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| Title: | Code of Ethics Policy |
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Code of Ethics Policy

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| Applicability | Colleagues, volunteers, contractors, personal service contractors, interns |
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Background

Whistler Sport Legacies is committed to uphold the highest ethical standards and promote a culture of ethical business conduct.

Policy

It is the policy of WSL to ensure colleagues are responsible for complying with our ethical standards and values under all circumstances.

1.0 General

Colleagues who have questions concerning the Code of Ethics (Code) should address them with their Director, Human Resources Representative or their Manager/Supervisor.

Colleagues who become aware of a violation or possible violation of the Code must report that information immediately to their Manager/Supervisor or a Human Resource representative.

Failure to comply with the Code can have severe consequences. Management will impose appropriate discipline, which may include termination, for violations of the Code. Conduct that violates the Code may also violate laws, rules and regulations and may subject WSL and the colleague to prosecution and/or legal sanctions.

2.0 Compliance

Colleagues must comply with the letter and spirit of all applicable laws, rules and regulations.

2.1 WSL's activities are subject to complex and changing laws, rules and in which it conducts business. Even if agreements or arrangements are not in writing, they must still comply with the letter and spirit of these laws, rules and regulations.

2.2 While engaged, directly or indirectly, in WSL's business activities, or while conducting personal activities which may impact, directly or indirectly, WSL's business, colleagues are strictly prohibited from engaging in fraud or illegal acts of any kind. Such actions may subject both WSL and the colleague to prosecution and/or legal sanctions.

3.0 Conflict of Interest

Colleagues must avoid all situations in which their personal interests, actions, and decisions made in their sphere of responsibility, directly or indirectly, conflict or may be perceived to conflict with their duties to WSL.

- 3.1 Every colleague owes a duty of good faith to WSL to advance its legitimate interests. Colleagues are prohibited from:
- a) Appropriating, for their personal benefit, any opportunities that are discovered through the use of WSL property, or information, or their position with WSL;
 - b) Using WSL property, or information, or their position with WSL for personal gain;
 - c) Engaging in any business, commercial, or financial interests, or activities that might reasonably be regarded as competing with, or is complementary to WSL, its business, or its activities; and
 - d) Accepting loans from those doing, or seeking to do business with WSL, except from those engaged in the general business of lending money and only upon standard commercial terms.
- 3.2 Colleagues must avoid acquiring any interest, or participating in any activities that could create an obligation, or distractions which would affect their judgment, or ability to act solely in WSL's best interest.
- 3.3 Colleagues are required to obtain approval from their Director, and President & CEO, prior to serving as Directors or Officers of outside business firms and organizations.
- 3.4 Each colleague must report any material transaction, or relationship (including those involving relatives) that could reasonably be expected to give rise to a conflict of interest.
- 3.5 If an improper financial benefit is gained by a colleague through a relative, or someone in a close personal relationship, as a result of the colleagues' employment with WSL, or by the use, or misuse of confidential information of WSL, the colleague must account for benefit received.
- 3.6 Colleagues may not, directly, or indirectly, report to, supervise, or review the work of a relative.

4.0 Discrimination and Harassment Prevention

WSL is committed to providing and maintaining a workplace that is free from discrimination and harassment contrary to law, where colleagues are accorded equality of employment opportunity based on merit and ability.

- 4.1 Each colleague has the right to work in an environment that is free from harassment and discrimination contrary to law(s) based on race, ancestry, place of origin, colour, ethnic origin, citizenship, religion, sex, sexual orientation, age, record of offenses, marital status, family status, pregnancy, disability, or any other ground listed in applicable laws, rules and regulations.
- 4.2 Colleagues are responsible for ensuring a work environment that is free from discrimination and harassment by:
- a) Behaving in a professional manner and treating others with respect by refusing to participate in, or tolerate, discrimination or harassment;

- b) Reporting known or observed incidents of discrimination or harassment and supporting colleagues who wish to report incidents of discrimination or harassment; and
- c) Respecting the confidential nature of any investigation of discrimination or harassment.

5.0 Health and Safety

WSL is committed to providing and maintaining safe and healthy work environments for all colleagues in accordance with industry standards and in compliance with applicable laws, rules and regulations where WSL conducts business. All colleagues are responsible for maintaining a constant awareness of WSL's health and safety requirements within their work areas, and

- 5.1 Follow safe work practices, standards, and procedures.
- 5.2 Report and address all observed hazards, including unsafe practices and defective equipment.
- 5.3 Not be under the influence of alcohol or cannabis while on the job.
- 5.4 Not use, possess, distribute, buy or sell any illegal substances while on the job, or on WSL's property.
- 5.5 Not participate or engage in violent or threatening acts of any form, including those of a verbal, physical or visual nature.

6.0 Protection of the Environment

WSL is committed to the protection of the environment and expects colleagues to honour this commitment by complying with industry standards and applicable laws, rules and regulations in which WSL conducts business.

- 6.1 Colleagues must take all necessary measures to adequately contain, use and store hazardous materials and substances, and to prevent these materials and substances from being spilled or released into the environment.
- 6.2 Colleagues must maintain truthful, accurate and complete reports of all environmental operations, inventories, and incidents, as required by applicable laws, rules and regulations in which WSL conducts business, and must report to the Manager/Supervisor all circumstances in which toxic substances and/or materials are spilled or released into the environment.
- 6.3 Violations of applicable environmental laws, rules, and regulations in which WSL conducts business, even if unintentional, can carry severe penalties and could result in prosecution of WSL and the colleagues involved.

7.0 Protection and Proper Use of WSL Assets

All colleagues must safeguard WSL's assets and ensure their efficient use and protection from loss, damage, theft, misuse and waste. Under no circumstances may WSL's assets be used for illegal or unethical purposes.

WSL's assets include (without limitation): colleague work product and time at work; WSL's equipment, supplies, computers, systems and software; WSL's trading and bank accounts; WSL's information; WSL's reputation, trademarks and name; WSL's manuals, training and promotional programs; WSL's strategy, marketing, development and other such plans; and WSL's business contracts and opportunities.

- 7.1 Colleagues must not, directly or indirectly, engage in, or be involved with any other business or organization which may require a colleagues' attendance or attention during his or her working hours.
- 7.2 Colleagues must comply with stated WSL policies and procedures when incurring and approving business expenses and ensure that such expenses serve WSL's business interests.
- 7.3 Colleagues must ensure that assets belonging to WSL or its guests are protected from loss, damage, theft, fraud, misuse and waste. Colleagues are prohibited from the removal or disposal of these assets without the prior consent of their Manager.
- 7.4 WSL's computer systems, data, programs, and communication systems, including servers which connect to the Internet, are WSL assets. WSL is capable of monitoring and recording all usage and inspecting all files stored in private areas of its computer network, which is subject to periodic audit and review by authorized WSL personnel. A colleague should not have any expectation of privacy in respect of e-mail or Internet usage. Prohibited Internet use includes, but is not limited to:
 - a) Accessing Internet sites containing obscene, offensive or otherwise unethical material;
 - b) Accessing Internet sites containing material prohibited by law;
 - c) Expressing personal opinions in a discussion group while using a WSL e-mail address or WSL's computer system.
- 7.5 WSL's communication tools and systems are provided for business purposes and must be used in a professional manner. However, limited personal use of the communication tools provided by WSL is permitted, provided such use is not for personal gain or any unethical, or illegal purpose and provided such use does not interfere with WSL's business or the colleague's duties.

8.0 Gifts

Colleagues must not, except as described below, use their employment status to give or accept for personal benefit any valuable gifts, favours, payments, loans or another benefits (gifts) to or from any person, organization, or group that does, or seeks to do, business or competes with WSL.

8.1 Colleagues may give, where their duties permit, and may accept, modest gifts provided that all of the following conditions are satisfied:

- a) Gifts are not cash or other negotiable instruments;
- b) Gifts cannot reasonably be interpreted as a bribe or an improper payment;
- c) Gifts are nominal value;
- d) Gifts can reasonably be considered to be made as a matter of general and accepted business practice;
- e) Gifts do not violate any applicable law, rule or regulation; and
- f) If subsequently disclosed to the public, the provision or acceptance of such gifts could not reasonably be expected to harm the reputation of WSL, the providers or the recipients of the gifts, as applicable

Gifts meeting all of the tests contained in subsection 8.1 above are referred to as 'permitted gifts' for the purposes of WSL's Code.

9.0 Dealing with Public Officials

All dealings between colleagues and public officials are to be conducted in a manner that could not reasonably be interpreted to compromise the integrity or the reputation of the public officials, colleagues or WSL. Any inappropriate dealing with public officials may be subject to criminal and civil sanctions.

9.1 Any participation by a colleague, whether directly or indirectly, in any bribe, scheme, kickback, illegal gratuity, indirect contribution, or similar payment is prohibited and may constitute a criminal offence, whether or not such payment might further WSL's interests.

9.2 Since the provision of any gift to a public official may be interpreted as a means to secure the influence of the public official, colleagues may only provide permitted gifts (as defined in Section 8) to public officials with the permission of their Director and the President and CEO.

10.0 Political Contributions

The use of WSL's funds, goods or services by colleagues as Political Contributions to political parties, candidates, campaigns or activities or any kind is strictly prohibited, except in the circumstances described below.

Political contributions include: money, or any items of value, such as loans, services, entertainment, travel benefits, colleague's time and the use of WSL's facilities or assets.

- 10.1 Colleagues may engage in political activities on their own behalf but not as a representative of WSL. Colleagues will not be reimbursed for any political contributions.
- 10.2 This section does not apply to political contributions approved under the standing authority granted to the President and CEO of WSL.

11.0 Proprietary and Confidential Information

WSL's records, reports, papers, devices, processes, plans, manuals and methods are proprietary and are to be held in the strictest confidence and not disclosed to any person or entity. In addition, WSL may obtain, or have access to, confidential information that belongs to other persons or entities. Colleagues are prohibited from revealing this information without proper authorization.

- 11.1 Colleagues must not publicly, or privately, discuss or disclose proprietary and confidential information about WSL to any person or entity outside of WSL and may only share such information in accordance with WSL's policies and procedures.
- 11.2 Colleagues must not publicly, or privately, discuss or disclose proprietary or confidential information they have obtained through their employment with WSL regarding guests, colleagues, suppliers, competitors, governments or investors.
- 11.3 Colleagues must appropriately handle, use and retain WSL's proprietary and confidential information.

12.0 Privacy

WSL and its colleagues are committed to high standards for the protection of personal information of both colleagues and guests.

Personal information (in general terms) includes: information about an individual that is personally identifiable, that is not otherwise publicly available and is not part of a colleague's work identification. Nothing in a document, or transmission, or other product of a colleague's use of e-mail addresses, or e-mail, or Internet access provided by WSL, or the use of any other work related resources, tools or networks provided by WSL, which relates to that colleague, shall be part of their private personal information. Colleagues should have no expectation of privacy when using resources provided by WSL.

- 12.1 Personal information of guests must be collected, handled, used and disclosed in accordance with applicable privacy laws and other terms applicable to the original collection of personal information.
- 12.2 Personal information of colleagues must be collected, handled, used and disclosed in accordance with applicable privacy laws. Colleagues have permitted WSL to collect, handle, use and disclose their personal information as outlined in offer letters. A colleague may review his or her personal information upon request.

13.0 Fair Dealing and Trade Practice Standards

WSL's business activities must be conducted in a fair and ethical manner and in accordance with the letter and spirit of all applicable laws, rules and regulations in the various jurisdictions in which WSL conducts business (including any applicable competition and trade practice laws and regulations).

- 13.1 Each colleague must deal fairly with WSL's guests, colleagues, customers, suppliers, and competitors. No one should take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation, or omission of material facts, or any other unfair trade practice.
- 13.2 Under no circumstances may a colleague be party to any collusion, or concerted effort of any type involving any competitor, vendor, supplier, customer or other party which constitutes a restraint of trade, or violates competition laws and regulations designed to foster competition.

Prohibited activities include, but are not limited to:

- a) Agreements with competitors or suppliers which directly or indirectly affect prices or limited marketing areas; or
- b) Agreements with one or more competitor to boycott a supplier or avoid selling to a customer.

14.0 Financial Information and Operating Activities

WSL's financial information and operating activities, including, among other things, its financial statements and the books, records, and accounts on which these statements are based, must fairly present WSL's performance, results and operations and must comply with applicable legal, accounting and regulatory requirements.

- 14.1 Colleagues must ensure that all transactions are authorized, executed, recorded and disclosed in accordance with WSL policies and procedures and with legal, accounting and regulatory requirements so as to ensure the accurate and timely preparation of financial statements and to, among other things, safeguard WSL assets.
- 14.2 Colleagues must ensure all transactions are supported by appropriate documentation and recorded in the proper accounts and in the proper accounting period. False, deceiving or misleading accounting entries are prohibited.

15.0 Code of Ethics Distribution and Acceptance

All colleagues will be provided with a copy of the Code, included in the Colleague Handbook, and are required to acknowledge acceptance and understanding, in writing, of its provisions.

- 15.1 At the commencement of employment and thereafter in accordance with WSL policy, all colleagues must acknowledge that they have read, or re-read, as the case may be, this Code.

15.2 In addition, in cases where, as an alternative to employment, an individual is engaged under contract to provide services to WSL, such individual will be provided with a copy of the Code and must sign the prescribed form acknowledging that the Code will apply to this individual as if he or she were a colleague.

16.0 Reporting Violations

To maintain a workplace that is respectful, productive and protects the safety of colleagues and guests, it is important that all suspected or actual violations of this Code are reported immediately so that they may be investigated and resolved. The Code is a general statement of WSL’s of Respect, Integrity, Teamwork and Empowerment and it may not cover every circumstance. As a result, colleagues should report any and all activities which they suspect violate the letter or spirit of the Code.

- 16.1 Colleagues must report suspected unethical activities to their Manager and a Human Resource representative.
- 16.2 Colleagues who wish to ask a question about how to apply or interpret the Code may contact a Human Resource representative.
- 16.3 All suspected unethical activities which violate the Code that are reported will be treated seriously and will be handled promptly, discreetly and professionally. Discussions and enquiries will be kept strictly confidential to the extent appropriate or permitted by WSL policies and procedures and applicable laws, rules and regulations.
- 16.4 It is a serious violation of the Code for a Manager or colleague to discriminate or retaliate against any colleague for making a report.

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| Approved by: | |
| Date Signed: | |