

CODE OF
BUSINESS

Ethics AND Behaviour

Code of Business Ethics and Behaviour

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We believe

Illnesses and injuries can and must be prevented. Belief in prevention drives action and commitment to change.

Our vision

Every worker home safe and healthy.

Our mission

We are a force for positive action – anticipating and responding to the greatest needs of our clients, and bringing together our partners, members, and diverse communities to build safer, healthier, stronger workplaces.

We will accomplish our mission by being...

Experts: mobilizing our know-how in the management of high-risk hazards.

Knowledge Brokers: acquiring and creating knowledge unique to our industries, and optimizing information exchange.

Change Agents: facilitating organizational improvement through auditing, consulting and training.

Champions: advocating workplace health and safety in Northern Ontario communities.

Our values

Wellness: *We live and breathe **health and safety** and we practice what we preach. We are committed to developing and sustaining a safe and healthy workplace and creating a **positive work environment**.*

Clients: *We recognize that a **satisfied client** is our future. We strive to anticipate, meet and **exceed client needs** and expectations every time.*

People: *WSN is founded on talented employees applying innovative solutions to advance our client's health and safety performance. Our **people are our greatest strength** and deserve to be **inspired and empowered** to be the best they can be*

Integrity: *We are each **personally accountable** for the highest standards of behaviour and **professionalism** in all aspects of our work. We consistently treat our clients and one another with **respect**.*

Excellence: *Our products and services will be of **quality and value**. We will deliver **excellence**, and strive for **continuous improvement** in all that we do.*

Leadership: *Leadership is demonstrated through our **actions**. We each lead through our **passion, competence and creativity**.*

Teamwork: *Nobody is as smart as everybody. We will **collaborate** with staff, clients, stakeholders and partners to leverage the significant contributions that come from the **diversity** of individuals and ideas.*

Statement of Intent

WSN places the highest value on the integrity of its employees, and of the organization itself. The purpose of the Code is to provide guidance to staff and to help them recognize and resolve ethical issues they may encounter in conducting the business of WSN. Everyone to whom this Code applies must comply with its provisions, both in letter and spirit, and is responsible for being familiar with the contents of this Code.

Employees who violate this Code may be subject to discipline up to and including a requirement for restitution or termination of employment.

Application

This Code applies to all employees, both active and inactive, including those under contract, those on any leave, and members of the Advisory Committee. Employees of WSN and all representatives including agents, advisors, consultants, contractors and suppliers of WSN are required to comply with certain provisions of this Code.

Board Members

The Board of Directors should comply with their established Code of Ethics and Conflict of Interest policies and procedures.

Compliance

Compliance is both a corporate and individual responsibility. Everyone has the personal responsibility to know and understand this Code, the conflict of interest rules, and other policies of WSN.

Privacy/Confidentiality

WSN takes privacy seriously. WSN is a custodian of sensitive personal information and confidential business information. Protecting the confidentiality of the information is everyone's responsibility.

Information pertaining to a complaint and/or investigation will be collected directly from the person to whom it applies, or directly from the person whose opinion is being sought. Information will be used for the purposes of the complaint or investigation. Issues raised and resolutions decided will be recorded and reported out annually to senior management and the Board of Directors. That information will also be used to identify trends, and to respond through policy and program development and evolution. Those to whom the information pertains will be notified in advance if it is to be used for any other purpose. When dealing with issues under this Code, information will be accessible during legal proceedings and for the grievance process.

All personal information collected relative to a complaint or investigation will be securely stored centrally by the fact finder or investigator. At the end of the process, all files or documentation created in association with the fact finding process or investigation will be securely stored. Information associated with an investigation will be kept for a period of time no less than legally required, at which time it will be destroyed.

Key Terms

The following terms apply in this Code:

ETHICS EXECUTIVE – Provides advice and direction to employees and members of the Board of Directors on violations to the Code, as well as the approved Conflict of Interest rules, and is accountable for addressing and responding to those violations. At WSN, the Ethics Executive:

- For employees is the President & CEO
- For the President & CEO is the WSN Chair of the Board of Directors
- For Board of Directors members is the WSN Chair of the Board of Directors
- For the WSN Chair of the Board of Directors is the Chair of the Governance and Strategic Planning Committee.

Reporting an Ethical Violation

WSN fosters an environment in which issues and concerns may be raised and discussed with management or others without fear of retribution or reprisal. If someone becomes aware of activities that are inconsistent with this Code, they may immediately report them using one of the avenues described in the guidelines. Those who report suspected behavior or actions that are seen as inappropriate will be protected from any kind of reprisal. Likewise, it is unacceptable to make a complaint or file a report knowing it to be false. WSN will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against anyone as a result of providing information or assistance for investigations into corporate conduct.

Information pertaining to a complaint and/or investigation will be handled in a manner that protects its confidentiality and the privacy of the individuals involved. However, disclosure may be necessary to aid in an investigation, to resolve a complaint, to take appropriate action or as otherwise required or permitted by law.

Code Provisions

Health & Safety

WSN is committed to the elimination of all workplace fatalities, injuries, and illnesses. All of those to whom this Code applies have a role in attaining this vision. WSN management is committed to putting in place appropriate work practices and taking all practical measures to ensure that equipment and premises within its control are in safe condition and reduce risk to health.

While WSN management has the prime responsibility for managing health and safety, everyone must protect their own personal health and safety through the decisions and actions they take.

The following principles guide the Health & Safety policies of WSN:

- Everyone is entitled to a safe, healthy workplace.
- Everyone is responsible for health and safety at WSN, and as such, everyone will take all possible steps to perform work in a safe manner to prevent personal injury and illness.
- Everyone will take responsibility for their actions and learn from experiences to prevent further incidents and near misses.
- Everyone will work in compliance with applicable legislation and established safe work practices and in doing so, be fit for work.
- Everyone will take timely corrective action to eliminate hazards at WSN workplaces, or to report hazards beyond their control to their supervisor
- WSN and COPE Local 24 are committed to consulting about health and safety issues and taking appropriate action to ensure the safety of employees.

Refer to the following policies for more specific information and guidelines:

Occupational Health and Safety Policy

Respectful Workplace, Harassment & Discrimination Prevention Policy

Workplace Violence Prevention Policy

Wrongdoing

WSN establishes procedures and provides protection to employees who disclose wrongdoing at or by WSN. Wrongdoing is defined to mean:

- Violation by a WSN employee of either a statute or regulation;
- An act or omission by a WSN employee that creates a grave danger of life, health, safety or persons or the environment where the danger is unreasonable under the circumstances;
- Gross mismanagement by a WSN employee (e.g. gross waste of money, abuse of authority, abuse of WSN assets);
- Directing or consulting someone to commit one of the above.

Only acts of wrongdoing as defined above may be reported directly to the Ethics Executive.

Conflict of Interest

A conflict of interest occurs when a person's activities or interests interfere with work responsibilities. Avoiding and preventing situations that could give rise to a conflict of interest or the appearance or perception of a conflict of interest is one of the primary means by which WSN maintains member confidence in the impartiality and objectivity of our business activities. Being aware of these situations protects employees as individuals, as well as WSN as a trusted organization.

There are times when your work or relationship with WSN, and personal relationships or activities outside of the workplace, may or can create a conflict of interest.

When in doubt, ask. It is better to declare a potential conflict than to take the risk of entering into a conflict. Employees are bound to comply with WSN's Conflict of Interest Policy. Refer to the following

policy for more specific information and guidelines:

Conflict of Interest Policy

Political Activity

WSN balances the need to preserve the integrity and neutrality of its service with an individual's right to engage in political activity.

A WSN employee engages in political activity when he or she:

- Does anything in support of or in opposition to a federal or provincial political party;
- Does anything in support of or in opposition to a candidate in a federal, provincial or municipal election;
- Is or seeks to become a candidate in a federal or provincial or municipal election, or comments publicly and outside of the scope of the duties of his or her position on matters that are directly related to those duties and that are dealt with in the positions or policies of a federal or provincial party or in the positions publicly expressed by a candidate in a federal or provincial or municipal election.

Employees may engage in political activity subject to certain restrictions.

They may not:

- Engage in political activity in the workplace;
- Use WSN premises, equipment or supplies when engaging in political activity;
- Associate his or her position at the WSN with political activity.

Employees who decline to be politically active reserve the right and are protected.

Some activities require a leave of absence without pay. Refer to the following policy for more specific information and guidelines:

Absence and Leave from Work

Where an employee is elected as an official representative of the union, the Employer recognizes that all union representatives have an enhanced responsibility to the labour movement including associated political ties. When representatives engage in political activity as an Officer of the Union, the Employer acknowledges such activities will not be construed as a conflict.

Use of WSN Information Technology and Business Equipment

Everyone is individually responsible for the protection of WSN assets and systems assigned to or made available to them. Misuse, misappropriation or theft of WSN property is absolutely prohibited. WSN property includes assets such as software, telephones, computers, peripherals, supplies, access to internet, intranet and e-mail systems, and any other property owned by WSN.

Emerging social media/collaboration platforms (blogs, wikis, on-line social networks/publishing/discussion) are changing the way people communicate and engage with each other.

Social networking and blogging are primarily forms of communication among individuals. If participating in social media activities, whether at work (if it is part of your job function) or on your own time, the following guidelines apply:

- The line between personal and work is often blurred in online social networks. Make it clear that what you say are your own views and opinions. Do not identify or represent WSN positions, strategies or opinions.
- Assume that what you have written will be read by others (including work and personal colleagues, clients, customers and stakeholders) and can be acted upon.
- Do not disclose or use WSN confidential, proprietary, sensitive financial, or business performance information, or that of any other person or company, online.
- Do not use or disclose any material that violates the privacy of others. Be mindful that what you write will be public for a long time.

Do not post material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful or embarrassing to another person or entity. This includes, but is not limited to, comments regarding WSN, WSN employees, customers, clients, stakeholders, WSN's partners and WSN's competitors. Refer to the following policy for more specific information and guidelines:

Acceptable Use of Information Technology and Business Equipment Policy

Communication

When WSN communicates publicly – whether to its stakeholders, clients, customers or to the general public – it has an established process. Only those officially designated by WSN have the authorization to speak on its behalf.

If WSN management finds that an employee's conduct on or off the job adversely affects his or her performance or that of other employees, or the legitimate business interests of WSN, such employees will be subject to disciplinary measures, including dismissal. Refer to the following policy for more specific information and guidelines:

Media Relations Policy

Intellectual Property & Copyright

WSN owns the copyright in all works created by its employees in the course of their employment in the absence of any express written agreement to the contrary. As the owner of copyright in such works, WSN has all of the exclusive rights associated with the ownership as set out in section 3 of the Copyright Act, including the exclusive right to give or withhold permission to do certain acts in relation to the works.

WSN's logo may only be used in the course of conducting WSN business, or where expressly authorized by senior management.

Business Expenses & Financial Accountability

WSN's financial, accounting and other reports and records will accurately and fairly reflect the transactions and financial condition of WSN in reasonable detail, and in accordance with generally accepted accounting principles, practices, procedures and legal requirements.

No one will authorize payment knowing that any part of the payment will be used for any purpose other than what is described in documents supporting the payment.

Everyone will exercise integrity, prudence, and judgment when they incur and approve business expenses. They must be reasonable and necessary for business reasons. Expenses incurred in the performance of WSN business will be reimbursed in accordance with the Travel, Meals and Hospitality Expenses policy, through the filing of expense reports, which must be documented accurately and completely. Refer to the following policy for more specific information and guidelines:

Travel, Meals and Hospitality Expenses

Procurement of Goods & Services

WSN will only make purchases based on total cost, service, health and safety, quality and proficiency of, and commitment to, integrity. All purchasing commitments (in any form, including verbal or written orders, letters of intent or contracts) must be processed through Corporate Services. Purchase requisitions issued after the fact where suppliers have already begun supplying WSN with the goods and/or services before obtaining the appropriate approvals are considered a violation of this Code. Those business units or individuals that are planning to purchase goods or services must involve Corporate Services early in the sourcing process to facilitate the supplier selection and qualification process and to conduct negotiations for the specific purchase.

No individual WSN employee or member of the Board of Directors may:

- Make a purchasing card commitment or sign a purchase order or contract without having the delegated authority to do so; or
- Make a verbal or written commitment to a supplier for it to provide goods and/or services to WSN without a purchase order and/or contract in place unless by purchasing card in accordance with the purchasing card guidelines.

No WSN employee shall participate directly in sourcing, selection or award of any contract if a conflict is unresolved. Refer to the following policies for more specific information and guidelines:

- **Procurement Policy**
- **Conflict of Interest**
- **Accessible Customer Service**
- **Delegation of Authority**

WSN will inform all vendors, suppliers, consultants and business partners of their responsibility to act on behalf of WSN consistent with the Code and other relevant WSN policies.

Respect, Sensitivity & Fairness – to public and to each other

The importance of courteous, prompt, sensitive and professional service to the public and to each other as colleagues cannot be over emphasized. We represent not only ourselves, but also every member of the Board of Directors and all other employees of WSN.

Sensitivity to the needs of the public and to each other involves being polite, even under difficult conditions, in times of personal stress, and in the face of provocation that does not involve a violation of the law. We must not make abusive, threatening, insulting, offensive or provocative statements or gestures to, or about, another person.

WSN is committed to leading by example and becoming the most effective Health and Safety Association of its kind. The commitment is based on the following principles:

- We treat everyone with fairness, dignity and respect;
- We act with honesty and integrity in our dealings with the public and each other;
- We demonstrate knowledge and competence in carrying out our work;
- Our employees have the right skills and training to do their jobs and to respond; appropriately to individual needs and interests;
- We respect personal privacy, and protect personal information;
- We provide timely access to personal information and business information;
- We communicate and make decisions in a timely manner;
- We keep the public and each other informed and return phone calls and queries in a timely manner;
- We demonstrate fairness and equity;
- We are open and transparent.
- We demonstrate responsible stewardship and governance.

Refer to the following policies for more specific information and guidelines:

Respectful Workplace Policy

Customer Service Standards

Workplace Violence, Discrimination and Harassment

The core values of WSN apply not only to relationships with our customers and the outside world, but to relationships with each other as well. All employees want and deserve a workplace where they feel respected, satisfied and appreciated. Workplace violence, discrimination and harassment is any direct or implied threat, intentional act or other conduct that would arouse a reasonable fear for personal safety or the safety of friends, family, co-workers, clients, suppliers or any other doing business with WSN. This includes, but is not limited to actions, words, communications or gestures, persistent pursuit to unwanted relationships, possession of weapons or any other conduct that would reasonably arouse fear. Refer to the following policy for more specific information and guidelines:

Workplace Violence Prevention

Workplace Diversity

WSN values the background, experience, perspective and talent of each individual, and regards those differences as positive. WSN strives to create a workforce that reflects the diverse populations of the workplaces and communities it serves. WSN does not discriminate in hiring and employment on grounds prohibited by applicable laws. These include race, ancestry, colour, place of origin, sex, ethnic origin, age, marital or family status, disability, sexual orientation, creed, religion and citizenship. Refer to the following policy for more specific information and code/guidelines:

Accessible Customer Service Policy

Ontario Human Rights Code

Workplace Culture

WSN's culture of health, safety, wellness, respect and integrity is reflected not only in our human resources policies and programs, but embodied and projected by every employee. Our dress code is one of business casual, to provide an open and welcoming environment for the diverse community we serve. Our employees are professionals, and present themselves in accordance with the nature of the work they do. To further support our sensitivity to each other and the customers we serve, our employees respect the chemical sensitivities of their clients and co-workers when using scented products in the workplace. Refer to the following policy for more specific information and guidelines:

Smoke Free Ontario Act

Amendments to the Code

The Code and its terms may be modified by WSN at anytime and at sole discretion. All amendments will be communicated to staff and as soon as they are approved and will be binding as soon as they are communicated.

Accountabilities

The Chair is accountable:

- To act as Ethics Executive for members of the Board of Directors;
- To be aware of and respond to violations of the code as reported by the President & CEO.

The Board of Directors is accountable:

- To model behavior through decisions and actions that is consistent with the provisions of the Code and all applicable laws;
- To be aware and respond to violations of the Code as reported by the President & CEO;
- To direct, as required, policy and procedural change necessary to respond to systemic issues arising out of reported conflicts of interest.

The President & CEO is accountable:

- To act as the Ethics Executive for WSN employees;
- To ensure that the Code is implemented and available to all whom it applies;
- To make final decisions following breach investigations that cannot be resolved at the local level;
- To report violations of the Code to the Board of Directors, and to ensure systemic and policy changes necessary to support the Code are implemented as soon as the need for changes are known;
- To be aware of and respond to trends or systemic causes of workplace harassment at WSN;
- To direct, as required policy and procedural change necessary to respond to systemic issues arising out of reported conflicts of interest;
- To inform COPE Local 24 of actions related to this code as appropriate.

Human Resources is accountable:

- To receive, track and oversee investigations as necessary;
- To report every breach and other activity associated with the Code and their resolutions;
- To assist the President & CEO in making final decisions following breach investigations that cannot be resolved at the local level.

Executive Leadership are accountable:

- To lead by example. They are the champions of the Code and must hold their direct reports accountable for compliance within their departments;
- To monitor compliance with the Code within their departments;
- To submit an annual due diligence report to the President & CEO confirming that all of their employees have completed annual training on the Code; all employees have acknowledged the Code through the annual performance development process; and all alleged violations of the Code have been reported to Human Resources;
- To declare all conflicts of interest, perceived conflicts of interest, and potential conflicts of interest, in writing to the President & CEO as soon as they are known.

Managers at all levels of the organization are accountable:

- To ensure that all of their employees, both current and new hires, understand their responsibilities under the Code and are in compliance;
- To ensure that all of their employees complete annual training on the Code;
- To report alleged violations brought to their attention by their employees to the Ethics Executive as soon as they are known;
- To take appropriate action to investigate and address known or suspected violations to the Code;

- To be a concerned, knowledgeable, and reliable counselor to whom employees can comfortably go for advice on business ethics;
- To maintain employee confidentiality, but if disclosure is unavoidable, to inform the employee of the disclosure, in advance if possible;
- To create a work environment that expects and supports ethical behavior;
- To declare all conflicts of interest, perceived conflicts of interest and potential conflicts of interest, in writing to the President & CEO as soon as they are known.

Employees at all levels of WSN are accountable:

- To complete annual training on the Code;
- To understand their responsibility under the Code and to be compliant with the Code;
- To carry out their accountabilities ethically and with integrity, and to seek advice when uncertain about the right ethical decision;
- To declare all conflicts of interest, perceived conflicts of interest and potential conflicts of interest, in writing to their manager as soon as they are known;
- To co-operate fully with an investigation process in which they are involved as the complainant or a witness.

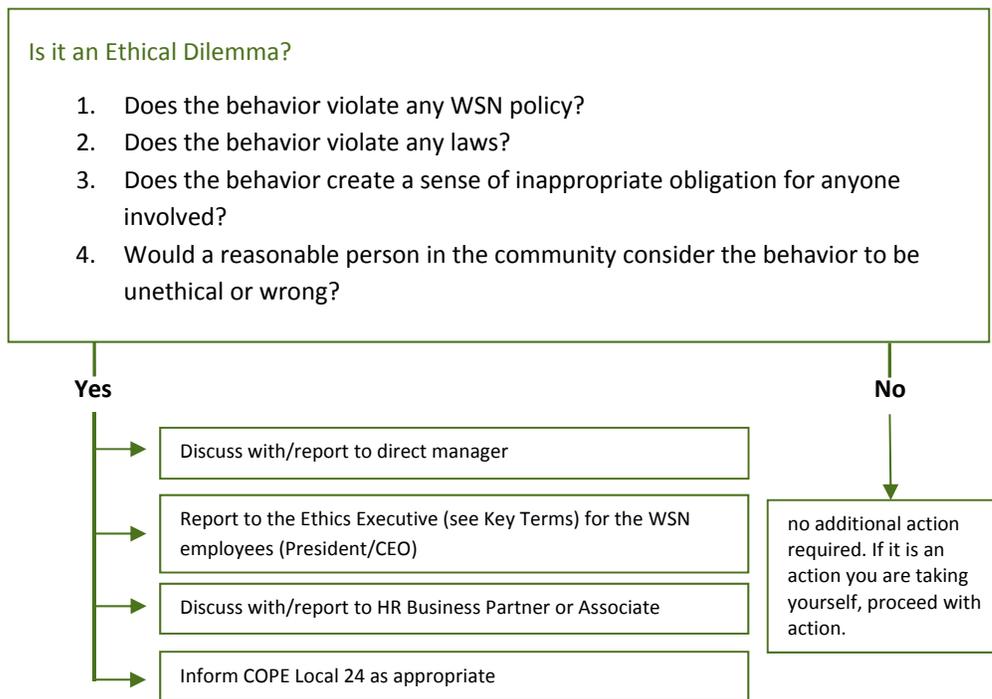
Guidelines for reporting, fact-finding & resolving workplace conflict

Anyone who is facing a work related ethical dilemma, any behavior or activity that violates that Code of Business Ethics & Behaviour, or just doesn't "feel right," has a right and responsibility to report that behavior or activity. These guidelines are designed to help you to understand how to disclose an inappropriate activity or behavior, and how those disclosures are responded to.

Decision to address or report the issue

Identifying actions or behaviours that are, or seem, to be inappropriate can be difficult. Decisions about the actions or behaviours of others are to be based on the provisions of the Code of Business Ethics & Behaviour, our own judgment, as well as "gut feeling." We must do what we feel is right given all of the factors known to us.

Before deciding to report a suspected violation of the Code of Business Ethics & Behaviour – or before taking a course of action yourself – ask yourself the following four questions:



Process for addressing or reporting the issue

There are several options to consider when deciding to report an action or behavior as a violation of the Code of Business Ethics and Behavior.

1. Discuss directly with the person demonstrating the behavior or action in question. You may be able to resolve your concern through better understanding or clarification, or you may be able to convince the person to stop the behavior or action.
2. Self report. If it is an action or behavior that you yourself have taken and question, discuss it with your manager or Human Resources.
3. First line management. Management will handle all such reports in accordance with procedures in place. If your manager is absent, report it to your next level of management.
4. If for any reason this is not an option, another WSN manager or member of the management team, or Human Resources is another approach. All members of the management team have been made aware of the appropriate procedures to follow, and will provide you with information on next steps.
5. Directly to the Ethics Executive. For employees, this person is the President and CEO. This option is available if none of the previous options suggested are appropriate for your issue or situation.
6. Ethics Executives within organizations are responsible for assessing every disclosure to determine whether there is enough information to address the issue, and if so, whether the allegation should be addressed through this process or a different forum. If the disclosure is

filed anonymously, and there is insufficient information, and there is no possible source for information, the matter cannot proceed. The Ethics Executive is accountable for the entire fact-finding process, final decision making based on facts, communication to all affected parties, and records retention.

After a report is made

All disclosures of violations to the Code of Business Ethics & Behavior, regardless of the channel or mechanism used to make the disclosure, will trigger a fact-finding process.

All reports received, regardless of initial reporting channel, will be reported to the Ethics Executive. This role has overall accountability for tracking reports and initiating a fact-finding process. The Ethics Executive will consult with others as appropriate in the organization to decide the most appropriate means of responding to the report.

All reports are recorded, assigned a case number, and tracked in a database maintained by the Human Resources.

Fact-finding

The Ethics Executive will review the report, and determine the best course of action. Options will include:

- A mediated discussion between parties;
- A fact-finding review by management staff within the most appropriate department given the facts of the allegation;
- An internal investigation where criminal activity is alleged;
- An external investigation where appropriate.

The Ethics Executive or delegate will consult with Human Resources and manager of the area in which the violation occurred, or other areas of the organization he or she believes will inform the decision on how to proceed.

Depending on the facts of the complaint, it may be appropriate to appoint a third party investigator. Such cases will be considered and decided upon a case-by-case.

In some cases it may be prudent or necessary to remove one or more of the parties involved in the complaint from the situation that may have given rise to it. Alternative work arrangements will be made to ensure the health, wellness and safety of everyone concerned until the situation has been addressed and resolved.

Regardless of the means of fact-finding, full cooperation on everyone's part is mandatory and consistent with rights under the law. Those conducting an investigation will keep the Ethics Executive and inform COPE Local 24 as appropriate of its progress, and look for guidance as fact-finding proceeds.

How fact-finding is conducted

Fact-finding will follow a set of procedures to ensure the accuracy and integrity of the process. If the issue is of a non-criminal nature, those conducting the fact-finding will first inform those who are the

subject of the matter of the fact-finding route to be taken. If the investigation is of a criminal nature, such notification will not occur.

As soon as a fact-finder has been assigned to a case, the person making the disclosure and the respondent to the disclosure will be informed. The fact-finder will set-up a preliminary meeting with the parties to agree on the process to be followed. Items to be discussed and agreed upon will include:

- The name or names of those who will be conducting the fact-finding process.
- The anticipated timelines to conduct the fact-finding.
- Provision for interim reports or updates with specific timelines agreed to.
- Any other relevant details of the fact-finding process.

Interim updates will be provided to the parties at a maximum of two week intervals, until the fact-finding is complete. Any delays to the original timelines for completion of the fact-finding process will be communicated immediately to the parties. Updates may also be provided to COPE Local 24 as appropriate.

Representation during a fact-finding process

If you are a Non-Bargaining Unit (NBU) employee, subject to an interview, you have a right to have representation during the fact-finding process. A business associate, colleague, senior leader, Human Resources, or independent legal counsel, selected and paid for by you, are examples of such representation.

If you are a Bargaining Unit (BU) employee, you have a right and are entitled to have a union representative in attendance during the interview. When a violation of this policy has been reported that involves a BU employee, the appropriate union representatives will be notified. This will give the employee or employees involved the opportunity to request union representation. If the BU employee declines union representation, this fact is noted.

Representatives on either side are present to advise but not answer for you, and the union is to appoint selected stewards who will be educated in this protocol. The union is to ensure a sufficient number of trained representatives are readily available so as not to impose a significant delay on the fact-finding process.

The allegations are not shared in advance with your representative, but are presented to both of you at the same time, with the option for a break in order for the representative to advise you in private.

Witnesses

Depending on the case, witnesses may be interviewed with the option of representation to ensure the completeness of the fact-finding process. It is the responsibility of the witness to cooperate to the fullest extent in the fact-finding process.

Like all statements taken, information collected from witnesses is recorded and entered into the supporting documentation for the case in question. Witness statements are subject to release upon request, to the person or persons accused of the violation, or otherwise named in the statement. It is critical that information provided by the witness and recorded by the fact-finding is factual and accurate.

How are the results reported?

Updates are provided every two weeks, until the end of the fact-finding process. A final report is provided once the fact-finding process is complete. Updates are provided to all parties involved in the fact-finding, as well as to the Ethics Executive or delegate. The content of the update must be objective, not draw any conclusions, and state only facts.

At the end of the fact-finding process, the report with conclusions and recommendations is given to the Ethics Executive for final decision making. This report includes the findings of the investigation, together with any pertinent documents gathered during the investigation, and any recommendations. The Ethics Executive is responsible to copy members of the senior management team as appropriate.

Once the recommendations are approved by the Ethics Executive, a copy of that full report will be provided to the person or persons accused of the violation and to the director of those persons. Fact-finding involving Directors or persons holding executive positions will be directed to the position immediately above the subject of the investigation with advice to the President & CEO. The original full report is retained by the Human Resources.

A summary report will be provided to all of those directly involved in the complaint, summarizing the issue, the findings, and the approved recommendations. No other copies will be kept. If the identity of the person reporting the alleged violation is known, he or she will be informed of the decision. Representatives will be provided with copies by the employee being represented, at his or her discretion. Cases involving union representation will follow the process as outlined in the Collective Agreement.

All documentation associated with a violation, including fact-finding, decisions and supporting documents, is considered to be confidential.

Unauthorized distribution of any documentation associated with a fact-finding process could be considered a violation of the Code of Business Ethics & Behavior.

Resolution

Regardless of the means of gathering information, all reports of ethical or behavioral violations will be addressed and resolved. Operating management makes discipline decisions, subject to review by the Ethics Executive or delegate. Employees and service providers will be given an opportunity to explain their actions before any disciplinary action is imposed.

Where action points form part of the final resolution or decision, the Ethics Executive or delegate will follow-up on those action points to ensure their completion.

WSN may find it necessary to take appropriate action against any person shown to be involved in a violation. Violations of the Code could result in discipline ranging from a warning, to a reprimand, to termination of employment or service contract.

Frivolous or vexatious complaints

Where it is proven that a complaint is intentionally frivolous, vexatious, malicious or untrue, WSN may take disciplinary action up to and including termination.

Reporter protection

Everyone is responsible for reporting suspected violations of the Code of Business Ethics & Behavior. Failing to report suspected violations is in itself a violation.

If you become aware of activities that are inconsistent with the Code of Business Ethics & Behavior, you may immediately report using one of the avenues described. When you report suspected behavior or actions that are seen as unethical, you will be protected from any kind of reprisal. WSN will not discharge, demote, suspend, threaten, harass, or in any other manner, discriminate against anyone who, in good faith, provided information or assistance for investigations into corporate conduct.

If you wish anonymity, you are assured of it, throughout the entire fact-finding process. Information that involves a threat to life and property, illegal activities, legal action or discipline against WSN may require actions that do not allow for complete anonymity.

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