



2023 Kincardine Scottish Festival Code of Conduct

1 Code of Conduct Policy

1.1 This Code of Conduct Policy addresses the Kincardine Scottish Festival & Highland Games (Festival) commitment to a safe and respectful workplace and addressing and reporting prohibiting bribery, theft and corruption.

1.2 Accordingly, all Festival volunteers, agents, games representatives, businesses, suppliers, distributors, consultants, and associations or anyone else doing business for or associated with Festival's name must comply fully with this Policy.

2 Definitions

2.1 Kincardine Scottish Festival & Highland Games – otherwise known as the “Festival” herein.

2.2 Festival Representative (aka Representative) – Is defined herein as any volunteer (including Board Members), employee(s), consultant, contractor and or subcontractor associated with or working for the Kincardine Scottish Festival & Highland Games.

2.3 Vendors - Are defined herein as any contractor, supplier, retail operator, or food vendor (caterer), providing any service or concessions at the Kincardine Scottish Festival in person, on-site/remotely, virtually/online. This extends to any Vendor employees, representatives, associates and/or members of the public who claim to represent or act on behalf of any Vendor in any capacity.

2.4 Games Representative – Are defined as any Representative organising, competing, officiating, judging and or representing any organisation competing, officiating, or judging at the Kincardine Scottish Festival & Highland Games.

2.5 Parties – Is defined as all Festival Representatives, Vendors and Games Representatives collectively.

3 Purpose

The purpose of this policy:

3.1 Set out the responsibilities of all Parties and those associated with them in observing and upholding the Festival's Code of Conduct.



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3.2 Emphasise the Festival's zero tolerance of abuse and or harassment of any kind, whether it be in person, in writing, or virtually/online at any time and for any reason.

3.3 Emphasise the Festival's zero tolerance of bribery and corruption, with any breach of the Festival's Policy which (if applicable) may result in employee disciplinary action and/or notifying the authorities.

3.4 Emphasise the Festival's promotion and expectations of professional and ethical behaviour from all parties.

4 Code of Conduct - Behaviour

4.1 This Policy covers all Festival volunteers, agents, representatives, business partners, suppliers, distributors, consultants, contractors, vendors and anyone else doing business with for or associated with the Festival name and collectively the Parties.

4.2 The Parties are responsible for conducting themselves and holding themselves accountable to the highest standards of business conduct, ethics and must ensure all interactions with fellow Representatives, Vendors, and Games Representatives and members of the public are conducted with the highest level of professionalism, dignity, and respect at all times.

4.3 All parties are to conduct themselves respectfully, truthfully and with professionally and in a manner that does not harm and or interfere with the lawful operation of the Festival.

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4.5 All parties agree to not to disclose or release of any Festival business whether solicited or unsolicited in person, electronically, or on line and without the prior written approval of the Kincardine Scottish Festival Board.

4.6 Any breach of this Policy may constitute a disciplinary, contractual and even criminal matter for the individual or individuals concerned and may cause serious damage to the reputation and standing of the Festival its representatives, and the local community.

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4.7 The Kincardine Scottish Festival has established principles to ensure that, at all times, working conditions in its operation and the operations of others are conducted safely and workers and volunteers are treated with dignity and respect, and that all Parties' operations and interactions (including those with the public) are conducted in a respectful, lawful, ethical, and when applicable environmentally-conscious way.

4.8 All Parties are expected to acknowledge and agree to act in alignment with this Code of Conduct by:

- 4.8.1 Ensuring all Parties and those associated with them or representing them in any capacity are familiar with this Code of Conduct, act consistently with it, and do not contribute to its breach by any of the Parties or their representatives.
- 4.8.2 As applicable, ensure their business operations comply with the laws, statutes and regulations of each jurisdiction in which they operate.
- 4.8.3 Committing to the ethical and responsible treatment of all individuals, including with respect to workplace health and safety, employment standards, labour regulation, compensation, non-discrimination, harassment, bullying and human rights.
- 4.8.4 The Kincardine Scottish Festival is proud to promote and uphold a commitment to an inclusive and diverse work environment.
- 4.8.5 Conducting business in an environmentally responsible way.
- 4.8.6 Ensuring that their sourcing of goods and services in no way directly or indirectly results in non-compliance with this Code of Conduct and that their own Vendors and Sub-Contractors conduct business in compliance with all applicable laws and consistently with this Code of Conduct.

5 Zero Tolerance Abuse, Harassment and Bullying

5.1 The Kincardine Scottish Festival & Highland Games is a volunteer-run festival and has a zero tolerance of abuse, harassment and or bullying of any kind made towards any representative Festival as it may impact the volunteers in a negative or its Representatives.

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- 5.2 The Festival expects all Parties to comply with and enforce this Policy. All Parties are to take all reasonable steps to safeguard the welfare of others and to report any forms of abuse and or harassment to the Event Manager or the local authorities if appropriate.
- 5.3 The Kincardine Scottish Festival considers harassment to include all forms of unwelcome verbal, physical and visual conduct and displays which interfere with performance and/or create an offensive or hostile environment, whether in person or online on social media or on the internet.
- 5.4 Harassment can take many forms, the following are some examples that may constitute harassment: verbal harassment such as jokes, epithets, slurs and unwelcome remarks, derogatory comments, discussions of or harassing remarks, posting harmful or false information on social media sites or the internet, or repeated unwanted communications via text, messaging, computer, or email.
- 5.5 Any person(s) or social media communities posting or hosting and facilitating the posting of false information on its site which is in breach of this Policy may be reported to the relevant authorities and may be subject to criminal prosecution or other legal recourse.

6 Bribery, Theft, and Disclosure Policy

- 6.1 The Festival operates its business in an honest and ethical manner. We take a zero-tolerance approach to theft, bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships. We are committed to implementing and enforcing effective systems to counter bribery and/or corruption and we encourage our partner organisations to adopt principles equivalent or similar to this Policy.
- 6.2 The Festival as a “not for profit” organisation and takes its legal and ethical responsibilities very seriously, and any breach of this Policy by our Representatives or Vendors will be considered a violation of this Policy and, if applicable a disciplinary offence. All Representatives and Vendors must avoid any activity that might lead to or give way to the suggestion of a breach of this Policy.
- 6.3 All Representative and Vendor interactions (including Vendor Permits and applications) will be reviewed annually in accordance with and in compliance with this Policy.

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- 6.4** The Festival encourages its Representatives to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to any Festival Board Member or directly to the President. The Festival will ensure that no representative suffers any detrimental treatment for refusing to take part in bribery, theft and or corruption or because of reporting (in good faith) their suspicion that an actual or potential bribery, theft or other corruption offence has taken place or may take place in the future.
- 6.5** Individual(s) being offered Personal gifts, bribes or facilitation/kickback payments is strictly prohibited.
- 6.6** Festival incentives, gratuities, and or other compensation offered to an individual or individuals representing the Festival in exchange for a contract, purchase order or concession from the Festival must be fully disclosed in writing by the entity offering such incentive, gratuity and or compensation, and presented to the Executive Board for approval and sign off.
- 6.7** Only Board-approved authorised signatories have the ability to bind the Festival to any contract, purchase order or agreement. Therefore, any Representative responsible for administering or acquiring a contract management and/or the procurement of any contracted services, including but not limited to; services, products, supplies, food and beverage, are to present all contracts to the Board for review, acceptance and signoff.
- 6.8** All contracts, purchase agreements and or purchase orders are to be approved by no less than 2 authorised signatories.

7 Charitable and Political Donations

- 7.1** The Festival considers that charitable giving forms part of its wider commitment and responsibility to the community. The Festival supports multiple charities that are selected in accordance with objective criteria.
- 7.2** The Festival is not politically affiliated and makes no donations to political organisations.

8 Local Business First

- 8.1** Each year the Festival is directly responsible for generating many thousands of tourist dollars for local stores, grocers, LCBO/BEER Store, Hotels, Restaurants, AirBnB, campgrounds, golf courses and many more. Spending money locally helps to stimulate the local economy and businesses within our region. Local businesses should be

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considered a priority wherever possible and provided it is feasible and commercially responsible to do so.

9 Notification Requirements

9.1 If in doubt as to whether something could be considered an act of theft, bribery or a facilitation/kickback payment, gift or hospitality, the Festival Representative must seek guidance from an Executive Board Member in writing (email).

9.2 All Parties are required to take particular care to ensure that all Festival records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

10 Bribery, Theft and Fraud - Reporting Actual (or Suspected) Breaches of this Policy

10.1 All Festival representatives must record and report any actual incidents of bribery or concerns of suspected bribery to any Executive Board Member.

10.2 Any such reports will be thoroughly and promptly investigated in the strictest confidence. Festival Representatives will be required to assist in any investigation into possible or suspected theft or bribery.

10.3 Employees suspected of theft, bribery may be suspended from their duties while the investigation is being carried out. The Festival will invoke its disciplinary procedures under these circumstances.

10.4 Any proven breach of this Policy may result in a finding of gross misconduct and immediate dismissal.

10.5 The Festival may terminate the contracts of any associated persons, including consultants or other contractors or subcontractors who act for, or on behalf of the Festival, who are found to have breached this Policy.

10.6 The Festival may also report any matter to the relevant authorities, including the Canadian Revenue Authority (CRA) and the police.



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11 Review of Procedures

11.1 Festival Representatives and those working for or on behalf of the Festival are encouraged to contact any Board Member with any suggestions, comments or feedback that they may have on how these procedures may be improved.

11.2 The Festival reserves the right to amend and update this Policy as required. Any breach may result in disciplinary action being taken, up to and including dismissal.

12 Commitment

12.1 This Policy will be communicated to all representatives to confirm the Festival's commitment to meeting all relevant requirements. It will be reviewed following changes to legislation and/or identification of risks. In all other cases, it will be reviewed annually.

13 Representatives Attestation

I hereby acknowledge that I have read and fully understand and will comply with this Policy.

Name (Print):

Signature:

Date Signed:

Representatives Role:

Contact Telephone:
