



## Purpose

The policy is intended to provide concrete guidelines for all employees with respect to expected conduct, and to avoid real, potential or perceived conflicts that would be seen as compromising the corporation's position with respect to its actions and general business decisions in the industry sectors in which it operates. This Code provides a basis for good business ethics and practices which are expected and necessary for the Technical Standards and Safety Authority (TSSA), and each individual employee.

## Scope

This policy applies to all employees of the TSSA.

## Responsibility

It is the responsibility of each employee to ensure that they perform their duties and arrange their private interests in a manner that:

- public confidence and trust in the integrity, objectivity and impartiality of TSSA and its employees are conserved and enhanced;
- all business transactions will bear the closest public scrutiny; and
- real or perceived conflicts of interest do not arise.

These obligations are not fully discharged by simply acting within the law.

When a breach of the *Code of Conduct Policy* has been reported, TSSA will conduct a review and determine if a potential, perceived or actual breach of the Code exists and take the necessary action including disciplinary action up to and including termination of employment.

## Policy

### Personal Conduct

At all times, employees will act in accordance with the TSSA values:

- LEADERSHIP - Be the best in actions and words.
- INTEGRITY - Be honest and ethical.
- RESPECT - Build trust and earn respect.
- ACCOUNTABILITY - Be responsible for all actions and deliver on all commitments.
- TEAMWORK - Work together, respect individuals and celebrate success.
- COMMUNICATION - Be an effective and efficient communicator. Be an active listener.



## Code of Conduct Policy HRP-001

All employees must conduct themselves with the highest standards of honesty and personal integrity while performing their responsibilities. In fulfilling their responsibilities, all employees shall:

- ensure open, transparent, ethical and equitable business dealings that reflect integrity, fairness, courtesy and respect for all stakeholders;
- fulfill responsibilities in an impartial and objective manner with no allowance for real, potential, or perceived preferential treatment;
- fulfill responsibilities to meet or exceed the spirit of applicable laws, policies and procedures;
- avoid and prevent at a personal level any real, potential, or perceived conflicts of interest and any real, potential or perceived personal gain or benefit; and
- ensure a work ethic that respects these guiding principles, espouses the highest ethical standards and which can withstand the closest possible scrutiny.

The following list provides some examples of actions that are unacceptable and may result in corrective action, up to and including termination:

- insubordinate behaviour including failure or refusal to perform job assignments;
- excessive absenteeism/tardiness;
- violation of safety rules and regulations;
- theft;
- dishonesty;
- disorderly conduct or use of foul or abusive language;
- falsification of corporation documents, including time sheets;
- disclosure of confidential information;
- violation of the corporation's drug and alcohol policy;
- harassment;
- physical fighting or other form of violence;
- possession of weapons on corporation premises or on his/her person during the course of TSSA business;
- misuse or removal of the equipment or property of the corporation or its employees; and/or
- unauthorized access to corporation computer systems.

The above list is not meant to be exhaustive. There may be other types of conduct that may warrant corrective action up to and including dismissal. Employees should consult their manager or Human Resources if they have any questions or if they are not sure if a behaviour is unacceptable.

### **Respect in the Workplace**

TSSA is dedicated to providing a workplace that is free of harassment. Any form of harassment on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, disability, creed, sex, sexual orientation, marital status, family status, age or record of offences is prohibited, and such action is viewed as extremely serious misconduct. Additional direction is provided in TSSA's *Respect in the Workplace Policy*.

### **Environmental Responsibility**

TSSA is committed to conducting all business operations in an environmentally responsible manner. It is the responsibility of each person to incorporate environmental considerations into corporate decision-making. The corporation will comply with the letter and spirit of all environmental legislation in the conduct of its business.



## Political Participation

TSSA leaves decisions about individual expressions of political activity, on their own time, as personal, voluntary matters for its employees. TSSA expects that no untoward relationships or endorsements will be raised or implied that inappropriately links the corporation to such personal political beliefs or practices.

## Conflict of Interest

A conflict of interest may be actual, potential or perceived and can be described as:

- Any situation, activity, action or interest that may negatively impact or affect the ongoing success or reputation of TSSA;
- Any situation, activity, action or interest that may negatively impact financial success or gains of TSSA; and/or
- An activity that negatively impacts the manner in which an employee carries out their official TSSA responsibilities.

When a conflict of interest exists, it can undermine the success of TSSA or compromise its reputation.

Every employee must, therefore ensure that a conflict does not exist and exercise diligence to avoid entering into situations in which his/her personal interest might conflict with or be perceived to be in a conflict with those of TSSA. More specifically, employees should avoid acquiring an interest or participating in activities that create an obligation that would adversely affect their judgement or ability to act in TSSA's best interests, or would tend to deprive TSSA of the time or attention required to perform their duties properly.

Employees shall not have private interests that would particularly or significantly affect or be affected by TSSA's actions in which they participate. If such a conflict does arise between the private interests of an employee and his/her employment duties and responsibilities, the conflict shall be resolved in favour of the corporation's interest.

Each employee is responsible to report any potential conflict of interest to his/her manager or the Director of Human Resources. If an employee is unsure whether a conflict exists, he/she is responsible to request clarification from the Director of Human Resources.

When a conflict has been reported, the Human Resources Department will conduct a review and determine if a potential, perceived or actual conflict exists. It is then the employee's responsibility to resolve and eliminate the conflict immediately, and provide proof that the conflict has been resolved. The Human Resources Department can assist in exploring appropriate compliance measures.

In a situation where the conflict has been ongoing and/or the employee did not disclose the conflict, disciplinary action up to and including termination may result.

## Entertainment, Gifts and Payments

TSSA values its reputation for integrity and every employee must deal with customers, suppliers and other third parties in a way that maintains and is not perceived to impair that reputation. At the same time, TSSA wishes to maintain strong working relationships, including acceptable hospitality, business courtesy and social conduct.

No employee will offer or provide on behalf of TSSA, or accept on behalf of TSSA or the employee, any gifts, entertainment or payments or any amount of money to or from any current or prospective supplier, customer,



subcontractor, competitor or any public official, or to their representatives, nor pay them directly or indirectly any commissions or fees which:

- are excessive in relation to the services rendered from the perspective of the employee, the third party or the public;
- are inappropriate in terms of usual, accepted and responsible business practice;
- may result in personal benefit to a TSSA employee and/or their family; and
- might reasonably be seen or are intended as an inducement to violate the employee's duties or to obtain inappropriate or favourable treatment.

Employees shall not solicit or accept transfers of economic gain or benefit. Acceptance or payment of a gift in cash or cash equivalent, such as a gift card, in any amount is prohibited.

Employees are required to make all reasonable efforts to comply with this requirement.

Full and immediate disclosure to TSSA management of suspicious, unusual or questionable cases will always be taken as an indication of good faith compliance with the Code.

Employees shall not step out of their official roles to assist private entities or persons to obtain preferential treatment in their dealings with TSSA.

Employees shall not act, after they leave the employment of TSSA, in such a manner as to take improper advantage of their previous employment with TSSA, nor as a consequence of such prior employment to cause others to receive preferential treatment by TSSA.

### **Confidential Information**

Employees shall not, during their term of employment or thereafter, knowingly take advantage of, or benefit from, information that is obtained in the course of their official duties and responsibilities and that is not generally available to the public nor use any such information in a manner that is inconsistent with the best interests of TSSA and the proper fulfillment of their employment responsibilities. In carrying out business activities, TSSA's employees may become knowledgeable about information or documents of a private, confidential or proprietary nature relating to TSSA's activities or to a customer, supplier or competitor. Any such information or documents will be treated as private and confidential.

All employees are bound by the *Technical Standards and Safety Act, 2000* and TSSA's Access and Privacy Code. These obligations and duties on employees respecting confidential information and documents will continue even after their employment relationship with TSSA has ended.

### **Intellectual Property**

Employees must make full disclosure of all discoveries, ideas and inventions made within the scope of TSSA's business while in the employ of TSSA. Such discoveries, ideas and inventions, including intellectual property rights, belong to and are the property of TSSA.

When an employee ends his/her business relationship with TSSA, all information, documents and records (including computer records, correspondence, contracts and telephone files) belonging to the corporation must be returned.

### **Whistleblowing**



## Code of Conduct Policy HRP-001

The Code emphasizes the TSSA policy that all TSSA employees must follow the highest standards for professional responsibility, business integrity and ethics, and at all times demonstrate respect for and be in compliance with all applicable laws and regulations. TSSA expects that employees will perform their duties conscientiously and in a manner that will not put personal interests in conflict with the best interests of TSSA.

TSSA is committed to high standards of transparency and accountability in its operations. TSSA's *Internal Disclosure of Information Concerning Wrongdoing in the Workplace* ("Whistleblowing") Policy outlines the internal process by which employees can bring forward information concerning any wrongdoing (as defined in the policy), and ensures that they are treated fairly and are protected from reprisal when they do so in a manner consistent with the policy.

### Compliance

All employees are required to review their obligations under this policy and sign a document certifying that they have read and understood this policy and that, as a condition of employment, they will adhere to it. The corporation may require periodic re-signing to ensure all employees remain aware of the requirements and obligations under this policy. In addition, employees must advise the corporation of any changes or perceived conflicts which may arise during their employment as soon as they arise. Such information should be made available to the employee's manager and the Human Resources Department. Employees may also contact their senior management team member or the Human Resources Department for advice/clarification as to what may constitute a violation of this policy.

The standards set forth in this Code of Conduct Policy are extremely important to TSSA and must be taken seriously. Anyone found to be violating a provision of the Code without having reported it to the corporation with the intention of resolving the violation will be subject to disciplinary action, up to and including dismissal. These disciplinary actions will apply equally to everyone regardless of what title or position they hold within TSSA.

### Policy Administration

#### References and related policy administration documentation:

- **TSSA Respect In The Workplace Policy**
- **TSSA Internal Disclosure Of Information Concerning Wrongdoing In The Workplace Policy**
- **TSSA Code of Conduct Declaration Form**
- **TSSA Access and Privacy Code**