



New Realm Vocational & Management Services Inc.

CODE OF CONDUCT & ETHICS POLICY

The **New Realm Vocational & Management Services Inc. (NRVMS)** *Code of Conduct & Ethics Policy* applies to all management and employees of the organization. The Code reflects a commitment to (NRVMS') values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of the company. Resources are expected to behave in a way that aligns with said code. All parties involved with (NRVMS) understand that this code does not cover every specific scenario, and as a result, said parties use the spirit and intent behind this document to guide their conduct, and exercise care and diligence in the course of their work with and for (NRVMS). To demonstrate commitment to transparency and accountability, this document is available to the public on the (NRVMS) website (www.newrealm.ca).

CORE VALUES

Respect:

- We respect our colleagues; clients; persons served; suppliers; community; and the environment. We treat them as we wish to be treated.

Ownership:

- We take pride in meeting our commitments (both personally and professionally).

Integrity:

- We will act honestly and ethically in all that we do.

Innovation:

- We are passionate about the development leading edge solutions that exceed our clientele's objectives and requirements.

Teamwork:

- We work together in a stimulating and supportive environment that inspires us to grow and achieve excellence.

Guiding Principles:

- These principles guide the behaviour and decisions of the (NRVMS) management process and resources utilized:
 - (a) The actions and decisions of management and employees are made to promote the best interests of our clients/persons served and to advance the mandate and long-term interests of the company.

- (b) Members and employees are responsible professional experts of information entrusted to us.
- (c) Management and employees have a responsibility to uphold the company's vision and mission statement.
- (d) Management and resources have a responsibility to act in good faith and to place the interests of the company, our clients and persons served above their own private interests.
- (e) Management and resources will behave in a way that demonstrates that their behaviour and actions are fair and reasonable in the circumstance.
- (f) When a manager, director or employee, as an individual, is subject to more than one code of conduct, the resource must consider the expectations in all. Resources understand that this policy is not intended to conflict with other Codes of Conduct, and will discuss any potential conflicts with their supervisor.
- (g) Resources are familiar with the (NRVMS) Conflict of Interest Policy and know that when they become aware of a real or apparent conflict of interest, they must at the first opportunity disclose said conflict. Resources understand that disclosure in itself does not remove a conflict of interest.
- (h) All resources will encourage their colleagues to act fairly and ethically and know that they are able to raise concerns about a suspected breach by another without fear of reprisal.
- (i) Resources know that breaches of this code/policy may result in disciplinary action, up to and including termination.
- (j) Resources know that if they have any questions about this policy, or are not sure how to apply these principles, they should consult with their supervisor or (NRVMS) management.
- (k) Each resource will confirm annually their understanding of, and commitment to, these expectations.

Behavioural Standards:

- Behavioural standards help resources make appropriate decisions when the issues they face involve ethical considerations.
- Behavioural standards cannot cover all scenarios but provide guidance in support of day-to-day decisions.

- All resources must adhere to the following standards:
 - (i) Resources must not engage in any criminal activity and comply with all relevant laws, regulations, policies and procedures.
 - (ii) Resources must not use their status or position with the company to influence or gain a benefit or advantage for themselves, their families, their business associates or others with whom they have a significant personal or business relationship.
 - (iii) Resource conduct contributes to a safe and healthy workplace that is free from discrimination, harassment or violence.
 - (iv) Resources must not use drugs or alcohol in a way that affects their performance and safety or the performance and safety of their colleagues, clients, and persons served or that negatively impacts the reputation or operations of the company.
 - (v) Members and employees must act in a way that is consistent with the company's protocols.
 - (vi) Resources must take reasonable steps to avoid situations where they may be placed in a real or apparent conflict between their private interests and the interests of the company. In other words, actions or decisions that resources take on behalf of (NRVMS) must not provide them with an opportunity to further the private interests of themselves, their families, their business associates or others with whom they have a significant personal or business relationship.

Confidential Information:

- Members and employees must respect and protect confidential information, use it only for the work of the company and do not use it for personal gain. Members and employees must comply with protocols that guide the collection, storage, use, transmission and disclosure of information.

Gifts and Gratuities:

- Members and employees must not accept or receive gifts and gratuities other than the normal exchange of gifts between friends or business colleagues, tokens exchanged as part of protocol or the normal presentation of gifts to people participating in public functions.

Outside Activities:

- Members and employees must avoid participating in outside activities that conflict with the interests and work of (NRVMS). For example:
 - a. Business Interests: Members and employees must not hold interests in a business directly or indirectly through a relative or friend that could benefit from, or influence, the decisions of (NRVMS).

- b. Employment: Resources must not take supplementary employment that affects their performance or impartiality with the company.
- c. Political Activity: Resources may participate in political activities including holding membership in a political party, supporting a candidate for elected office or seeking elected office. However, they must not use their position with the organization to seek contributions for a political party or activity from current or future clients or entities doing business with the company. In addition, any political activity must be clearly separated from activities related to the work for (NRVMS) and they, must not be done while carrying out the work of the company. Additionally, they must not make use of NRVMS facilities, equipment or resources in support of these activities. If a resource is planning to seek an elected municipal, provincial or federal office, they must disclose their intention in writing as soon as possible for guidance relating to their duties with the company.
- d. Volunteer Activity: If members and employees are involved in volunteer work, the activity must not influence or conflict with decisions relating to the company.

Pre-Separation:

- Resources considering a new offer of appointment or employment must be aware of and manage any potential conflicts of interest between their current position and their future circumstance, and must remove themselves from any decisions affecting their new appointment or employment.

Post-Separation:

- Once members and employees have left NRVMS, they must not disclose confidential information that they became aware of during their time with NRVMS and must not use their contacts with their former colleagues to gain an unfair advantage for their current circumstance. An Exit Interview will be undertaken to review the terms and conditions of the Privacy and Confidentiality Agreement.

Property:

- Employees will not use company facilities for personal or private use. This includes fax, copiers, printers, internet and phone. Administrative processes help resources manage ethical dilemmas, including any real or apparent conflict of interest concerns. Resources are encouraged to review individual company policies regarding Conflict of Interest, Privacy, Confidentiality and the Employee Handbook.

- (I) Administration: Directors, Managers or Supervisors will receive and ensure the confidentiality of all disclosures and ensure that any real or apparent conflict of interest is avoided or effectively managed. This policy will be reviewed with each resource during the On-Boarding (hiring) process and at minimum annually therein.

- (II) **Disclosure:** It is the responsibility of each resource to declare in writing those private interests and relationships that they think could be seen to impact the decisions or actions they take on behalf of the company. When there is a change in their responsibilities within the company or in their personal circumstance, members and employees shall disclose in writing any relevant new or additional information about those interests as soon as possible. Where a real or apparent conflict of interest cannot be avoided, employees must take the appropriate steps to manage the conflict.
- (III) **Reporting a Potential Breach by Another:** Resources are encouraged to report in writing a potential breach by another to their supervisor. When reporting a potential breach in good faith and with reasonable grounds, resources are protected from retaliation for such reporting.
- (IV) **Responding to Potential Breach:** Once a potential breach has been reported, company's procedures for responding to and managing a potential breach will be promptly initiated. Management will review the circumstance and details of the potential breach and will notify the alleged resource. The alleged employee has the right to complete information and the right to respond fully to the potential breach. The identity of the reporter will not be disclosed unless required by law or in a legal proceeding. Dependent on the severity of the breach, management or the COO makes a decision and completes a report in a timely manner. The decision may range from finding no potential breach to one that reveals suspected criminal conduct.
- (V) **Consequences of a Breach:** Resources who do not comply with the standards of behaviour identified in this policy, including taking part in a decision or action that furthers their private interests, may be subject to disciplinary action up to and including removal or termination of the employee.
- (VI) **Review of a Decision:** An employee can request in writing that the President / CEO review the decision made regarding a breach of the company's Code of Conduct.

Questions to Consider:

- When resources are faced with a difficult situation, the following questions may help them decide the right course of action:
 - Q: Have I reflected on or consulted with my manager about whether I am compromising the Code's values, principles or behavioural standards?
 - Q: Have I considered the issue from a legal perspective?
 - Q: Have I determined whether my behaviour aligns with a policy or procedure of the company?

- Q: Could my private interests or relationships be viewed as impairing my objectivity?
- Q: Could my decision or action be viewed as resulting in personal gain, financial or otherwise?
- Q: Could my decisions or actions be perceived as granting or receiving preferential treatment?