


<b>Holland Bloorview</b> Kids Rehabilitation Hospital	Manual Corporate	Cluster Corporate
	Theme Finance	Number 00239
Business Code of Conduct		

**Preamble**

All employees of Holland Bloorview involved in purchasing and business activities will abide by a code of conduct, integrity and professionalism which support Holland Bloorview's commitment to financial responsibility and accountability. Confidential information will be safeguarded.

**Policy Statement**

This policy outlines the process for business code of conduct.

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**Procedure:**

**Personal Integrity and Professionalism:**

All individuals involved in purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence must be integral to all supply chain activities within and between BPS organizations, suppliers and other stakeholders. Respect must be demonstrated for each other and for the environment. Confidential information must be safeguarded. All individuals must not engage in any activity that may create, appear to create, a conflict of interest such as accepting gift and favours, providing preferential treatment or publicly endorse suppliers or products.

**Accountability & Transparency:**

Supply chain activities must be open and accountable. In particular, tendering, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All individuals must ensure that scarce public sector resources are used in a responsible, efficient and effective manner.


**Conflict of Interest:**

Employees are expected to maintain “arm’s length” relationships and conduct negotiations in an ethical and lawful manner. Conflicts of interest arise when:

- An employee is in a situation where he/she has the opportunity to use the authority, knowledge or influence derived from his/her employment with Holland Bloorview in a way that benefits the employee contrary to the interest of the employer.
- An employee acts in a way that benefits him/her at the expense of Holland Bloorview.
- The personal and/or business activities and interests of an employee conflict with the business interests of Holland Bloorview/Plexxus.

Employees are not authorized to give to or receive personal gifts or services of greater than \$50 on an annual basis from external stakeholders. If you do receive a gift, where possible, it should be donated for company wide uses, such as social or meeting events. While it is recognized that business entertainment is intended to build relationships, employees are not authorized to attend any event which influences business decisions. If in doubt, please discuss with your Manager, Director or Vice President.

Employee participation in business related trips that are sponsored by an external organization must be pre-approved by their supervisor.

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It is a conflict for an employee to own a substantial interest (other than as a shareholder of a publicly traded company) or participate in the business of an actual or potential supplier, customer, competitor, or any business or organization that conducts, or seeks to conduct, business with Holland Bloorview/Plexxus. The potential for a conflict of interest could also exist if an employee's close relative had a substantial interest in a supplier / competitor / customer of Holland Bloorview/ Plexxus.

Employees may work/volunteer for other organizations as long as doing so does not interfere with their ability to fulfill their responsibilities or is a conflict of interest with their position at Holland Bloorview/Plexxus.

An employee who has reasonable grounds to believe that he or she has a conflict of interest shall exclude themselves from all aspects of the acquisition process and disclose the general nature of the conflict of interest. This shall be in writing to a senior manager at Plexxus/Holland Bloorview and must disclose: all grants, research funding, free products, equipment on loan at Holland Bloorview or private practices, ownership of shares held in the competing companies, receipt of any gifts, educational funds etc. Companies or service providers must disclose same in writing to Holland Bloorview/Plexxus at the time they are presenting prices, quotations or tender responses.

**Confidentiality of Information:**

Employees are expected to safeguard and keep strictly confidential all information pertaining to Holland Bloorview/Plexxus, its affiliated organizations, members and business partners gained as a result of their employment.

An employee who uses or discloses any of this information will be held liable for any damage or loss suffered by Holland Bloorview/Plexxus and those organizations and individuals to which the confidential information relates.

All employees must rigorously protect the security and confidentiality of company, employee, member and other information and transactions. You should use common sense, good judgment and take all reasonable steps to ensure that this information is kept confidential. Confidential documents that are being discarded must be shredded or discarded appropriately and not left in the garbage.

Employees must not disclose confidential information to colleagues, family, friends or any other person within or outside of Holland Bloorview/Plexxus, who does not have a direct association with the transaction and the right to know.

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Employees will not use confidential, non-public information gained from the company for any personal or business benefit or transaction.

An employee leaving Holland Bloorview/Plexxus must return all relevant information in any form and all copies that are in their possession immediately. This policy and its obligations continue to apply to individuals after their employment with Holland Bloorview/Plexxus ends.

**Business Conduct:**

No employee shall falsify company records or make improper payments on behalf of Holland Bloorview/Plexxus.

Any employee with access to company funds must demonstrate the upmost care in handling these funds in accordance with the standards established to help the company protect and account for its finances.

It is essential that a professional image be maintained in all business transactions. Employees should demonstrate a responsible attitude, professional demeanor and suitable attire at all times.

**Compliance:**

Employees are asked to report any potential breaches of this policy that they may find themselves in or observe other employees in potential conflict. Compliance with the Code of Business Ethics and Conduct and its provisions are considered to be a condition of employment.

Any breach of this policy is subject to appropriate disciplinary action up to and including termination.

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<b>Policy Lead</b>	<b>Issued Date</b>
Ben Sybring	Feb 01, 2010
<b>Committee Chair</b>	<b>Review Date</b>
	-
<b>Committee Member(s)</b>	<b>Review Date</b>
	-
<b>Authorizer</b>	<b>Review Date</b>
Ben Sybring	-
<b>Authorizer's Signature</b>	