# Section 2 - Code of Conduct

(Organization) is committed to conducting itself with the highest standards of ethics, integrity, honesty, fairness and professionalism – in every respect, and without exception. The Code of Conduct establishes the standards that govern the way employees conduct themselves in the workplace, with each other, with clients, volunteers, associations, institutions, partners, suppliers, other stakeholders and the public atlarge.

It is understood that this Code of Conduct cannot cover every scenario; therefore, employees are expected to use the spirit and intent behind the Code of Conduct, to guide their actions and behaviours.

# 2.1. Accepting and Giving Entertainment and Gifts

Employees shall not furnish or accept, directly or indirectly, on behalf of the company, expensive gifts or provide excessive entertainment or benefits to other persons. Employees, whose duties permit them to do so, may furnish modest gifts, favours and entertainment to persons, other than public officials. Consult with your supervisor to determine what would be considered acceptable in the circumstances and receive authorization.

Since the furnishing or acceptance of even an inexpensive gift or a modest entertainment or benefit to or from a public or influential official may be open to the interpretation that it is given to secure the use of the official's influence, no such gift, entertainment or benefit may be provided or accepted by an employee unless he or she is authorized by the company to do so.

### 2.2. Behaviour Outside the Workplace

The company expects employees to act in a manner, outside of the workplace, that will enhance the company's reputation for honesty and integrity and will not reflect negatively on themselves, their coworkers, products or services of the company, nor upon the company. Employees remain accountable for their conduct, inside but also outside of work.

#### 2.3. Conflict of Interest

Employees must avoid all situations in which their personal interests or activities conflict or might conflict with their duties at the company. Employees are expected to avoid acquiring any interests or participating in any activities that might:

- a) Deprive the company of the time or attention required by the employee to perform their duties properly; or
- b) Create an obligation or distraction that would affect their judgment or ability to act solely in the company's best interest. In certain instances, ownership or other participation in a competing or complementary enterprise might create or appear to create such a conflict.

Employees are required to disclose in writing to the company all business, commercial and/or financial interests or activities that might reasonably be regarded as creating an actual or potential conflict with their duties of employment.

# 2.4. Confidentiality

The company considers certain software, applications, documents, files, records, reports, processes, plans or proposals, whether paper or electronic, as being strictly confidential in nature and the following guidelines must be strictly adhered to by all employees:

- a) Employees are prohibited from divulging confidential information to anyone, except as required in the performance of their duties, without receiving prior authorization. Whenever an employee is in doubt as to whether certain information is confidential, or whether such information should be divulged, no disclosure should be made without first consulting their immediate supervisor and receiving authorization.
- b) Employees have an obligation to take all reasonable steps necessary to protect company tools, information or property from theft, damage or misuse. This includes maintaining appropriate data security and record confidentiality practices.