

Turner Valley Golf Club

Code of Ethics Policy

Intent

Turner Valley Golf Club is committed to conducting business in an open and ethical manner. We accomplish this by creating a workplace built on the strength of trust, accountability, and integrity in all our business practices. It is the responsibility of every employee to build and maintain this code of ethics by supporting, and actively participating in the process.

This Policy shall:

1. Establish the roles employees are expected to take in establishing an ethical workplace;
2. Define behaviour that would be unethical;
3. Outline disciplinary actions for violations.

Policy

At Turner Valley Golf Club we strive to protect all of our employees, vendors, customers and TVGC itself from any illegal or damaging actions committed by individuals either knowingly or unknowingly.

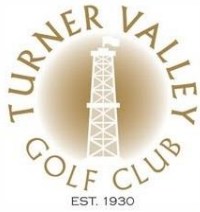
Turner Valley Golf Club will not tolerate any wrongdoing or impropriety, and will immediately take the appropriate disciplinary actions to correct the problem.

Employee Expectations

Management & Executives

- These company officials are expected to set a prime example. In all their business dealings, honesty and integrity shall be required.
- Shall have an open door policy allowing for the free discussion of suggestions and concerns from employees.
- Must report any conflicts of interest regarding their position at Turner Valley Golf Club.
- Must report suspected violations.

Employees



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- All employees are expected to work together to promote a workplace built on trust, accountability and openness.
- Disclose any conflicts of interest regarding their position at Turner Valley Golf Club.
- Report suspected violations.

**Retaliation against employees who use these reporting mechanisms to raise genuine concerns will not be tolerated.*

Unethical Behaviour

Anyone not working together to [promote a workplace built on trust, accountability and openness is exhibiting unethical behaviour. Some examples are:

- Harassment or discrimination
- Improper use of confidential information or TVGC trade secrets
- Use of corporate assets or business relationships for personal use or gain
- Stealing (money, tangible inventoried items such as liquor, food, all items from the Pro Shop, tools, etc)
- Spreading gossip
- Conducting oneself inappropriately
- Being complacent; witnessing an infraction and not doing anything about it
- Encouraging another to violate policies

Violations

In the event that a violation of this policy occurs, Turner Valley Golf Club will employ disciplinary measures that reflect the severity of the offence up to and including termination of employment.

Turner Valley Golf Club will not be party to the intent or appearance of unethical or compromising practices in its business relationships.

Disciplinary action shall be administered, in progression, according to the following procedures; however, TVGC reserves the right to elevate discipline depending on the severity of the situation:

- Documented verbal counselling, to be signed by the employee
- Warning letter, to be dated and signed by the employee
- Second warning letter, to be dated and signed by the employee
- Termination of the employee from Turner Valley Golf Club



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Some violations may indelibly affect our business in a negative fashion. In this case, punitive measures, including legal action may be pursued.