



CODE OF CONDUCT POLICY

Design Group Staffing Inc. (“DGSi”), including Design Group Staffing, Inteqna, Project Search Group, Talentcor and Talentcor Professional has a firm, longstanding commitment that all Employees conduct themselves in a professional and ethical manner while at their place of work or while representing DGSi at an outside location. This is demonstrated through our policies and our behaviours in relation to ethics, conflict of interest, privacy, and providing a work environment that is free of harassment, discrimination and violence. DGSi maintains compliance with federal and provincial legislation and strives to be an industry leader in each of these areas of business and professionalism.

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Definition - Terms

Employee	Regular (full time or part time) or Contractual (limited term) Employee of DGSI.
Consultant	Individual providing services to DGSI, either Self-employed or registered as an incorporated company. Consultants are not Employees of DGSI.
Candidate	Job seeker accessing DGSI for a permanent placement, temporary and/or contractual assignment. Candidates may be accessing the services of DGSI or applying for roles with DGSI.
Temporary Employee	Individual on assignment to clients through DGSI.
Manager	Supervisor of DGSI Employee(s).
2 nd Level Manager	Supervisor of the Manager of Employee of DGSI, if the Manager reports to someone other than a CEO.
CEO	Chief Executive Officer of the Manager’s business unit.
Executive Committee	CEO – Design Group and Inteqna, CEO – Talentcor and Talentcor Professional, Chief Financial Officer, Vice President - Human Resources.

ETHICS STATEMENT

While our job is entrepreneurial, there are nevertheless a number of guidelines which are core to our business practices and essential to preserve our integrity, ensure adherence to employment law and privacy policies. These guidelines have been documented below and it is essential that each DGSI employee follow these ethics in conducting business.

1. We do not recruit from our clients.
 - a. Note that a client is a company where we currently have a billing contractor, have made a permanent placement in the last year, or from whom we have obtained a job requirement in the last 6 months.
2. There is a distinction between recruitment and representation. While we may not recruit from our clients, we may represent employees of our clients to find alternate employment or

contract work should they approach us to do so. We may not, however, actively solicit them to leave. We may actively contact someone whose resume is posted on a job board, as this is classified as public domain and does not constitute recruitment. (It is considered best practice to discuss with the applicable internal Account Manager if the prospective candidate in this situation, is currently employed with a major client of our business.)

3. We will not represent a candidate we have placed into a permanent position without the express permission of the client to do so, even if they approach us to do so and we have not recruited them. This will be the case regardless of how long a time period has passed since the original placement, and regardless of whether or not the company in which we placed the candidate is still a client.
4. Note that we may represent a billing contractor out of a client, providing that the billing contractor approaches us to do so, gives the client the required notice, and that the Branch Manager and Account Manager agree that we may do so.
5. We will not submit a candidate to a client without the express permission of the candidate to do so.
6. We will not send unsolicited resumes to clients.
7. We will not discriminate on any prohibited ground as defined in Human Rights legislation (e.g. race, gender, age, religion, etc.)
8. We will report a fall off of a permanent placement as soon as we are made aware of the situation, even when it is only a partial fall off, credit or there is a chance to refill the position. The entire amount of the original fee is debited as soon as we are made aware of the situation (or on the last day of work of our placement, if this is later), and the new fee credited only at such time as it is earned i.e. at the time of the refill or when the credit is used up or has expired.
9. We will follow the DGSi policies and procedures.

CONFLICT OF INTEREST STATEMENT

1. No gratuity shall be accepted by any employee from anyone doing business with the company, either client or contractor, without full disclosure and the approval of management.
2. No gratuity shall be acceptable other than those that can be reciprocated as per standard business etiquette, i.e. luncheons, hockey tickets, golf games, etc.
3. Notwithstanding the above there shall be no personal gain or favoritism shown for such gratuities.
4. No employee shall own, work for, or accept gratuity of any sort from any company considered as competition or doing the same business as DGSi, namely that of an employment agency, without full disclosure and management approval.
5. Any employee having a business interest outside of the company must disclose that interest to management to determine if there is a potential conflict of interest.
6. Employees having any ownership or interests in a company that presently do or will do business with DGSi or any of its affiliates must disclose that interest to management to avoid any conflict of interest.

PRIVACY STATEMENT

We respect the privacy of individuals in all aspects of our business operations. This includes Candidates and Temporary Employees, Regular or Contractual Employees, and Consultants. We have a firm, longstanding commitment to protecting all personal information within our knowledge and under our control, and to maintain compliance with federal and provincial privacy legislation. Our Privacy Policy and Procedure demonstrates that commitment by describing the responsibilities and activities required regarding the collection use and disclosure of personal information.

SCOPE

This procedure applies to all Candidates, Temporary Employees, Regular or Contractual Employees and Consultants within DGSi.

In so far as possible, DGSi attempts to ensure that clients and other organizations with which DGSi deals, respect privacy legislation. However, the DGSi Privacy Policy and Procedure does not apply to any organizations other than DGSi, and DGSi does not review or control the privacy policies, procedures or practices of any outside organizations.

RESPONSIBILITIES

Candidate	Provides personal information to facilitate service from DGSi.
Employee	Provides personal information to facilitate employment relationship with DGSi.
Consultant	Provides information to facilitate contractual relationship with DGSi.
Vice President, Human Resources	Responsible to ensure Privacy Policy and Procedure complies with legislation.

PROCEDURE

Consent to Collect, Use & Disclose Personal Information

By using the services of DGSi and providing DGSi with personal information, either by telephone, fax, mail, email, social media (e.g. LinkedIn, Facebook), through the DGSi website(s), in person or through other electronic or physical means, implies the Candidate's consent. Wherever possible and when necessary, DGSi obtains express consent for particular uses and disclosures.

Implicit consent is implied when using the Candidate's personal information for purposes that are considered reasonable within the nature, purpose and consequences of the organization's activities. For example, if a Candidate provides a list of names and phone numbers of previous employers on the resume for reference checking purposes, DGSi will not seek express consent again prior to conducting those references.

Candidate Application

Candidates are asked to provide information to facilitate the best possible service from DGSi. The information includes contact details, resume, and description of career and role expectations. The

Candidate file may include interview notes regarding work experience and skills, educational background, assessment reports, reference and background check information.

Personal information is requested from Candidates when the Candidate requests DGSi to provide recruitment services or when the Candidate applies for a role with DGSi. The information is used to understand the Candidate's qualifications, needs and preference and to find the best job opportunities. DGSi only collects personal information that is needed to fulfill these purposes, unless requested by the client and consented to by the Candidate.

Temporary Employees

When hiring Temporary Employees, payroll processing information will be requested. This may include Social Insurance Number, banking details and tax deduction information.

Regular or Contractual Employees

When hiring Regular or Contractual Employees, payroll processing information will be requested. This may include Social Insurance Number, banking details, tax deduction and benefits-related information.

Disclosure of Personal Information

Personal information is never traded, sold or leased by DGSi to any external company for any purpose other than what the Candidate or Employee has expressly consented to. The information is only disclosed for DGSi's legitimate business purposes or as authorized or required by a statute, regulation or bylaw, purposes of investigations or legal proceeding, or necessary to respond to an emergency that threatens the life, health or security of an individual or the public.

In the normal course of business, and with consent of the Candidate, Candidate information will be disclosed to clients when DGSi feels there is a potential for a job placement that is well-suited to the Candidate. We only provide information required and requested to make an informed decision regarding the candidacy.

DGSi may share information with affiliates, partners, or other companies we use to provide full staffing services. However, DGSi discloses limited information as required for the function that will be performed on our behalf.

Examples of companies with which DGSi shares limited personal information includes organizations that perform background checks (criminal, education and credit checks) as required by the client.

Security of Internet Submissions

DGSi utilizes third parties for internet services, such as online resume collections and web hosting. Information provided to us via DGSi's website(s) or through unencrypted email carries inherent risks of interception over which DGSi has no control. DGSi website(s) automatically collect certain non-identifiable information regarding website users such as the Internet Protocol (I) address of the accessing computer, the IP address of the Internet Service Provider, the operating system used, the pages accessed and information viewed. This non-identifiable information is used for administration purposes, to monitor traffic and to improve the DGSi website(s).

DGSi's website(s) contain links to third party sites. DGSi has no control over, nor any responsibility or liability for the privacy practices or content of these sites.

RECORDS

Retention of Personal Information

DGSI retains Candidate information as long as the Candidate is using DGSI's placement services, or longer if required by law. For temporary workers, that means payroll information is maintained according to the DGSI Archive Policy.

If a Candidate is no longer seeking employment through DGSI's services, the Candidate may contact DGSI with a request to deactivate their file.

DGSI takes care to secure personal information provided by our clients, Candidates and Employees. DGSI has appropriate safeguards to prevent unauthorized access, loss, misuse, alteration, disclosure or destruction of personal information.

Individual Access of Personal Information

DGSI relies on the information provided by the Candidates and/or Employees, as well as third parties such as those providing references, educational institutions or those conducting background checks. Candidates and/or Employees can assist DGSI maintain accuracy of information by notifying DGSI of any changes to personal information. DGSI will release the personal information of an individual, retained by DGSI, to the individual.

CONTACT

DGSI takes full responsibility for the management and confidentiality of personal information collected. If you have comments or questions about this policy, please write to:

Vice President, Human Resources
Design Group Staffing Inc.
#1620, 800 5th Avenue S.W.
Calgary, Alberta T2P 3T6

DIVERSITY STATEMENT

Design Group Staffing Inc. ("DGSI") employees respect the rights, cultures, interests, and aspirations of all Peoples and are committed to building strong and lasting relationships that help us understand each other's perspectives and priorities.

Inclusiveness

DGSI is proud to employ people from diverse backgrounds and ensures and encourages fair and equitable hiring practices. Our organizational culture demonstrates welcome and inclusiveness. We encourage full participation and contributions of employees, with the ability to access information and resources, be involved in work groups, and have access to leadership and decision-making processes.

Visible Minorities

We recognize that our business is comprised of people of different nationalities and backgrounds and perspectives and that as a team we are stronger because of our diversity. We build respectful relationships that are inclusive of all cultures and ethnic backgrounds.

Indigenous Peoples

As part of our diversity goals, and in recognition of the historical and cultural significance of Indigenous People – DGSi commits to working with Indigenous People to build respectful relationships through early, inclusive dialogue and collaborative processes. Where opportunities for a relationship exist, our employees are encouraged to explore those opportunities in a respectful and pro-active manner.

DGSi supports working with Indigenous Peoples to achieve self-defined community goals that provide lasting benefits and capacity building. We understand that resource development on Indigenous territories requires all parties involved to support building meaningful relationships that is consistent with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

DGSi and many of our client-partners have recognized that building relationships with Indigenous Peoples is fundamental to success. We also recognize that our actions must be meaningful to all our partners.

Persons with Disabilities

Accommodations for job applicants with disabilities will be provided upon request during the recruitment, selection, interview, evaluation and placement process. Likewise, accommodations are considered, wherever possible, within the workplace.

Gender

DGSi maintains a gender balance within our organizational structure. Our annual Compensation Review process includes a review of gender parity.

WORKPLACE HARASSMENT, DISCRIMINATION, VIOLENCE STATEMENT

As part of DGSi's values of 'People First', we respect and value the diversity of our people and consider their concerns and best interests first. We prohibit behaviour and actions that amount to harassment (including bullying, cyber-bullying, intimidating or offensive jokes or innuendoes, displaying or circulating offensive pictures or materials, offensive or intimidating phone calls, emails, texts), sexual harassment (including stalking, leering, offensive gestures, unwanted or derogatory comments, refusal to work with someone because of their sex or sexual orientation, sexual solicitation/advance where the solicitation comes from a person in a position of power), discrimination (including action or decision that treats a person/group negatively because of their race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity, gender expression, marital status, family status, disability, conviction for which they have been pardoned or their record is suspended) or violence (physical force that causes or could cause injury, threat or attempt of violence, domestic violence impacting the workplace, possession of weapons, physical restraint or confinement, loud, disruptive or angry behaviour that is clearly not part of the typical work environment). We prohibit behaviour and actions that are unwelcome, unreasonable to the person and/or others and realize that it is the impact of behaviour, not the intent that determines whether an action is harassment.

DGSI supports that reasonable actions taken by a manager or supervisor relating to management and direction of workers or the workplace is not harassment. This includes providing advice, assigning work, counselling, performance evaluation, proper discipline, and supervisory functions; proper provision of negative performance feedback is not harassment.

The DGSI Workplace Management Program includes an employer reporting mechanism, procedures for investigation of incidents or complaints, information on privacy, investigation reports and communication.

SCOPE

This procedure applies to all Employees or Consultants within DGSI.

In so far as possible, DGSI attempts to ensure that clients and other organizations with which DGSI deals, respect harassment, discrimination and violence in the workplace legislation. However, the DGSI Workplace Harassment, Discrimination, Violence Policy and Procedure does not apply to any organizations other than DGSI, and DGSI does not review or control the policies, procedures or practices of any outside organizations.

This procedure does not pertain to Reasonable Management of Employees within the workplace.

[Definition - Harassment, Discrimination & Violence](#)

Workplace Harassment	Engaging in a course of vexatious comment or conduct (including cyber-bullying) against a worker in a workplace that is known or ought reasonably to be known to be unwelcome. Vexatious behavior is defined as repeated and hostile or unwanted conduct that affects an employee’s dignity, resulting in a harmful work environment for the employee. Workplace harassment may include bullying, intimidating or offensive jokes or innuendoes, displaying or circulating offensive pictures or materials, or offensive or intimidating phone calls. Harassment is concerned with the impact of behaviour, not the intent.
Workplace Sexual Harassment	Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identify or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.
Grounds of Discrimination	An action or decision that treats a person or a group negatively for reasons that are protected under the Canadian Human Rights Act: race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability, conviction for which a pardon has been granted or a record suspended.
Discriminatory Practice	Practices that are prohibited by the Canadian Human Rights Act when they are based on one or more of the 11 Grounds of Discrimination: denying someone goods, services, facilities or accommodation, providing someone goods, services, facilities or

	accommodation in a way that treats them adversely and differently, refusing to employ or continue to employ someone or treating them unfairly in the workplace, following policies or practices that deprive people of employment opportunities, paying men and women differently when they are doing work of the same value, retaliating against a person who has filed a complaint with the Commission or against someone who has filed a complaint for them, harassing someone.
Workplace Violence	Exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker. This also includes attempt to exercise physical force against a worker in a workplace, that could cause physical injury to the worker; and a statement or behaviour that a worker could reasonably interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.
Domestic Violence	Pattern of behaviour used by one person to gain power and control over another person with whom he/she has or has had an intimate relationship. When this pattern of behaviour impacts the workplace, this Policy and Procedure is invoked. Relationships may be defined as spouse or former spouse, domestic partner or former domestic partner, cohabitant or former cohabitant and or other household members, a person with whom the victim is having, or has had, a dating or engagement relationship, a person with whom the victim has a child.
Prohibited Behaviour	May include, but is not limited to threats or intimidation, stalking, leering or sexually offensive gestures, possession of weapons of any kind at the workplace or at DGSi sponsored events, assault of any form, physical restraint or confinement, loud, disruptive or angry behaviour or language that is clearly not part of the typical work environment; any other act that a reasonable person would perceive as constituting a threat of violence; making remarks, jokes or innuendoes related to Grounds of Discrimination, displaying or circulating offensive pictures, graffiti or offensive materials; making unwanted comments or questions about a person's personal life; refusal to work with someone because of their sex or sexual orientation; making derogatory or degrading comments about a person's body.
Reasonable Management of Employees	Reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace. Management of workplace performance and conduct related to bona fide management duties and obligations.
Complainant	Employee of DGSi or Consultant reporting an allegation of Workplace Harassment, Discrimination or Violence. The Complainant could be the victim of harassment, discrimination or

	violence; believe they have been threatened with violence; or a witness of an act or threat of harassment, discrimination or violence towards another person.
Respondent	Employee of DGSi or Consultant reported for allegations of Workplace Harassment, Discrimination or Violence.
Human Resources	DGSi employees who are part of the Human Resources department.

RESPONSIBILITIES

Complainant and Respondent	Cooperate with the investigation process in a full, truthful and transparent manner, providing all requested documents and information.
Investigator	An investigation protocol will be used to ensure the quality and integrity of the investigation process. Investigations will be made within a reasonable timeframe.
Managers	Responsible for promoting a culture of compliance (to this Policy and Procedure) and integrity, including a positive working environment in which people are treated with dignity and respect.
Human Resources	DGSi employees who provide support, advice and investigation, if necessary.
Vice President, Human Resources	Responsible for the maintenance and compliance for this Policy and Procedure.
CEOs or Chairman (as applicable)	Responsible for the resolution and outcome(s) of any complaint.

PROCEDURE

Immediate Danger

If an emergency exists and if a person is in immediate danger, the local police should be called at 9-1-1. The person should take appropriate steps to protect themselves from harm, such as leaving the area.

Not Immediate Danger – Informal Resolution

An Employee or Consultant has options to address inappropriate behaviour in the workplace. The option chosen may vary depending upon the event, the frequency and the severity of the event:

- Informal – Without being confrontational, clearly and directly describe the behaviour and let the other person know that the behaviour was inappropriate and unwelcome. This option may be appropriate if the person is not fully aware of the impact of their actions.

- Informal (2nd level) – If an informal conversation is not successful, or if the person is not comfortable speaking with the other person directly, contact Human Resources. Human Resources will work with the person to assist in resolving the situation using an informal approach. This may include meeting with the person or arranging for mediation.

Formal Written Complaint

If an informal approach does not result in resolution, or if the person chooses to go directly to a formal resolution process, the person may file a formal written complaint.

An Employee or Consultant alleging Workplace Harassment, Workplace Discrimination or Violence in the Workplace, may report their complaint to the DGSI Vice President, Human Resources. In the event that the alleged Respondent is a member of the Executive Committee, the complaint will be referred to an external investigation process.

A [Formal Written Complaint](#) must include the following information:

- Who was involved and the names of any witnesses;
- What happened, where did it happen, when did it happen;
- What section of this Policy & Procedure does the complaint fall under;
- What remedy the person is seeking.

The formal complaint should be submitted to ethics@dgsi.ca. Written complaints should be submitted in a timely manner. Upon receipt of a written complaint of Workplace Harassment, Discrimination or Violence an investigation into the allegations will commence.

Investigation

For incidents or complaints involving Employees or Consultants of DGSI, an internal investigation, conducted by Human Resources, will be conducted in a timely and thorough manner, based on best practices within the field of workplace investigations.

DGSI will comply with provincial legislation that may require an external investigation of a complaint. An investigation and report in this circumstance is at the expense of DGSI.

Confidentiality

Information obtained about an incident or complaint of Workplace Harassment, Workplace Discrimination or Violence in the Workplace, including identifying information about any individuals involved, will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or is otherwise required by law.

Duty to Report

Employees, Consultants and Managers have a duty to report in good faith any known or suspected violation of the Workplace Harassment, Workplace Discrimination or Violence in the Workplace Policy. Any concern raised or report filed will be shielded from any form of reprisal, discrimination or retaliation. DGSI is committed to creating an environment in which every person affected by this Policy feels free to report activity or incidents suspected of violating the Policy.

Communication

At the conclusion of the investigation and decision regarding outcomes, the Complainant and Respondent will be informed in writing of the results of the investigation and or any corrective action that has been taken or that will be taken as a result of the investigation.

Training

DGSI will provide training to Employees, Consultants and Managers through a variety of mediums including onboarding, presentations and resource materials.

Risk Management

DGSI includes Workplace Harassment, Workplace Discrimination and Violence in the Workplace in its risk management and audit procedures.

On an annual basis each DGSI workplace/branch will conduct a violence in the workplace risk assessment using the '*Risk Assessment for Workplace Violence Prevention Form*'. The risk assessment includes an evaluation of actual or potential risks with consideration of circumstances that are both common and specific to each workplace.

Records

Investigation File(s)

For incidents or complaints involving Employees or Consultants of DGSI, the internal investigation file will be kept by Human Resources, separate to the Personal File of an Employee or Consultant. This includes the Complainant, the Respondent and any witnesses interviewed during the course of the investigation.

For incidents or complaints involving the Executive Committee of DGSI, the external service conducting the investigation will hold the investigation file and provide final results to the Chairman, DGSI.

Recommendation, Resolution and Outcomes

For incidents or complaints involving Employees or Consultants of DGSI, recommendation(s) for resolution and outcome(s) will be made to the applicable CEO. Disciplinary outcomes will become part of the Personal File of the Employee or Consultant, who is found in breach of the Workplace Harassment, Workplace Discrimination or Violence in the Workplace Policy of DGSI.

For incidents or complaints involving the Executive Committee of DGSI, the Chairman of DGSI will have final decision regarding resolution and outcomes.

Policy and Procedure Review

This Policy and Procedure is reviewed on an annual basis to ensure currency and compliance to applicable federal and provincial legislation.

Risk Assessment Review

The '*Risk Assessment for Workplace Violence Prevention*' will be reviewed annually or upon receipt of a reported incident, workplace relation or major change to a work environment. This is to ensure continued protection of employees from workplace violence.

Each Manager is responsible for ensuring the risk assessment is completed for their area in consultation with staff and that any identified control measures for the prevention of workplace violence are implemented, monitored and maintained.

The original copy of the completed assessment forms will be kept by the Health, Safety & Quality department, with an annual risk assessment review by the Executive Committee.

Contact

Queries, complaints or concerns regarding the Workplace Management Program – Workplace Harassment, Workplace Discrimination and Violence in the Workplace may be addressed to:

Vice President, Human Resources

Design Group Staffing Inc.

#1620, 800 5th Avenue S.W.

Calgary, Alberta T2P 3T6

ethics@dgsi.ca

WORKPLACE ENVIRONMENT STATEMENT

DGSI seeks to ensure the health and safety of our community and provide employees, contractors, temporary staff, clients and candidates with the most productive environment possible. Every employee can contribute to the quality of our work environment through good work habits, personal responsibility, respect for others, professional decorum and cooperation with policies, processes and programs.

Personal Privileges

Every employee contributes to the image and reputation of DGSI. While employees have the right to personal preferences in dress and workplace décor, the overall image should be one of professionalism as appropriate for the particular function (e.g. client-facing roles). Business casual attire (slacks, skirts, dress shirts, blouses, golf shirts, sweaters) is acceptable. Jeans, t-shirts, running shoes or attire that is excessively casual or careless is not acceptable for regular working time. Safety is also a consideration, particularly for individuals working in high-rise offices. In the event of a building evacuation, it is important to have appropriate footwear to be able to exit the building safely.

Smoking

All offices are non-smoking (cigarettes and e-cigarettes) during office hours. Employees wishing to smoke must do so on their own time. Any time used for smoke breaks is to be made up at the beginning or end of the day. Any office located in a non-smoking building will abide by the building rules.

Food

Food may be consumed on the premises providing it does not create an odor that is objectionable to other persons in the office.

Reception areas are to be kept clear of any food at all times during office hours.

Policy Name	CODE OF CONDUCT	Policy Number	3.1
<i>Revision History</i>		<i>Reason</i>	
	04/2017	New legislation & processes; consolidation of Code of Conduct policies	

	10/2018	Removal of reference to Drugs and Alcohol due to new separate Drug and Alcohol Policy.
	01/2019	Inclusion of language defining 'vexatious behaviour' to align with CNESST (Quebec legislation).
<i>Approved – Executive Committee</i>		<i>Issue Date – January 2019</i>