

CODE OF BUSINESS ETHICS

St. Joseph's Health Centre (the "Health Centre") is a values based organization. These values are HUMAN DIGNITY, EXCELLENCE, COMPASSION, SOCIAL RESPONSIBILITY and COMMUNITY OF SERVICE. In order to build and maintain trust in the organization, we need to consistently demonstrate integrity and credibility. Therefore each individual employed by or associated with the organization is expected to share in our commitment to high ethical and legal standards. Each employee, physician, volunteer, student, contract personnel and corporate stakeholder (hereinafter referred to as "individual/s") is accountable to act with integrity and to comply with this Code of Business Ethics. We expect agents, service providers, consultants, researchers, contractors, representatives and vendors (hereinafter also referred to as "individual/s") to abide by the Code of Business Ethics when acting on behalf of or providing services to the Health Centre. The Code of Business Ethics has been prepared to give every individual a clear understanding of what is expected.

Our commitment to integrity involves a commitment to compliance with applicable laws. Each individual is responsible for providing health care services that comply with all laws, regulations and standards, including those addressing patients' rights.

RESPONSIBILITY AND ACCOUNTABILITY

Each individual is responsible and accountable for acting with integrity by demonstrating compliance with all applicable laws and regulations that relate to activities for and on behalf of St. Joseph's Health Centre and acting in ways that are consistent with the Health Centre's mission, vision, values.

Ethical dilemmas may be encountered in the performance of work related duties. This Code is not intended to be comprehensive. Individuals requiring clarification as to whether an activity is in contravention of this Code of Business Ethics or is illegal or unethical are encouraged to discuss the issue with a member of management.

Illegal or unethical practices or conduct in violation of this Code of Business Ethics is subject to disciplinary measures appropriate to the violation, up to and including dismissal.

SUPPLY CHAIN AND PROCUREMENT

Personal Integrity and Professionalism

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

Accountability and Transparency

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

Compliance and Continuous Improvement

All individuals involved in purchasing or other supply chain-related activities must comply with this Code of Business Ethics and the laws of Canada and Ontario. All individuals should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.

Relationship with Suppliers

The term “supplier”, as used here, means any person, group of persons, firm or corporation, who is providing or seeking to provide, goods or services to St. Joseph's Health Centre

Business relationships with suppliers must be equitable to both parties, based on merit, and comply with Health Centre policies. Business decisions are based solely on the best interest of St. Joseph's Health Centre, its patients and the community served.

Contracts are awarded based on product or service suitability, price, delivery and quality. Purchasing agreements are documented and clearly identify the services or products to be provided, the payment terms, and the applicable price commensurate with the services or products provided.

Any relationship with a supplier that could be interpreted as influencing an employee's decision-making on behalf of the Health Centre must be disclosed to management.

Loans from suppliers of either a business or personal nature may not be received.

Receipt of a prize or award from a supplier must be disclosed to management.

The receipt of any form of payment from a supplier for speeches, presentations or articles is not acceptable if it could be interpreted as influencing decision-making on behalf of the Health Centre. All such payments must be disclosed to management in advance, if possible.

TRAVEL

Transportation and lodging provided by a supplier or other third party are acceptable when the trip is for business purposes and is approved in advance by the employee's Manager. When the transportation and lodging are provided by a supplier or potential supplier the employee's Manager must consult with the Purchasing Department or designate prior to providing approval, to identify any possible conflict of interest situations.

The individual's appropriate Manager must pre-approve travel at Health Centre expense.

GIFTS, ENTERTAINMENT AND FAVOURS

A gift is something acquired without compensation, such as, a meal, a ticket to a special event, cash, a gift certificate, a piece of jewellery, a bottle of alcohol, etc.

A favour is a privilege or concession, such as, a reduction in the price of an item or service.

Entertainment means something that amuses, pleases, or diverts, especially a performance or show, such as a cultural, musical, or sporting event, for which there is a charge for admission.

Gifts or other favours that could in any way influence or appear to influence business decisions are not acceptable. Giving or receiving occasional gifts of nominal value is a common practice in building and maintaining business relationships. However, if any gift of more than nominal value is offered, the gift must be declined. This principle applies at all times, whether during a traditional gift-giving season or otherwise, and applies to all individuals.

For the purposes of this section, a donation made to the St. Joseph's Health Centre Foundation and which is eligible for a charitable receipt, is not considered a gift.

It is important to distinguish between gifts and entertainment. To be entertainment, the person offering and accepting the invitation must attend and the purpose must be for business discussion or the enhancement of a business relationship. Accepting entertainment that may appear inappropriate should be discussed with management in advance if possible. If an invitation seems inappropriate, the offer should be rejected. Individuals are not allowed to accept tips or gratuities.

CONFLICT OF INTEREST

An individual's position, or knowledge gained through their employment or affiliation is not to be used in a manner that a conflict of interest or an appearance of a conflict of interest arises.

Individuals must disclose any kind of financial or personal obligation or interest that affects (or may appear to affect) their judgment in the transaction of business on behalf of St. Joseph's Health Centre with outside firms or individuals.

Each individual must examine his/her own activities and those of his/her family to be sure that no such obligation or relationship exists that could create (or appear to create) a conflict of interest.

Any individual involved in recommending or purchasing goods and services or in recommending or hiring an individual must disclose in writing, any known material interest, whether personal, family, or financial, in a prospective vendor, service provider or employee to the Purchasing Department authority/Director of Human Resources. The individual will withdraw from the decision-making process, if that is deemed appropriate.

INVESTMENTS

Investments that influence, or could appear to influence, an individual's independent judgment on behalf of St. Joseph's Health Centre must be disclosed and the individual will withdraw from the decision-making process, if that is deemed appropriate.

For example: a conflict of interest could arise if a staff member has an investment in a supplier and has decision-making authority that may have a business impact on an outside party. *For clarity, having a personal mortgage etc. with a financial service organization that provides a financial service to the Health Centre would not be a breach of this provision.*

PERSONAL ACTIVITIES OUTSIDE EMPLOYMENT

Individuals are encouraged, and free to support community, charity, religious and political organizations and causes of their choice, providing it is made clear that their views and actions are not those of St. Joseph's Health Centre.

USE OF ASSETS

Individuals are responsible for ensuring that the property of St. Joseph's Health Centre is used only for its proper and charitable purposes and the benefit of the community.

The assets of the Health Centre including **funds, supplies, equipment, premises, time and information** are:

- Controlled and safeguarded to prevent fraud, theft, misuse and dishonesty;
- Entrusted to staff to prevent loss, damage, misuse or theft;
- Only used for legitimate Health Centre purposes;
- Not to be used for personal purposes, including paid or unpaid work for other organizations, unless specifically authorized by management (for example – to support a charitable community project); and
- Not to be borrowed or removed for non-business purposes.

Any individual who has knowledge of any theft, fraud, misuse or dishonesty is expected to report such information.

THE ORGANIZATION'S PROPRIETARY AND CONFIDENTIAL INFORMATION

The organization's documents and information are the property of St. Joseph's Health Centre.

Each individual must maintain and protect the confidentiality of any proprietary or confidential information *of the Health Centre* that the individual learns or obtains during the course of their involvement at the Health Centre. Unauthorized disclosure, use or discussion of Health Centre documents or information is prohibited.

Each individual must use such confidential information only in a manner consistent with the purposes for which it was shared with the individual. ***No individual shall use confidential/proprietary information of the Health Centre***, either during or after their involvement with the Health Centre, for any other purpose.

For a detailed description of each individual's responsibilities with respect to privacy/confidentiality, please see the comprehensive Security of Information and Confidentiality Policy (Policy SE 10-1-1).

INTEGRITY OF RECORDS

All financial books, records and accounts must accurately reflect transactions and events, and conform both to required accounting principles and to St. Joseph's Health Centre's system of internal control.

ENVIRONMENT/HEALTH AND SAFETY

St. Joseph's Health Centre is committed to the protection of the environment by minimizing the environmental impact of our operations and to provide a healthy and safe work environment according to law. Each individual is responsible to comply with all environmental, health and safety laws and regulations.

Environment related incidents and infractions are reported immediately upon discovery, according to Health Centre policy (Policy SJ 09-01-30).

POSITIVE WORK ENVIRONMENT

St. Joseph's Health Centre is committed to a policy of equal employment opportunity without regard to race, creed, colour, age, ethnic origin, sexual orientation, sex, family status, marital status, disability, record of offences, ancestry, citizenship and place of origin (as defined by the Human Rights Code).

In accordance with Health Centre values, it is the responsibility of each individual to treat others with honesty, integrity, compassion and respect in order to provide a trusting work environment free from discrimination and harassment. This includes refraining from the use of language, gestures, signs, jokes, print or electronic material or any other mode of communication that may reasonably be considered to be offensive.

I have read and understood St. Joseph's Health Centre's Code of Business Ethics and will conduct myself with the standards outlined above.

Signature

Print Name

Date