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<b>Title:</b>	<b>Standards of Conduct Policy</b>		
<b>Policy No.:</b>	GPS-004	<b>Responsible Executive:</b>	Vice President, Human Resources
<b>Effective/Version Date:</b>	March 31, 2023	<b>Date approved by Board of Commissioners:</b>	April 25, 2023

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### **1. REASON FOR POLICY**

The purpose of this Policy is to define and communicate the Standards of Conduct expected of all Employees, and Commissioners of BC Housing.

### **2. WHO SHOULD KNOW THIS POLICY**

This Policy and the standards contained within it apply to all Employees and Commissioners who in the course of their duties would be expected at all times to adhere to the standards of this Policy.

### **3. POLICY STATEMENT**

As an organization, we are committed to honest, impartial, respectful, and ethical behaviour, true to the principles of equity and inclusion, both in working together and in serving our clients and our communities. Our Standards of Conduct are designed to help each one of us meet this commitment.

Employees and Commissioners of BC Housing must uphold the highest standards of conduct in order to maintain and enhance the public's trust and confidence in BC Housing. Employees and Commissioners must be focused on positive outcomes for the citizens of British Columbia by delivering effective, equitable, cost-efficient public services and programs. Employees and Commissioners of BC Housing, and others have a duty of loyalty to BC Housing. The fairness and the impartiality of Employees and Commissioners in the conduct of their duties must be exemplary and include honest and fair decisions that are consistently in the best interest of BC Housing.

Conduct at work and in the community determines how clients, external stakeholders, and the public view our organization. These Standards of Conduct help us all to avoid and prevent activities that could damage BC Housing's reputation, create an unfair or harmful workplace, or impair one's ability to do their job.

### **3.1 INTERPRETATION**

This Standards of Conduct Policy sets out minimum standards of conduct. It is not possible to foresee every possible situation. The Policy provides a framework of basic principles. Although presented separately, all principles and requirements are interconnected. For example, the principle of trustworthiness is fundamental to all activities of Employees and Commissioners in every circumstance even though that may not be expressed in every example in the Policy.

This Policy is intended to compliment and clarify other policies, procedures, guidelines or directives of BC Housing. If there is a conflict between this Policy and any other Agreement, Policy, Procedure, Guideline, or Directive of BC Housing, this Policy prevails.

### **3.2 COMPLIANCE WITH LAWS**

BC Housing Employees and Commissioners must act at all times in full compliance with both the letter and the spirit of all applicable laws. In their relationship with BC Housing, no one shall commit or condone an unethical or illegal act or instruct another Employee or Commissioner to do so. Employees and Commissioners are expected to be sufficiently familiar with any legislation which applies to their work, to recognize potential liabilities and to know when to seek advice. If in doubt, Employees and Commissioners are expected to ask for clarification.

BC Housing is continually under public scrutiny. Therefore, Employees and Commissioners must comply fully with the law and must also avoid any situation which could be perceived as improper or indicate a casual attitude towards compliance.

### **3.3 WORKPLACE BEHAVIOUR**

Employees and Commissioners must carry out their duties and responsibilities in a manner that is courteous, professional, equitable, efficient, and effective. The conduct and language of each individual in the performance of their duties must contribute to a positive, respectful, and inclusive work environment. Conduct, both during and outside of work, must not compromise the integrity, trust, or reputation of BC Housing.

BC Housing Employees and Commissioners must treat each other with dignity, respect, and courtesy in the workplace and ensure that all interactions are respectful and aligned with principles of reconciliation, equity, diversity, inclusion and belonging, and with principles of anti-racism, anti-discrimination, and anti-harassment. BC Housing will not tolerate discrimination or harassment of any kind, and particularly discrimination or

harassment based on any of the prohibited grounds covered by the *Human Rights Code*, namely: Indigenous identity, race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, gender identity, gender expression, age, or previous criminal conviction unrelated to employment.

All Employees and Commissioners must also review and abide by the Respect in the Workplace Policy, the Diversity and Inclusion Policy, as well as the applicable employment contract: the Terms and Conditions of Employment for Excluded Employees, or Article 6 of the Administrative/Clerical Division and Maintenance/Service Division Collective Agreements.

### **3.4 OFF-DUTY CONDUCT**

Whether on or off duty, Employee's and Commissioner's conduct is a reflection of BC Housing. Employees and Commissioners are therefore encouraged to conduct themselves in a respectful, polite, and considerate manner, both within the workplace and outside the workplace.

The off-duty conduct of Employees and Commissioners can negatively impact the reputation of BC Housing and the ability of others to perform their duties effectively. Employees and Commissioners may be subject to discipline for off-duty conduct that harms BC Housing's business and reputation or negatively impacts co-workers. Problematic off-duty conduct can occur in online communications and social media, during television and radio appearances, and at functions or in spaces with other Employees, clients, external stakeholders, or members of the public.

Every instance of off-duty conduct will be assessed on a case-by-case basis and consistent with the terms of a collective agreement or employment contract.

### **3.5 CONFLICTS OF INTEREST**

#### **(a) Definition and Explanation**

Employees and Commissioners of BC Housing will not put themselves in a position in which their private interests might be, or might be perceived to be, in conflict with the interests of BC Housing, including situations in which they may receive personal gain. Further, Employees and Commissioners must avoid actions or conduct that might, or might be perceived to, undermine, impair or compromise their ability to act in the public interest, the trust that the public places in BC Housing or the ability of BC Housing to accomplish its mandate.

Some conflicts are quite clear, but others are less obvious. BC Housing recognizes that its Employees and Commissioners have legitimate outside interests. However, there may also be situations which could be perceived as a conflict of interest no matter how innocent the intentions of the Employee or Commissioner.

A perceived conflict of interest exists when a reasonably well-informed person could perceive that an Employee or Commissioner's ability to perform a duty or function of the position was or will be affected by the Employee or Commissioner's private interests.

An actual conflict of interest exists when an Employee or Commissioner, in performing a duty or function of the position, has the opportunity to further their own private interests. An actual conflict of interest also exists where an Employee or Commissioner's personal interests directly or indirectly interfere or conflict with that Employee or Commissioner's obligation to act in the best interest of BC Housing.

*Conflicts involving organizations with which BC Housing has business dealings*

Employees and Commissioners of BC Housing may not hold a significant financial interest, either directly or through a company, relative or associate, or hold or accept a position as a director or officer in an organization having business dealings with BC Housing, unless that interest has been fully and properly disclosed and a determination has been made that a conflict of interest does not exist, or appropriate steps have been taken to mitigate or remove the circumstances giving rise to the conflict, or perception of conflict. A significant financial interest includes a financial interest or shareholdings that could interfere or conflict, or appear to interfere or conflict, with that individual's obligation to act in the best interests of BC Housing but would not normally include a holding of less than 1% of shares of a publicly traded company, or of the right to acquire less than 1% of such shares.

*Conflicts involving organizations with which BC Housing Employees volunteer*

Employees and Commissioners of BC Housing may not hold or accept a position in a non-profit organization, including as a director or officer, if that non-profit organization is one with which the Employee or Commissioner would hold a decision making role about funding or be in a position to make a funding-related recommendation, unless that interest has been fully and properly disclosed and a determination made that a conflict of interest does not exist, or appropriate steps have been taken to mitigate or remove the circumstances giving rise to the conflict, or perception of conflict.

If an Employee has a conflict or any doubt about whether they are in a conflict of interest, they must submit a report in writing using the Personal Interest Disclosure Form within the self-service section of the Talent Management System (TMS). The disclosure will then be reviewed by the Employee's manager who is responsible for addressing, eliminating or

mitigating the conflict. The Director of Employee Relations (or designate) will audit disclosures and decisions made by managers and if necessary work with managers to identify further considerations to address, mitigate or eliminate any conflicts.

If the Chief Executive Officer or a Commissioner has a conflict or any doubt respecting a Conflict of Interest, they must submit the circumstances in writing to the Chair of Commissioners who may refer the matter to the ethics advisor. The ethics advisor will be an independent appointment of the Commissioners. The Chair of the Commissioners or the ethics advisor will be responsible for addressing, eliminating or mitigating the conflict as necessary.

In the event that the manager, Chair of the Commissioners or ethics advisor determines that:

- (i) a real or apparent conflict of interest exists;
- (ii) available mitigation strategies will be insufficient to eliminate the real or apparent conflict; and
- (iii) the best interests of BC Housing may require the continuation of the circumstances giving rise to the conflict, the matter may be referred for further consideration under the exemption provisions of this Policy.

Some examples of possible conflicts of interest include:

- using BC Housing property, information, or position for personal benefit, whether direct or indirect;
- participating in activities that compete with the work, business or mandate of BC Housing;
- serving as a director, officer, partner or owner of a company, non-profit or other entity that enters into a contract with BC Housing or with respect to which BC Housing would make funding decisions or recommendations;
- disclosing confidential information held by BC Housing;
- participating in an employment decision concerning a relative or person with whom they reside or are in a personal relationship (including romantic or sexual) with, that the nature of which could cause any reasonable person to question the impartiality of the ensuing decision;
- participating in a housing, business or other operational decision concerning a relative or person with whom they reside or are in a personal relationship (including romantic or sexual) with, that the nature of which could cause any reasonable person to question the impartiality of the ensuing decision;
- receiving monies or other substantial gifts from a contractor or potential contractor of BC Housing;

- purchasing shares in a public company that they are aware is in negotiations with BC Housing for a contract; and
- holding a secondary position of employment (outside of BC Housing) that creates a real or perceived conflict of interest due to the nature of work.

**(b) Entertainment, Gifts & Benefits**

It is essential to ethical business practices that all those who do business with BC Housing, as contractors, suppliers or customers, have access to BC Housing on equal terms.

Except as expressly noted below, Employees and Commissioners must not accept entertainment, gifts or benefits where their personal interest could conflict, or appear to conflict, with their employment duties or responsibilities by creating an obligation, or the reasonable perception of an obligation, to a current or potential supplier, contractor, tenant or other business partner.

Similarly, no Employee or Commissioner may offer entertainment, gifts or benefits in order to secure preferential treatment for BC Housing. Gifts, entertainment and benefits may only be accepted or offered by an Employee or Commissioner in the normal exchanges common to business relationships.

Gifts, Entertainment and Benefits are defined as:

<u>Gift</u>	A tangible item of value that is of enjoyment or benefit for the recipient (gift cards, clock, gift basket, etc. ...).
<u>Entertainment</u>	An offer to experience or participate in an event that serves the sole purpose of entertainment, unrelated to business (sporting event, concert tickets, golf tournament, weekend fishing trip, movie pass, etc. ...).
<u>Benefit</u>	An offer of services or an event that may or may not serve the purpose of the recipient and the organization, but is of value either in enjoyment or personal/professional development (complimentary services, conference, etc. ...).

The following criteria should guide Employees' and managers' judgment in respect to gifts, entertainment or benefits:

- (i) the gift, entertainment or benefit would be considered by the business community to be within the bounds of propriety taking into account all the circumstances of the occasion and appropriate to the business responsibilities of the individuals involved;

- (ii) the exchange does not, nor is it expected to, create an obligation;
- (iii) it occurs infrequently; and
  
- (iv) it could be justified on a BC Housing expense statement if the Employee or Commissioner offers rather than receives and would be seen to be within limits of reciprocation as a normal business expense.

Employees or Commissioners will be required to declare receipt of all gifts, entertainment or benefit to their manager/CEO or Chair of Commissioners who will determine whether acceptance is appropriate and approve it, according to the above guidelines.

In the instance of an offer of entertainment that is in excess of a value of \$100.00 the manager or Employee must make a declaration using the Personal Interest Disclosure Form which should be reviewed by their manager and the Director of Employee Relations for approval. Declaration should occur within 30 days of accepting or declining the entertainment and should include the following information:

- estimated value of the benefit;
- date received or offered;
- nature of business relationship;
- is the benefit for an individual or a group/team; and
- a brief description of the benefit.

Human Resources will monitor all declarations to ensure reasonable compliance with the Policy.

Where the Employee or Commissioner determines gifts offered and received are inappropriate, they should be declined or returned to the donor and may be accompanied by a copy of this Policy. Perishable gifts can be donated to a charity and the donor notified.

In some cultures or business settings, the return of a gift or refusal of a favour, benefit or entertainment would be offensive; in these cases, an Employee or Commissioner should refer the circumstances to their manager or the Chair of Commissioners for guidance.

If an Employee or Commissioner, has any doubt about whether a gift, entertainment or benefit might breach this Policy they must report it; in the case of an Employee to their manager, and in the case of a Commissioner to the Chair of Commissioners. All reports will be accepted as good faith compliance with this Policy.

The earning of personal loyalty points is not an accepted practice when making Employer purchases. Utilizing an Employer established discount for personal purchases is also an unacceptable practice at BC Housing.

The use of the Employer's equipment such as tools and materials for personal gain is considered a violation of the Standards of Conduct.

**(c) Restriction on Employee's or Commissioner's use of BC Housing's Affordable Housing**

Due to the public nature of BC Housing, special care and attention must be taken to ensure its integrity. Given public perception and the potential for the appearance of improper dealing, BC Housing Employees and Commissioners may not avail themselves of housing owned, managed, or otherwise overseen by BC Housing unless it is a provision of their employment as in the case of our Resident Building Managers (see Article 8 - Maintenance Service Division Collective Agreement).

An exception may be made where BC Housing management is fully satisfied that the Employee or Commissioner is a genuine candidate for directly managed affordable housing according to the criteria set out for tenants and clients.

**(d) Disclosure**

**(i) Employees and Commissioners**

Full disclosure enables Employees and Commissioners to resolve unclear situations and gives an opportunity to dispose of conflicting interests before any difficulty can arise.

At the time of their employment or appointment, each Employee or Commissioner must disclose to management of BC Housing in writing, all interests and relationships of which the Employee or Commissioner is aware of which will, or may, give rise to a conflict of interest or a potential or perceived conflict of interest.

Further, upon becoming aware of a conflict or potential conflict of interest, each Employee must immediately disclose the conflict using the Personal Interest Disclosure Form. In the case of a Commissioner, they will disclose the conflict in writing. This requirement exists even if the Employee or Commissioner does not become aware of the conflict until after a transaction is underway or complete.

Written assurance that no conflict of interest or other breach of this Policy exists may be required from an Employee or Commissioner from time to time.

Unless an Employee or Commissioner is otherwise directed, they must immediately take steps to resolve any conflict or perceived conflict.



If an Employee or Commissioner is concerned that another Employee or Commissioner is in a conflict of interest, they must immediately bring the concern to the attention of their manager. If the Employee is uncomfortable talking to their manager about the concern, or if their manager is involved in the concern, the Employee may contact the Vice President, Human Resources (or designate). In the case of a Commissioner or Chief Executive Officer, they must immediately bring the concern to the attention of the Chair of the Commission. If there is a concern with the Chair, the issue should be referred to the Minister responsible for BC Housing who may refer the matter to the ethics advisor.

A Commissioner is required to disclose the nature and extent of any conflict at the first opportunity with the Chair of the Commissioners, and thereafter at the first meeting of the Commissioners after which the facts leading to the conflict have come to that Commissioner's attention. After disclosing the conflict, the Commissioner:

- (a) must not take part in the discussion of the matter or vote on any questions in respect of the matter. However, the Commissioner may be counted in the quorum present at the Commissioners' meeting;
- (b) may, if the meeting is open to the public, remain in the room, but shall not take part in the portion of the meeting during which the matter giving rise to the conflict is under discussion, and shall leave the room prior to any vote on the matter giving rise to the conflict;
- (c) must, if the meeting is not open to the public, immediately leave the meeting and not return until all discussion and voting with respect to the matter giving rise to the conflict is completed;
- (d) must not attempt, in any way or at any time, to influence the discussion or the voting of the Commissioners on any questions relating to the matter giving rise to the conflict.

### **3.6 OUTSIDE BUSINESS INTERESTS**

Employees and Commissioners are required to limit outside business activities (current or prospective), including ownership, Commissioners membership, advising, consulting or interacting with an external stakeholder business, to avoid any real or perceived conflict of interest or other breaches of the provisions of the Policy. Notwithstanding any outside business activities, Employees and Commissioners are required to act in the best interest of BC Housing.

No Employee or Commissioner should hold a substantial private interest, directly or indirectly, through a relative, personal relationship (romantic or sexual), friend or associate, or hold or accept a position as an officer or director, in an entity where, by virtue of their position in BC Housing, the Employee or Commissioner could in any way benefit the entity by influencing the decisions of BC Housing.

### **3.7 OUTSIDE EMPLOYMENT**

Employees and Commissioners are required to limit outside employment (current or prospective), to avoid any conflicts of interest or other breaches of the provisions of this Policy. Notwithstanding any outside employment, Employees and Commissioners are required to act in the best interest of BC Housing.

Employees and Commissioners may hold outside jobs on their own time, using their own resources, and in a manner not adversely affecting their performance or objectivity for BC Housing. However, no BC Housing Employee or Commissioner may accept work with any entity that could lead to a conflict of interest or situation prejudicial to BC Housing's interests.

Outside employment must be declared through the Personal Interest Disclosure form.

### **3.8 VOLUNTEER WORK**

BC Housing encourages its Employees and Commissioners to contribute to their communities through involvement with charitable, community service, and professional organizations in a manner consistent with their obligation to avoid conflicts of interest, as described in Article 3.5 of this Policy. Employees and Commissioners should only use BC Housing time or resources for such activities with the prior agreement of management.

From time to time, individual Employees and Commissioners reach positions of leadership in non-profit associations, societies or charities where they may be viewed as spokespersons for those groups. In such situations, the individuals should ensure that they are seen as speaking for their organization or as individuals, and not as Employees, Commissioners or spokespersons of BC Housing. Such cases must be declared through the Personal Interest Disclosure form.

### **3.9 USE OF BC HOUSING PROPERTY**

The property and assets of BC Housing must only be used in the course of carrying out the genuine business purposes of BC Housing. Employees and Commissioners are entrusted with the care, management, and cost-effective use of BC Housing's property and assets,

including the use of BC Housing's name and intellectual property, and should not make use of these resources for purposes that are unrelated to BC Housing's business or for their own personal gain.

Employees and Commissioners should ensure that all property and assets of BC Housing assigned to them are maintained in good condition, secured and stored in a safe manner, and should be able to account for such property while assigned to them.

Property and assets, including intellectual property, financial information, contracts, agreements and rights produced or developed during the course of employment, or through the use of BC Housing property or assets, are the property of BC Housing.

### **3.10 PERSONAL RELATIONSHIPS**

We encourage our Employees to refer friends, family and colleagues to work at BC Housing, however, Employees and Commissioners must not participate in making a business decision which concerns or may impact a relative, person with whom they reside or are in a relationship (including romantic or sexual) with, or any other person with whom they have a personal relationship, such that the nature of which could cause any reasonable person to question the impartiality of the ensuing decision. This also applies to personal relationships with suppliers, partner agencies or other external contacts that may create a real or perceived Conflict of Interest.

All personal relationships, both internally with Employees, and externally with suppliers, partners or contractors, must be disclosed using the Personal Interest Disclosure Form and steps must be implemented immediately to resolve the conflict or remove the perception that a conflict could exist.

### **3.11 PUBLIC COMMENTS**

Employees and Commissioners may comment on public issues provided they do not compromise the perception of impartiality required for the performance of their duties. When commenting on public issues, Employees and Commissioners must make it abundantly clear that they are speaking on their own behalf and not on behalf of BC Housing, and that their comments in no way represent or reflect the opinions or beliefs of BC Housing.

Employees and Commissioners must not make public comment regarding the policies, practices and decisions of BC Housing, except as expressly authorized by BC Housing.

Employees and Commissioners should be aware that public comment can include, but is not limited to, responding to questions from reporters, speaking at community events, online communications, and social media posts.

For more information, please refer to the Media Policy and Social Media Policy.

### **3.12 CONFIDENTIAL INFORMATION**

Employees and Commissioners may have access to, or become aware of, personal, confidential or proprietary information of BC Housing or its Employees, or personal confidential or proprietary information of a third party (clients, contractors, suppliers) who has disclosed such information to BC Housing. Employees and Commissioners are to maintain the confidentiality of such information in whatever form or however stored or transmitted, and must protect such confidential information from loss; theft; or misuse unauthorized use, modification, replication or disclosure. This obligation does not end when employment with BC Housing ceases. Employees must continue to protect the confidentiality of personal, confidential, private, or proprietary information after the end of their employment, and must not disclose this information without prior written approval from BC Housing.

Unless authorized to be made available to the public, by Court Order or by the Chair of the Commission, plans, strategies, records, reports, papers, internal communications, techniques, programs, software, formulas, developmental or experimental work, processes, and methods are proprietary and confidential, and are not to be disclosed or used by any Employee or Commissioner other than in the ordinary course of the business of BC Housing.

Employees and Commissioners must exercise caution and discretion in handling personal and confidential information and, in particular, care should be taken not to discuss confidential information in social or public contexts.

Employees and Commissioners must not use personal or confidential information obtained as a result of employment with BC Housing for the purpose of furthering any private interest, or as a means of making personal gains.

For more information refer to the Privacy Policy.

Notwithstanding any confidentiality or other provision of this Standards of Conduct Policy, this Standards of Conduct Policy does not limit, restrict or preclude an Employee from making a request for advice, a disclosure or a complaint under the British Columbia Public Interest Disclosure Act or participating in any other process authorized or required under that legislation.

### **3.13 POLITICAL PARTICIPATION**

#### **(a) Political Activities**

Employees and Commissioners may participate in political activities including belonging to a political party, or supporting a candidate for elected office. An Employee's or Commissioner's political activities, however, must be clearly separated from activities related to that Employee's or Commissioner's duties with BC Housing. In some cases, this clear separation may not be possible, and mitigation may be required.

If engaging in political activities, an Employee or Commissioner must retain impartiality and the perception of impartiality in relation to their duties and responsibilities. Furthermore, Employees and Commissioners engaging in political activities must comply with their obligations under section 3.5 Conflicts of Interest, including the obligation not to put themselves in a position of actual or perceived conflict of interest.

An Employee or Commissioner must not use BC Housing facilities, equipment, or resources in support of political activities, or engage in political activities during working hours (except authorized meetings as an elected municipal official).

#### **(b) Running for Office**

If an Employee or Commissioner seeks to run as a candidate in a federal, provincial or local government, they must disclose their potential candidacy and request an unpaid leave of absence from BC Housing for the duration of their candidacy. Leave approval is at the discretion of BC Housing and subject to the approval of the VP of Human Resources.

If an Employee or Commissioner is elected to either a provincial or federal position, they must immediately resign their position with BC Housing. If elected to a municipal position, an Employee must immediately disclose their election through the Personal Interest Disclosure form, and a Commissioner must disclose in writing to the Chair. If elected to a municipal position, the Employee or Commissioner must ensure that the duties of the office, other than regular Council, Board or Committee meetings, do not impinge on regular working hours.

BC Housing may require a leave of absence during the term of municipal office. BC Housing may not require a leave of absence if they are satisfied that there are no actual or perceived conflicts of interest and there is no compromise of impartiality or the perception of impartiality in relation to the individual's duties and responsibilities. BC Housing may need to place constraints to address these concerns and may review those conditions on an ongoing basis and as needed. Any constraints must be recorded on the

Employee's Personal Interest Disclosure form, and for a Commissioner, recorded in writing.

### **3.14 ENVIRONMENT AND SAFETY**

Environmental protection is a fundamental BC Housing value. Every Employee and Commissioner has a role in ensuring BC Housing's operations comply with environmental legislation and standards.

Management and Commissioners have both a legal and a moral responsibility for safety and the protection of the environment, and every manager has a specific obligation in this respect.

BC Housing is committed to providing all Employees and Commissioners with a safe workplace and to ensuring safe and respectful work practices and conditions.

All Employees have the right to expect, and the responsibility to create, a workplace where all Employees are safe. Violence in the workplace is unacceptable and will not be tolerated. Violence includes any attempted or actual exercise by any person, including another Employee, of any physical force so as to cause injury to an Employee and includes any threatening statement or behaviour which gives a worker reasonable cause to believe that the worker is at risk of injury.

Employees must report any incident of violence directed towards themselves or their co-workers. Any Employee hearing a threat, including a threat to co-worker, must report that threat if they have reasonable cause to believe that the threat is serious. Any incident of threat of violence in the workplace must be addressed immediately.

An Employee or Commissioner shall report any situation they believe represents a danger to public health or safety, or may be a significant danger to the environment, to the Chief Executive Officer or the Chair of the Board.

In some cases, the matter may be reported in accordance with the provincial Public Interest Disclosure Act (PIDA), the process for which includes the option of anonymous third-party reporting, and is outlined in BC Housing's Public Interest Disclosure Policy.

For more information, please refer to the Prevention of Violence in the Workplace Policy and Public Interest Disclosure Policy.

### **3.15 FINANCIAL ACCOUNTABILITY**

BC Housing will fully comply with all applicable laws and regulations regarding its books of account, business records, and financial reporting. Such books of account and records will be properly and accurately maintained.

All assets, liabilities, and transactions of BC Housing must be accurately reflected in BC Housing's financial records and reports and must be supported by appropriate documentation. No Employee or Commissioner shall create or condone the creation of false records, or destroy or condone the destruction of a record, except in accordance with the policies of BC Housing and all applicable laws.

No assets, liabilities, or financial transactions will be concealed from management or from BC Housing's auditors.

Appropriate accounting and financial policies, procedures, controls and audit processes must be maintained. Further information on accounting and financial policies can be referenced through the *Financial Administration Act*, internal BC Housing financial policies and applicable government mandates.

All Employees and Commissioners, regardless of their position at BC Housing, are expected to follow internal BC Housing policies and procedures designed to protect the integrity of BC Housing assets, data and financial reports and to foster a culture of cost-consciousness at all levels.

If Employees or Commissioners have concerns about questionable accounting, auditing or Taxpayer Accountability matters, they must promptly report them to the appropriate person. Employees are encouraged to speak to their manager. The manager will promptly contact the Vice President, Finance who will conduct a preliminary investigation of every concern.

If the Employee is uncomfortable with talking to their manager about the matter, or believes the manager has not reported the matter, the Employee may contact the Chair of the Commission directly and, if desired, anonymously. If the Employee or Commissioner has concerns that may involve the Chair of the Commission, or does not feel comfortable talking to the Chair, the Employee or Commissioner may report their concerns directly to the Minister responsible for BC Housing who may refer the matter to the ethics advisor.

In some cases, the matter may be reported in accordance with the provincial Public Interest Disclosure Act (PIDA), the process for which includes the option of anonymous third-party reporting, and is outlined in BC Housing's Public Interest Disclosure Policy.

Complaints will be handled promptly, professionally, and with as much confidentiality as possible consistent with investigating the complaint.

For more information, please refer to the Fraud Policy and Public Interest Disclosure Policy.

### **3.16 EXEMPTIONS**

#### **(a) When an Exemption May be Granted**

An Employee or Commissioner may request an exemption from a requirement of this Policy in accordance with the procedure outlined in this section.

Where it is clearly in the best interests of BC Housing to do so, an exemption from the requirements of this Policy may be granted to allow the continuation of circumstances that would otherwise be considered an actual or apparent conflict of interest under this Policy or that would be considered a breach of this Policy. Conditions may be attached to an exemption.

If a Commissioner or Employee is exempted from a requirement of this Policy for the continuation of circumstances that would otherwise be considered an actual or apparent conflict of interest, the Commissioner or Employee must refrain from participating in any way in any decision-making respecting the subject matter of the conflict of interest, except to the extent specifically authorized in the decision granting the exemption.

Note: The provisions of this Standards of Conduct Policy are in addition to, and not in substitution for, any obligation to BC Housing imposed upon a Commissioner or Employee by common law, equity or statute. Compliance with the Policy shall not relieve a Commissioner or Employee from any such obligation.

#### **(b) Procedure for Granting an Exemption**

##### **(i) Guiding Principles**

Employees and Commissioners are permitted to request an exemption from the provisions of the Policy.

It is not possible to provide guidelines to cover all circumstances where an exemption may be requested. Each circumstance must be considered on its own merits. However, the following are some general principles that will guide decision-makers in their evaluation of requests.

As a general proposition, the exemption procedure, although expected to be utilized rarely, provides a means to address situations where to require compliance with a Policy requirement may not be in the overall best interest of



BC Housing. The exemption procedure is not intended to benefit Employees or Commissioners – it is intended to benefit BC Housing and to provide it with the opportunity to relieve an Employee or Commissioner from complying with the Policy in circumstances where it is in the best interest of BC Housing to do so.

Any individual who is requesting an exemption is responsible for making full disclosure of all relevant facts and circumstances – whether or not they appear to support the request being made - to their manager/CEO/Chair of the Commission. Full disclosure permits BC Housing to assess whether its best interests are being served by approving a request for an exemption. Failure to make full disclosure may result in denial of the request or in subsequent withdrawal of an approval given. Determining the best interests of BC Housing always requires consideration of specific facts. Consideration of relevant facts addressing the following issues will be included in an assessment of the best interests of BC Housing:

- (a) operational requirements, including hiring and appointing qualified individuals and securing required services and products;
- (b) financial economic considerations;
- (c) legal obligations;
- (d) mission and values; and
- (e) the public interest.

If approving an exemption from the requirements of the Policy would better serve BC Housing's interests than requiring compliance with the Policy, then it may be appropriate to approve an exemption.

The facts disclosed by an Employee or Commissioner should be assessed taking into account, where applicable, the following considerations:

- (a) Materiality: Is the subject matter of the prohibition material to the applicant and to BC Housing? If it is not material to either party, granting an exemption may be in the best interest of BC Housing. If it is material to one party and not to the other, caution should be exercised before granting an exemption. If it is material to both parties, an exemption is not likely to be in the best interests of BC Housing.
- (b) Proximity: Are the applicant and the subject matter of the prohibition closely related? If yes, an exemption is not likely to be in the best interests of BC Housing. If the relationship is remote,

granting an exemption may be in the best interests of BC Housing.

- (c) Conflict of Interest: Did the circumstances that are the subject matter of the prohibition arise or result from the applicant being in a potential conflict of interest? If yes, did the applicant disclose the potential conflict of interest fully and in a timely manner and take steps to avoid any involvement in the matter? If such disclosure was not made, an exemption is not likely to be in the best interests of BC Housing.
- (d) Cost of Compliance: Are BC Housing's interests adversely affected by requiring compliance? If, for example, BC Housing may lose valued personnel, access to required or scarce services/products, or may incur increased costs by requiring compliance, an exemption may be in the best interests of BC Housing. On the other hand, are the interests of BC Housing adversely affected by not requiring compliance? If, for example, BC Housing may suffer from low morale or public criticism, or incur legal liability by not requiring compliance, an exemption may not be in the best interests of BC Housing.
- (e) Taxpayer Accountability: Is the proposed exemption in the best interest of alignment with Taxpayer Accountability? Would the exemption jeopardize the cost efficiency or efficacy of programming or services?
- (f) Timeliness of Disclosure: When and how was the subject matter of the prohibition disclosed to BC Housing? If it was disclosed fully and as soon as practically possible by the applicant, granting an exemption may be in the best interests of BC Housing. If the subject matter of the prohibition was not disclosed fully and as soon as practically possible by the applicant, an exemption may not be in the best interests of BC Housing.
- (g) Fair and Reasonable: Would granting the exemption meet community standards about fair dealing and be considered fair and reasonable in all of the circumstances?

Other considerations may be relevant, depending upon the circumstances.

(ii) **Employees**

Where an Employee deems it appropriate and desires an exemption from this Policy, the Employee, or a manager on their behalf, may make a request directly to the Vice President Human Resources (or designate). If a manager makes the

request on behalf of an Employee, the manager will provide the Employee with a copy of the request. If the Employee makes the request, the Employee will provide their manager with a copy of the request.

A request should contain, at minimum:

- (a) a statement of the specific nature of the exemption being requested, including the provision of the Policy from which the exemption is requested;
- (b) a full and complete statement of all material and relevant circumstances relating to the request being made, including the name of the Employee and the Employee's job description particularly as it may relate to the exemption being sought. This statement must be prepared and signed by the Employee even if the request is made by the Employee's manager;
- (c) the reasons why it may be considered appropriate to give the exemption;
- (d) in the case of an exemption from the conflict of interest provisions, a statement of the steps the Employee will take or has taken to avoid participating in any decision or activity relating to the disclosed circumstances; and
- (e) a statement of whether or not the Employee has discussed the request with their manager.

The Vice President Human Resources (or designate) will acknowledge in writing that the request has been received and may request additional information from the Employee or the Employee's manager. Following the review of any requested additional information, if any, the Vice President Human Resources (or designate) will advise the Employee and the Employee's manager in writing of the decision on the request. If the exemption request is granted, the Vice President Human Resources (or designate) may impose conditions on the exemption granted.

(iii) **Commissioners/CEO**

Where a Commissioner or Chief Executive Officer desires an exemption from the Standards of Conduct Policy, they personally may make a request to the Chair of the Commission. If the request is by the Chair, the request should be made to the Minister responsible for BC Housing who may refer the matter to the ethics advisor.

Such a request should contain, at minimum:

- (a) a statement of the specific nature of the exemption being requested, including the provision of the Policy from which the exemption is requested;
- (b) a full and complete statement of all material and relevant circumstances relating to the request being made;
- (c) the reasons why it may be considered appropriate to give the exemption. The Policy requires that exemptions should only be given “in extraordinary circumstances and where it is clearly in the best interests of BC Housing to do so”; and
- (d) in the case of an exemption from the conflict of interest provisions, a statement of the steps the Commissioner/CEO will take or has taken to avoid participating in any way in any decision or other activity relating to the subject matter of the conflict of interest.

The Chair of the Commission will acknowledge in writing that the request has been received and may request additional information from the Commissioner. Following the review of any requested additional information, if any, the Chair will advise the Commissioner/CEO in writing of the decision on the request. Where the request is made by the Chair, the Minister responsible for BC Housing or the ethics advisor will make a decision and will advise the Chair of the decision, in writing. Conditions may be imposed on any exemption granted.

### **3.17 BREACH OF THE STANDARDS OF CONDUCT POLICY**

#### **(a) What Constitutes a Breach**

An Employee or Commissioner will be in breach of this Policy in the following circumstances:

- (i) Where they act in a manner that violates or is inconsistent with any standard set out in this Policy;
- (ii) Where they, upon becoming aware, fail to report an act of another Employee or Commissioner that violates or is inconsistent with the standards set out in this Policy;
- (iii) Where they fail to act and that failure violates or is inconsistent with the standards set out in this Policy.

A supervisor or manager is in breach of this Policy if they direct or condone conduct that violates or is inconsistent with the standards set out in this Policy.

### **(b) Consequences of a Breach**

This Policy applies to all Employees of BC Housing. Compliance with this Policy is a condition of employment. An Employee's breach of this Policy could lead to disciplinary action.

This Policy applies to all Commissioners of BC Housing. Compliance with this Policy is a condition of appointment. A Commissioner's breach of this Policy could result in a recommendation for removal from office.

### **(c) Reporting**

If an Employee becomes aware of circumstances that they reasonably believe may be a breach of this Policy, they must promptly report the possible breach to their manager. The manager will promptly contact the Vice President Human Resources (or designate) who will designate an appropriate person to conduct a preliminary investigation of the possible breach. If the Employee is uncomfortable talking to their manager about the possible breach, or, if their manager is involved in the possible breach, the Employee may promptly contact the Vice President Human Resources (or designate) directly and, if desired, anonymously.

If a Commissioner or Chief Executive Officer becomes aware of circumstances that they reasonably believe may be a breach of this Policy, they must promptly report the possible breach to the Chair of the Commission. The Chair will personally or will designate someone to conduct a preliminary investigation of the possible breach. If the Chair is involved in the possible breach, a Commissioner must promptly report the possible breach to the ethics advisor.

In the case of reporting serious or systemic wrongdoing, Employees or Commissioners may choose to do this in accordance with BC's [Public Interest Disclosure Act](#) (PIDA), provincial legislation that provides a safe, legally protected reporting process for current and former public sector Employees.

As outlined in the PIDA [Policy](#) and associated [Procedure](#), current and former Employees can report, in good faith, wrongful or unlawful conduct without fear of retaliation or reprisal through one's supervisor, directly to the [Office of the BC Ombudsperson](#), or through an independent third-party PIDA Reporting office ([The Neutral Zone](#)). In the case of the independent third-party PIDA Reporting office, reports may be made anonymously.

If it is alleged that a person(s) has, or may have, breached the Policy and these circumstances have been reported, the person(s) about whom the allegations have been made will be informed and given the opportunity to respond to the report(s) and, where appropriate, to contribute to the discussions on how the breach could be remedied. If disclosure of the complaint would jeopardize the investigation process, such disclosure may be delayed until later in the investigation, but no investigation will be completed without the person(s) who is/are the subject of the investigation being fully informed and given the reasonable opportunity to provide information respecting any allegation of a breach of this Policy.

All complaints will be investigated in a timely, professional and confidential manner, to the extent reasonably possible. [NTD: Confidentiality cannot always be protected, since disclosure may be required according to the rules of natural justice]. Investigations will be initiated within 30 days from report of the breach.

#### **(d) No Retaliation**

BC Housing will not retaliate against an Employee or Commissioner who, in good faith, reports a known or suspected breach of this Policy. This means that Employees will not be dismissed, demoted, or discriminated against in any way for reporting legitimate concerns about these matters in accordance with this Policy, including giving information in relation to an investigation. However, because of the seriousness of a false allegation and the resources which will be expended to investigate complaints, BC Housing reserves the right to discipline anyone who knowingly makes a false accusation, or knowingly provides false information in respect of any alleged breach of this Policy.

No Employee or Commissioner will discriminate or retaliate in any way against another person because that person reported or participated in any way in an investigation of a possible breach of this Policy. Any such discrimination or retaliation will be treated very seriously and is a violation of this Policy that may result in discipline.

## **4. RESPONSIBILITIES**

BC Housing is determined to behave, and to be perceived, as an ethical organization. Each Employee and Commissioner must adhere to the standards described in this Policy, and to the standards set out in all policies, guidelines, legislation and mandates that apply to BC Housing directly or indirectly.

Decisions and actions are to be transparent, ethical and free from conflict of interest and must serve citizens of British Columbia by respecting the shared public trust.

To demonstrate its determination and commitment, BC Housing asks each Employee and Commissioner to review and acknowledge the Policy annually, and complete the required training every two years. Employees and Commissioners should take the opportunity to discuss with the appropriate individual, any circumstances that may have arisen which could be an actual or potential violation of this Policy.

#### **4.1 REPORTING**

On a quarterly basis, the Vice President, Human Resources reports on the Standards of Conduct to the Commissioners. This reporting includes the number and type of disclosures submitted through the Public Interest Disclosure Form, whether or not a conflict has occurred, and how these disclosures were addressed, mitigated or eliminated. This is explained in more detail in BC Housing's Public Interest Disclosure Act Policy.

#### **4.2 FEEDBACK**

The department responsible for this policy will maintain a process where feedback is garnered annually from those who went through the process, or anyone interested in providing feedback on the process. This feedback will be considered when the process is reviewed and updated on an annual basis.

### **5. DEFINITIONS**

**Employees** – means BC Housing's Employees or workers providing direct service work in a similar role to those of an Employee (including co-op students and casual or temporary Employees).

**Commissioners** – means the Board of Commissioners members who have the general duty to guide BC Housing's strategic direction and oversee management in the conduct of the business of organization. Commissioners play a role in policy making, guidance of the strategic planning process and performance monitoring.

**External Stakeholders** – a volunteer, applicant, housing provider, visitor, contractor, or other individual doing business with BC Housing.

**Private Interest** - A material relationship, obligation or responsibility that is unique to the Employee and/or a related person, and that benefits them in a disproportionate or preferential way. A private interest is often, but does not have to be, financial in nature.

**Taxpayer Accountability** – the principles of cost consciousness, accountability, appropriate compensation, service, respect, and integrity that reflect the priorities and values of government and the shareholders – the citizens of B.C., which guide the organization’s decisions and actions.

## 6. RELATED DOCUMENTS

- [Standards of Conduct Policy \(GPS-004\)](#)
- [Standards of Conduct Policy Questions and Answers](#)
- [Fraud Policy \(GA-002\)](#)
- [Reporting and Investigating Fraud Procedure \(P-GA-2000\)](#)
- [Information Technology Security Policy \(GIS-001\)](#)
- [Privacy Policy \(GPP-001\)](#)
- [Records and Information Management Policy \(GRE-001\)](#)
- [Diversity & Inclusion Policy \(GPS-003\)](#)
- [Respect in the Workplace Policy \(GPS-001\)](#)
- [Social Media Policy \(GCO-002\)](#)
- [Media Policy \(GCO-001\)](#)
- [Prevention of Violence in the Workplace Policy \(GPO-003\)](#)
- Terms and Conditions for Excluded Employees
- [BCGEU Collective Agreement \(Administrative & Clerical Division\)](#)
- [BCGEU Collective Agreement \(Maintenance/Service Division\)](#)
- [Public Interest Disclosure Policy \(GCR-003\)](#)
- [Public Interest Disclosure Act Reporting Procedure \(P-GCR-1001\)](#)

## 7. CONTACTS

Where an Employee or Commissioner is uncertain about anything contained in this Policy, BC Housing strongly encourages them to seek clarification from their manager. If a manager is not able to provide the necessary clarification, the Employee should seek clarification from the BC Housing Human Resources Department.

A Commissioner who requires clarification on any matter contained in the Policy should first seek it from the BC Housing Director of Employee Relations (or designate). If the Director of Employee Relations (or designate) is not able to provide the necessary clarification, the Commissioner should seek clarification from the Chair of the Commission.



**HISTORY**

<b>Policy No. and Name</b>	<b>Reason</b>	<b>Date</b>
Standards of Conduct	Full review. New clauses: 3.4 Off-Duty Conduct; 3.10 Personal Relationships; 3.13(b) Running for Office. New sections: 5 Reporting; 6 Feedback; 7 Definitions. Language changes throughout: “Employees and commissioners” changed to more specific language and “Code” changed to “Policy”. References added throughout to new PIDA policy and procedure, and new Personal Interest Disclosure form for COI reporting.	2023-03-31
Standards of Conduct	Non-substantive updates and corrections. Moved to gender neutral language. Clarification around requirements for annual disclosure.	2019-08-21
Standards of Conduct	Updates.	2014-12-16
Standards of Conduct	Full Review – changes to acceptance of entertainment and gifts, loyalty points, employer’s tools or equipment; approved by Board November 2011 and by Executive Committee February 1, 2011.	2012-02-01
Standards of Conduct	Full Review.	2007-06-01
(22.20.20) Standards of Conduct	Revision.	1997-10-01
(06.10.05) Conflict of Interest	Original policy	1988-06-06

**APPROVAL**

Authorized:

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Vincent Tong, Acting Chief Executive Officer

Date Approved:

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BC Housing conducted a review and update of the Standards of Conduct Policy most recently in 2022/23. The goals of this review include:

1. ensuring the principles of reconciliation and of equity, diversity, inclusion and belonging, as well as anti-racism, anti-discrimination and anti-harassment are clearly embedded within our Standards of Conduct for BC Housing Employees and Commissioners;
2. ensuring full compliance with government mandate, particularly within the Conflict of Interest provisions;
3. updating parameters to expand on Standards of Conduct related to conduct outside of the workplace, personal relationships, seeking public office and other updates,
4. including references to news processes such as the Personal Interest Disclosure form, the Public Interest Disclosure Act and the Public Interest Disclosure Act

The result of this review is an updated Standards of Conduct Policy for all BC Housing Employees and Commissioners. Consistent with BC Housing’s values, this policy is aligned with the highest standards of accountability and transparency.

In addition to a new Standards of Conduct Policy, the following list of Questions and Answers has been prepared and is available to all Employees via the Human Resources website. If you have additional questions, please check with your manager and please feel free to contact Human Resources.

**Q1. What is the definition of Gifts, Entertainment and Benefits?**

A. Gifts, entertainment and benefits are defined as:

Gift A tangible item of value that is of enjoyment or benefit for the recipient (gift cards, clock, gift basket, etc.).

Entertainment An offer to experience or participate in an event that serves the sole purpose of entertainment, unrelated to business (sporting event, concert tickets, golf tournament, weekend fishing trip, movie pass, etc.).

Benefit An offer of services or an event that may or may not serve the purpose of the recipient and the organization, but is of a value either in enjoyment or personal/professional development (complimentary services, conference, etc.).

**Q2. Is there a value of a gift received from a supplier or client that would be acceptable? At what value is a gift deemed to be excessive?**

A. There is no set value that would be regarded as acceptable for a gift; each gift received must be assessed on its own merits. For example, a fruit basket received from a regular supplier at Christmas for the workgroup would likely be reasonable and shared among the staff; however,

an expensive watch given to one individual would not be acceptable. Another aspect of the gift would be how and when it was received. If there is any potential perceived "return" expected (i.e. an expectation of favouritism from a supplier bidding on a project), this would not be acceptable and would need to be returned. In all cases, the item(s) must be reviewed with your manager and a reasonable determination will be made based on the criteria outlined in the policy. Gifts in excess of a \$100 value must be referred to the Director, Employee Relations for assessment.

**Q3. Is there a value of entertainment received from a supplier or client that would be acceptable?**

- A. Most entertainment up to \$100.00 in value is acceptable, so long as it is approved by your supervisor/manager and meets the criteria outlined in the Standards of Conduct policy. Some entertainment, such as hockey or concert tickets, may exceed the \$100.00 mark but would still be acceptable if it meets the criteria outlined in the Standards of Conduct policy, including that the offer of entertainment occurs infrequently and that acceptance of the offer does not create any obligation. For gifts over \$100 approval is required by the Director, Employee Relations.

**Q4. When do I need to declare gifts and/or entertainment?**

- A. All gifts must be declared to your manager/supervisor who will determine if the gift is appropriate and acceptable.

All entertainment must be declared to your manager/supervisor to determine if it is appropriate. The Employee must declare any entertainment in excess of an estimated \$100.00 value using the Personal Interest Disclosure Form within 30 days of the Employee accepting or declining the offer of entertainment.

**Q5. Is this audited?**

- A. Yes. Human Resources is responsible for monitoring declarations to ensure there is a reasonable and consistent application of the policy. The Vice President, Human Resources also reports quarterly on the Standards of Conduct to the Board of Commissioners.

**Q6. I am on the board of a co-op, and I hold a position at BC Housing related to the Commission's funding of co-ops. Am I in a conflict of interest?**

- A. Yes, you are in a conflict of interest unless you have fully and properly disclosed this conflict of interest and BC Housing has determined that no conflict of interest exists.

**Q7. My mother is a tenant and I am a housing clerk. What can I do?**

- A. As in the situation above, you must disclose this using the Public Interest Disclosure Form and your manager/Human Resources will work with you to assess the situation and ensure you are not in a conflict of interest position. You should not access your Mother's records during the course of your employment.

**Q8. Is there any time when contracting with or hiring a relative is allowed?**

A. There are situations in which this is acceptable, provided there is full disclosure made in advance and no involvement of the Employee in the process of hiring or contracting a relative. As well, intervening levels of management and supervision would need to be in place to ensure there is no conflict of interest or favouritism, perceived or actual.

**Q9.** I have been approached by a supplier (i.e. Shaw, TELUS) asking me to canvas my tenants for interest in signing up. They have offered me a small bonus for anyone who signs up through me, is this OK?

A. No, it is not acceptable for an Employee to accept a personal benefit or a perceived personal benefit. All such issues or requests must be disclosed using the Public Interest Disclosure Form.

**Q10. How often do I need to update BC Housing on my second job or on my volunteer activities?**

A. You must declare your status annually using the Public Interest Disclosure Form and provide updates of any changes as they happen in order to avoid any possible conflicts that could adversely affect BC Housing's interests.

**Questions 11 & 12**

NOTE:

There may be situations in which you purchase something for BC Housing using your own personal credit card and are later reimbursed by BC Housing, although this is not encouraged. If you receive points for this purchase from your credit card company this is seen as a benefit and there is an income tax implication. The Canada Revenue Agency considers this to be a taxable benefit and the value would need to be determined and reported by you as taxable income on your income tax. Information on this is included in the income tax folio located here: <http://www.cra-arc.gc.ca/E/pub/tp/it470r-consolid/it470r-consolid-e.pdf>

**Q11. If I purchase items for work at Save-On-Foods, am I violating the Standards of Conduct policy by using my Save-On-More card to get a discount for BC Housing and receiving personal points?**

A. Yes. Although this may save BC Housing money, you are receiving a personal benefit. While there may be some savings for the employer, it is in conflict with the Standards of Conduct policy.

**Q12. I purchase goods/supplies on behalf of BC Housing and/or stay at hotels on BC Housing business on a regular basis. Many of the places I make purchases or hotels I stay at have points programs (i.e. Air Miles®). Am I able to collect these points?**

A. No, this is in conflict with the Standards of Conduct Policy that we have for all Employees.