



# Code of Ethical Conduct

November 24,  
2022

Document Number: OMS 1.4-CORP-POL-001

Final

Version: 4.0

Process Owner: Laurel Towler, Human Resources Specialist

Security Class: OWA

Parent Document: OWA Operations Management System Standard (OMS 1.0-CORP-STD-001)

Reviewed by: Lars DePauw, President

Approved By: OWA HR & Compensation Committee

## Table of Contents

1.0	Introduction.....	2
1.1.	Purpose .....	2
1.2.	Scope.....	2
2.0	Application.....	2
2.1.	General Principles .....	2
2.2.	Guidelines .....	3
2.2.1.	Confidentiality and Information Security.....	3
2.2.2.	Staff Records .....	4
2.2.3.	Requests for Staff Information .....	4
2.2.4.	Public Statements and Social Media.....	5
2.2.5.	Disclosure .....	5
2.2.6.	Health, Safety, Security and Environment (HSSE).....	5
2.2.7.	Gifts and Gratuities .....	6
2.2.8.	Business Expenses.....	7
2.2.9.	Maintaining Complete, Accurate and Timely Business Records.....	7
2.2.10.	Equal Opportunity.....	7
2.2.11.	Respectful Workplace .....	7
2.2.12.	Nepotism.....	8
2.2.13.	Off-Duty Conduct .....	8
2.2.14.	Conflicts of Interest.....	8
2.2.15.	Outside Employment and Volunteer Activities.....	9
2.2.16.	Staff Conducting Business with the Association .....	9
2.2.17.	Dress and Grooming Standards .....	9



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

2.2.18. Working with Reputable Business Partners..... 10

2.2.19. Competitors ..... 10

2.2.20. Personal Property and Association Search Rights ..... 11

2.2.21. Association Property ..... 11

2.2.22. Acceptable Use of Technology ..... 11

2.3. Compliance And Consequences .....12

2.4. Whistleblower Process And Contacts .....12

2.5. Follow Up and Investigation Process .....13

2.6. Amendment .....13

3.0 Revision History .....13

## 1.0 Introduction

This section provides the purpose of this document along with the scope of what is included in the document and where to find relevant information. The terms used in this document are defined in the OMS Terminology List (OMS 7.2-CORP-TOL-003).

### 1.1. Purpose

This document is to ensure a clear understanding of the standards that govern professional conduct and decision making at the ALBERTA OIL AND GAS ORPHAN ABANDONMENT AND RECLAMATION ASSOCIATION (the “OWA” or “Association”) in accordance with the OWA Operations Management System Standard (OMS 1.0-CORP-STD-001).

The Code is intended to focus on areas of ethical risk, providing guidance to help recognize and deal with ethical issues, mechanisms to report unethical conduct, and guidance for all employees and contractors when they are faced with making decisions. It is a serious violation of our Code of Ethical Conduct for staff to conduct themselves in a manner that is contrary to the expected behavior norms.

### 1.2. Scope

This policy is applicable to all employees, contractors and visitors/guests of the OWA (collectively referred to as “staff” for purpose of this policy) carrying out work directly or indirectly for the Association.

## 2.0 Application

Training requirements associated with the processes outlined in this document are provided in the OMS Awareness, Training & Competency Standard (OMS 3.1-CORP-STD-001).

### 2.1. General Principles

- The highest standards of integrity and trustworthiness are expected from all staff. Conduct that compromises one’s reputation as an honest, trustworthy and competent individual must be



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

avoided. When faced with difficult decisions, choices must be made that are morally and legally correct and that also stand the test of public scrutiny. Conduct is questionable and may be improper if it could reasonably result in valid allegations or criticism from others. Conduct that adversely affects the interests of the OWA or that is not compliant with established policies or that adversely affects an individual's ability to carry out their contractual duties could result in disciplinary action, up to and including termination of their employment or engagement with the OWA.

- Staff are responsible for their conduct at all times and are accountable for all decisions that they make.
- This Code of Ethical Conduct outlines the principles and standards of conduct that should guide the behavior of all OWA staff. These principles and standards provide general guidance to deal with specific issues or problems that may arise; they are not exhaustive and are not intended to cover all possible situations that could arise.
- All professionals who are governed by a regulatory body that has adopted a code of conduct/ethics for its membership must abide by their professional code of conduct/ethics in addition to that of the OWA.
- The onus for reporting an ethical concern always rests with the staff member. Concerns should be reported using one of the methods outlined in Section 2.4 of this Code of Ethical Conduct.

## 2.2. Guidelines

### 2.2.1. Confidentiality and Information Security

The OWA is committed to ensuring the privacy, confidentiality and integrity of the information we collect, use and disclose in our business operations.

Any product or technology developed by staff in performing their job responsibilities with the Association is the property of the OWA.

Staff must sign a contract and a confidentiality agreement. Breach of the terms of the contract, the confidentiality agreement or any policy will result in corrective action.

To maintain the integrity and confidentiality of the OWA, confidential information or material may not be used inappropriately or disclosed to unauthorized persons during the term of service with the OWA or thereafter. It is a serious violation of our Code of Ethical Conduct for any staff to release confidential information or Association documents to unauthorized persons, news media or other outside agencies, or to make public statements or provide press releases on behalf of the OWA without the express written permission of the President. "Confidential Information" includes any information, documents or communications of any nature in relation to any aspect of the OWA or any of its associated entities (including contractors and landowners), provided to staff or learned by the staff directly or indirectly in the course of their employment or service engagement; including but not limited to any document, note, plan, drawing, formula, model, financial information, rates, marketing information, data, process, procedure; including any of the aforesaid which may be oral, written, recorded, stored or electronic; which may be in original form, copied, re-compiled, modified or otherwise translated.



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

Staff must take routine precautions to safeguard the privacy of confidential information and immediately report suspected violations of this standard to their supervisor/designated contact and the President. A supervisor or other employee who is advised of or becomes aware of a possible confidentiality breach must notify the President of this immediately. This information includes but is not limited to:

- use of another staff member's user identification
- use of another staff member's password
- attempted use of a user identification for unauthorized purposes
- provision of a user identification or password to any individual other than the designated user.

This policy applies to all systems, including passwords for OWA applications, systems, personal computers and e-mail. The Association reserves the right to monitor work areas to confirm compliance with this policy.

## 2.2.2. Staff Records

The Association collects and retains personal information about staff that is relevant to their employment or engagement, satisfies government reporting regulations and is necessary for payroll and benefits processing and expense reimbursement. Records are maintained on all current and past staff members in accordance with provincial legislation and the OWA Privacy Policy. Access to individual staff records is restricted to the specific staff member, accounting, payroll and management. Staff members and former staff members wishing to view their personal staff files must submit written requests to the President.

Staff are required to ensure that all personal information retained in their personal file is always current, and to provide updated information in writing to the designated payroll administrator as necessary.

Staff members whose duties are performed in accordance with a professional license are required to maintain their professional licenses and to provide copies of the renewed licenses to the designated payroll administrator each year.

## 2.2.3. Requests for Staff Information

It is the policy of the Association for all inquiries made by outside parties concerning the employment or engagement of past or present staff members to be directed to a member of management to respond accordingly. The only information that may be provided by telephone is confirmation of dates of employment/engagement and positions held during the service period. Other private or confidential information (e.g., compensation details, comments on performance, contact details, etc.) may only be released with prior authorization from the staff member.

It is a breach of this policy for staff outside of the management team or Human Resources to release information related to past or present staff members. Written recommendations or reference letters may only be issued by the team member's immediate supervisor/service contact, based on authorization from the President.



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

## 2.2.4. Public Statements and Social Media

Public statements on behalf of the Association may only be made by a designated spokesperson. Staff who are approached by the news media to provide information and/or interviews concerning OWA practices or operations must immediately refer all such requests to the President.

OWA staff using Social Media in any capacity may not disclose any business, health and/or personal information of any other OWA staff, or another aspect of their position within the OWA that they are not specifically authorized to disclose. Staff must use their personal non-OWA email address when using a personal Social Media account and make reasonable efforts to indicate that their Social Media use is in a personal capacity rather than as a representative of the OWA.

## 2.2.5. Disclosure

Neither the OWA nor any of its staff may knowingly engage in, facilitate or benefit from any illegal transaction or activity. Participating in such activities puts the Association at risk and potentially exposes the Association and/or its staff and other stakeholders to serious legal and regulatory consequences and reputational damage.

Staff must promptly advise their supervisor/designated contact if they are charged with any serious breach of trust or other serious violation of the law, including any offence under the Criminal Code (Canada) or the Controlled Drugs and Substances Act (Canada). A charge is a serious violation of the law if an independent third party might reasonably take the view that it brings into question the staff member's ability to perform their duties and responsibilities and includes loss of a license or permit to practice such as a driver's license or membership of a professional association where this is required for the competent performance of the staff member's duties. Staff are also obliged to advise their supervisor/designated contact of the outcome of any such charges.

Staff who are governed by professional regulatory bodies also have an obligation to advise their supervisor/designated contact if their professional license lapses, and of any investigation or charges being pursued against them by such regulatory bodies that could directly affect their ability to fulfill their duties and responsibilities to OWA, as well as any suspension or revocation of accreditation or certification resulting from such investigation or charges.

Supervisors/designated contacts must discuss such disclosures with the President who will determine an appropriate course of action based on the circumstances.

## 2.2.6. Health, Safety, Security and Environment (HSSE)

The OWA is committed to protecting the health and safety of staff and to monitoring activities so they are not harmful to the environment or the community. This commitment to HSSE is always our highest priority. To uphold this commitment and maintain high safety standards, the OWA expects all staff to take responsibility for their own safety and the safety of their coworkers. In demonstrating this responsibility, staff must:

- Report fit for OWA business and remain fit for OWA business during working hours,
- Comply with OH&S legislation,
- Comply with all safety rules established by our service providers/Prime Contractors,



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

- Comply with all safety policies, procedures and instructions,
- Immediately stop or intervene in any work that is unsafe,
- Conduct regular and proper risk assessments and report their concerns to their supervisor/ designated contact,
- Promptly report any unsafe working conditions, near misses, incidents, injury or illness, and
- Participate in safety training when required.

Possession of dangerous or unauthorized materials such as explosives or firearms in the workplace, working while impaired, smoking/vaping in the workplace and possession, distribution, sale, transfer or use of unauthorized substances in the workplace or while on duty are violations of this Code of Ethical Conduct.

The OWA recognizes that OWA staff may have a clinical need to take prescription and non-prescription medications for their health and wellbeing. OWA staff are required to use all prescription and non-prescription medications responsibly and in accordance with the instructions of an authorized prescriber or manufacturer, or in the case of cannabis for medical purposes, the medical documentation for that cannabis. The use of medications that inhibit the ability of OWA staff to perform OWA business safely and productively, the possession of prescription medications which were not prescribed to them or cannabis for medical purposes without medical documentation, are prohibited.

Please refer to the Health, Safety, Security and Environment Policy for further details.

## 2.2.7. Gifts and Gratuities

Staff must not accept or grant any gift, perquisite benefit or other fee or favor which may be intended or perceived to be intended to influence or be provided in exchange for a favor or advantage to a third party conducting or wishing to conduct business with the OWA.

To preserve the image and integrity of our staff and the Association the following guidelines shall be followed:

- Business gifts other than tokens of small intrinsic value (\$100 or less) may not be accepted from suppliers or potential suppliers, nor given to vendors. All gifts/tokens with a value exceeding \$100 must be disclosed to and discussed with the President before they are given or accepted.
- Reasonable hospitality is an accepted courtesy of a business relationship and does not need to be disclosed. "Reasonable hospitality" is hospitality that in the normal course of business may be reciprocated by the staff member or client, which may include infrequent meals, invitations to attend occasional sporting events, etc. If invitations from specific vendors become more routine and/or frequent they must be disclosed to and discussed with the President before they are accepted.
- To avoid a conflict of interest, the appearance of a conflict of interest, or the need for staff to examine the ethics of acceptance of gifts and/or hospitality, gifts and/or hospitality may not be accepted from vendors, suppliers, customers, potential employees, potential vendors or suppliers, or any other individual or organization, while any bid or proposal process is active (e.g., RFI, RFP, RFQ), irrespective of the value of such gift or gratuity. This does not apply to staff when



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

a bid or proposal is being reviewed by a different OWA department or functional group than their own.

- The frequency and nature of gifts or hospitality accepted or given should not be allowed whereby the recipient (staff member or vendor) might be or might be deemed by others to have been influenced in making a business decision because of accepting such hospitality or gifts.
- Staff shall not give or receive business gifts containing cannabis.
- Staff shall not solicit suppliers for business gifts or hospitality for personal benefit.
- Cash or near-cash gifts (e.g., gift cards) in any amount may not be accepted or given in any circumstance without prior approval from the President.

## 2.2.8. Business Expenses

Staff who incur expenses on behalf of the Association must comply with the requirements outlined in the Travel and Expense Policy (OMS 1.4-CORP-POL-005).

## 2.2.9. Maintaining Complete, Accurate and Timely Business Records

Complete, accurate and timely business records are vital to transparent and reliable communication of the Association's financial and operational status. The OWA relies on staff to ensure that all business records, including financial, human resources, payroll, project and environmental records and reports accurately reflect the underlying facts and figures and comply with applicable standards, regulations and internal controls. Falsification of records is considered an offence under this Code of Ethical Conduct.

## 2.2.10. Equal Opportunity

The OWA is committed to promoting equal opportunities in all dealings with staff, suppliers and others. The OWA abides by the non-discrimination and Human Rights legislation in the jurisdictions it operates in. These laws often prohibit discrimination on various Human Rights grounds, such as race, national origin, religion, age, gender, marital status, sexual orientation and disability. This is not a complete list and staff are required to be familiar with those that apply in their jurisdiction.

## 2.2.11. Respectful Workplace

The OWA is committed to providing a safe, positive, professional and respectful work environment for all staff that is free from any disrespectful conduct including:

- Discrimination on any Human Rights grounds (as outlined in relevant federal and provincial Human Rights legislation).
- Fighting or threatening violence in the workplace.
- Boisterous or disruptive activity in the workplace.
- Harassment, including sexual harassment or other unlawful or unwelcome advances or disrespectful conduct.

Disrespectful behavior toward a fellow staff member or others that a staff member interacts with on behalf of the Association is prohibited and will not be tolerated under any circumstances. Any complaints of harassment or other disrespectful or inappropriate behavior will be promptly, thoroughly and impartially managed.



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

Please refer to the Respectful Workplace Policy for further details.

## 2.2.12. Nepotism

Subject to the requirements of any applicable human rights legislation, business is conducted fairly and free from nepotism and the OWA intends to avoid situations that could be seen as nepotism. All business encounters will be undertaken in a fair and impartial manner including hiring, promotions, performance appraisals and discipline.

Two members of a family may work in the same group provided there is no opportunity to exercise favoritism and no chance for one to benefit from the other's decisions.

## 2.2.13. Off-Duty Conduct

Although off-duty conduct is generally a private matter, some activities can have a significant impact on the OWA, its business reputation, stakeholder relations and/or the workplace environment. Off-duty conduct will be considered a work-related matter if the conduct:

- detrimentally affects the OWA's reputation.
- renders the staff member unable to properly discharge his or her employment or engagement obligations.
- causes other staff members to refuse to, or be reluctant to, work with that staff member.
- inhibits the Association's ability to effectively manage and direct service delivery.

Any staff member who is charged with or found guilty of a criminal offence must immediately notify his/her immediate supervisor. Staff engaging in detrimental off-duty conduct which is considered a work-related matter may be subject to discipline up to and including termination of their employment or engagement with the OWA.

## 2.2.14. Conflicts of Interest

Staff must act in the best interests of the Association and avoid any situations that involve, or may involve, a conflict between their personal interests and the interests of the Association. Such conflict may be seen as just cause for termination of employment/engagement. Staff working with customers, suppliers, contractors, competitors or any other individuals engaged in or seeking to engage in business with the OWA must avoid creating or being placed in situations which could compromise the OWA's relationships with its team, vendors, other stakeholders, suppliers or contractors or damage the Association's reputation.

Examples of a conflict of interest include but are not limited to:

- ownership by a staff member or by a member of their family of a direct interest in any outside enterprise that does or seeks to do business with or is a competitor of the OWA.
- serving as a Director, Officer, Partner, Consultant or in a managerial or technical capacity with an outside enterprise that does or is seeking to do business with or is a competitor of the OWA. Exceptions to this rule can be approved only by the President and will be executed only in writing.



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

- acting as a broker, finder, go-between, or otherwise for the benefit of a third party in transactions involving or potentially involving the OWA or its interests; and/or
- any other arrangements or circumstances, including family or other personal relationships, including those with customers, associates, or competitors, which might dissuade the staff member from acting in the best interest of the Association.

Personal activities must not interfere or conflict with a staff member's duties and responsibilities and should be conducted during scheduled breaks or outside of working hours.

Where there is any conflict of interest, whether actual, potential or perceived, it is essential that this be immediately declared and discussed with the President.

## 2.2.15. Outside Employment and Volunteer Activities

Staff may take supplementary employment, including self-employment, and participate in volunteer activities while employed at the OWA, unless such pursuits:

- cause an actual or perceived conflict of interest,
- are performed in such a way as to appear to be an official act or to represent an OWA opinion or policy,
- interfere through telephone calls, conflict with the scheduled work hours of the staff member and as such conflict with the performance expectations under a staff member's OWA contract of employment or contract for service, or interfere in other ways with regular duties, or
- involve the use of OWA premises and equipment except as stated under Sections 4.21 and 4.22 of this Code.

Before accepting any supplementary employment or participating in a voluntary activity where an actual or perceived conflict of interest might arise, staff must discuss the situation with their designated contact.

Staff cannot accept additional compensation for duties performed during or arising from their OWA responsibilities. Staff must not allow the performance of their official duties to be influenced by offers of future employment/engagement or the anticipation of offers of employment/engagement nor may they use their position or OWA premises or equipment to solicit services as a private consultant.

## 2.2.16. Staff Conducting Business with the Association

The practice of staff conducting business with the Association which is outside of their employment/service relationship is generally discouraged but is allowed with express approval from the President. If authorized, such business transactions must meet the highest possible test of transparency.

## 2.2.17. Dress and Grooming Standards

As the business world continues to change and to support a positive work environment, OWA recognizes the need to embrace a policy to support staff to work comfortably and productively. Staff are responsible for exercising reasoned judgment for their attire and grooming including when working from home and are expected to maintain a professional presentation. The following guidelines are provided for staff and are applicable when working in office or remotely:



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

- Staff should always dress appropriately for the job at hand.
- Business suits, sport jackets and ties are optional (for those who wish to wear them).
- Athleticwear, yoga pants, loungewear and other similar attire have no place in the office.
- Smart jeans (e.g., not shredded or torn) may be worn even when working at the OWA office – but when staff have in-person meetings with non-OWA people, more formal but still comfortable clothing (dress pants/chinos/khakis/casual slacks or equivalent) is required. This expectation is not applicable to Casual Fridays when smart jeans may be worn even if external meetings are occurring.
- Dress shoes are required when working in the office – Birkenstocks, flip-flops and other overly casual shoes are not permitted.
- Ballcaps, hoodies and t-shirts, torn clothes, ripped jeans, sundresses (for those who use she/they pronouns), tank tops and clothing with spaghetti straps are not permitted as they are not the best expression of our professional selves.

Supervisors/designated contacts will provide coaching for staff not deemed to be complying with the intent of this policy. Staff may be asked to modify their dress and/or attend to appearance or grooming, should a concern arise. Staff are responsible for making up any time lost to comply with this policy.

## 2.2.18. Working with Reputable Business Partners

The Association takes great care in building strong relationships with reputable clients, suppliers, subcontractors and other business partners. We collaborate with partners that share our values and demonstrate a high standard of business conduct. We do not knowingly enter into relationships with those who operate in violation of applicable laws and regulations. Before entering a contract or commitment with a business partner, staff must receive all necessary internal approvals, including legal review (where applicable) and conduct a review of the potential partner's reputation, ownership, health and safety performance, qualifications, experience, creditworthiness, governance and business conduct frameworks.

## 2.2.19. Competitors

The Association is committed to conducting all business transactions in compliance with all applicable laws and regulations and will not engage in illegal or unethical business activities. The OWA expects its staff to maintain the highest standards of integrity in their relationships with competitors and other stakeholders. Staff are prohibited from conducting any activity that improperly reduces or eliminates competition in the marketplace.

Staff must refrain from entering into any illegal arrangement, agreement or understanding with a competitor or supplier concerning prices, contract terms or bidding practices, or which may influence prices, contract terms or bidding practices. Staff must also refrain from obtaining a competitor's trade secrets, proprietary or confidential information through illegal or unethical means.

Staff are also directed to refrain from publicly expressing any disparaging comments about a competitor or vendor's products, services or business practices.



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

## 2.2.20. Personal Property and Association Search Rights

The Association is not responsible for the damage or theft of any personal property on its premises or at a work location. In addition, the OWA reserves the right to search/inspect Association property with or without notice, when there is a business or safety need.

Any property that supports a breach of compliance may be confiscated. Any property that is determined by the OWA to be illegal may be provided to appropriate law enforcement agencies.

Any staff member who impedes any search/inspection, or who is found to be in breach of compliance or possessing any unauthorized articles, may be subject to corrective action.

## 2.2.21. Association Property

Staff are required to faithfully account for, and deliver to the Association, all monies, securities, equipment, supplies, records (including employee/contractor and corporate records) and other property which they may from time to time receive from, or on behalf of, the OWA. Staff are responsible for exercising due care and attention, making appropriate use of, and protecting all OWA owned or leased property that is entrusted to them. Negligence or improper conduct leading to damage of OWA property will not be tolerated.

The use of Association property including time, facilities, vehicles, equipment, computer & other electronic devices, tools & supplies or other material is permitted only when performing Association duties, unless expressly authorized by the OWA. Theft or unauthorized or inappropriate removal or possession of property is considered a violation of this Code of Ethical Conduct that is subject to disciplinary action up to and including termination of their employment or engagement with the OWA with or without notice.

If they leave the service of the OWA, staff must deliver to the Association all books, records, documents, equipment, effects, monies, securities, computers and other electronic equipment or devices, telephones, or other property belonging to the OWA or for which the OWA is liable or responsible.

## 2.2.22. Acceptable Use of Technology

Staff must use all technology supported by the OWA in a manner that is consistent with this Code of Ethical Conduct and the Association's Information Technology policies, and which furthers the OWA's business interests.

Internet/Intranet-related systems, including but not limited to computer equipment, software, operations systems, cloud-based and other storage media, network accounts providing electronic mail, internet browsing, and FTP (the "Systems"), are considered the property of the OWA. These Systems are to be used for business purposes in service of the interests of the OWA, and of our clients and customers during normal operations. Limited and reasonable personal use of OWA computer resources is acceptable provided it does not interfere in any way with normal business or conflict with any Association policies, practices or values.

Unacceptable use, including viewing, downloading, distributing or printing any material that is illegal or inappropriate, as defined in the OWA's Information Technology policies, will not be tolerated. Staff should



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

be aware that computer-based activities are subject to monitoring for security purposes and for acceptable use, and this monitoring extends to personal devices which are routed through OWA networks. Staff must understand that use of OWA resources implies consent to monitoring and that there is no expectation of privacy.

## 2.3. Compliance And Consequences

Compliance with this Code of Ethical Conduct and all OWA policies is a condition of service for all OWA staff. The Association reserves the right to audit compliance with the Code of Ethical Conduct and any OWA policy from time to time. Employees and contractors to the OWA must sign an annual acknowledgement that they have read, understand and agree to comply with the principles of the Code of Ethical Conduct. Failure to read and understand the Code or any policy, or failure to sign the acknowledgement, does not excuse a staff member from compliance with the policy.

Conduct contrary to the Code or in contravention of any OWA policy may result in disciplinary action up to and including termination of employment or engagement with the OWA. Any disciplinary action arising from breach of a policy will be taken according to the Association's disciplinary procedures.

Staff are responsible for knowing and adhering to OWA policies. Managers/supervisors are responsible for knowing, complying with, communicating and enforcing OWA policies.

While staff are responsible for ensuring compliance with the Code and prompt reporting of any suspected violations, Management is ultimately responsible for ensuring complaints and violations under the Code are managed promptly and appropriately.

Staff should seek clarification from OWA management if they are unclear about any aspect of these policies or feel that they may potentially be in violation of a policy.

## 2.4. Whistleblower Process And Contacts

The following individuals are available to discuss any questions about the Code of Ethical Conduct, OWA policies or any ethical questions or concerns that staff may have:

- Brad Herald – Chairman of the Board – brad.herald@capp.ca – 403-267-1113
- Lars DePauw – President – lars.depauw@orphanwell.ca – 403-297-3398

These individuals will keep all discussions confidential, including the identity of the whistleblower, unless, in their reasonable and professional opinion, the issue must be escalated to the Board of Directors, external advisors or another third party.

Staff have an obligation to report any conduct they observe, or reasonably suspect, that may be contrary to the Code of Ethical Conduct. Staff may report contraventions to the OWA's external whistleblower toll-free number (1-844-539-2390), the OWA's external whistleblower website ([www.orphanwell.ethicspoint.com](http://www.orphanwell.ethicspoint.com)), or to the President.

Concerns relating to the President of the OWA should be directed to the OWA's external whistleblower hotline (1-844-539-2390), the OWA's external whistleblower website ([www.orphanwell.ethicspoint.com](http://www.orphanwell.ethicspoint.com)) or to the Chairman of the Board.



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

Staff will not be disadvantaged for reporting good faith concerns. The Association prohibits retaliation of any kind against an individual for making a complaint in good faith, providing information in connection with an investigation, or because of the resolution of the complaint.

## 2.5. Follow Up and Investigation Process

All filed reports will be promptly reviewed by the Association. Where an investigation is warranted, the investigator(s) chosen will be contingent on the specific incident. Individuals' identities will not be disclosed without their knowledge; except as necessary to investigate the claim, take disciplinary action related to the claim, or as required by law. Although all possible steps will be taken to protect the identity of individuals and details of complaints, confidentiality cannot be guaranteed. Any information which is disclosed will only be disclosed to those with a legitimate "need to know".

All information regarding the filed report will be confidential, except in the above circumstances. All staff have a responsibility to cooperate in the investigation process.

After the investigation, the investigator will prepare a thorough unbiased written report for the President (or Chairman of the Board, for complaints related to the President) which describes the allegation, provides a conclusion as to whether a policy has been breached and any recommendations regarding remedial action.

If it is determined that a policy has been breached, the President (or Chairman of the Board, for complaints related to the President) and the investigator will decide upon appropriate remedial action necessary to rectify the situation and prevent any recurrence. In his/her sole discretion, the President (or Chairman of the Board, for complaints related to the President) may consult with the immediate supervisor of the employee who breached the policy, when determining appropriate action to take.

Complainants will be informed that action has been taken when applicable but will not be provided with the details.

## 2.6. Amendment

The Association may amend or alter any policy from time to time as business and legislative parameters demand. The Code of Ethical Conduct is subject to periodic review at least every three years. Staff will be advised of these amendments as changes are made. Staff and contractors are expected to comply with all aspects of any current policy as a condition of continued employment.

## 3.0 Revision History

Revision No.	Date	Revision Purpose	Description of Change	Document Author
0	May 28, 2018	Initial Release	Initial Release	Laurel Towler
1.0	November 27, 2018	Requirement Change	Section 4.7 updated to address gifts of cannabis	Laurel Towler
2.0	March 11, 2019	Requirement Change	Minor verbiage edits and delete references to Director of Operations	Laurel Towler



# Code of Ethical Conduct

OMS 1.4-CORP-POL-001

Revision No.	Date	Revision Purpose	Description of Change	Document Author
3.0	May 4, 2022	Requirement Change	Section 4.4 Updated use of social media. Section 4.6 Updated to provide clarity regarding fitness for work and use of prescription and non- prescription medications, minor administrative updates	Laurel Towler
4.0	November 24, 2022	Requirement Change	Section 2.2.17 Updated Dress and Grooming Guidelines Section 2.2 Minor updates and conversion to OWA Operating Management System Standard Template	Laurel Towler