employee is also a conflict of interest if knowingly engaged in through a third party such as a Family Member, or other related persons or organization.

A **"Family Member"** shall include, but is not limited to, a spouse, partner, natural or adoptive parent, child, sibling, people who are in an intimate relationship and people who permanently reside together. A **"Related Party"** shall include a Family Member, associates or a private corporation controlled by any of these individuals.

An employee is required to disclose to their immediate supervisor, the COO or the Chief Executive Officer any conflict, or potential conflict of interest as soon as the employee becomes aware of it and must recuse him/herself from any related decisions.

Conflicts of interest may arise in situations involving:

- An interest, either real or perceived, that benefits the employee or a Related Party;

- Outside organizations with which the employee has an official governing responsibility, or which employ the employee or a Family Member;
- The employee having a financial interest in the outside organization; or
- Real or perceived potential to compromise the best interests of Curling Canada

Circumstances in which a conflict of interest or unethical conduct would arise include, but are not limited to:

- Material and direct personal involvement with bid city committees, sponsors, suppliers, vendors, contractors, customers or others, liable or seeking to benefit from the assistance of the employee in his or her capacity with Curling Canada (“Entities”);
- Exerting undue influence with respect to the qualification of an athlete for Games;
- Ownership of a material interest in one or more Entities, acting in any material capacity in one or more Entities, or acceptance of material payments, services or loans from such Entities; or

Ownership of property directly and specifically affected by Curling Canada’s actions or acquired as a result of Confidential Information obtained.

Preferential Treatment

Employees must not act in their official roles with Curling Canada to assist organizations or persons in their dealings with CC, if this may result in, or potentially appear to result in, preferential treatment to that organization or person.

Corporate Property

Employees must not use corporate property to pursue their private interests or the interests of a Related Party. Without limiting the foregoing, occasional, limited personal use of Curling Canada computers, phones and other communication equipment is permitted, provided it does not negatively impact productivity, or interfere with normal business operations. Corporate property includes, but is not limited to, real and tangible items such as monetary assets, land, buildings, furniture, fixtures, equipment, and vehicles and also includes items such as data, computer systems, reports, information, proprietary rights, patents, trademarks, copyrights, logos, name, and reputation.

Benefits, Entertainment and Gifts

Employees must not solicit or accept benefits, entertainment or gifts (collectively, “Gifts”) in exchange for or as a condition of the exercise of their duties, or as an inducement for performing an act associated with their duties or responsibilities with Curling Canada. Without limiting the foregoing, employees may accept unsolicited Gifts associated with their official duties and responsibilities, but only if such Gifts are within the bounds of propriety, a normal expression of courtesy, within the normal standards of hospitality, would not bring suspicion on the employee’s objectivity and impartiality and would not

compromise the integrity of Curling Canada. If a Gift does not meet all of these measures, it will be considered an improper Gift.

An improper Gift must be returned as soon as practicable. If it is not possible to return the improper Gift or if there is some other valid reason for not returning an improper Gift, such Gift must be disclosed to the COO who will determine how to deal with the Gift, having regard to the language and spirit of this Policy. In exceptional circumstances, the CEO may waive compliance with these restrictions provided such waiver does not compromise the integrity of Curling Canada and the purposes of this Policy.

Similarly, employees may not give away Gifts on behalf of Curling Canada in exchange for, or as a condition of, any benefit for Curling Canada or the employee. Provided that the employee may give away a Gift, if such Gifts are within the bounds of propriety, a normal expression of courtesy, within the normal standards of hospitality, would not bring suspicion on the employee's objectivity and impartiality and would not compromise the integrity of Curling Canada

It is the responsibility of the employee to ensure that a gift, whether received or to be given, is proper. If in doubt, the employee should consult with the individual to whom they report or the COO.

Future Employment or Services

Employees must not allow prospects of outside or future employment, appointment or investment to create a real or perceived conflict of interest during their appointment with Curling Canada

Political Activities

Employees are free to participate in partisan political activities. Their political activities, however, must be clearly separated from activities related to their involvement with Curling Canada

If engaging in political activities, employees must remain impartial and retain the perception of impartiality in relation to their duties and responsibilities. Partisan politics must not be introduced into CC's work or sport environment in any way that creates undue or inappropriate influence on other employees, contractors, volunteers or persons or business enterprises with whom Curling Canada does business.

In order to ensure its independence and objectivity, Curling Canada will not use corporate funds, goods, or services as a contribution to or in support of political parties, candidates, activities or campaigns.

Working Relationships

Employee's and their Family Members may not be employed, or hold office, in situations where:

- A reporting relationship exists where an employee has decision-making power over the Family Member's performance evaluation, compensation, perquisites, opportunities, appointment, special permissions, conditions of work, team participation or selection and similar matters; or
- The working relationship affords an opportunity for collusion between the two individuals that could have a detrimental effect on CC's interests.

Should a situation of this nature arise, the employee must disclose such relationship to the COO. This restriction may be waived if the COO is satisfied that sufficient safeguards are in place to ensure that CC's interests are not compromised.

WORKPLACE DISCRIMINATION, HARASSMENT AND VIOLENCE

Discrimination, Harassment and Violence

All employees are expected to support a work and sport environment that fosters respect and promotes everyone's dignity and self-esteem. Curling Canada recognizes that discrimination, harassment, bullying and violence can poison the work and sport environment, not only for the group targeted, but for many other employees. All employees must recognize that it is the impact of the behaviour on a recipient that is paramount, not the intent of the individual who engages in the perceived offending behaviour. Curling Canada is committed to creating and maintaining a work and sport environment which is free from discrimination, harassment, personal harassment, sexual harassment, bullying and violence.

Discrimination

Discrimination means any action, behaviour or attitude whether intentional or not, which negatively affects or could negatively affect the employment, performance or volunteer activities of an individual, where such actions, behaviour or attitude is based on a prohibited ground for discrimination under applicable human rights law, such as, age (*except for athletes, age has the same definition as under the applicable human rights legislation*); ancestry; citizenship; colour; creed; disability; ethnic origin; language (*but not where a language is a qualification for employment or office*); marital/family status (*defined to include common law relationships, and to not preclude anti-nepotism policies*); place of origin; political opinion; race; sex (*defined to include pregnancy*); record of offences (*has the same definition as under the applicable human rights legislation*); gender identity and gender expression; and sexual orientation.

This Policy also applies to any other ground of discrimination prohibited by applicable law.

Harassment

Harassment is a form of discrimination, and refers to wrongful conduct, whether or not the conduct is associated with a prohibited ground, that negatively affects the work and sport environment or leads to adverse consequences within that environment for the person(s) experiencing the harassment, which the perpetrator knew or ought reasonably to have known would be unwelcome. Harassment includes bullying, and can take many forms but often involves conduct, comment or display that is insulting, intimidating, humiliating, hurtful, demeaning, belittling, malicious, degrading, or otherwise causes offence, discomfort, or personal humiliation or embarrassment to a person or group of persons. One incident could be enough to constitute harassment.

Specific categories of Harassment include:

Personal Harassment

Personal harassment is inappropriate behaviour directed toward an individual which the perpetrator knew or ought reasonably to have known would be unwelcome.

Examples of personal harassment include belittling jokes, insults, nicknaming, inappropriate teasing, taunting and condescension. This behaviour is not necessarily linked to the prohibited grounds of discrimination.

Bullying

Bullying is unwanted verbal, physical or social behaviour directed to harming or inappropriately controlling another person. It often involves a real or perceived power imbalance.

Examples of bullying are such actions as threats, spreading rumours, attacking someone physically or verbally, or deliberately excluding someone from a group.

Sexual Harassment

Sexual Harassment is also making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. Sexual Harassment includes requests for sexual favours, or other verbal or physical conduct of a sexual nature or related to a person's sex.

Violence

Curling Canada is committed to the prevention of violence and to providing a safe and respectful working environment for employees. Curling Canada will take whatever steps are reasonable to protect employees from violence from all sources in order to eliminate and/or minimize these risks. Violent behaviour in the work or sport environment is unacceptable from anyone. Curling Canada will not tolerate any type of violence within Curling Canada offices or at Curling Canada Activities. For the purpose of this Policy, “Violence” is any actual, attempted or threatened conduct of a person that causes or is likely to cause physical and/or psychological harm/injury/illness or that gives a person reason to believe that he or she or another person is at risk of physical and/or psychological harm/injury/illness, including but not limited to, any actual or attempted assault (including sexual assault and physical attacks), threat, verbal, psychological or sexual abuse and harassment.

Reprisal

Reprisals or threats of reprisal are an aggravating factor in any situation involving discrimination, harassment, or violence, particularly where the reprisal or threat of reprisal is by a Person in Authority or a Person in Leadership

Examples of reprisal include:

- Acts of retaliation designed to punish an individual who has reported discrimination, harassment or violence;
- Engaging in a course of vexatious comment or conduct because of sex, sexual orientation, gender identity or gender expression, that is known or ought reasonably to be known to be unwelcome
- Threats of retaliation designed to dissuade an individual from reporting discrimination, harassment or violence; and
- Threats of retaliation designed to dissuade other individuals from assisting with the process, such as serving as a witness, or by providing information.

In sexual harassment situations, reprisals can also include:

- Acts of retaliation to punish an individual who has rejected sexual advances; and
- Threats of retaliation if sexual advances are rejected.

For the purpose of this Policy, knowingly making a groundless or false allegation, or knowingly providing false information shall also be deemed a reprisal and may be subject to sanctions under this Policy.

Condemnation

If a Person in Authority or a Person in Leadership knows, or should reasonably have known, that discrimination, harassment or violence may have occurred and fails to take

appropriate action, the Person in Authority or Person in Leadership has condoned the discrimination, harassment or violence and may be subject to sanctions under this Policy.

Intimate or Sexual Relationships

An intimate or sexual relationship between an individual who is perceived to be in a position of authority or power (“**Person in Authority**”) over the individual with whom the intimate or sexual relationship has occurred, or where it is reasonable to perceive there to be a power imbalance, may be inappropriate behaviour, even if all parties are consenting adults and may also constitute a conflict of interest. The Person in Authority shall promptly disclose the existence of the relationship to the COO and the COO shall determine whether or not the conduct was detrimental to the individual involved, to others, or to the reputation of Curling Canada and whether there is a conflict of interest. Should the COO determine that the conduct was detrimental to the individual involved, to others, or to the reputation of CC, or a conflict of interest, the provisions of this Policy shall apply, and sanctions may be imposed. The CEO will be consulted as appropriate, and always before any sanctions are imposed.

Illegal Betting

Curling Canada wishes to safeguard Curling Canada Activities from the threat connected to illegal sports betting and to promote the integrity of sport. Accordingly, employees are expressly prohibited from placing illegal bets of any type upon athletic performance and/or event results/outcomes in the Games and any other competitive athletic event that falls within the jurisdiction of Curling Canada in the future.

“**Illegal Betting**” are ventures involving a calculated risk and resulting in a potential gain/loss situation.

External Advice

The COO can recommend to the CEO the need for an advisory capacity to provide guidance and advice from time to time in situations that pose significant ethical dilemmas. This resource shall be an individual who is known to possess integrity, and the wisdom to advise on ethical issues.

Duty to Report

All employees are expected to promptly report any behaviour of which they become aware that may constitute a breach of this Policy, or contravenes the law. This includes situations where the breach is suspected, provided the employee has reasonable grounds to believe such suspicion is true.

In the event that Curling Canada reasonably believes that the reported conduct constitutes criminal activity or behaviour, Curling Canada shall have the right to report such conduct to the law enforcement authorities.

Curling Canada Resource Person

a) Purpose

Curling Canada shall appoint an individual designated as CC's Resource Person for the purpose of this Policy. CC's Resource Person shall be neutral and independent of Curling Canada such that he or she is not a current Curling Canada employee or contractor (except as a contractor in respect of providing services as the Resource Person), nor a current Curling Canada Governor. The role of Curling Canada Resource Person shall be:

- (i) To receive reports brought forward relating to this Policy;
- (ii) To facilitate the process for bringing forward reports and complaints;
- (iii) To provide support to individuals who have questions or concerns about the application of this Policy;
- (iv) To provide assistance and guidance to complainants and to respondents;
- (v) To report on an annual basis to the COO and CEO on the work of the Curling Canada Resource Person including any issues, concerns or suggestions the Curling Canada Resource Person wishes to highlight.
- (vi) The CEO will brief the Board Chair as appropriate.

If the person appointed as the Curling Canada Resource Person has been involved in the matter giving rise to an allegation under this Policy, the Curling Canada shall appoint an alternative Curling Canada Resource Person for the purposes of such matter.

b) Assistance to Complainants

If the COO and CEO concur beforehand, a complainant may request the assistance of the Curling Canada Resource Person in understanding this Policy, in pursuing an informal resolution if appropriate, and in formulating the written Complaint. The Curling Canada Resource Person shall refer the complainant to counselling upon request. For Curling Canada employees, this assistance could be provided through the Employee and Family Assistance Program (EFAP). The Curling Canada Resource Person may explore the possibility of alternative forms of dispute resolution with the complainant, whether before or after the Complaint is made, if appropriate.

c) Assistance to Respondents

If the COO and CEO concur beforehand, a respondent may request the assistance of the Curling Canada Resource Person in understanding this Policy. The Curling Canada Resource Person shall refer the Respondent to counselling upon request. For Curling Canada employees, this assistance could be provided through the Employee and Family

Assistance Program (EFAP). The Curling Canada Resource Person may explore the possibility of alternative forms of dispute resolution with the respondent.

Complaint Procedure

1. Informal Resolution

Curling Canada encourages individuals to first attempt to resolve conduct issues informally, whenever possible. If an informal resolution fails to resolve the issue, or if the circumstances are such that informal resolution is not possible or appropriate, the formal process outlined below should be utilized. Options for informal resolution include: speaking to the person and informing the individual that the conduct was unwelcomed or inappropriate and asking for it to stop; or consulting a supervisor or the human resources department.

2. Initial Reporting

In furtherance of the purpose of this Policy, Curling Canada expects reporting of a breach and of a potential, or suspected breach of this Policy. To this end, a report of a potential, suspected, or actual breach of this Policy may be made in writing or verbally to the COO or CEO. If the report was made to a Person in Leadership, the Person in Leadership shall advise the COO or CEO to provide assistance.

3. Formalizing and Processing the Complaint

Once a report has been made, Person in Leadership to whom the report was made, shall inform the COO (if the COO did not receive the report), and the CEO of the report, unless one of them is the subject of the report (in which case only the other shall be informed). No Person in Leadership who is the subject of the report, or who has a material personal interest in the matter, shall participate in the complaints process once there has been a report (except as a complainant or respondent, if applicable).

In order for a report to be processed, reviewed and adjudicated, it must be formalized in writing, at which point it shall be considered a complaint (“**Complaint**”). A Complaint shall be signed either by the complainant, or by the COO, or a member of the Leadership Team (as applicable), if the Complaint is brought on behalf of Curling Canada, Curling Canada shall have the ability to bring forward a Complaint on its own or on the complainant’s behalf. The Complaint shall be submitted to the CEO, and a copy shall be provided to the COO.

The Complaint should include particulars of the alleged breach, including details of the incident or incidents, including dates, times, locations, description of action, account of dialogue, the name of the alleged perpetrator(s) and any witnesses or names of other individuals who may have other relevant information. The Complaint should detail any corrective action taken to date.

The parties to a Complaint are Curling Canada, the respondent and the complainant, if any.

Upon receiving the Complaint in which both the complainant and the respondent are employees, the COO, upon receiving the Complaint in circumstances where one of the parties is not an employee, the COO, shall decide whether to proceed with the Complaint, and if so, whether to conduct an internal investigation, or whether to retain an external investigator. The COO will then have carriage of the matter and shall keep the CEO informed as appropriate throughout the Complaints process.

The CEO may decide not to deal with a Complaint:

- If in the opinion of the CEO, the facts alleged in the Complaint would be insufficient, if proven, to establish a breach under this Policy; or
- If in the opinion of the CEO, the further investigation of the Complaint would not advance the purpose of this Policy in the circumstances, either because of a significant delay between the alleged events and the time of the Complaint or for any other reasonable reason.

In the event that it has been determined that the Complaint is not to proceed, the CEO shall so advise the complainant and advise the complainant of his or her right to appeal the decision in accordance with the Appeal Process below.

In all other cases, the CEO shall investigate the Complaint or appoint and provide terms of reference to an investigator who shall investigate the Complaint and make findings of fact.

Employees, including the respondent, must co-operate fully in any investigation under this Policy. Any process or investigation shall adhere to and provide for fairness. Any party shall have the right to retain legal counsel at any stage of a Complaint or appeal, at such party's own expense.

The COO shall advise the respondent of the Complaint and shall provide the complainant and the respondent a copy of the written Complaint, and of this Policy. The respondent shall be given an opportunity to provide a written response to the allegations within a reasonable period of time, having regard to the circumstances, but in no event less than 24 hours and no more than one week. If a respondent declines to do so, or does not respond within the timeframe provided, the investigator's report may nonetheless be issued. A respondent may rely on any legal defenses recognized under applicable law.

The COO may consult with the investigator during the course of the investigation, may review the investigation report in draft and may provide additional terms of reference to, or request clarification from, the investigator, provided that none of the involvement shall be for the purposes of influencing the findings, or compromise the independence of the investigator.

Interim Measures

The CEO may impose interim measures pending the investigation and disposition of a Complaint, if the CEO is of the view that the imposition of such measures is in the best interest of the complainant, respondent and/or Curling Canada. Interim measures are not sanctions, and they may take many forms, including but not limited to:

1. The imposition of measures regarding the continued participation in Curling Canada Activities or work of CC;
2. Leave of absence from participation in Curling Canada Activities or work of CC, with pay, or under such other terms as are seen to be appropriate; and/or
3. Security arrangements.

The COO shall be informed of any interim measures.

CEO Determination

The CEO will be responsible for determining whether there has been a breach of the Policy in light of the findings of fact contained in the investigation report and for deciding what disciplinary or corrective action is appropriate, if any. The CEO's determination shall be communicated to the complainant, the respondent and the COO.

The CEO will advise the Board Chair as appropriate.

Settlement and Mediation

A Complaint may be settled at any stage. A resolution agreement should be in writing and signed by the complainant, respondent and the CEO. A copy of the resolution agreement will be provided to the COO.

If the CEO determines mediation could be a successful alternative resolution process, the CEO may, in his or her discretion, suggest such process and if the complainant and respondent are willing to enter such process, Curling Canada will select and provide at its expense, a mediator to mediate the matter.

Sanctions

Breaches of this Policy will be considered a serious matter and subject to disciplinary action. The CEO shall have the authority to impose sanctions, if deemed warranted.

The complainant and the respondent shall be given a reasonable opportunity, to be established by the CEO, to make submissions to the CEO prior to the imposition of sanctions.

Sanctions may include, but are not limited to:

- The issuance of a warning and/or reprimand;

- The imposition of such temporary or permanent conditions on continued employment, including without limitation, reimbursement of expenses paid by Curling Canada on such party's behalf or as a result of the breach, or for participation in some or all of Curling Canada activities;
- Temporary suspension from employment (with or without pay), and/or from participation in some or all of Curling Canada activities, as the CEO may view as appropriate;
- Termination of employment or contract;
- Any other legal remedies available to Curling Canada.

The CEO shall provide the other party with such information about any sanctions imposed as is appropriate in the circumstances. The COO will be advised of sanctions imposed.

Should any sanction that the CEO view as appropriate require a resolution to be passed by the COC Board, the CEO shall take such action as is appropriate to have the matter placed before the Board for its consideration, but the matter will not be considered prior to any appeal or expiration of right to appeal under this Policy.

Appeals

An appeal under this Policy will be heard and determined by a three person ad hoc Appeal Committee appointed by the CEO (hereinafter the "Appeal Committee") as soon as practicable, but in no event later than thirty days from the date of the notice of appeal referred to below. None of the persons hearing the Appeal shall have had prior involvement in the matter or shall otherwise have a real or perceived conflict of interest.

(i) Grounds for Appeal

The decision may be appealed on the following grounds only:

- That the investigation was conducted in an unfair or biased manner;
- In the case of the respondent, that the findings of fact contained in the investigation report are insufficient to support a determination that a breach has been established;
- In the case of the complainant, that the findings of fact contained in the investigation report ought to have resulted in a determination that a breach has been established;
- A party may also appeal the sanction(s) imposed or recommended following a complaint. In such an appeal, the other party shall be advised that an appeal has been filed, and shall be entitled to make written representations, but shall not be entitled to participate as a respondent in the appeal; or
- A complainant may also appeal the decision not to deal with a complaint. In such a case, the respondent shall not be identified in the appeal and shall not be entitled to participate as a respondent in the appeal.

There shall be no appeal from any finding of fact contained in the investigation report.

(ii) Notice of Appeal

The notice of appeal must be made in writing to the CEO, within fourteen days of the appellant receiving notice of the CEO's decision with respect to sanctions, and must state the specific grounds for the appeal. A copy of the notice of appeal shall be promptly provided to the COO.

(iii) The Hearing

The following persons may appear before the Appeal Committee at its in camera hearing and make representations in the appeal:

- The CEO;
- The appellant(s);
- Any person entitled to participate as a respondent in the appeal;
- Any other person invited by the Appeal Committee to make representations, or permitted to attend.

(iv) Disposition of the Appeal

The Appeal Committee's deliberations shall take place in camera. No other person shall be present during the deliberations.

The Appeal Committee, by a majority of votes cast, may:

- Dismiss the appeal;
- Substitute its own determination for the determination under appeal;
- Substitute a sanction for the sanction under appeal; or
- Remit the complaint for further investigation and/or for re-determination in accordance with its directions.

The Appeal Committee shall provide written reasons for its disposition. A copy of the written reasons shall be provided to the CEO, the COO, the appellant, and to any respondent in the appeal.

In an appeal from sanctions, the CEO shall give the other party such information about the disposition of the appeal as is appropriate in the circumstances.

Confidentiality of Complaint Materials

To the extent possible, reports, Complaints, witness statements and other documents produced under this Policy or shared in an investigation, shall be held in confidence by Curling Canada, provided that, no guarantees of confidentiality may be made by Curling Canada. Circumstances in which information may be shared include, without limitation:

- When criminal conduct may be involved;
- When it is felt to be necessary to protect others from harassment, discrimination, violence or any other potential breach of this policy;
- When required to ensure fairness or natural justice in the procedures contemplated by this policy;
- In the course of an investigation by a law enforcement agency;
- To protect the interests of CC; and
- When required by law.

Record Keeping

The CEO, or his or her delegate, shall keep a secure record of every report and Complaint under this Policy. The record shall contain all relevant documentation including, if such exists:

- Details of the report(s) and/or a copy of the Complaint(s) and response thereto;
- The terms of reference of the investigator;
- The interim measures;
- Any witness statements;
- The investigation report;
- The terms of any informal resolution or written resolution agreement;
- The CEO's determinations;
- The sanctions imposed;
- All other correspondence;
- Any material filed in an appeal.

Administration and Training

Curling Canada will ensure that its employees are aware of and understand this Policy through appropriate guidance, training, administration and review. All Curling Canada employees shall confirm in writing on an annual basis that they have read and understood this Policy and agree to be bound by its terms. Curling Canada shall be available to employees for guidance to ensure their understanding and promote adherence to this Policy.

Whistleblower Policy

This Policy is supported and augmented by CC's Whistleblower Policy. Any employee may report a breach or a potential, or suspected breach anonymously through the process described in the Whistleblower Policy without fear of harassment or retaliation.

Repeal of Prior Policies

This Policy, once approved, shall repeal and replace all prior policies and guidelines related to the matters contained herein.

Policy does not repeal or replace the Policy Statement and Guidelines on Whistleblowing.

Examples of Harassment include:

- Unwelcome remarks, jokes, nicknames, innuendo, or taunting which may, but need not be linked to a prohibited ground, such as a person's age, sexual orientation, race, ancestry, political opinions, etc.;
- Written or verbal abuse or threats which may, but need not be linked to a prohibited ground;
- Racial, ethnic or other slurs;
- Displays which may cause offence and which may, but need not be related to prohibited grounds, such as sexual, racial, ethnic or religious posters or graffiti;
- Use of terminology that reinforces stereotypes which may, but need not be based on prohibited grounds;
- Vandalism or physical assaults which may, but need not be motivated by prohibited grounds; and
- Condescension, paternalism, or patronizing behaviour which may, but need not be linked to prohibited grounds which undermines self-respect or adversely affects performance or working conditions.

Examples of Sexual Harassment include:

- Criminal conduct such as stalking, and physical or sexual assault or abuse;
- Inappropriate comments about a person's body or appearance;
- Inquiries or comments about an individual's sex life, sexual preferences, etc.;
- Leering or other obscene or suggestive gestures;
- Promises or threats contingent on the performance of sexual favours;
- Sexual/sexist graffiti or any displaying of sexually explicit material or pictures;
- Unwanted physical contact including touching, kissing, patting and pinching;
- Unwelcome flirtation, sexual remarks, invitations or requests whether indirect or explicit; and
- Use of inappropriate or derogatory sexual terms.

Further Examples of Harassment and/or Violence Prohibited by this Policy:

- Verbal abuse: is the use of vexatious comments that are known, or that ought to be known, to be unwelcome, embarrassing, offensive, threatening, or degrading to another person (including swearing, insults, or condescending language) which causes the person to believe their health and safety is at risk.
- Threat: (verbal or written) is a communicated intent to inflict physical or other harm on any person or to property by some unlawful act. A direct threat is a clear and explicit communication distinctly indicating that the potential offender intends to do harm, for example, “I am going to make you pay for what you did to me.”
- A conditional threat involves a condition, for example, “If you don’t leave me alone you will regret it.” Veiled threats usually involve body language or behaviours that leave little doubt in the mind of the victim that the perpetrator intends to harm.
- Physical attacks: are aggression resulting in a physical assault/abuse with or without the use of a weapon. Examples include hitting, shoving, pushing, punching, biting, spitting, groping, pinching, or kicking the victim, unwelcome displays of affection or inciting harm to a person directly or indirectly.
- Psychological abuse: is an act that provokes fear or diminishes an individual’s dignity or self worth or that intentionally inflicts psychological trauma on another.
- Assault: is any intent to inflict injury on another, coupled with an apparent ability to do so; any intentional display of force that causes the victim to fear immediate bodily harm.
- Sexual abuse: is any unwelcome verbal or physical advance or sexually explicit statement, displays of pornographic material, pinching, brushing against, touching, patting, or leering which causes the person to believe their health and safety is at risk.
- Sexual assault: is the use of threat or violence to force one individual to touch, kiss, fondle, or have sexual intercourse with another.

Examples of What Is Not Considered Harassment:

- Reasonable action or conduct by a Curling Canada Person in Authority or Person in Leadership that is part of his/her normal function, even if there are possible unpleasant consequences for an employee (e.g., disciplinary action, performance management, changes to schedules or duties, implementation of policies, etc.).
- Differences of opinion or disagreements between co-participants, expressed appropriately.
- Discipline in training is an indispensable part of high performance sport and should not be confused with discrimination or harassment. However, it is of vital importance that those in authority:
 - Set and communicate non-discriminatory performance standards, selection criteria, rules and regulations to all participants;

- Ensure that training involving touching or other physical contact occur in an appropriate setting, and only after informed consent has been sought and received;
- Be consistent in taking any corrective or punitive action without discrimination based on prohibited grounds or harassment; and
- Use non-discriminatory terminology; address individuals by name and avoid the use of derogatory slang or offensive terms.

Code of Conduct and Ethics Policy for Athletes, Coaches and Umpires/Officials

Definitions

The following terms have these meanings in this Code:

- a) *“Individuals”* – Individuals employed by, or engaged in activities with, the Curling Canada including, but not limited to, athletes, coaches, convenors, officials, volunteers, managers, administrators, committee members, parents and guardians and spectators at events, and Officers of the Curling Canada.
- b) *“Workplace”* - Any place where business or work-related activities are conducted. Workplaces include but are not limited to, the Curling Canada’s office, work-related social functions, work assignments outside the Curling Canada’s offices, work-related travel, the training and competition environment, and work-related conferences or training sessions.
- c) *“Abuse”* – As defined in the Curling Canada’s *Abuse Policy*
- d) *“Discrimination”* – Differential treatment of an individual based on one or more prohibited grounds which include race, citizenship, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, or disability.
- e) *“Harassment”* – A course of vexatious comment or conduct against an Individual or group, which is known or ought to reasonably be known to be unwelcome. Types of behaviour that constitute Harassment include, but are not limited to:
 - i. Written or verbal abuse, threats, or outbursts;
 - ii. Persistent unwelcome remarks, jokes, comments, innuendo, or taunts;
 - iii. Racial harassment, which is racial slurs, jokes, name calling, or insulting behaviour or terminology that reinforces stereotypes or discounts abilities because of racial or ethnic origin;
 - iv. Leering or other suggestive or obscene gestures;
 - v. Condescending or patronizing behaviour which is intended to undermine self-esteem, diminish performance or adversely affect working conditions;

- vi. Practical jokes which endanger a person's safety, or may negatively affect performance;
 - vii. Hazing, which is any form of conduct which exhibits any potentially humiliating, degrading, abusive, or dangerous activity expected of a junior-ranking individual by a more senior individual, which does not contribute to either individual's positive development, but is required to be accepted as part of a team or group, regardless of the junior-ranking individual's willingness to participate. This includes, but is not limited to, any activity, no matter how traditional or seemingly benign, that sets apart or alienates any teammate or group member based on class, number of years on the team or with the group, or ability;
 - viii. Unwanted physical contact including, but not limited to, touching, petting, pinching, or kissing;
 - ix. Deliberately excluding or socially isolating a person from a group or team;
 - x. Persistent sexual flirtations, advances, requests, or invitations;
 - xi. Physical or sexual assault;
 - xii. Behaviours such as those described above that are not directed towards a specific person or group but have the same effect of creating a negative or hostile environment; and
 - xiii. Retaliation or threats of retaliation against a person who reports harassment to the Curling Canada.
- f) *"Workplace Harassment"* – Vexatious comment or conduct against a worker in a Workplace that is known or ought reasonably to be known to be unwelcome. Workplace Harassment should not be confused with legitimate, reasonable management actions that are part of the normal work/training function, including measures to correct performance deficiencies, such as placing someone on a performance improvement plan, or imposing discipline for workplace infractions. Types of behaviour that constitute Workplace Harassment include, but are not limited to:
- i. Bullying;
 - ii. Workplace pranks, vandalism, bullying or hazing;
 - iii. Repeated offensive or intimidating phone calls or emails;
 - iv. Inappropriate sexual touching, advances, suggestions or requests;
 - v. Displaying or circulating offensive pictures, photographs or materials in printed or electronic form;
 - vi. Psychological abuse;
 - vii. Excluding or ignoring someone, including persistent exclusion of a particular person from work-related social gatherings;
 - viii. Deliberately withholding information that would enable a person to do his or her job, perform or train;
 - ix. Sabotaging someone else's work or performance;

- x. Gossiping or spreading malicious rumours;
 - xi. Intimidating words or conduct (offensive jokes or innuendos); and
 - xii. Words or actions which are known or should reasonably be known to be offensive, embarrassing, humiliating, or demeaning.
- g) *“Sexual Harassment”* – A course of vexatious comment or conduct against an Individual because of sex, sexual orientation, gender identify or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advance to the Individual and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. Types of behaviour that constitute Sexual Harassment include, but are not limited to:
- I. Sexist jokes;
 - II. Threats, punishment, or denial of a benefit for refusing a sexual advance;
 - III. Offering a benefit in exchange for a sexual favour;
 - IV. Demanding hugs;
 - V. Bragging about sexual ability;
 - VI. Leering (persistent sexual staring);
 - VII. Sexual assault;
 - VIII. Display of sexually offensive material;
 - IX. Distributing sexually explicit messages or attachments such as pictures or video files;
 - X. Sexually degrading words used to describe an Individual;
 - XI. Unwelcome inquiries into or comments about an Individual’s gender identity or physical appearance;
 - XII. Inquiries or comments about an Individual’s sex life;
 - XIII. Persistent, unwanted attention after a consensual relationship ends;
 - XIV. Persistent unwelcome sexual flirtations, advances, or propositions; and
 - XV. Persistent unwanted contact.
- h) *“Workplace Violence”* – the use of or threat of physical force by a person against a worker in a Workplace that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker in a Workplace that could cause physical injury to the worker; or a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker in a Workplace that could cause physical injury to the worker. Types of behaviour that constitute Workplace Violence include, but are not limited to:
- I. Verbal or written threats to attack;
 - II. Sending to or leaving threatening notes or emails;

- III. Physically threatening behaviour such as shaking a fist at someone, finger pointing, destroying property, or throwing objects;
- IV. Wielding a weapon in a Workplace;
- V. Hitting, pinching or unwanted touching which is not accidental;
- VI. Dangerous or threatening horseplay;
- VII. Physical restraint or confinement;
- VIII. Blatant or intentional disregard for the safety or well-being of others;
- IX. Blocking normal movement or physical interference, with or without the use of equipment;
- X. Sexual violence; and
- XI. Any attempt to engage in the type of conduct outlined above.

Purpose

The purpose of this Code is to ensure a safe and positive environment (within the Curling Canada's programs, activities, and events) by making Individuals aware that there is an expectation, at all times, of appropriate behaviour consistent with the Curling Canada's core values. The Curling Canada supports equal opportunity, prohibits discriminatory practices, and is committed to providing an environment in which all individuals are treated with respect and fairness.

Application of this Code

This Code applies to Individuals' conduct during the Curling Canada's business, activities, and events including, but not limited to, competitions, practices, tryouts, training camps, travel associated with the Curling Canada's activities, the Curling Canada's office environment, and any meetings.

An Individual who violates this Code may be subject to sanctions pursuant to the Curling Canada's *Discipline and Complaints Policy*. In addition to facing possible sanction pursuant to the Curling Canada's *Discipline and Complaints Policy*, an Individual who violates this Code during a competition may be ejected from the competition or the playing area, the official may delay the competition until the Individual complies with the ejection, and the Individual may be subject to any additional discipline associated with the particular competition.

An employee of the Curling Canada found to have engaged in acts of violence or harassment against any other employee, worker, contractor, member, customer, supplier, client or other third party during business hours, or at any event of the Curling Canada, will be subject to appropriate disciplinary action subject to the terms of the Curling Canada's policies for human resources as well as the employee's Employment Agreement (if applicable).

This Code also applies to Individuals' conduct outside of the Curling Canada's business, activities, and events when such conduct adversely affects relationships within the Curling Canada (and its work and sport environment) and is detrimental to the image and reputation of the Curling Canada. Such applicability will be determined by the Curling Canada at its sole discretion.

Responsibilities

Individuals have a responsibility to:

- a) Maintain and enhance the dignity and self-esteem of the Curling Canada members and other individuals by:
 - I. Treating each other with the highest standards of respect and integrity;
 - II. Focusing comments or criticism appropriately and avoiding public criticism of athletes, coaches, officials, organizers, volunteers, employees, or members;
 - III. Consistently demonstrating the spirit of sportsmanship, sport leadership, and ethical conduct;
 - IV. Acting, when appropriate, to correct or prevent practices that are unjustly discriminatory;
 - V. Consistently treating individuals fairly and reasonably; and
 - VI. Ensuring adherence to the rules of the sport and the spirit of those rules.
- b) Refrain from any behaviour that constitutes Harassment, Workplace Harassment, Sexual Harassment, Workplace Violence, or Discrimination
- c) Abstain from the non-medical use of drugs or the use of performance-enhancing drugs or methods. More specifically, the Curling Canada adopts and adheres to the Canadian Anti-Doping Program. Any infraction under this Program shall be considered an infraction of this Code and may be subject to further disciplinary action, and possible sanction, pursuant to the Curling Canada's *Discipline and Complaints Policy*. the Curling Canada will respect any penalty enacted pursuant to a breach of the Canadian Anti-Doping Program, whether imposed by the Curling Canada or any other sport organization
- d) Refrain from associating with any person for the purpose of coaching, training, competition, instruction, administration, management, athletic development, or supervision of the sport, who has incurred an anti-doping rule violation and is serving a sanction involving a period of ineligibility imposed pursuant to the Canadian Anti-Doping Program and/or the World Anti-Doping Code and recognized by the Canadian Centre for Ethics in Sport (CCES)
- e) Refrain from the use of power or authority in an attempt to coerce another person to engage in inappropriate activities
- f) Refrain from consuming tobacco products, or recreational drugs while participating in the Curling Canada's programs, activities, competitions, or events

- g) In the case of minors, not consume alcohol, tobacco, or cannabis at any competition or event;
- h) In the case of adults, not consume cannabis in the Workplace or in any situation associated with the Curling Canada's events (subject to any requirements for accommodation), not consume alcohol during competitions and in situations where minors are present, and take reasonable steps to manage the responsible consumption of alcohol in adult-oriented social situations associated with the Curling Canada's events
- i) Respect the property of others and not willfully cause damage
- j) Promote the sport in the most constructive and positive manner possible
- k) When driving a vehicle with an Individual:
 - i. Not have his or her license suspended;
 - ii. Not be under the influence of alcohol or illegal drugs or substances; and
 - iii. Have valid car insurance
- l) Adhere to all federal, provincial, municipal and host country laws
- m) Refrain from engaging in deliberate cheating which is intended to manipulate the outcome of a competition and/or not offer or receive any bribe which is intended to manipulate the outcome of a competition
- n) Comply, at all times, with the Curling Canada's bylaws, policies, procedures, and rules and regulations, as adopted and amended from time to time

Committee Members and Staff

In addition to section 7 (above), the Curling Canada's Committee Members and Staff will have additional responsibilities to:

- a) Act with honesty and integrity and conduct themselves in a manner consistent with the nature and responsibilities of the Curling Canada's business and the maintenance of Individuals' confidence
- b) Ensure that the Curling Canada's financial affairs are conducted in a responsible and transparent manner with due regard for all fiduciary responsibilities
- c) Conduct themselves transparently, professionally, lawfully and in good faith in the best interests of the Curling Canada
- d) Be independent, impartial, and not be influenced by self-interest, outside pressure, expectation of reward, or fear of criticism
- e) Behave with decorum appropriate to both circumstance and position
- f) Keep informed about the Curling Canada's activities, the sport community, and general trends in the sectors in which it operates
- g) Exercise the degree of care, diligence, and skill required in the performance of their duties pursuant to the laws under which the Curling Canada is incorporated
- h) Respect the confidentiality appropriate to issues of a sensitive nature
- i) Respect the decisions of the majority and resign if unable to do so

- j) Commit the time to attend meetings and be diligent in preparation for, and participation in, discussions at such meetings
- k) Have a thorough knowledge and understanding of all the Curling Canada governance documents
- l) Conform to the bylaws and policies approved by the Curling Canada

Coaches

In addition to section 7 (above), coaches have many additional responsibilities. The coach-athlete relationship is a privileged one and plays a critical role in the personal, sport, and athletic development of the athlete. Coaches must understand and respect the inherent power imbalance that exists in this relationship and must be extremely careful not to abuse it, consciously or unconsciously. Coaches will:

- a) Ensure a safe environment by selecting activities and establishing controls that are suitable for the age, experience, ability, and fitness level of the involved athletes
- b) Prepare athletes systematically and progressively, using appropriate time frames and monitoring physical and psychological adjustments while refraining from using training methods or techniques that may harm athletes
- c) Avoid compromising the present and future health of athletes by communicating and cooperating with sport medicine professionals in the diagnosis, treatment, and management of athletes' medical and psychological treatments
- d) Support the coaching staff of a training camp, provincial team, or national team; should an athlete qualify for participation with one of these programs
- e) Accept and promote athletes' personal goals and refer athletes to other coaches and sports specialists as appropriate
- f) Provide athletes (and the parents/guardians of minor athletes) with the information necessary to be involved in the decisions that affect the athlete
- g) Act in the best interest of the athlete's development as a whole person
- h) Comply with the Curling Canada's *Screening Policy*, if applicable
- i) Report to the Curling Canada any ongoing criminal investigation, conviction, or existing bail conditions, including those for violence, child pornography, or possession, use, or sale of any illegal substance
- j) Under no circumstances provide, promote, or condone the use of drugs (other than properly prescribed medications) or performance-enhancing substances and, in the case of minors, alcohol, cannabis, and/or tobacco
- k) Respect athletes playing with other teams and, in dealings with them, not encroach upon topics or actions which are deemed to be within the realm of 'coaching', unless after first receiving approval from the coaches who are responsible for the athletes
- l) Not engage in a sexual relationship with an athlete under 18 years old;

- m) Disclose any sexual or intimate relationship with an athlete over the age of 18 to the Curling Canada and immediately discontinue any coaching involvement with that athlete;
- n) Recognize the power inherent in the position of coach and respect and promote the rights of all participants in sport. This is accomplished by establishing and following procedures for confidentiality (right to privacy), informed participation, and fair and reasonable treatment. Coaches have a special responsibility to respect and promote the rights of participants who are in a vulnerable or dependent position and less able to protect their own rights
- o) Dress professionally, neatly, and inoffensively
- p) Use inoffensive language, taking into account the audience being addressed

Athletes

In addition to section 7 (above), athletes will have additional responsibilities to:

- a) Report any medical problems in a timely fashion, when such problems may limit their ability to travel, practice, or compete;
- b) Participate and appear on-time and prepared to participate to their best abilities in all competitions, practices, training sessions, tryouts, tournaments, and events
- c) Properly represent themselves and not attempt to participate in a competition for which they are not eligible by reason of age, classification, or other reason
- d) Adhere to the Curling Canada's rules and requirements regarding clothing and equipment
- e) Act in a sportsmanlike manner and not display appearances of violence, foul language, or gestures to other athletes, officials, coaches, or spectators
- f) Dress to represent the sport and themselves well and with professionalism
- g) Act in accordance with the Curling Canada's policies and procedures and, when applicable, additional rules as outlined by coaches or managers

Officials

In addition to section 7 (above), officials will have additional responsibilities to:

- a) Maintain and update their knowledge of the rules and rules changes
- b) Not publicly criticize other officials or any club or association;
- c) Work within the boundaries of their position's description while supporting the work of other officials
- d) Act as an ambassador of the Curling Canada by agreeing to enforce and abide by national and provincial rules and regulations
- e) Take ownership of actions and decisions made while officiating
- f) Respect the rights, dignity, and worth of all individuals
- g) Not publicly criticize other officials or any club or association
- h) Act openly, impartially, professionally, lawfully, and in good faith

- i) Be fair, equitable, considerate, independent, honest, and impartial in all dealings with others
- j) Respect the confidentiality required by issues of a sensitive nature, which may include ejections, defaults, forfeits, discipline processes, appeals, and specific information or data about Individuals
- k) Honour all assignments unless unable to do so by virtue of illness or personal emergency, and in these cases inform the assignor or association at the earliest possible time
- l) When writing reports, set out the actual facts
- m) Dress in proper attire for officiating

Parents/Guardians and Spectators

In addition to section 7 (above), parents/guardians and spectators at events will:

- b) Encourage athletes to compete within the rules and to resolve conflicts without resorting to hostility or violence
- c) Condemn the use of violence in any form
- d) Never ridicule a participant for making a mistake during a performance or practice
- e) Provide positive comments that motivate and encourage participants' continued effort
- f) Respect the decisions and judgments of officials, and encourage athletes to do the same
- g) Never question an official's or staff member's judgment or honesty
- h) Support all efforts to remove verbal and physical abuse, coercion, intimidation, and sarcasm
- i) Respect and show appreciation to all competitors, and to the coaches, officials and other volunteers
- j) Not harass competitors, coaches, officials, parents/guardians, or other spectators

WHISTLEBLOWING

The purpose of this *Whistleblowing Policy* is to encourage and enable Curling Canada (CC) participants* and members of the public to report questionable activity concerning financial or operational matters, pertaining to CC, without fear of reprisal.

Participants have a duty to report any activity which:

- a) They believe contravenes the law;
- b) Represents a real or apparent conflict of interest or a breach of a Curling Canada policy, including the ethics policy or the policy and guidelines on discrimination and harassment;
- c) Represents a misuse of CC's funds or assets; or
- d) Represents a danger to public health, safety, and/ or the environment.

This policy provides direction regarding the process for reporting questionable activity and the treatment of such reports.

Rationale

Curling Canada is committed to maintaining a high standard of public trust and confidence from its stakeholders. As a result, Curling Canada requires the observation of high standards of business and personal ethics in the conduct of the duties and responsibilities.

All Curling Canada participants have an obligation to report questionable activity regarding financial or operational matters, including violations of federal or provincial law, and violations of CC's policies.

Applicability

This Whistleblowing Policy applies to all Curling Canada participants* at all times, during the course of their work in sport and also during other activities where their conduct may affect the work and sport environment, whether that be at Curling Canada offices, at meetings of Curling Canada or other entities at Games or at any other location, whether in Canada or abroad.

*Curling Canada participants include all persons engaged in any paid or volunteer capacity with Curling Canada or otherwise under the jurisdiction of Curling Canada Without limiting the reach of this policy, Curling Canada participants include:

1. Curling Canada Governors, officers, members and volunteers;
2. Curling Canada employees and persons under contract with CC;
3. All athletes eligible for nomination to, or forming part of, any team participating in sport competitions over which Curling Canada has jurisdiction; and
4. All persons working with those teams or athletes, including coaches, medical and paramedical personnel, sports federation representatives, and other support persons.

The Whistleblowers

Concerns should be reported using CC's prescribed procedures for filing reports, though written reports in other forms are permitted. Curling Canada may also initiate a written report on behalf of an anonymous Whistleblower when warranted.

It is the policy of the CC:

1. To treat all reported incidents in a confidential manner and with due care to the extent possible, consistent with the need to conduct an adequate investigation. A Whistleblower may provide a report anonymously. Curling Canada will make its best efforts to protect the identity of a Whistleblower;
2. That all parties to an investigation will be treated fairly.

Reprisals

It is the policy of Curling Canada that any person who reports a concern in good faith will not be subject to reprisal or other adverse consequences as a result of submitting a report.

Any Curling Canada participant who retaliates against someone who has reported a concern in good faith will be subject to sanctions. Any participant who is found to be in violation of this policy (e.g. harassment of the Whistleblower) shall be sanctioned.

Any Curling Canada participant who has reasonable grounds to believe that a reprisal has been taken against him or her may file a complaint under Curling Canada Policy Discrimination, Harassment and Violence, and the complaint will be investigated as if the alleged reprisal was a breach of that policy.

None of the protections afforded to a Whistleblower under this policy shall apply to protect a person who intentionally makes false accusations. Curling Canada may sanction a participant in such circumstances.

Procedure

A concern can be reported in confidence using CC's online Whistleblower Form.

The Whistleblower Form will be sent the COO for review and assessment.

A Whistleblower Form which raises a potential breach pertaining to Curling Canada Policy on Guidelines on Discrimination, Harassment and Violence will be dealt with in accordance with that Policy. The COO in consultation with the CEO, will have the authority to retain outside counsel, accountants, investigators and other resources deemed necessary to conduct a full and complete investigation of the concern.

The COO in consultation with the CEO, may also refer a matter to a more appropriate authority (i.e. WADA, RCMP, local police).

If wrongdoing is found, appropriate remedial actions will be taken and/or sanctions imposed.

Except when a report is anonymous, the Whistleblower will be advised once the review and/or investigation of a matter has been completed, and if warranted may be provided information about the outcome.

In any year in which a concern has been reported, the CEO will be advised. The CEO will exercise her/his judgment as to whether the Board Chair needs to be advised. The CEO will advise the Board Chair on a monthly, bi-annual or annual basis as to how many complaints were received, and if any were founded.

Questions relating to this Whistleblowing Policy should be directed to the COO.

WORK PLANS AND PERFORMANCE APPRAISALS (PERFORMANCE DISCUSSION PROCESS)

Each employee will be responsible for developing their respective work plan for the year. This plan will be reviewed by their manager and amended as necessary to ensure alignment with Curling Canada's Business Plan, Strategic Priorities and Budget. At a minimum, at the end of each quarter, the manager and employee will review the objectives and the results achieved. Throughout the year, the employee and manager may refer to this document to track progress made toward objectives, highlight areas of concern and indicate challenges identified along the way.

Performance discussion should occur throughout the year and take the form of coaching. This fourth quarter meeting should take place to review successes and challenges from the preceding year, and to establish the objectives for the coming year. This would also be the opportunity for either party to identify and recommend professional development opportunities which may assist the employee in their day-to-day work or to grow within the organization. Once complete, both parties shall sign off on the final document and it shall be added to the employee's personnel file.

TERMINATION AND SEPARATION

Performance Management

In the event that a particular situation such as poor attendance or a performance issues becomes a recurring problem; your Manager's will make their best efforts to assist employees to correct the issue or behaviour. A sequence of progressive verbal and written feedback, potentially including training and retraining will be used. Employees, who are unable to change their behaviour or performance as a result of this progressive feedback, may be terminated.

Management will evaluate the situation on an individual basis. They will make every attempt to follow the sequence of steps of progressive feedback; however it is important to note that we reserve the right to immediately terminate employment without due process or notice where the employee is guilty of willful misconduct, willful neglect of duty, insubordination or any other action that seriously jeopardizes **Curling Canada's** operations.

This shall include but is not limited to:

- (a) any material breach of the provisions of an employee's offer of employment letter;
- (b) consistent poor performance on your part, after being advised as to the standard required;

- (c) any intentional or grossly negligent disclosure of any confidential or proprietary information by you;
- (d) your violation of any local, provincial or federal statute, including, without limitation, an act of dishonesty such as embezzlement or theft;
- (e) conduct on your part that is materially detrimental to the business or the financial position of Curling Canada;
- (f) personal conduct on your part which is of such a serious and substantial nature that, would reasonably be considered to injure the reputation of Curling Canada if you are retained as an employee; or
- (g) any and all omissions, commissions or other conduct which would constitute cause at law, in addition to the specified causes.

Lay-Offs

Curling Canada has the right to unilaterally impose temporary layoffs in accordance with the *Employment Standards Act, 2000* without further notice or compensation.

Termination

Curling Canada may terminate employment at any time, without cause, by complying with the requirements of individual employment agreements or the *Employment Standards Act* with respect to the written notice and severance pay obligations therein. Curling Canada may, at its sole option, provide payment of salary in lieu of such written notice. If Curling Canada has just cause to terminate employment, this may be done without any notice or payment.

Resignation

While we hope that employment with us is positive and lasting, if an employee chooses to voluntarily resign their position, they must provide at least two (2) weeks prior notice of their departure. This allows us to hire and train a replacement to avoid any potential negative effect on our service. We are entitled, at our sole discretion, to accept two (2) weeks notice or terminate employment, with or without cause, in accordance with the termination policy above. Should employment be terminated for any reason, separated employees will be required to return all documents and databases, records and reports relating to the business of Curling Canada and its clients.

Return of Company Property

Curling Canada property including, but not limited to keys, laptop computers, mobile phones, etc. must be returned to Curling Canada immediately upon termination or resignation. The deemed value of any Company property not returned will be deducted from the last pay cheque and/or from any outstanding vacation pay. Continued use of Company property by the employee or other after termination, could result in criminal charge.

Non-Compete / Non-Solicit

Employees or former employees of Curling Canada are prohibited from soliciting, either directly or indirectly, on your behalf or on behalf of any other person, Company or business entity, business from any of our customers and shall not accept on your behalf or on behalf of any other person, Company or business entity, business from any of our customers for a period of one year following separation of employment.

In addition, for a period of 12 months following cessation of their employment former employees will not to directly or indirectly induce or persuade or tend to induce or persuade any of the employees of Curling Canada to terminate their employment with us.

Please note that these provisions shall not be construed to restrict a former employee's right to accept employment with, or engage in, any business not competitive with that of Curling Canada.

HOURS OF WORK AND SCHEDULED BREAKS

The regular office hours are 8:30am to 4:30pm. Monday through Friday inclusive (excluding holidays), with core operational hours being 9am to 3:30pm. During core hours, it is expected that most staff will be available. All employees are expected to work 7.5 hours per day (37.5 hours per week), which include those hours indicated as core, exclusive of an unpaid eating break of at least thirty (30) minutes. Employees may also be expected to work such other hours as may be requested or required, from time to time. Employees hired on a part-time basis will have **schedules** determined on a case-by-case basis.

Employees are required to notify their manager, in advance, of planned days away from the office. Unplanned absences from the office should be reported to the employee's manager/supervisor as soon as could reasonably be expected. At the discretion of their Director and depending on circumstances, employees may be allowed to work from home for specific periods of time. Such work from home will be on an exceptional basis only, as Curling Canada has not endorsed alternate work arrangements (i.e.) for Ottawa based staff.

WORK FROM HOME

The purpose of the Work from Home policy is to provide necessary flexibility to promote a workplace of choice, while attaining Curling Canada business goals and maintaining productivity. It is also for health and safety reasons, where inclement weather may preclude safe travel to and from work, whereas Work from Home under such circumstances would be feasible, safer and more sensible alternative.

To maintain employee safety **Curling Canada** allows its employees to work from home as deemed appropriate and necessary by your manager or supervisor, or when the building is closed due to government directives.

Once the building is opened and meets all H&S Protocols, your manager or supervisor will decide if you can work from home and if so, for how often (part-time or full time, rotating schedules to encourage physical distancing, etc.) and for how long. **Curling Canada** can recall you to work in the office and revoke work from home privileges at any time.

If you are approved to work from home, you are responsible for ensuring a safe and healthy work environment in homework space. As such, you will be responsible for setting up your own workstation and equipment so that is appropriate for your health and ergonomics along with the necessary productivity that is required from your role.

You may be asked to provide verification of an adequate home-workstation set-up to **Curling Canada** in the form of a photo. As a result, **Curling Canada** may provide suggestions for a better ergonomic set-up to ensure your health and safety while working from home.

Staff who would like to work from home, must receive express approval from their supervisor or manager. It is expected that staff working from an off-site location (e.g. client site, home) are fully productive and engaged for the entire business day. They must be accessible by telephone and email, and must demonstrate high standards of availability and responsiveness to all other staff and clients;

1. Email must be checked at least 4 times daily and calls should be returned within the hours
2. Email and voicemail greeting should indicate availability and accessibility, and should be updated on daily basis;
3. All the work performed off-site must reflect high levels of engagement and productivity;
4. Deliverables will be assigned and must be met.
5. Attempts should be made to maintain connection with the office regarding announcements, updates, project status, meetings and initiatives.
6. Employees who work from home must communicate their attendance as though they were in the office.
7. Notify your manager/supervisor/colleagues of any sick leave or vacation schedules
8. Be sure to use your vacation in the appropriate calendar year.

All other policies in this manual apply to staff who are working on or off site.

PROBATION

All employees begin with Curling Canada on a probationary period unless otherwise stated and detailed in their Employment Agreement. Typically, a minimum three (3) months probationary period will be standard at Curling Canada. The manager can decide to extend this probationary period for up to six (6) months by providing notice to the employee. During this time, performance and suitability will be monitored and evaluated. If Curling Canada decides the employee is unsuitable for the employment offered; performance is unsatisfactory; or unwilling or unable to properly carry out any of your duties, then Curling Canada has the right to terminate employment at any time during the probationary period, given the appropriate notice outlined by the Ontario Employment Standards and Employment Agreement.

OVERTIME

Directors

Through their individual Employment Agreements with Curling Canada, Directors recognize that the nature of their jobs shall require them to work additional hours without additional compensation. In recognition of this fact, Directors are allotted five (5) days of Director Leave.

Managers

Managers are not eligible for compensation for hours worked in excess of their regular hours of work. They are expected, where possible to flex their hours. Under exceptional circumstances, Managers would be eligible for time off in lieu of overtime. Approval by their Director must be obtained in advance.

Staff

While every reasonable effort will be made to limit the working hours to the normal schedule, the employees may be called upon to work overtime. Some Curling Canada positions, by nature of their responsibilities and travel, will require additional hours. Employees are encouraged to flex their time in order to manage any additional hours that may be required to work.

Corporate Services will maintain the official record of overtime worked by all employees through Purely HR. It is not the Curling Canada's policy to pay employees for overtime worked. Employees shall make every reasonable effort to use their lieu time in a timely manner as it is earned in order to avoid accumulating large numbers of hours.

All overtime must be authorized by their manager in advance of being worked through the software 'Purely HR'. Employees will be provided with time off in lieu of overtime pay at straight time for all hours worked up to (see chart below for eligibility of time and a half hours per week). Once eligible, employees shall accumulate time off in lieu of overtime pay at the rate of one and a half (1.5) the regular non-overtime rate of pay. Time in lieu of

overtime pay must be taken in the three (3) months following it being earned and it must be scheduled with the agreement of their manager based on operational requirements.

Any overtime worked and not taken in lieu will be paid out in the event that the employee resigns or is terminated.

Overtime at time and a half eligibility in each jurisdiction:

Time & a half Overtime Eligibility	NS	ON	QC	MB	SK	AB	BC
	48	44	40	40	40	44	40

Note: For more detailed information, please refer to the applicable Employment/Labour Standards Act and its Regulations for each province/territory.

BUSINESS TRAVEL

Business travel for Season of Champions and National Championship, conferences, meetings, etc., which cause an employee to depart or arrive home on a non work-day does not constitute overtime. If travel is part of the employee's job, or could be reasonably expected to occur in the course of performing one's duties, it is merely an inconvenience. Some travel, which may be exceptional to the employee's normal duties, may qualify as overtime at the discretion of their Director in consultation with the COO, Corporate Services. This additional consultation is to ensure equitable application of this provision.

Directors and Managers

Curling Canada business that requires the travel outside of North America are granted a recovery day off on the first business workday upon their return to their regular place of work. This recovery day cannot be accumulated. If personal travel is booked at the end of the business travel, the recovery day is forfeited.

Travel within North America that exceeds 10 days, will also qualify for a recovery day as described above.

Staff Level Employees

Staff level employees accrue time in lieu while working outside of North America. As such, staff level employees are not entitled to recovery days.

Staff level employees are encouraged to use on their accumulated time in lieu days to rest and recover on the first business work day upon their return to their regular place of work.

TIME AND ATTENDANCE

All employees are expected to be present for their scheduled assignments each day and are expected to attend scheduled staff meetings.

Using the Purely HR system, all employees are required to inform their manager, by 9:00 am if they are going to be absent from work, advising the nature of the absence and the expected date of return. The use of the Purely HR system is required for all reasons of absence.

Employees should try to arrange medical or dental appointments so that they do not interfere with the normal working day. If an appointment requires more than the time allotted for breaks, the additional time will be deducted from the employee's accumulated overtime or unused vacation time via the Purely HR system.

The onus is on each employee to ensure their manager is kept current by using the Time-Off Manager system.

INCLEMENT WEATHER

On occasion, inclement weather may make it difficult for employees to get to work. Employees are expected to make arrangements during periods of inclement weather that will enable them to arrive as soon as possible.

In times of severe weather, employees may be notified by e-mail, telephone or in person (if during work hours) of any amendments to the work schedule. This will be at the sole discretion of the COO. Should the decision be made that employees are not required to present themselves at the workplace, they will be expected to work from home.

Curling Canada will not penalize an employee for lateness or absence due to inclement weather if a genuine effort has been made to get to work.

EMPLOYEE BENEFITS

Limited Liability in Providing Benefits

An employee's entitlement to benefit coverage will always be subject to the terms and conditions of the plans and policies, as they may from time to time be re-evaluated at the sole discretion of Curling Canada.

Curling Canada's liability is strictly limited to arranging for the plans and paying the insurance carrier for the applicable premiums. Curling Canada is specifically not liable for any failure or refusal of coverage by a third party, for any reason, and is not responsible for providing the benefits themselves.

Full-time employees are eligible for the following benefits effective their first day of work. These benefits do not apply to contractors, part-time employees, or seasonal

Curling Canada may, from time to time, alter, modify, vary or cancel any benefits and/or to change providers provided that in so doing, it is altering, modifying, varying or cancelling such benefits for all of its employees generally. The Employer shall provide such notice of any pending amendment or termination to benefits or plans as is feasible. The Employee acknowledges and agrees that any such amendment to the Group Benefit Package will not constitute a fundamental change and/or a constructive dismissal.

Group Insurance Plan

Curling Canada will pay 50% of the cost of the basic group insurance plan which is administered by the Canadian Olympic Committee. The employee's share will be deducted from his/her pay cheque. This plan includes death and accident protection, accidental death and dismemberment benefits, disability income, health care and dental benefits.

RRSP Contribution

Upon completion of the probationary period, the Employer will contribute 6% of the Employee's gross earned salary towards the Employee's Registered Retirement Savings Plan (i.e., Curling Canada's RBC Group RRSP) via automated biweekly payroll, and the Employee will match with at least 3% of your gross earned salary via automated biweekly payroll. Participation in the RRSP matching plan is mandatory and a condition of employment. Curling Canada reserves the right to modify, amend or cancel the RRSP matching benefit at any time.

Termination or Continuation of Benefits While Disabled

For employees not actively at work due to a disability, Extended Health Care and Dental Care benefits will terminate twenty-four (24) months following the employee's last workday prior to going on disability, or age 65, whichever comes first. If premium contributions are required by the employee, continuation of Extended Health Care and Dental Care benefits are conditional upon the employee continuing to remit their share of premiums by the 1st of each month. Any failure to remit premiums will result in coverage being terminated. The Company may, at its sole discretion, decide upon the following: modification of this Plan, including the reduction of benefits; introduction of new plans; selection of carriers; funding arrangements; cost sharing arrangements; and benefits to be provided. For all other benefits please see the applicable sections of this booklet.

ANNUAL LEAVE

Vacation leave is earned in accordance with the following schedule of continuous employment from the date of hiring:

First through tenth years	...	15 days per year
Eleventh through fifteenth years	...	20 days per year
Sixteenth year and onwards	...	25 days per year

Vacation leave for staff is in accordance with their Employment Agreement.

These figures will be pro-rated for part-time staff. Part-time staff will receive their vacation pay annual on April 30, of every year, or at the end of the employee's employment - whichever is sooner. Any vacation time used will be unpaid.

As vacation is designed to give employees a chance to rest and rejuvenate, taking vacation is encouraged by the employer. For this reason, employees may only carry five (5) days from one year to the next. These carry over days should be used during the first 90 days of the new calendar year. It is a joint responsibility between management and employees to manage the use of vacation leave throughout the calendar year.

Vacation requests during peak curling tournament season (January 1 to April 30 of each year) are strongly discouraged.

COVID-19 may have an impact on the nature and timing of employee holidays. Please review the following guidelines for taking vacation days during this time:

- Employees are encouraged to use their accrued vacation time while business has slowed as a result of the pandemic. If your work can be covered while you are on vacation without disrupting the business, your vacation will be approved.
- Employees are strongly discouraged from travelling outside of Canada while on vacation and will be required to self-isolate upon their return as directed by the federal and provincial government (see Travel Policy for further details).
 - i.* The preventative self-isolation period upon return from travelling does not qualify an employee for short term disability benefits
- Employees that do travel outside of Canada are asked to closely monitor themselves for symptoms of COVID-19 and communicate with their workplace in full transparency.
- While working from home it can be easy to forget about taking time off– employees are encouraged to plan and request their earned vacation days regardless of their work environment.

Vacation Requests

All vacation requests must be submitted at least 30 days in advance of vacations that extend 5 days or more. Vacation requests must be approved by the manager and the COO. Employees are discouraged from making plans/commitments/expenditures until

the vacation requests have been approved. Curling Canada confirms the right to deny vacation requests. Extraordinary vacation requests (i.e. during peak season) will be discussed and considered by the employee and the COO.

PURELY HR – ATTENDANCE SOFTWARE

Curling Canada has adopted a web-based system (Purely HR) that allows employees to request/advise time away from the office, regardless of the nature of the absence. Each employee is obliged to use the system whenever they are not going to be present. The necessity to advise/request approval applies to the following instances:

- Vacation
- Sick leave (casual and certified)
- Unpaid Leave
- Attendance at appointments/meetings (outside the national office for periods longer than 4 hours)
- Attendance at championships
- Inclement weather

Every effort will be made to grant the request for leave. However, recognizing that it may not be possible to allow everyone to be away when they wish due to the small size of the office staff and the limited time available, consideration will be given on a “first come, first serve basis” and thus vacation leave is subject to approval.

Employees who generally Work From Home, must use Purely HR to advise/request leaves of any kind (as listed above) of to ensure that all availability and non-availability is shared.

STATUTORY HOLIDAYS

The following chart depicts the eligible statutory holidays are in accordance with the Employment Standards Act of the jurisdiction of the employees primary province of work. Employees who qualify for statutory holiday pay shall receive the following statutory holidays with pay:

Entitled Statutory Holidays by applicable jurisdiction:

NS	ON	QC	MB	SK	AB	BC
• New Year’s Day	• New Year’s Day	• New Year’s Day	• New Year’s Day	• New Year’s Day	• New Year’s Day	• New Year’s Day
• Family Day	• Family Day	• Good Friday or Easter Monday	• Louis Riel Day	• Family Day	• Family Day	• Family Day
• Good Friday	• Good Friday	• Victoria Day	• Good Friday	• Good Friday	• Good Friday	• Good Friday
• Victoria Day	• Victoria Day	• Jean Baptiste Day	• Victoria Day	• Victoria Day	• Victoria Day	• Victoria Day
• Canada Day	• Canada Day	• Canada Day	• Canada Day	• Canada Day	• Canada Day	• Canada Day
• Civic Holiday	• Labour Day	• Labour Day	• Labour Day	• Civic Holiday	• Labour Day	• Civic Holiday
• Labour Day	• Thanksgiving	• Thanksgiving	• Thanksgiving	• Labour Day	• Thanksgiving	• Labour Day
• Thanksgiving	• Christmas Day	• Thanksgiving	• Christmas Day	• Thanksgiving		• Thanksgiving

• Christmas Day	• Boxing Day	• Christmas Day		• Remembrance Day • Christmas Day	• Remembrance Day • Christmas Day	• Remembrance Day • Christmas Day
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Note: For more detailed information, please refer to the applicable Employment/Labour Standards Act and its Regulations for each province/territory.

TRAVEL POLICY AND EXPENSES

All employee travel must directly relate to Curling Canada business priorities, and such travel must be pre-approved by the employee's manager. Employees must make all reasonable efforts to select cost effective travel solutions (e.g., economy class).

If an athlete is a minor during any Curling Canada related travel, parental consent is required. In an effort to follow the Responsible Coaching Movement protocol, all Curling Canada staff who attend Curling Canada events with minors will follow a screening process and submit a current Criminal Record Check that will be on file with Curling Canada. Curling Canada staff will also ensure the Rule of 2 is adhered to while traveling with minors. Parental consent for minors is also in the event player contracts requiring signatures of legal guardians.

Employees traveling on behalf of Curling Canada will be reimbursed for all travel at the following rates:

Use of own car: \$0.45 per kilometer, including applicable taxes

Meal Allowance: \$65.00 per day within Canada, including applicable taxes; \$95.00 per day international, including applicable taxes. The per diem breakdown of the \$65.00 per day within Canada is \$15.00 breakfast; \$15.00 lunch; \$35.00 dinner = \$65.00 total. The per diem breakdown of the \$95.00 per day international is \$20.00 breakfast; \$20.00 lunch; \$55.00 dinner = \$95.00 per day. Effective October 1, 2019, the per diem within Canada including applicable taxes will be \$75.00 per day (breakdown of \$15.00 breakfast; \$20.00 lunch; \$40.00 dinner). Please note, if any of your meals are provided by your hosts or colleagues while travelling, the balance will be deducted from the total per-diem receipts submitted for reimbursement.

Airfares: When booking travel, all Curling Canada staff and contractors must use the most economical airfare available (i.e. if flying Air Canada, a Tango fare must be purchased). Any deviation from this policy must be justified on the applicable expense claim or approved by the CEO. Employees are required to use Uniglobe (CC's Travel Agent)

Other expenses: Pursuant to Curling Canada policy, receipts must be submitted before reimbursement can be made. (i.e.: hotel bills, taxi and parking receipts, per diems, etc.). If per diems are advanced to the employee prior to travel, they must be reconciled against actual receipts upon return.

COVID-19 Travel Restrictions

At this time, Curling Canada is restricting all non-essential business travel until further notice. The following travel guidelines should be followed for any business or personal travel outside of Canada during this time:

- All travel outside of Canada is strongly discouraged
- In the event of necessary international travel, employees should report all intended travel to management prior to travelling
- As circumstances change and international business travel becomes more reasonable, all travel destinations will need to be approved by management
- Before travelling, employees should review all Government of Canada safety notices and follow all government directives
- Employees who have travelled outside the country will be required to self-isolate and work remotely upon approval by their manager or take a leave of absence for 14 days upon their return to Canada, as currently directed by federal and provincial governments.
 - a) Employees may only return to the workplace after 14 days if they are free from all COVID-19 symptoms.
 - b) Employees will follow *Work From Home protocols* during this isolation period or may be entitled to an unpaid, job-protected leave of absence if they are unable to work from home.

SICK LEAVE

Non- Certified Sick Leave

Sick leave for periods of three working days or less and not requiring a doctor's care is referred to as Casual Sick Leave. Employees are entitled to six working days of casual sick leave in any fiscal year at the rate of ½ day per month beginning on May 1. Sick leave cannot be accumulated from one fiscal year to the next. If the six-day limit is exceeded, it will be necessary for the employee to produce a medical certificate; otherwise, any time absent will be deducted from the employee's salary.

In order to keep our employees safe and healthy in the workplace, Curling Canada is implementing a zero-tolerance policy for coming into work with cold or flu-like symptoms. Any employee that appears to demonstrate these symptoms will be asked to leave the workplace immediately. Curling Canada has the right to request evidence 'reasonable in the circumstances' (and at a time reasonable in the circumstances) to verify that an employee's safe return to work in the office or Working From Home, has been verified.

COVID-19 Related Leaves

A leave is not required if the employee must self-isolate but is still able to work from home at full capacity and receives approval from their manager (see the *Work From Home*

Policy for further details). If an employee is unable to come into the office or work from home due to COVID-19 related circumstances the following options should be considered:

In the event that an employee is unable to attend the office or work from home because they are ill with COVID-19 or have been directed to self-isolate due to government directives (travel exposure, caring for a sick family member or caring for children who are home from school) and therefore is unable to work:

- Employees are entitled to Sick Leave or Flex Days as described herein for personal or family health issues, such as injury, illness or medical attention.
- If an employee has used their entitlement or a portion of their entitlement to Sick Leave or Flex Days already, employees may instead use their earned, but unused vacation entitlements (“Vacation Leave”).
- Curling Canada reserves the right to direct employees to use their Vacation Leave.

Short-Term Disability Leave

If the absence for an **individual employee’s illness** due to COVID-19 extends past 5 days, employees are eligible to apply for short term disability insurance coverage. The Company offers coverage of extended leaves of absence due to illness for up to 16 weeks. This benefit and the eligibility for this is described in your benefit handbook. It is administered by our Insurance provider. The following criteria will apply when claiming short term disability insurance benefits for COVID-19:

- If an insured individual is diagnosed with COVID-19, this employee will be considered disabled and eligible for short-term disability insurance benefits and the case will be treated as any other illness under the terms of the contract, except for the waiting period, which will be waived when COVID-19 has been confirmed through testing.
- If an insured individual has apparent symptoms of COVID-19 and has not been tested, the employee will be considered disabled and eligible for short-term disability insurance benefits and the case will be treated as any other illness under the terms of the contract.
- Preventive quarantine is NOT considered an eligible disability claim and the following will NOT qualify an employee for short-term disability benefits:
 - Self-isolation after international or provincial travel
 - Being in close contact with someone that has been diagnosed with a COVID-19 infection
 - Self-isolation directed by the employer or a medical professional
 - Taking leave to care for a sick family member
 - Standard disability claims do NOT require the employee to provide an attending physician statement

Certified Sick Leave – Non-COVID Related

Sick leave requiring a doctor's care is referred to as Certified Sick Leave. If the employee is absent for a continuous period of more than three working days, he/she will be required to submit a medical certificate within five days following his/her return to work.

An employee will no longer be on the Curling Canada payroll after the first five working days of continuous illness at home, or the first day of hospitalization or accident. The group insurance plan (Short Term Disability) will be in effect.

Unused sick leave will not be paid out upon resignation, retirement, or termination of employment for any reason.

Long Term Disability

Curling Canada also provides coverage for extended leaves for employees eligible for Long Term Disability. This benefit and the eligibility for it is described in your benefit handbook. It is administered by our Insurance provider.

FLEX DAYS

Full-time and part-time employees will receive three (3) flex days per calendar year, prorated for part-time employees. These days are not cumulative from year to year.

All flex days must be authorized by their manager in advance through the software 'Purely HR'. The reason for time off is at the discretion of the employee. Some examples:

- Family or personal needs
- Parental responsibilities
- Non statutory holidays
- Observance of Creed, Spiritual or Religious days
- Community volunteer activities – must be approved by Curling Canada.

MATERNITY/PARENTAL LEAVE

Curling Canada has adopted this policy to ensure that its employees are provided with limited paid time-off to coincide with the birth or adoption of a child.

Maternity (Pregnancy) Leave and Parental Leave shall be in accordance with the Ontario Employment Standards Act, the provincial Employment Standards Code, whichever is applicable based on employee's place of employment.

Request for Maternity/Parental Leave Procedure

- To ensure that Curling Canada can make the necessary arrangements to accommodate an employee taking Maternity (Pregnancy) or Parental Leave, employees are asked to provide four weeks' notice before commencement of Leave, or a lesser period of notice as permitted by the applicable legislation. This is to help the organization to

procure staffing solutions and to alleviate any additional work stress on other employees that may occur as a result of the employee's absence.

- Employees are expected to give four weeks' notice regarding their expected date of return to work. The COO should be contacted as soon as possible in the event of any changes.

Benefits

- Curling Canada will continue to pay employee benefits (life insurance plans, accidental death plans, extended health plans, and/or dental plans) for the full duration of the leave. Employees must remit their benefit premium contributions of 50% in the form of post-dated cheques prior to the beginning of their maternity leave.
- Curling Canada will not be responsible for the monthly fee of a home internet connection and/or cellular business phone during the Leave period. The employee has the option of requesting that this service be terminated during the term of the Leave to avoid the monthly fee. Should the employee wish to have these services continued during the term of the Leave, the employee will be asked to provide Curling Canada with post-dated cheques to cover the cost of any such fees for the duration of the Leave period.

Duration of Leave Parameters

- Curling Canada will top-up Employees who take Maternity (Pregnancy) or Parental Leave a maximum amount of \$534 per week, or 55% of their average insurable weekly earnings (whichever is lower) for a maximum of 20 weeks.
- In the event that the employee requires leave before Maternity (Pregnancy) or Parental Leave begins, available sick days shall be used accordingly.
- In the event that a mother gives birth to, or adopts a child (or children) that necessitates lengthy post-natal hospitalization, she shall have the option to delay all or part of her Maternity (Pregnancy) Leave until the child (or children) are released from the hospital's care with the written authorization of the COO, at their discretion.

Use of Sick Leave, Vacation and/or Unpaid Leave

- During the term of the leave, Curling Canada will continue to match RRSP contributions IF the employee elects to contribute the mandatory 3% of their top-up pay.
- Employee will not earn paid vacation days in excess of the minimum to which they are statutorily entitled.
- After the paid Maternity (Pregnancy) / Parental leave has concluded, employees shall be allowed to use up any accrued but unused vacation time, and/or sick days.

- In the event that a Curling Canada employee requires an extension of leave following a Maternity (Pregnancy) / Parental Leave, they may use unpaid Leave to a maximum of five days.
- Curling Canada employees that elect to extend their leave through the use of accrued Vacation time, Medical or Unpaid Leave are requested to provide Curling Canada with as much advance notice as is possible prior to the exhaustion of their Maternity (Pregnancy) / Parental Leave. A minimum of 2 weeks notice is required and 4 weeks is preferred.

BEREAVEMENT LEAVE

Curling Canada will grant up to three paid working days per event on the occasion of a death in the staff member's immediate family. Immediate family is defined as: parent(s), step parent(s), foster parent(s), sibling(s), grandparent(s), spouse (including common law a/o same sex partner), step child(ren) or ward of the staff member, father-in-law or mother-in-law (including parent of same sex partner).

Additional compassionate leave may be granted at the discretion of their Director in consultation with the COO.

NON-PROTECTED UNPAID LEAVE

Employees may be granted unpaid leave with the written consent of the Chief Executive Officer. During periods of unpaid leave, medical, dental, life and AD&D coverage shall be suspended, vacation accrual shall cease and length of service shall be interrupted. Matching contributions to the group RRSP will also cease. Every attempt will be made to return employees to a position of equal responsibility on return from leave, however, no guarantee exists that the exact position left will be available on return.

VOTING LEAVE

Curling Canada is committed to protecting the right of each employee to exercise his or her democratic right to vote on election days and to act in compliance with Federal and Provincial regulations guaranteeing time off work for these purposes.

Business requirements will be reviewed and schedules established to ensure that each staff member has a window of between 1 and 4 hours off work during polling hours on an election day for voting purposes depending on the jurisdiction.

If an employee's regular schedule already provides for such a window of time during polling hours, this employee will be required to work his or her hours as usual. In the event that an employee is granted time off during their regularly scheduled hours of work, this time shall be granted off with pay to ensure that voting does not negatively affect his or her compensation.

Table 3: Entitled leave to vote by jurisdiction

Hrs	NS	ON	QC	MB	AB	BC
	3	3	4	3	3	4

Note: For more detailed information, please refer to the applicable Employment/Labour Standards Act and its Regulations for each province/territory.

CONFLICT/DISPUTE RESOLUTION:

Regrettably, conflict can occur in any working environment. In an effort to resolve conflict in an expedient, yet fair manner, Curling Canada recommends the following process for conflict or dispute resolution:

- Speak to the person you are having the dispute with. Many times disputes arise due to misunderstandings and miscommunications.
- If speaking to the individual does not work, speak to the COO, Corporate Services. The COO may arrange a meeting between those involved in the dispute, to determine a resolution.
- If the COO is unable to resolve a workplace dispute, the parties may be referred by the COO in consultation with the CEO to mediation by an outside third party. The resolution of the mediator is binding on both parties of the dispute.

This policy is implemented at the discretion of management and does not supersede the termination provision in the employees Employment Agreement.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT – 2005 (AODA)

Commitment to Accessibility Policy

Intent

Curling Canada (CC) is committed to providing a barrier-free environment for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), and its associated standards and regulations.

Curling Canada understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization’s compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices.

Requirements

General

Curling Canada is committed to training staff on Ontario's accessibility laws and on accessibility aspects of the Human Rights Code that apply to persons with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

Customer Service

Curling Canada understands that all customers need to receive the same value and quality. We are committed to allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk. We will provide alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner and will take into account individual needs when providing goods and services.

Information and Communications

Curling Canada is committed to meeting the communication needs of people with disabilities.

When asked, we will provide information and communications materials in accessible formats or with communication supports in a timely manner. This includes publicly available information about our goods, services and facilities, as well as publicly available emergency information.

Employment

Curling Canada will notify the public and staff that, when requested, we will accommodate disabilities during recruitment and assessment processes and when people are hired. If needed, we will provide customized workplace emergency information to employees who have a disability. If using performance management, career development and redeployment processes, we will take into account the accessibility needs of employees with disabilities.

Design of Public Spaces

Curling Canada will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:

- Recreational trails/beach access routes
- Accessible off-street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

As part of the implementation of this policy, the following supplemental policies and procedures have been developed.

HEALTH & SAFETY PROTOCOLS – COVID-19 PROTOCOLS

Curling Canada maintains its commitment to ensuring a safe and healthy environment for all of its employees and will take every reasonable measure to ensure that the proper controls are implemented and followed to reduce the exposure of COVID-19 in the workplace. These policies will be enforced so long as COVID-19 is deemed a risk to Curling Canada or as mandated by Public Health and government directives. Curling Canada will:

- Recognize & Assess Risks
- Implement Controls
- Evaluate & Adjust Accordingly

These controls include but are not limited to:

Protecting Yourself and Co-Workers

COVID-19 is spread through close contact, including at work. Here are some helpful tips to prevent the spread of infection:

- Wash your hands often and thoroughly with soap and water or alcohol-based hand sanitizer.
- Sneeze and cough into your sleeve.
- If you use a tissue, discard immediately and wash your hands afterwards.
- Avoid touching your face, eyes, nose or mouth.
- Avoid contact with people who are sick.
- **Stay home if you are sick.**
- Practice physical distancing at the office and as advised by Public Health inside and outside the office, after and before work hours.
- Where possible, avoid high-touch areas, or ensure you clean your hands afterwards.
- Where possible, wear gloves when interacting with high-touch areas if washing or sanitizing is not available immediately after. Do not touch your face with gloved hands. Put on and remove gloves in a manner that avoids contamination of the hands.

Handwashing / Sanitizing

When washing your hands, all employees are required to follow the thorough hand-washing guidelines posted in washrooms and by other handwashing / sanitizing stations. These hand washing protocols include:

1. Wetting hands with warm water
2. Applying soap to hands
3. Scrubbing hands for at least 20 seconds while paying attention to the palms, the back of each hand, under the nails and the thumbs

4. Rinse well to ensure all soap is removed
5. Thoroughly dry hands with paper towel
6. Turn off tap with paper towel

Where soap and water are not available, please follow the same 'scrubbing' process with hand sanitizer and avoid touching any unnecessary surfaces after your hands have been sanitized / washed.

Physical Distancing

All employees are required to keep a minimum distance of 2 metres apart from any other employee at all times. This means making changes in your everyday work routine to minimize close contact with others. The following changes will be implemented to ensure physical distancing:

You should also:

- Avoid crowded common areas such as lobbies, kitchens, cafeterias and printing areas.
- Avoid handshakes or other greetings that do not comply with physical distancing measures.
- Avoid any contact or in-person interaction with employees who may be at higher risk due to underlying health issues (i.e. asthma or other respiratory issues).
- **Keep at least 2 metres apart from any person at all times.**

It is critical that you not only follow these physical distancing protocols but also encourage and ensure that all employees are doing the same. Don't hesitate to remind employees of physical distancing protocols if you see that they are not being followed.

Employee Screening And Symptomatic Employees

Curling Canada's top priority is to ensure that all of its employees are safe and healthy in the workplace. As such, employees may be subject to a COVID-19 symptomatic screening at the discretion of the employer. The method of the screening will be chosen by the employer and can include but will not be limited to screening questionnaires and/or other testing methods as needed.

To ensure the health & safety of our employees, Curling Canada will send you home and ask that you self-isolate or see a doctor if you answered YES to any of these questions as you may have symptoms of COVID-19. You may also be required to provide medical verification indicating you do not have COVID-19 before returning to the workplace. Employees who become sick due to COVID-19 should immediately notify a registered health practitioner via phone to first verify their symptoms. The employee should then notify Curling Canada of their COVID-19 related illness.

No individual should be permitted to enter the workplace if:

- They have been ordered or recommended to self-isolate; or
- They have any symptoms of COVID-19 (e.g. a sore throat, cough, or a fever); or
- If they live in the same residence with someone who exhibits any COVID-19 symptoms

Infection Control Plan

1. Employees who become sick due to COVID-19 should immediately notify a registered health practitioner via phone to first verify their symptoms.
2. Employees who appear to have symptoms (i.e., fever, cough, or shortness of breath) upon arrival at the workplace, or who become sick during the day should immediately be separated from other employees, customers, and visitors and sent home to self-isolate.
 - a. Employee can call Telehealth Ontario (1-866-797-0000), their health care provider or an Assessment Centre to see if they need testing.
 - b. If the employee is able to be tested, the employee should not be allowed to return to the workplace until the employee tests negative for COVID-19 and has completed any self-isolation period mandated by public health authorities.
 - c. If the employee is unable to be tested, the employee should not return to the workplace until the employee has completed any mandated self-isolation period and is free of symptoms.
 - d. The employee may take a Job Protected Leave (unpaid) or use their accrued but unused vacation if they wish
 - e. Curling Canada has the right to request evidence ‘reasonable in the circumstances’ (and at a time reasonable in the circumstances) to verify that an employee’s safe return to work in the office or Working From Home, has been verified by a medical professional.
 - A symptomatic employee may have just quarantined and self-isolated for 2 weeks, but employers can encourage them to confirm with a negative COVID-19 test that they are free of the virus and the associated symptoms.

The number one priority is the health and safety of the employee, their co-workers and the workplace

3. In the event of the infection of another employee or individual in the workplace who has been in contact with the employee with symptoms, Curling Canada will follow the same procedure and immediately:
 - a. Notify other employees of the incident

- b. Remind all employees of their obligations to practice social distancing, follow all sanitation protocols (including handwashing), and adhere to all H&S Protocols as detailed in their training and the HR Manual
- c. Remind employees of the steps above if they appear to have symptoms
- d. Report the incidents to the Provincial Health Authority.

Workstation Cleanliness

Employees are responsible for contributing to the health and safety of Curling Canada by ensuring that their workstations meet all of the hygiene, sanitation and cleanliness protocols.

These protocols include:

- Using disinfectant wipes or a comparable equivalent to sanitize high-touch surfaces in and near your workstation These items include:
 - a. On / Off computer switches
 - b. Desk counter tops
 - c. Keyboards
 - d. Computer Mice
 - e. Chair arm rests
 - f. Office Handles & Light switches (if applicable)
 - g. Personal Landlines / telephones
 - h. And any other high-touch surfaces in your workstation
- Emptying personal garbage bins and ensuring that personal garbage bins do not contain any used PPE equipment. All used PPE equipment must be disposed of in the proper container.
- Ensuring that all personal equipment and supplies that have been used in the day are disinfected and stored away so that they are not accessible to others.
- Keeping the workstation as clear as possible - ALL personal items and those that are not essential for the workday should be cleared and removed from the workstation altogether
- Use your personal cellphone, if applicable, opposed to using a land line that may have multiple users

High Touch Surfaces / Common Areas

There are several high-touch surfaces and areas in the work environment that may receive the most contact from potentially ill persons and need to be disinfected most often. As such it is strongly recommended that you are mindful of or avoid physically touching any of these surfaces:

- Door Handles
- Lunchroom Tables
- Shared Printer / Fax Machine / Office Equipment
- Bathroom Stall Handles

- Light Switches
- Microwave Handles / Keypads
- Breakroom Cabinets
- Vending Machines
- Faucet Handles
- Handrail

In order to minimize the risk of high-touch surfaces, Curling Canada has implemented the following:

1. Hand sanitizing stations will be added in proximity to high touch areas
2. Cleaning supplies will be provided for employees to clean their workstations

HEALTH AND SAFETY POLICY

Purpose

The purpose of this policy is to convey Curling Canada's (CC) commitment to creating and maintaining a safe and healthy work environment for its workforce. This policy is guided by the Ontario Ministry of Labour and the *Occupational Health and Safety Act* (OHSA).

This Policy may be reviewed and amended by Curling Canada at any time, and will be reviewed at least on an annual basis, to ensure continuous compliance with applicable law and other Curling Canada policies.

Applicability

This policy applies to all of CC's workforce, including, full and part-time employees and interns. The basic rights and responsibilities of CC, its managers and supervisors and all other members of the workforce are outlined in Part III of the OHSA:

<https://www.labour.gov.on.ca/english/hs/pubs/ohsa/index.php>

Statement of Policy

Our objective is to have a safe and hazard free workplace in all principal locations where members of Curling Canada workforce conduct their responsibilities, including in particular Curling Canada offices. To achieve this objective, Curling Canada will develop, implement and enforce such policies, procedures and standards that are compliant with all relevant legislation and will use its best reasonable efforts to provide a safe and healthy work environment. Where reasonable, Curling Canada will strive to exceed the legislated requirements by adopting the best practices available.

In partnership with its employees, Curling Canada will support and promote a safe and healthy work environment by spreading awareness of safety issues and fostering recognition within the workforce that ensuring a safe workplace is everyone's responsibility. All members of CC's workforce must protect their own health and safety and the health and safety of their colleagues by working in compliance with CC's policies and procedures and all relevant health and safety legislation. They must also report any

contravention of CC's policies and procedures and applicable legislation, as well as any hazards in the workplace.

To fulfill the above-mentioned objectives, Curling Canada commits to providing the following:

- Discrimination, harassment and violence-free environment
- First aid
- Joint health and safety committee
- Training and education
- Reporting procedure

Discrimination, Harassment and Violence

The Curling Canada is committed to creating and maintaining a work and sport environment that is free from unlawful discrimination, harassment of all kinds, including personal, psychological and sexual, bullying and violence.

First Aid

Curling Canada will ensure that at least one trained first aider is present at all times during working hours at the National Office in Ottawa and that their name and position is posted on the Health and Safety bulletin boards. Curling Canada will cover all costs associated with the required training.

Curling Canada will also ensure that first aid kits are available with clear signs indicating the locations of the kits. The first aid kits will be inspected at least on a quarterly basis to ensure that they are stocked and the materials within them are up to date. Records of all incidents and first aid treatment given will be kept by the COO.

Joint Health and Safety Committee

Curling Canada will establish a Joint Health and Safety Committee (JHSC) in the Ottawa office. The JHSC will have the following responsibilities:

- Provide input into existing and proposed health and safety policies, procedures and programs;
- Receive workforce members' concerns and complaints and make recommendations to address;
- Discuss health and safety problems and recommend solutions;
- Ensure the workplace is inspected at least every month, identify issues, recommend corrective action and follow-up on implemented recommendations;
- Identify and evaluate potential hazards, recommend corrective action and follow up on implemented recommendations;

- Carry out all other functions identified in applicable legislation.

For more information on the JHSC, please refer to the JHSC Terms of Reference attached.

Training and Education

Basic health and safety awareness training required under the *Occupational Health and Safety Act* in Ontario is available through an eLearning module prepared by the Ontario Ministry of Labour. This training is mandatory by law for all employees in Ontario and it is a Curling Canada requirement for all other employees to complete this training. All new members of the workforce must complete this training as soon as practicable within 30 days of their start date.

Non-management will complete the worker training (Step 4); supervisors and managers must complete the supervisor training (Step 5). If an employee takes on a supervisory or managerial role, they must complete the supervisor training within one (1) week of the start date of their new role. Both training modules may be accessed through the following link: <https://www.labour.gov.on.ca/english/hs/training/>.

The “Proof of Completion” certificate that is provided after the completion of both modules must be forwarded to the COO as Curling Canada is required to maintain proof of training records to comply with relevant legislation (e.g., OHSA).

Specific mandatory training must also be completed by certain employees including First Aid/CPR for those identified as First Aid leads and JHSC Certification Training for at least two members of each JHSC. Details for this training will be provided by the COO.

CC’s workforce may receive additional training relating to specific workplace hazards as well as required training with respect to CC’s policies and procedures against workplace violence and harassment.

All required training and education will be documented and Curling Canada will retain training and education records in accordance with any applicable legislated requirements.

Reporting A Health or Safety Concern

Employees should report any health or safety concerns to their manager/supervisor as soon as they arise. The manager/supervisor will respond immediately by having a discussion with the workforce member, attempting to resolve the issue and, if necessary, will take corrective action. If the manager/supervisor is unable to resolve the concern, they will involve a higher level of supervision, COO and a JHSC member, as appropriate.

Work Refusal Procedure

Employees may refuse to work or do particular work where he or she has a reason to believe that:

- Any equipment, machine, device or thing the employee is to use or operate is likely to endanger himself, herself or another worker;
- The physical condition of the workplace or the part thereof in which he or she works or is to work is likely to endanger himself or herself;
- Workplace violence is likely to endanger himself or herself; or
- Any equipment, machine, device or thing he or she is to use or operate or the physical condition of the workplace or the part thereof in which he or she works or is to work is in contravention of the OHSA or the regulations and such contravention is likely to endanger himself, herself or another workforce member.
- Employee health & safety due to COVID-19 protocols

The work refusal must be reported to the manager/supervisor according to the Work Refusal Procedure outlined below.

Stage One

1. Upon refusing work, the employee must immediately report the circumstances of the refusal to their manager/supervisor. If they are not present at the workplace, the employee must take reasonable steps to ensure that the manager/supervisor is informed as soon as possible.
2. The manager/supervisor must immediately investigate the situation in the presence of the employee and a non-management JHSC representative. The employee must remain in a safe place and be available to the manager/supervisor for the purposes of the investigation.
3. Following the investigation, either:
 - Agreement is reached that there is no danger, the refusing employee returns to work, and the work refusal is resolved.
 - Agreement is reached there is a potential danger, corrective action is taken, the refusing employee returns to work, and the work refusal is resolved.
 - There is no agreement and the employee continues to refuse. The work refusal progresses to Stage 2.
 - If the employee continues to refuse despite the conclusion by the employer's representative and the non-mgmt. JHSC representative, that no danger exists or that the refusal is based on grounds that are acceptable in the particular case of this workforce member, but do not justify another workforce member's refusal, the employer may have the work performed by another workforce member. The employee must be advised of the other worker's refusal and of his or her reasons for the work refusal in the presence of the non-management JHSC representative prior to commencing the work.

Stage Two

1. Following the investigation and implementation of corrective measures, if any, the employee must have **“reasonable grounds”** (described as evidence or facts) to continue refusing to work.
2. The manager/supervisor, the JHSC, COO and the workforce member’s senior leader will be notified, and their assistance requested.
3. Upon the continuance of the workforce member’s refusal to work, COO will immediately contact the CEO followed by the Ministry of Labour.
4. Pending the arrival of a provincial Inspector, the employee may be assigned to reasonable alternative work.
5. No other employee can be assigned to perform the refused work without being advised of the refusal situation and the reasons for it in the presence of a non-management member of the JHSC.
6. The provincial Inspector shall investigate in consultation with the manager/supervisor, COO, a non-management member of the JHSC and the workforce member.
7. The provincial Inspector shall decide whether the employee or any other workforce member(s) are likely or not likely to be endangered. The provincial Inspector will confirm his/her decision in writing.
8. The decision of the provincial Inspector must be complied with.
9. Once the situation is resolved (corrective action is taken, or misconceptions are cleared up) the employee must return to work.
10. All provincial Inspector orders will be forwarded to the JHSC Co-Chairs and, if required, will be posted on the Health and Safety bulletin board of the relevant office.

Incident and near miss incident reporting and investigation

If there is an incident in the workplace, it is important to conduct an incident investigation and prepare a written report in a timely manner. An investigation will help determine the cause of the incident, identify any unsafe conditions, and help to minimize future risks of a similar incident. It will also form the basis for any claims submitted to the provincial workplace safety organization.

It is also important to report and investigate a near miss incident. A near miss is an unplanned incident that did not result in injury or damage but that had the potential to do so.

Stage One: Treatment and Assessment

- Injured employee will seek required treatment immediately. If the situation is such that the injured employee requires immediate medical attention, call 911.
- Injured employee to advise manager/supervisor of the incident before leaving the workplace or as soon as possible. If the injured employee is not able to

notify their manager/supervisor, they should notify a third party to do this on their behalf.

- Manager/supervisor will assess the incident and, if necessary, immediately arrange for transportation to a medical clinic, a health care practitioner, a hospital or the workforce member's home. The employee will submit receipt for reimbursement.
- In the case of a fatality or a critical injury requiring emergency medical attention, the manager/supervisor must secure the scene of the incident. The scene may only be disturbed to the extent it is necessary for saving life or relieving human suffering, to maintain an essential public utility service or a public transportation system or to prevent unnecessary damage to equipment or other property. COO must be contacted for confirmation as to whether it is necessary to report the matter to an applicable government body and/or for confirmation as to when the scene may be released. The COO will immediately advise the CEO.
- Manager/supervisor or employee should contact COO, Corporate Services. COO is to notify the workforce member's emergency contact if necessary and check the workforce member's records for medical information. If an individual from another organization (e.g., a consultant, temporary agency, etc.) is injured, an Incident and Near Miss Report and Investigation Form must be completed and the Manager/Supervisor or COO will notify the relevant organization.
- COO to notify the location Office Manager if 911 has been called.

Stage Two: Investigation and Reporting

- If the employee receives first aid only, the manager/supervisor must record the incident in the First Aid Log located in each first aid kit.
- If the incident is more serious, the manager/supervisor is required to investigate and complete an Incident and Near Miss Report and Investigation Form and forward to COO within 24 hours of the incident. If required to do so, the JHSC must also conduct an investigation.
- If the injured employee is an employee of another organization, the manager/supervisor or COO will support their investigation and reporting processes, where applicable.
- With support from COO and/or the JHSC, the manager/supervisor will take action to prevent recurrence.

Stage Three: Absence from Work

If an injured Curling Canada employee is required to be absent from work they must communicate with their manager/supervisor and COO on an on-going basis.

They may also be required to provide medical documentation to support their ongoing absence from work.

Stage Four: Return to Work

- An injured Curling Canada employee may be required to provide functional abilities information to support their return to work, including information regarding any modified duties that may be required or precautions they might have to take when returning to work.
- If applicable, the manager/supervisor, with support from COO, will develop a Modified Work Agreement to accommodate the employee.

For further information on occupational health and safety, please refer to the provincial occupational health and safety statute that is posted on the Health and Safety bulletin boards.

DRUGS & ALCOHOL

Curling Canada is committed to providing a drug-free environment for you and all the other members of team. You directly benefit from a drug-free environment. It promotes a safe and positive work atmosphere and can indirectly keep health care costs down. Employees are prohibited from the use, sale, purchase, distribution, and possession and from being under the influence of illegal drugs or unauthorized controlled substances on company property, when on company business, or when in a company vehicle.

This section pertains to employees not only on duty but also at the workplace. Alcohol consumption or drug usage while at the workplace, regardless of on or off duty, shall mean in any building, structure, hut, machine, or vehicle used by Curling Canada in the performance of operating Curling Canada endeavors.

It is understood that there are rare circumstances which are exceptions to this such as the staff Christmas lunch reception and/or certain occasions as approved by the CEO.

Employees who must use prescribed drugs or narcotics during work must notify their Supervisor or Manager and present acceptable medical documentation prior to starting work. A determination regarding the employees' ability to work safely will be made accordingly. Any employee having problems with drugs and/or alcohol is encouraged to request assistance from their Supervisor or Manager.

When a Curling Canada staff member's position requires work to be completed outside of regular business hours (8:30 am – 4:30 pm local time), he/she shall not consume alcohol or any other debilitating substance to a level which would reasonably be expected to impair the staff members ability to perform his/her duties competently, cause impairment in the staff members ability to speak, walk or drive, or cause him/her to perform in a disruptive manner.

Any Curling Canada employee while at the workplace, regardless of whether they are on or off duty, and who is found to be using illicit drugs and/or in possession of illicit drugs will be turned over to the local Police Service or applicable law enforcement agency. The Police Service will therefore be contacted regarding any illicit drug use by staff. Criminal charges or further prosecution will be up to the court of law.

The adherence to this policy is expected as part of the employee's acceptance of the terms and conditions of involvement with Curling Canada and is not in any way designed to infringe on their individual rights. Any employee who fails to adhere to this policy may be subject to discipline up to and including termination.

CANNABIS POLICY

Intent

Curling Canada (the "Employer") is committed to safeguarding the health and safety of its employees, contractors and the public by providing a safe and healthy work environment.

In light of cannabis legalization across Canada effective October 17, 2018, Curling Canada wishes to communicate clear guidelines and rules on recreational cannabis use, misuse, and abuse in relation to the workplace.

It is also recognized that the use of certain prescription medications, including medical cannabis, can impair a person's ability to safely and effectively perform their job.

Accordingly, the purpose of this Policy is to set out the Employer's expectations with respect to fitness for work, as well as its obligations and expectations with respect to providing appropriate accommodations to employees and contractors who are dealing with substance abuse or dependence problems, or who are medically required and legally authorized to use medical cannabis.

Definitions

"cannabis" means all forms of cannabis, including but not limited to cannabis flowers, leaves, oils and edibles.

"employees" means anyone in an employment relationship with Curling Canada, any dependent or independent contractors, and anyone attending the Employer's work site for work-related purposes.

"fit(ness) for duty" means the individual is fit to perform assigned tasks competently, safely, and in a manner that does not compromise or threaten the safety or health of that person or others, the environment, or property.

"impairment" means a state of being under the influence of drugs, whether legal or illegal. Signs of impairment may include glassy or red eyes, unsteady gait, slurring and poor coordination.

“medical cannabis” means cannabis that has been medically and legally authorized by a qualified health care practitioner as defined by the *Access to Cannabis for Medical Purposes Regulations*, as amended from time to time, or any applicable successor legislation.

“safety-sensitive duties” are those that could have a direct and substantial impact on the health and safety of the employee, contractor, other workers, customers, visitors, the public, property or the environment.

Application

This Policy applies to all employees and contractors as follows:

- During work hours, including work breaks;
- During non-work hours where there is a potential impact on the Employer’s reputation or interests;
- While conducting business or otherwise performing duties for the Employer, including travelling for work purposes;
- While on Employer property;
- While operating a company vehicle; and
- Whenever an employee or contractor is representing the Employer.

Guidelines

Subject to limited exceptions for medical cannabis, Ontario’s *Cannabis Act, 2017* prohibits the consumption of cannabis in the workplace. Employees and contractors must abide by this and all other applicable statutory requirements, including those that pertain to the possession and use of cannabis.

Employees and contractors are expected to use medical cannabis and other prescription and over-the-counter medications safely and responsibly.

All workplace parties will adhere to applicable statutory requirements, as amended from time to time, including under the:

- Occupational Health and Safety Act
- Smoke Free Ontario Act, 2017 or similar legislation in other jurisdictions
- Human Rights Code
- Ontario Cannabis Act, 2017 or similar legislation in other jurisdictions
- Access to Cannabis for Medical Purposes Regulations

This Policy will be interpreted so as to be in compliance with all applicable laws, including the above-noted acts.

Any questions related to the content of this Policy or its interpretation should be directed to the COO.

Roles and Responsibilities

All workplace parties have a role to play in the implementation of this Policy.

Duties of the Employer

The Employer is required by law to provide a safe workplace. Part of that duty includes taking reasonable precautions to ensure that all employees and contractors are fit for duty.

The Employer also has a duty to provide individualized accommodation up to the point of undue hardship in accordance with the requirements of the *Human Rights Code, Ontario*, or similar legislation in other jurisdictions.

The Employer will ensure that this Policy is communicated to all employees, including managers and supervisors as well as contractors.

Duties of Management

Managers must:

- Enforce and abide by this Policy.
- Where appropriate and practical, assess the fitness for duty of employees and contractors under their control at the start of and throughout the work period.
- Pay attention for signs of impairment and take prompt and appropriate action whenever there are reasonable grounds to believe that an employee or contractor is impaired or not capable of working in a safe and effective manner. Such actions may include:
 - Further assessing the individual for impairment using observational and interview techniques;
 - Sending the employee home with transportation (with or without pay, as applicable);
 - Temporarily assigning the employee to less safety-critical work;
 - Requiring a fitness for work assessment;
 - Placing the employee or contractor on a leave of absence (with or without pay depending on the circumstances) pending further investigation.
- Work with employees or contractors who request and/or require accommodation for medical cannabis use or substance abuse/dependency as they would for any other employee or contractor requiring accommodation for a legitimate disability. This will normally include assessing the employee or contractor's fitness for work, with input from a qualified medical practitioner.
- Handle all employee or contractor information related to this Policy in a confidential manner, and not make any disclosure of such information unless the disclosure is necessary for protecting workers, investigating a complaint or

incident, taking corrective action, assessing and developing an accommodation plan, or otherwise required by law.

Duties of Employees & Contractors

Supervisory employees must:

- Abide by this Policy and lead by example.
- Assist management to implement and enforce this Policy, as directed.
- Serve as a liaison between management and other employees or contractors.
- Pay attention for signs of impairment and take prompt and appropriate action whenever there are reasonable grounds to believe that an employee or contractor is impaired or not capable of working in a safe and effective manner.
- Document and advise management of any incidence of suspected impairment.
- Treat employee or contractor information in a confidential manner, to the extent possible in the circumstances.

All employees (including supervisors and managers) and contractors must:

- Abide by this Policy and encourage their peers to do the same.
- Notify management/Human Resources and/or a Health and Safety Representative, as appropriate, of any safety issues, breaches or suspected breaches of the Policy.
- Cooperate with respect to any investigations into potential breaches of this Policy.
- Take responsibility to ensure their own safety and the safety of others.
- Comply with workplace standards and perform their work-related activities in a safe and effective manner.
- Ensure that they are fit for duty/not impaired when attending at and/or reporting to work.
- Remain fit for duty/not impaired for the duration of their shift and/or while on call.
- Never participate in activities which could cause a safety risk, such as driving or carrying out safety-sensitive duties while impaired.
- Not consume, possess, sell or distribute cannabis, other drugs, alcohol or related paraphernalia during work hours (including during paid and unpaid breaks), while on work premises, when representing the Employer and/or when there could be a potential impact on the Employer's reputation or interests. This is subject to an exception for use and/or possession of a legal and prescribed drug in accordance with a pre-authorized accommodation plan.
- If on medically-approved medication, promptly disclose to the Employer any potential risk, limitation, or restriction requiring modification of duties or temporary reassignment. Without limiting the generality of the foregoing, employees and contractors must disclose medical cannabis use to the Employer prior to any drug-related incident or accident, and engage in and cooperate with the Employer's accommodation process, including by:
 - providing proof that medical cannabis use is medically and legally authorized;

- providing proof of fitness for work, satisfactory to the Employer;
- providing medical information with respect to the employee or contractor's restrictions, limitations and accommodation needs; and
- maintaining ongoing communication with management regarding the effects of medical cannabis on their ability to perform their job duties.
- Use medications (including medical cannabis) only as prescribed and directed, and in accordance with any agreed-upon work modifications or accommodations.
- Communicate dependency or emerging dependency to the Employer, before job performance is affected or a drug-related incident or accident occurs and engage in and cooperate with the Employer's accommodation process, where applicable.
- Never use someone else's or share their own medication (including medical cannabis) with another employee or contractor, even those who may have a similar prescription.
- If an employee or contractor being accommodated must ingest medical cannabis by smoking, they will not be permitted to do so in the presence of other employees or contractors. The employee or contractor must also abide by all provincial smoking regulations. The Employer will work with the employee or contractor to determine an appropriate smoking area or other reasonable and safe solution, up to the point of undue hardship.

Disciplinary Action

Employees or contractors found in violation of this Policy may be subject to disciplinary action up to and including termination of employment. Where applicable, Curling Canada may also take legal action in accordance with the law.

Please note that use of drugs as part of a prescribed and approved medical treatment program/accommodation plan or the reporting of a drug and/or alcohol related disability is not grounds for disciplinary action; however, failure to disclose the need for accommodation in advance of a drug-related incident or accident may be grounds for discipline up to and including termination of employment.

PRIVACY

In accordance with the Privacy Act, "Personal Information Protection and Electronic Documents Act", effective January 1, 2004, Curling Canada understands that an employee's personal information should be kept confidential. We have several measures in place to ensure this as outlined below.

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. The type of information collected by Curling Canada that fits this definition includes:

Name, home address, home phone number (including personal cell phone number), date of birth, dependent's age and name, ID numbers (SIN and Driver's

License numbers), income, banking information, work and education history, health card number, emergency contact information, benefit pay information, performance evaluations and disciplinary notes.

Procedures

Access to Personal File

An employee's supervisor, manager, human resources and payroll personnel, the CEO and COO as well as the external auditors shall have access to employee records for the purpose of carrying out their job without the consent of the employee. Personal information required by federal and provincial law, court orders or subpoena, or for legitimate business purposes, including administration of benefit plans, will be disclosed without the employee's consent, unless such consent is required by law.

Corporate Services keep paper files on the employee with information relevant to their specific area in locked files. There is also an electronic database which contains employee information. Access to this system is controlled by Corporate Services, and requires login and password to access.

Requesting Access to Personnel File

Employees may request access to review their file by making arrangements with the COO. Employees shall provide at least twenty-four hours notice (one full business day) in order to access their file. Employees may obtain a copy of any document in their file which they have signed previously and a copy of any document containing personal information that they have a right to access by law. No material contained in the employee file may be removed and viewing of the information in the file will be done under the supervision of the COO.

In order for Curling Canada to ensure that the personal information maintained by Corporate Services is accurate, complete and up-to-date, the employee must provide timely notification to Corporate Services of any changes or corrections to their personal information.

The employee's file and the contents contained within are the property of Curling Canada. An employee who leaves the organization either voluntarily or involuntarily will no longer be permitted access to their personnel file.

Third Party Release of Information

Human Resources and Payroll are jointly responsible for the personal information collected from all employees.

If an employee requires disclosure of their personal information to a third party (i.e. bank) the request must be accompanied by a completed, signed and dated Authorization to Release Information Form as provided by the requesting third party.

Internal Complaints Process

Employees who have concerns regarding how their personal information is stored, handled or released may contact the COO or their respective Director.

PROFESSIONAL DEVELOPMENT

At the discretion of the Chief Executive Officer, and on the recommendation of the accountable manager, employees may be able to attend conferences, courses, seminars and meetings, identified through annual work plans and performance reviews, which may be beneficial to the employee's professional development. If these opportunities are directly related to the employee's position, or are suggested by the Chief Executive Officer, then some or all of the cost of registration, course materials and travel expenses may be covered.

If Curling Canada has agreed to pay for a course, the fees will be paid on evidence of successful completion and a passing grade.

C. OPERATIONAL POLICIES

STANDARDS OF BUSINESS CONDUCT AND CONFLICT OF INTEREST

A conflict of interest for Curling Canada employees can occur when an individual is involved in multiple interests, one of which can potentially corrupt the motivation for an act in another. Conflicts of interest can cause the potential for negative public perception, impact on the Curling Canada's image and/or brand, or adversely affect the integrity of the organization.

Please note that the presence of a conflict of interest is independent from the execution of impropriety. If Curling Canada believes that an employee's secondary interests interfere with Curling Canada's primary interests to the point the circumstances are reasonably believed, on the basis of past experience and/or objective evidence, to create a risk that decisions may be unduly influenced—Curling Canada will deem a conflict of interest.

A conflict of interest, if not dealt with properly, may leave doubt about the objectivity of a particular decision-making process, thereby rendering the entire organization suspect. It is, therefore, crucial for each Curling Canada employee to recognize a conflict of interest, disclose it and remove themselves from the decision making and ideally, from the entire discussion.

All employees of Curling Canada are expected to adhere to the following Standards of Business Conduct and Conflict of Interest parameters:

- The business of Curling Canada shall be conducted in accordance with the laws of the areas in which operations are conducted in accordance with the highest ethical standards of business conduct.
- No employee or representative shall knowingly permit Curling Canada to enter into any agreement or contract requiring Curling Canada to do any act prohibited by law; nor shall they knowingly aid or abet any party in their dealings with Curling Canada to circumvent any laws, including any laws relating to restraint of trade, currency exchange or taxation.
- No employee or representative of Curling Canada is to accept gifts in cash or cash equivalent (other than of nominal nature), nor shall they use their status with Curling Canada to obtain a personal gain from those doing or seeking to do business with Curling Canada.
- Soliciting of tips in the performance of your duties is not permissible.
- Employees or representatives shall not use inside information gained by virtue of their involvement with Curling Canada for their own personal gain; nor shall they disclose such information for the use of others.
- Staff, who find themselves in an unavoidable conflict of interest, must declare that conflict immediately and absent themselves without comment from the operational discussion and potential vote on the issue.

- All Curling Canada staff meetings will have a standing conflict of interest agenda item at the commencement of each formal meeting. This will allow staff to declare any conflict. Staff members who declare a conflict will be included in the minutes by name and be entitled to receive the related staff decision, once any review and final decision has been rendered.
- Employees shall disclose their involvement with other organizations, vendors, or other associations that produce a conflict when they sign a Code of Conduct and at any time during the year should their involvement change.
- Employees shall refrain from any role at its national events and Season of Champions properties which may place Curling Canada in a conflicted position. Employees, as a minimum, will not be permitted to play a coaching or competitor role at any such events.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Confidential Information

From time to time, employees of Curling Canada may come into contact with confidential information, including but not limited to information about Curling Canada's members, suppliers, finances and business plans. Employees are required to keep any such matters that may be disclosed to them or learned by them confidential.

Furthermore, any such confidential information, obtained through employment, must not be used by an employee for personal gain or to further an outside enterprise.

Intellectual Property

Any intellectual property, such as trademarks, copyrights and patents, and any work created by an employee in the course of employment at Curling Canada shall be the property of Curling Canada and the employee is deemed to have waived all rights in favour of Curling Canada. Work, for the purpose of this policy refers to written, creative or media work. All source material used in presentation or written documents must be acknowledged.

IT Information Storage and Security

Any storage devices (CD's, USB's, Floppy Discs) used by employees at Curling Canada, acknowledge that these devices and their contents are the property of Curling Canada. Furthermore, it should be understood by employees, that company equipment should be used for company business only during normal working hours. Downloading of personal materials on company equipment can be harmful to said equipment and should not be done.

POLITICAL ACTIVITY

Employees are free to participate in political activities including belonging to a political party, supporting a candidate for elected office and actively seeking elected office. Employees' political activities, however, must be clearly separated from activities related to their employment. If engaging in political activities, employees must be able to retain the perception of impartiality in relation to their duties and responsibilities to Curling Canada.

Employees must not engage in political activities during working hours and partisan politics at the local, provincial or national levels are not to be introduced into the workplace. This does not apply to informal private discussions among co-workers.

MOBILE PHONE/DEVICE

Curling Canada will only provide a mobile phone/device if there is an essential business need specific to the individual role. Cost of the phone and monthly fees will be the responsibility of CC.

Mobile equipment issued by Curling Canada has to be used for work-related communications. Personal use is permitted for local calls. The employee must reimburse any long distant charges that are not covered by the supplier user agreement. Users must be aware that call usage will be monitored on a regular basis. Members of staff who are allocated a mobile device will be held responsible for the handset and all calls made and other charges incurred. It is therefore essential that devices must be kept secure at all times and use by anyone other than the named individual is prohibited.

The handset/SIM PIN code or other security locking system should always be used. Sensitive information (e.g. personal data, passwords, or any other data that could bring Curling Canada into disrepute should it fall into the wrong hands) should not be stored unsecured on a mobile device.

Mobile devices and the associated phone numbers, remain the property of Curling Canada at all times and must be surrendered when employee leaves employment or on demand by the COO.

Curling Canada will not reimburse employees for personal mobile phones/devices nor monthly charges.

Mobile Phone / Handheld Device Use

Curling Canada recognizes that the employees are our most valuable assets and the most important contributors to our continued growth and success. Our organization is firmly committed to the safety of our employees and is committed to providing a safe working environment for all employees.

Driver inattention is a factor in a majority of motor vehicle accidents. We are not only concerned about your welfare as a Curling Canada employee, but also the welfare of others who could be put in harm's way by inattentive driving.

Driving while distracted is strictly prohibited. As a driver, your first responsibility is to pay attention to the road. When driving on business, or driving while conducting business on behalf of Curling Canada in any other manner, the following applies:

Mobile Hand-Held Units: Hand-held devices may include cell phones, pagers, palm pilots, faxes and other communication devices.

- The use of hand-held devices while operating a motor vehicle on company time is strictly prohibited.
- Allow voicemail to handle your calls and return them when safe.
- If you need to place or receive a call, pull off the road to a safe location and stop the vehicle before using your phone.
- Ask a passenger to make or take the call, if possible.
- Inform regular callers of the best time to reach you based upon your driving schedule.
- The only exception to this policy is for calls placed to 9-1-1.
- Under non-emergency situations, should the user decide to utilize any form of hands-free devices, they do so at their own risk and expense.

COMPUTER/INTERNET ACCEPTABLE USE

Computer-based technology and Internet systems are to be used for appropriate company business only. All Curling Canada information and correspondence, including email, transmitted/received using our computer-based technology is considered to be the business property of Curling Canada and is to be managed accordingly for appropriate business-related matters.

Password Protection

- Internet access is managed via individual user accounts and confidential passwords.
- All user-names and passwords for owned and operated devices must be supplied to the information technology (IT) department.
- Curling Canada employees will be required to provide the IT department with security questions/answers to be used in the event that a password is lost, forgotten or compromised.
- In the event that an employee loses, forgets, or believes that his/her password has become compromised, the employee must inform the IT department immediately. The IT department shall confirm the user-name, reset the password, and inform the employee of the changes made.

Security

Any and all passwords may not be disclosed to, or shared with, other users or third parties. Internet accounts are to be accessed only by assigned users for legitimate business purposes. Employees are not permitted to obtain anyone else's account password. If a user has reason to believe that his/her password has been compromised, the user must inform the IT department immediately.

Internet users must comply with the following security guidelines, rules, and regulations:

- Personal files or data downloaded from the internet may not be stored on CC's PC hard drives or network file servers.
- Video and sound files must not be downloaded from the Internet unless their use has been authorized for the purposes of conducting Curling Canada business.
- Users must refrain from any online practices or procedures that would expose the network or resources to virus attacks, spyware, adware, malware, or hackers.
- Users are responsible for familiarizing themselves with procedures for downloading and protecting information in a secure manner, as well as for identifying and avoiding any online material deemed sensitive, private, and copyrighted.
- Employees utilizing the internet must conduct themselves in a professional manner at all times, especially while participating in collaborative activities, and must not disclose Curling Canada information or intellectual capital to unauthorized third parties.

Appropriate Use of Internet

Employees may use the Internet only to complete their job duties, under the purview of CC's business objectives. Permissible, acceptable, and appropriate internet related work activities include:

- Researching, accumulating, and disseminating any information related to the accomplishment of the user's assigned responsibilities, during working hours or overtime.
- Collaborating and communicating with other employees, business partners, and customers of CC, according to the individual's assigned job duties and responsibilities.
- Conducting professional development activities (i.e. news groups, chat sessions, discussion groups, posting to bulletin boards, web seminars, etc.) as they relate to meeting the user's job requirements.

Inappropriate Use of Internet

Inappropriate and unacceptable internet use includes, but is not limited to:

- Usage for illegal purposes, such as theft, fraud, slander, libel, defamation of character, harassment (sexual and non-sexual), stalking, identity theft, online gambling, spreading viruses, spamming, impersonation, intimidation, and plagiarism/copyright infringement.
- Any usage that conflicts with CC's mission, goals, and reputation.
- Copying, destroying, altering any data, documentation, or other information that belongs to Curling Canada or any other business entity without authorization.
- Downloading unreasonably large files that may hinder network performance. All users shall use the internet in such a way that they do not interfere with others' usage.
- Accessing, downloading, or printing any content that violates any of CC's existing policies or Canadian law, i.e. sexually explicit material.
- Engaging in any other activity which would in any way bring discredit, disrepute, or litigation upon CC.
- Engaging in personal online commercial activities, including offering services or products for sale or soliciting services or products from online providers.
- Engaging in any activity that could compromise the security of Curling Canada host servers or computers. Any and all passwords may not be disclosed to, or shared with, other users.
- Allowing unauthorized or third parties to access CC's network and resources.

Accessing & Monitoring Computer/Internet Usage

Curling Canada reserves the right to access and monitor staff use of company email, computer usage and Internet systems. Only authorized staff may examine such usage/records for business-related issues. Curling Canada will do its best to accommodate employee privacy while being diligent and thorough when conducting investigations regarding company email, and computer and Internet usage.

INTERNET

Curling Canada will not reimburse employees for monthly home internet charges, including for work related activities.

AUTHORIZED SPOKESPERSONS

The chief spokesperson for Curling Canada is the Chief Executive Officer (CEO). The CEO will typically speak on the direction of the organization, national sponsorship matters, financial performance, major event announcements, sport performance, etc.

The main point of contact for the media is the Director, Communication & Media Relations. This individual will review most requests for information and/or interview and have the CEO or designate speak on the subject matter.

MEDIA RELEASES/PUBLIC SERVICE ANNOUNCEMENTS

Media releases and PSAs are a standard form of communication which Curling Canada will utilize in an effort to inform and expose Curling Canada products, services, and events to a wide array of stakeholders, especially the media. Depending on the time of year, such releases may occur on a weekly or monthly basis. The protocol of such releases is that they are typically designed and formatted by the Director, Communication & Media Relations. If the media release relates to the Season of Champions and/or one of the SoC properties, then the media release should be reviewed by the General Manager Event Operations and a copy sent to the CEO prior to other stakeholders.

All other Curling Canada related media releases or PSAs require approval from the CEO.

All Curling Canada staff are encouraged to generate ideas or concepts which are media worthy and, in turn, help the Coordinator, Media with the necessary information or access to the facts pertaining to the release.

For further information on media relations, please refer to the *Curling Canada Media Relations Policy* as found on the Curling Canada Intranet.

In terms of distribution, the current process is that the Curling Canada Board of Governors are to be the first stakeholders who receive the media releases or PSAs. The Board receives this information after it is in its final format and has been approved by the Director, Communication and Media Relations or the CEO. Depending on the content and timelines involved, this may be a few hours prior to the full distribution, or typically the day prior to full release.

Curling Canada staff and each of Curling Canada's Member Associations are also to be issued the information prior to it being sent to the full media and general public.

The Director, Communication & Media Relations is responsible for the information distribution to the Curling Canada Board, staff, Member Associations, and selected other stakeholder groups on the distribution list.

Similarly, the Director, Communication & Media Relations is responsible for the complete distribution of all media releases and/or PSAs to the Canadian media.

SOCIAL MEDIA USER AGREEMENT AND TERMS OF USE

Acceptance Of Terms Of This Agreement Through Use

Curling Canada, maintains a Facebook page, Twitter account, Instagram account, YouTube page and website currently located at www.curling.ca (collectively the “Curling Canada Social Media”) which collectively provide articles, publications, information, commercial opportunities, data, registration, draws, contests and other materials (the “Content”). The Curling Canada Social Media is provided to you subject to your compliance with the terms and conditions of use defined in this Agreement. By accessing or using the Curling Canada Social Media you agree to be bound by this Agreement. If you do not agree to be bound by this Agreement, please do not access or use the Curling Canada Social Media. Please read detailed Information Services and Technology Policies

SPEAK UP / OPEN COMMUNICATION

Curling Canada employees are the backbone of the organization. Each employee is encouraged to bring forward suggestions or comments. This can be done verbally or in writing to your Supervisor or through the COO. Change can only occur if the proper individuals are made aware of the issue.

The following can be used as a guideline to help facilitate open communication. It is recommended that you follow these steps when you have concerns or needs that require attention.

- a) Talk to your immediate Supervisor, who is generally more familiar with you or the details of the issue.
- b) If the issue cannot be discussed with your Supervisor, or if you have not been satisfied after discussing the matter with him/her; then bring said matter to the COO.
- c) After discussing the matter with the aforementioned individuals and you feel the situation has been inappropriately handled or your rights have been violated, the staff member has the option to contact the CEO.

OFFICIAL LANGUAGES

As Curling Canada is an organization with a national mandate and responsibilities, it must operate in a way that responds to the linguistic needs and preferences of its membership. In addition, Curling Canada is obligated, through commitments made by accepting funding from Sport Canada, to recognize that the English and French languages enjoy equal status in Canada. Sport Canada requires that Curling Canada:

- Provide communications, announcements and information to the public in both official languages, and

- Provide services to and communicate with national level athletes, coaches and officials in their official language of choice, and
- Organize activities, services or programs in such a manner as to meet the needs of the two linguistic communities and encourage participation of members of both linguistic communities, and
- Integrate in its activities the official language standards established by Sport Canada in the National Accountability Standards of the Sport Funding and Accountability Framework (SFAF).
- English and French are the official languages of Curling Canada. All communication may be in either official language. Curling Canada shall maintain the capability to communicate with its members and with the broader curling public in both official languages.

Curling Canada shall endeavor to provide all services and programs in both official languages. However, limitations in financial and staff resources are such that it may not be practical to translate all material or to provide English and French versions simultaneously.

SCENTS

Curling Canada will strive to eliminate scented products from the workplace, as some individuals may have allergies or sensitivities to perfumes, lotions, colognes and/or chemical smells.

Wherever possible, we encourage our staff and visitors to use unscented or fragrance-free products. Employees will be required to abide by this policy and avoid using scented products.

Visitors and Curling Canada employees will be informed of this policy through signs posted at entrances and elevators/stairwells, or by their host.

PET POLICY

Curling Canada employees are requested not to bring their pets to work as a regular practice. If there are special circumstances requiring an employee to bring their pet to work for a day or two, on an exception basis, they are asked to seek their manager's approval beforehand.

PERSONAL USE OF COMPANY PROPERTY OR EQUIPMENT

All provided equipment and/or property are intended for their assigned business purposes only and are also intended exclusively for use in the performance of Curling Canada business.

Employees are strictly prohibited from using equipment or property for unapproved business activity.

Curling Canada also prohibits the use of any company equipment or property for personal use. Employees are not permitted to use any of the fleet vehicles or tools for themselves, the care of their own personal property or of that of their families.

Maintenance/Care

- It is the responsibility of the employee in possession of Curling Canada property to ensure that equipment and/or property are properly maintained.
- Curling Canada materials and property are intended only for their approved use.
- In the event that any Curling Canada owned materials or property are lost or stolen, employees are required to report the loss/incident to COO as soon as possible, and will be required to participate in any investigations that are deemed necessary.
- Employees are expected to adhere to all operating instructions and guidelines, safety standards and general care instructions.
- In the event that damage to the material(s) occurs, it should be reported to COO as soon as possible, with a description of the extent of the damage, and whether or not it is still a viable piece of equipment.
- Damaged equipment/material(s) should be returned to COO for assessment and repair or warranty service.
- Employees are required to minimize any possible damage to equipment that is not in use by safely storing the equipment/machinery.
- Employees are not permitted to use any equipment that has been tagged as being out of service, for any reason, without the consent of their immediate supervisor/manager.