

**Document Number: HR 08**

## Code Of Ethics And Professional Conduct

### **Be Inclusive**

We welcome and support people of all backgrounds and identities. This includes, but is not limited to members of any sexual orientation, gender identity and expression, race, ethnicity, culture, national origin, social and economic class, educational level, colour, immigration status, sex, age, size, family status, political belief, religion, and mental and physical ability.

### **Be Considerate**

We all depend on each other to produce the best work we can as a company. Your decisions will affect customers, partners, stake holders and colleagues, and you should take those consequences into account when making decisions.

### **Be Respectful**

We will not all agree all the time, but disagreement is no excuse for disrespectful behaviour. We will all experience frustration from time to time, but we cannot allow that frustration become personal attacks. An environment where people feel uncomfortable or threatened is not a productive or creative one.

### **Choose Your Words Carefully**

Always conduct yourself professionally. Be kind to others. Do not insult or put down others. Harassment and exclusionary behaviour are not acceptable. This includes, but is not limited to:

- Threats of violence.
- Insubordination.
- Discriminatory jokes and language.
- Sharing sexually explicit or violent material via electronic devices or other means.
- Personal insults, especially those using racist or sexist terms.
- Unwelcome sexual attention.
- Advocating for, or encouraging, any of the above behaviour.

### **Do Not Harass**

In general, if someone asks you to stop something, then stop. When we disagree, try to understand why. Differences of opinion and disagreements are mostly unavoidable. What is important is that we resolve disagreements and differing views constructively.

## **Make Differences Into Strengths**

We can find strength in diversity. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas. Being unable to understand why someone holds a viewpoint does not mean that they are wrong. Do not forget that we all make mistakes and blaming each other does not get us anywhere. Instead, focus on resolving issues and learning from mistakes.

## **Work Environment Code Of Conduct**

- Equal opportunity for all.
- No discrimination and harassment.
- No violence policy.
- Safety policy.
- No substance abuse.
- No gambling policy.
- Privacy policy.
- Misconduct explanation and policy.

## **Conflict Of Interest Code Of Conduct**

- Corporate asset contributions.
- Running for public office.
- Insider trading and financial interests.
- Investments in companies' employees do business with.
- Employee political interests.
- Significant financial interests in other companies.
- Securities transactions.
- Taking out loans.

## **Company Assets Code Of Conduct**

- Preparing, maintaining, and disclosing accurate records.
- Information security.
- Protecting communication and information technology systems.
- Protecting external communications.
- Use of company property.
- Use of property owned by others.
- Protecting intellectual property.

## **Anti-Bribery And Corruption Code Of Conduct**

- Doing business with governments.
- Choosing and maintaining service providers.
- Receiving gifts and entertainment.
- Loans, bribes, and kickbacks.
- Relationships with former employees.
- Obligations of departing and former employees.
- Interaction with competitors.
- Relationships with affiliates, international entities, and customers.

## **Dress Code**

A professional appearance is important when employees work with customers, suppliers, government bodies etc. Employees should be well groomed and dressed appropriately for the business and for their position.

## **Substance Abuse**

The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse on company property is prohibited. Being under the influence of illegal drugs, alcohol, or substances of abuse on company property is prohibited. Working while under the influence of prescription drugs that impair performance is prohibited.

## **Tobacco Products**

The use of tobacco products on company property, outside of permitted areas, is specifically prohibited.

## **Code Of Ethics And Professional Conduct**

Do the right thing – follow the law, act honourably, and treat co-workers with courtesy and respect. No matter what job you do or where you do it, think about that as you watch over every business relationship, every transaction, and every product, and make sure your actions always reflect our values. To make decisions that affect our reputation. Individual actions at work shape how the outside world views our company, which is why it is so important that we each take responsibility for our actions and thus acting ethically in all situations.

## **Build Trust And Credibility**

The success of our business is dependent on the trust and confidence we earn from our employees, customers, suppliers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honourable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do. When considering any action, it is wise to ask: Will this build trust and credibility for our company? Will it help create a working environment in which our company can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

## **Set Tone At The Top**

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behaviour does not simply happen; it is the product of clear and direct communication of behavioural expectations, modelled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, all employees must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees’ ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At our company, we want the ethics dialogue to become a natural part of daily work.

## **Proprietary Information**

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor’s trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

## **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

## **Confidential And Proprietary Information**

Integral to company’s business success is our protection of confidential company information, as well as non-public information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or non-public information about other companies, including current or potential supplier and vendors. We will not disclose confidential and non-public information without a valid business purpose and proper authorization.

## **Use Of Company Resources**

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, personal use is permissible only with prior permission as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent our company are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to non-profit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours. In order to protect the interests of the company's network and our fellow employees, company reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or company's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate. Questions about the proper use of company resources should be directed to your manager.

## **KEY TAKEAWAYS**

The above described code of ethics is a guide of principles designed to help our employees conduct business honestly and with integrity. Our code of ethics document has outlined the mission and values of our organization, how each employee is supposed to approach problems, the ethical principles based on our organization's core values, and the standards to which the employee is held. Our code of ethics encompasses areas such as business ethics, a code of professional practice and an employee code of conduct.

- Our code of ethics sets out our organization's ethical guidelines and best practices to follow for honesty, integrity, and professionalism.
- For employees of our organization, violating the code of ethics can result in sanctions including termination.