



CODE OF CONDUCT AND ETHICS

OVERVIEW

The Yellowknife Golf Club Co-Operative (YKGC) is a cooperative and operates in compliance with all laws, legislation, rules and regulations that govern such companies.

Since its inception, YKGC has instilled in the Board members and employees of the Cooperative the need for high ethical standards in its dealing with members.

YKGC's Code of Conduct and Ethics (the Code) is applicable to board members, officers and employees of the Cooperative and its subsidiaries. The Code focuses on providing standards which are designed to encourage and promote integrity and to minimize or eliminate wrongdoing. It has provisions dealing with the treatment of customers, members, suppliers and competitors. The Code specifies procedures respecting the proper use of the Cooperative's assets. It also has provisions respecting confidentiality of information and conflicts of interest.

All YKGC board members, officers and employees are expected to conduct themselves in accordance with this Code.

YKGC's Code of Conduct and Ethics is an evolving document which will be amended and updated as appropriate by the YKGC Board's authority. The Code is not written to be an exhaustive document.

LAWS, LEGISLATION, RULES AND REGULATIONS

Board members, officers and employees are expected to familiarize themselves with the laws, legislation, rules and regulations that govern business operations according to their specific positions and duties, and exercise appropriate judgment and/or seek advice when issues arise.

Privacy Policy

YKGC complies with the Federal and Provincial Privacy Acts regarding the collection and use of personal information received in the course of doing business.

Personal information collected on potential, current and past members is considered highly confidential and treated as such.

HUMAN RIGHTS

Non-Discrimination

Interactions with fellow employees, members, suppliers, government representatives, customers, and competitors are to be conducted without discrimination in any form with respect to race, religion, national or ethnic origin, gender, handicap, marital status, or age.

YKGC strives to be an equal opportunity employer and works to ensure that First Nations peoples, minorities and women are properly included in the management and decision-making of the YKGC.

Respectful Work Environment

Interactions with fellow employee and business associates should be conducted in a reasonable and non-threatening manner at all times. Verbal abuse, physical abuse and sexual harassment will not be tolerated. Incidents and conflicts should be dealt with upon occurrence, and escalated to a supervisor or the General Manager when necessary. The need for a Harassment Free Workplace is important and all employees must ensure they conduct themselves accordingly.

CONFLICTS OF INTEREST

Board members, officers and employees must endeavor to avoid personal conflicts of interest or a perception of conflict of interest. This may include, but not be exclusive to situations such as working concurrently for a competitor company, accepting inappropriate gifts from suppliers and residents, divulging proprietary information, and dealing with family members.

Proprietary Information

Information gathered in the course of performing one's duties should not be used for personal advancement or financial gain, such as benefiting from opportunities that are discovered through the use of the YKGC property, information or position, using the YKGC property, information or position for personal gain, or competing with the YKGC.

Gifts

Gifts (monetary or otherwise) or entertainment should not be accepted if they could be reasonably considered to be extravagant for the employee, manager or board member who receives it, or otherwise improperly influence the YKGC's business relations with or create an obligation to a member, supplier or contractor. When in doubt about accepting a gift or entertainment, consult with a supervisor.

Employing Relatives

A YKGC supervisor must exercise caution and judgment when employing a relative. An employee must not report directly to a supervisor to whom he/she is directly related.

At YKGC there are situations where related individuals may be employed together, such as a brother and sister who perform duties as groundskeepers. However, one should not report to the other.

WORKPLACE CONDUCT

Substance Abuse

The use of alcohol or illegal drugs during scheduled business hours while working is strictly prohibited. When attending YKGC -sponsored events on or off site, employees who are not working and who choose to drink alcohol should do so in moderation.

Smoking

Smoking is permitted in designated areas only, and employees must abstain from smoking in YKGC owned vehicles while on the golf course and in building entrances.

Use of Company Assets

In performing daily business activities, employees are expected to use YKGC assets conservatively, responsibly and with due care. The use of company vehicles, telephones, cell phones, stationery, hardware, software, etc., is for YKGC authorized purposes only, or as otherwise stipulated in an employment contract.

Board members, officers and employees are advised that the following activities are expressly forbidden using YKGC telephones, cell phones or internet and computers:

- a) Conducting illegal activities
- b) Making personal long distance calls or sending long distances personal faxes
- c) Conducting private business or soliciting money for personal causes
- d) Political lobbying
- e) Making/delivering/sending hate messages, messages that are discriminatory or defamatory, and messages that could be considered harassment or antisocial
- f) Using objectionable language
- g) Transmitting or downloading material that is discriminatory, defamatory, harassing, insulting, offensive, pornographic or obscene
- h) Accessing websites supporting hate, pornography, gambling, shopping or auctions, investments or stock trading, gaming, espionage and terrorism, theft, or drugs, unless accessing such sites is a requirement of your job responsibilities and access is authorized

Security

Loss, misuse or theft of YKGC or an individual's property is everyone's concern. If you are aware of any situation or incident, report it to a supervisor immediately.

Political Affiliations

Political affiliations should be maintained on a personal basis exclusively, and YKGC funds should never be used for political contributions or gifts. Political activism is an activity that should be carried out on the employee's own time.

HEALTH & SAFETY

YKGC endeavours to maintain a healthy and safe work environment and employees must report accidents or any health and safety issues or concerns to a supervisor or manager in a timely manner. A *YKGC Health & Safety Manual* will be written and distributed to employees in due course.

IMPLEMENTATION OF THE CODE

Dissemination

The Code is circulated to all board members, officers and employees of the Cooperative who are required to sign a copy of *Schedule 'A'* (attached to this document) acknowledging the same. New employees and board members will be provided the Code upon receiving initial documentation. The Code will eventually be posted to YKGC's website and will as such be available to employees and members of the general public.

Monitoring Compliance

The YKGC Board will monitor compliance with the Code by requiring management to provide quarterly reports respecting complaints and violations of the Code. If any matters related to specific members of the Board or employees arise, management will bring these matters directly to the attention of the Board.

Requests for departures from the Code are expected to be very infrequent. The President or the YKGC Board will be required to assess and if applicable, grant requests for departures from the Code. Any waivers from the Code that are granted for the benefit of the board members or senior management of the Cooperative may only be granted by the YKGC Board itself on the recommendation of the Governance & Compensation Committee. The YKGC Board acknowledges that conduct by an employee; a board member or the general manager which constitutes a material departure from the Code of Conduct and Ethics will require the filing of a material change report detailing the violation.

Violations

Each reported incidence of a Code violation will be dealt with by a supervisor and the President. Depending on the severity and nature of the violation, consequences may include disciplinary action, a written report for inclusion in the employee file, redeployment, or termination.

Yellowknife Golf Club Co-operative

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Statement of Agreement and Affirmation

I, _____, do affirm that I have read and understood the terms of the YKGC Code of Conduct and Ethics as they apply to me while I am employed or sit on the Board of the Yellowknife Golf Club Co-operative. I affirm that I will abide by the said terms of the YKGC Code of Conduct and Ethics.

Signature

Date

Witness Signature

Date