

OPERATIONAL POLICY			
Department	Corporate Governance	Number	CG-002
Subject	Disclosure and Protected Disclosure	First Issued	December 10, 2024
		Effective	December 10, 2024
Issued to	All Members of the Calgary Stampede	Version	01
Approved by	Chief Executive Officer	Next Review	As Required

1.0 POLICY STATEMENT

The Calgary Stampede (or “Stampede”) has high standards of personal ethics and conduct for individuals involved with its programs and activities and encourages a culture of integrity and accountability.

The Stampede is committed to providing its members and stakeholders with guidance on how to escalate concerns about misconduct.

Everyone involved with Calgary Stampede programs and activities is encouraged to raise concerns about misconduct or perceived misconduct without risk of reprisal so that concerns can be investigated and addressed.

2.0 POLICY RATIONALE

The purpose of this policy is to:

- a. Provide stakeholders with guidance for reporting concerns about misconduct or perceived misconduct;
- b. Ensure concerns are received and addressed in accordance with Calgary Stampede procedures; and
- c. Protect those who report concerns in good faith.

3.0 SCOPE

This policy applies to Calgary Stampede members.

4.0 POLICY DEFINITIONS

4.1 Misconduct: means conduct that violates expectations and requirements set out in the Calgary Stampede’s Code of Conduct and other relevant corporate policies. This may include contravention of applicable laws, any act or omission that creates harm or risk of harm to others, knowingly counselling another to commit misconduct, or retaliation or reprisal against an individual for reporting a concern or participating in an investigation in accordance with this policy.

4.2 Members: refers to employees, volunteers, designates, appointees and contractors of the Stampede.

4.3 Leaders: includes supervisors, managers, management directors, vice presidents, the executive management team, board of directors and committee chairs.

4.4 Member’s leader: refers to the person who each member reports to directly.

4.5 Executive management team: refers to the chief executive officer and executive vice presidents of the Calgary Stampede.

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4.6 Reprisal: refers to retaliatory measures that are taken against an individual because the individual has sought advice about a concern, made a report in good faith, or cooperated in an investigation in accordance with Calgary Stampede policy. Retaliatory measures may include but are not limited to any threat or action that adversely affects an individual's involvement with the Calgary Stampede such as their employment, working conditions, or educational experience of the individual as applicable.

5.0 REPORTING CONCERNS OF MISCONDUCT - GENERAL

5.1 Calgary Stampede members may report concerns about misconduct or perceived misconduct in accordance with this policy, and the Calgary Stampede is responsible for investigating and addressing concerns in accordance with its policies and procedures. The Calgary Stampede may receive and investigate reports regarding the conduct of Calgary Stampede members and may take action with respect to individuals' employment or involvement with Calgary Stampede programs and activities.

5.2 Guests and customers of the Calgary Stampede are not subject to the Calgary Stampede's Code of Conduct, and any concerns about misconduct by these individuals is outside the scope of this Disclosure and Protected Disclosure Policy. Guests and customers may, however, report concerns about Calgary Stampede personnel conduct in accordance with this policy as may any member of the public who becomes aware of misconduct.

5.3 Types of misconduct include, but are not limited to, the following:

- a. Accounting, auditing, or other financial reporting irregularities, fraud, or misrepresentations
- b. Misappropriation/misuse of Calgary Stampede funds, equipment, or other assets
- c. False claims for reimbursement of Calgary Stampede expenses
- d. Non-compliance with laws or regulations that could result in fines or civil damages payable by the Calgary Stampede or that could otherwise significantly harm the Stampede's reputation or public image
- e. Unethical business conduct in violation of any Calgary Stampede policy
- f. Danger to the health, safety, or well-being of any member or the public (including any actual or perceived threat of workplace harassment, whether physical, emotional, sexual or of any kind and workplace violence)
- g. Harassment or discrimination
- h. The enabling of forced labour, child labour or trafficking in persons through the Stampede's business affairs, supply chains and/or operations.

5.4 Concerns from a member about misconduct or perceived misconduct should be made verbally or in writing by the member to their own leader.

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5.5 If a volunteer leader or employee leader is the subject of a member’s concern, the report may be made to a representative of Volunteer Services or Employee Services or, as appropriate, to a member of the executive management team or the president and chair of the board.

5.6 Concerns from other stakeholders about misconduct or perceived misconduct of a member may be reported to an applicable volunteer leader or employee leader or through the Confidential Safe Reporting Service at 1-833-648-4437 or reporting@activatehr.ca.

5.7 Misconduct concerns may be reported anonymously through the Confidential Safe Reporting Service, but this may limit the Calgary Stampede’s ability to respond and investigate.

5.8 Members may become aware of concerns about misconduct or wrongdoing. These individuals should encourage others with firsthand knowledge of the concern to make a formal report and are encouraged to make a report themselves in accordance with this policy to ensure concerns are addressed.

6.0 RECEIVING A REPORT OF POTENTIAL MISCONDUCT

6.1 Any Calgary Stampede member who receives a report of misconduct is responsible to immediately forward it to a representative of Volunteer Services or Employee Services;

6.2 If the report is received verbally, the receiver should record as many details as possible including:

- a. The reporter’s name and contact information;
- b. The nature and details of the misconduct, including applicable dates, times, and the names of other people involved or who may have been witness to the issues giving rise to the concern;
- c. Any information or evidence to substantiate the concern; and
- d. If applicable, the reporter’s desired outcome.

6.3 Reports of misconduct will be promptly investigated and addressed in accordance with the Calgary Stampede’s investigation procedures.

6.4 Reports related to fraud will follow the financial fraud reporting procedures.

7.0 CONFIDENTIALITY AND PROTECTION FROM REPRISAL

7.1 The Calgary Stampede will treat reports of misconduct as confidential to the greatest extent possible and will only disclose information as necessary for the purpose of investigating and addressing the complaint and as required by law. In such instances the individual(s) involved in a misconduct investigation will be informed in advance.

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7.2 Individuals who seek advice about this policy or a concern, report misconduct, or participate in investigations in good faith will be protected from reprisal for doing so. Reprisal will not be tolerated and may result in disciplinary action, which may include termination of an individual's employment or involvement with any Calgary Stampede program or activity.

7.3 Any individual who believes they have been subject to reprisal because they have sought advice about this policy or a concern, reported a concern about misconduct or perceived misconduct, or participated in an investigation in good faith should report this to a representative of Volunteer Services or Employee Services or, as appropriate, to an executive vice president, the corporate secretary, the chief executive officer or the president and chair of the board.

8.0 COMPLIANCE AND ENFORCEMENT

Any report that proves to be false, malicious, frivolous or vexatious may be treated as a violation of the applicable Code of Conduct policy and result in disciplinary action, which may include termination of an individual's employment or involvement with the Calgary Stampede.

9.0 RESPONSIBILITY FOR POLICY ADMINISTRATION

The executive management team will have responsibility for maintaining and administering this policy.

10.0 REFERENCES

CP-003 Code of Conduct
 PS-002 Respectful Workplace
 PS-SOP-037 Workplace Harassment and Violence Prevention
 Confidential Safe Reporting Service Outline

11.0 RESCIND DETAIL

None