

## SECTION 1 - CODE OF ETHICS / STANDARDS OF CONDUCT

### *Purpose*

The following Code of Ethics/Standards of Conduct policies provide basic guidelines concerning the business conduct expected of every employee, including permanent (regular), temporary, casuals, contractors, co-op students and interns, as well as volunteers. Knowledge Network, including its subsidiary Knowledge-West Communications Corporation, is committed to the highest standards of ethics, honesty, transparency and accountability as outlined in our Corporate Values. Together we strive to maintain and build trust with our viewers, our stakeholders and our Knowledge Partners. The spirit and intent of this code will be adhered to by those who enforce it and those who are guided by it. It is every employee's obligation to learn and understand this code; any questions or concerns can be discussed with the Human Resources Department.

### *Procedures*

Should an employee become aware of a contravention of any of the Code of Ethics/Standards of Conduct policies, the employee is expected to notify the department Director, who in turn will notify Human Resources.

The requirement to comply with these standards of conduct is a condition of employment. Contravention of these policies may result in disciplinary action up to and including dismissal.

Each situation will be investigated and dealt with on its own merit. Human Resources will be available for advice and guidance.

The Human Resources Department and each member of the Knowledge Management Team are jointly responsible for ensuring the Code of Ethics/Standards of Conduct policies are being upheld.

## 1.1 ACCEPTANCE OF GIFTS & BENEFITS

### *Policy*

**It is expected that employees or members of their immediate families will not offer, give, solicit or receive gifts, benefits or other personal favours from suppliers or others, where these would or might appear to influence employees in the performance of their duties or ability to make business decisions for Knowledge Network Corporation.**

### *Procedures*

Employees must never take undue advantage of their position with Knowledge to derive benefit for themselves, their family members or friends, or for corporate entities with which they are associated, either directly or indirectly.

When a vendor provides a gift or item as part of a regular business relationship, the employee is expected to share that item with staff (i.e. gift baskets, chocolates) or forward it to Human Resources for a staff draw. This also applies to items of significant value (i.e. over \$100) received or won during a company-paid workshop or conference.

## Definitions

Personal favours are described as:

- Any item that is unreasonably significant in value and/or unrelated to the maintenance of reasonable business relationships
- Allowable gifts may include:
  - Invitations to golf tournaments
  - Tickets to sporting events or shows where the vendor is also in attendance
  - Samples and promotional items from vendors
  - Meals with a vendor
- Non-allowable gifts include:
  - Gift certificates of significant value (i.e. over \$100)
  - Cash
  - Free flights
  - Any item from a vendor while an EOI or RFP is open

## 1.2 ANTI-FRAUD, CORRUPTION & COMPLIANCE WITH THE LAW

### Policy

**Knowledge Network Corporation does not tolerate any form of fraud or corruption from any employee, or from those acting on our behalf. Employees must act at all times in full compliance with both the letter and the spirit of all applicable laws. Employees are expected to report any situation relevant to Knowledge Network that contravenes the law.**

### Procedures

All employees must ensure that any third parties they deal with are aware of KNC's zero tolerance to fraud and corruption before entering into a contract with them.

Employees will not knowingly conduct business with any third party who could bring KNC into disrepute. Employees will never turn a blind eye to fraud or corruption or perceived fraud or corruption. Employees will not commit or condone an unethical or illegal act or instruct anyone else to do so.

Employees have a duty to report any situation relevant to KNC that they believe contravenes the law, misuses public funds or assets, or represents a danger to public health and safety.

All employees are expected to uphold these key principles and be sufficiently familiar with any legislation that applies to their work in order to recognize potential liabilities. Employees having suspicions or concerns must raise them immediately to their department Director or Human Resources.

### Definitions

Actual or potential fraud or corruption arises when:

- Employees accept a bribe, regardless of what may be an accepted local practice when doing business in a different jurisdiction, or make facilitation payments to public officials to gain benefit or to expedite the provision of services when acting on behalf of KNC.
- Employees falsify or have knowledge of the falsification of any record of transactions.

### 1.3 APPROPRIATE USE OF COMPUTING RESOURCES

#### *Policy*

**Employees are expected to use Knowledge Network Corporation's computing resources in a legal, ethical, and responsible manner for purposes appropriate to the job function.**

#### *Procedures*

Employees must not attempt or obtain unauthorized access to other computer systems using Knowledge computing resources. All use of computing and communications resources owned, leased or rented by Knowledge must be legal and appropriate to the job function of the individual. Incidental personal use of resources may be permitted provided that use does not contravene any other aspect of this policy. Such use should be limited to personal time or unpaid breaks.

Employees must not annoy, offend or harass others, such as distributing obscene, abusive, racist or threatening messages or material using Knowledge computing resources. Information Technology management and conference moderators are responsible for questioning and removing any unacceptable files or messages.

Employees are responsible for all use pertaining to their own computer and all central server and network accounts. Employees are expected to lock their desktop computer screen, keep passwords confidential and take all reasonable steps to avoid unauthorized access to their accounts and desktop computer. Knowledge has the right to monitor usage of computers, the network and the internet including data stored and transmitted, without prior notification.

All employee computer accounts, files and information on Knowledge computing systems are the property of Knowledge Network Corporation. Unauthorized use, duplication, or sharing of such accounts, files and information is strictly prohibited.

Remote access to Knowledge computing facilities and data will only be provided where justified by the employee's job functions.

### 1.4 CONFLICT OF INTEREST

## *Policy*

**Employees are expected to conduct themselves so that there is no actual, perceived or potential conflict of interest between their personal interests and those of Knowledge Network Corporation. All business decisions must be made with honesty and integrity, based on merit and made strictly in the best interests of Knowledge Network. Employees must ensure that any outside business or personal activities do not interfere with their ability to perform their work, create a real or potential conflict of interest, or compete with the business of Knowledge Network.**

## *Procedures*

When an actual or potential conflict of interest situation arises, the employee must inform the department Director in writing with a copy to Human Resources. A detailed description of the employee's involvement must be included in the notification. Full disclosure is required to enable the parties to resolve unclear situations.

The department Director will review the potential conflict of interest situation with Human Resources to determine if a conflict of interest exists. This requirement exists even if the Director does not become aware of the conflict until after the fact.

## *Definitions*

A conflict of interest arises when:

- An employee takes undue advantage of their position with KNC by making business decisions to derive benefit for themselves, their family members or friends, or for corporate entities with which they or their family members or friends are associated either directly or indirectly.
- An employee's job performance is compromised by undertaking additional activities or employment.
- An employee's actions, either in the workplace or outside it, have the potential to negatively impact the reputation of Knowledge Network.

## **1.5 DIVERSITY & INCLUSION**

### *Policy*

**Knowledge Network Corporation values multiculturalism and diversity in the workplace, and acknowledges that cultural diversity encompasses many elements including: race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, age, or any other category protected by applicable laws. Knowledge does not tolerate discrimination on the basis of any prohibited ground and is committed to enforcing the principles of Human Rights legislation and providing an environment where all employees respect the dignity, rights and beliefs of their co-workers. We value, recognize and support the rights of all individuals to be given equal opportunity in employment, and accepted in their workplace without biases based on differences of any kind.**

### *Procedures*

Knowledge Network Corporation will ensure that there are no barriers to

equitable employment in its workforce. Decisions made with respect to recruitment, hiring, training and promotion will be made based on individual qualifications and performance as they relate to the requirements of the position.

Directors will be responsible and accountable for ensuring that the principles of employment equity and non-discriminatory hiring practices are observed.

Job postings and outside advertisements for employment opportunities will include a statement supporting our commitment to employment equity. All individuals will have equitable access to employment and advancement opportunities.

Knowledge will, where possible, accommodate employee requests regarding religious and ethnic observances.

## 1.6 POST-EMPLOYMENT RESTRICTIONS

### *Policy*

**Employees may not derive benefit in future employment from unauthorized disclosure or inappropriate use of information acquired through your employment with Knowledge Network.**

### *Procedures*

Confidential corporate information obtained during employment must not be used or disclosed for benefit in future employment.

The following additional restrictions apply to the CEO:

If you had a substantial involvement in dealings with an outside entity at any time during the year immediately preceding the end of your employment then, for a year after your employment ends, you must not

- i) Accept an offer of employment, an appointment to the board of directors or a contract to provide services to that outside entity;
- ii) Lobby or otherwise make representations for that outside entity to the government, or
- iii) Give counsel to that outside entity, for its commercial purposes, concerning the programs or policies of Knowledge Network Corporation

Until one (1) year after your employment ends, you must not

- i) Lobby or otherwise make representations for any outside entity to any ministry or organization of the government in which you were employed at any time during the year immediately preceding the termination of your employment, or

- ii) Act for an outside entity in connection with any ongoing proceedings, transaction, negotiation or case in which the outside entity and the government are involved where you or an associate could personally benefit from your involvement or influence in Knowledge Network decisions.

## 1.7 PROTECTION OF ASSETS/CORPORATE INFORMATION

### *Policy*

**Employees are expected to protect Knowledge Network Corporation property and funds from misuse and to protect and respect the confidentiality and accuracy of any Knowledge Network Corporation records, reports, programs, methods, data, or related items.**

### *Procedures*

All work records, reports, programs, methods, data, or related items are the property of Knowledge Network Corporation and employees are expected to maintain confidentiality. Unauthorized access, possession or use of the Company's property, funds or records will be considered a contravention of this policy. Employees wishing to use materials they have developed for external purposes require written approval from the department Director.

Employees who are required to share sensitive corporate information with anyone outside of KNC during the course of business must ensure that the proper documentation is in place to protect the information (such as a non-disclosure agreement).

As a Crown Agency, Knowledge Network's collection, use, storage and disclosure of personal information is governed by BC's *Freedom of Information and Protection of Privacy Act* (FOIPPA). Access to Information requests for personal information under FOIPPA and questions regarding freedom of information and protection of privacy should be referred to the President's Office for a response.

## 1.8 PROTECTION OF PRIVACY

### *Policy*

**Knowledge Network Corporation is dedicated to protecting the personal information of our Knowledge Partners, viewers, contractors and suppliers. Employees may access personal information only when and to the extent it is required by their job, and are expected to take every reasonable step to protect the privacy of anyone whose personal information is held by Knowledge Network.**

### *Procedures*

Employees are required to ensure the privacy and security of Knowledge Partner information including credit card and payment information. Improper access to, sharing or release of personal information is a serious employment offence which may result in discipline, up to and including termination of employment.

Employees having suspicions or concerns regarding unauthorized access to or use of personal information must raise them immediately to the department Director or Human Resources, who will refer to the Privacy & Security Policy – Privacy Breach Response Protocol.

## 1.9 REPORTING A CONCERN OR VIOLATION/WHISTLEBLOWER

### *Policy*

**Knowledge Network Corporation is dedicated to maintaining an ethical, respectful and safe workplace and all employees are encouraged to report business or ethical concerns without concern of reprisal.**

### *Procedures*

Employees having concerns about any unethical or unlawful activities are encouraged to raise them immediately to any member of the Knowledge Management Team, Human Resources or the CEO.

Any reporting of concerns will be acknowledged and dealt with and every reasonable effort will be made to keep the employee's identity confidential.

Knowledge Network will ensure that individuals reporting improper activity or breaches of this policy will not be subject to discipline, demotion, termination, or any form of retaliation, intimidation, harassment or financial penalties.

## 1.10 WORKPLACE BULLYING & HARASSMENT

### *Policy*

**Knowledge Network Corporation is committed to maintaining a pleasant work environment, free from any kind of bullying or harassment, where all employees are treated with dignity and respect. Any kind of bullying or harassment by any employee toward another, regardless of gender or employment position, is expressly prohibited.**

### *Procedures*

Bullying and harassment includes any inappropriate conduct or comment by a person towards an employee that detrimentally affects the work environment and that the person knew or reasonably ought to have known would cause that employee to be humiliated or intimidated. Bullying and harassment excludes any reasonable action taken by a supervisor relating to the management and direction of any employee. Examples of conduct or comments that might constitute bullying and harassment include verbal aggression or insults, calling someone derogatory names, harmful hazing or initiation practices, vandalizing personal belongings, and spreading malicious rumours.

Sexual harassment includes any unwanted comments or conduct of a sexual nature that may detrimentally affect the work environment, or lead to adverse job-related consequences for the victim of the harassment. Examples of conduct or comments that might constitute sexual harassment include unwanted sexual advances, gestures, comments, invitations or jokes, or the display of sexually suggestive or inappropriate materials.

All employees have a responsibility to assist in promoting a positive, inclusive work environment. Should an employee become aware of a contravention of this policy, the employee is expected to notify the department Director or Human Resources immediately. Disclosure must be based on an honest belief that the information is true, and not based on malicious motives or made for personal gain. If comfortable doing so, the employee may advise the offending person that their behaviour is unwelcome and ask them to stop.

The department Director will resolve the issue in consultation with the Human Resources Department. A third party may be engaged to undertake a thorough and objective investigation of the allegations. Human Resources may recommend:

- education, counseling and/or training for individuals or groups affected;
- review and modification of guidelines, procedures and practice;
- continuous monitoring;
- other strategies designed to eliminate and/or prevent harassment;
- disciplinary action up to and including dismissal.

Any retaliation against an employee who initiates a complaint of bullying or harassment will be dealt with by means of disciplinary action. Any employee who engages in bullying or harassment, including any supervisor who knew about the behaviour but took no action to stop it, is subject to disciplinary action.

Each situation will be investigated and dealt with promptly and thoroughly, on its own merit. It is the responsibility of all parties to protect the confidentiality of the individuals involved and to resolve the matter expeditiously. Investigation of claims will be open-minded, fair and handled with care and sensitivity for all parties.

Where, as a result of an investigation, it is determined that an employee has made a complaint in bad faith or with the intent to harm another, then formal disciplinary action may be taken against the employee involved up to and including dismissal. Conduct based on mistakes, misunderstanding or misinterpretations is not the same as malicious conduct.

## 1.11 WORKPLACE IMPAIRMENT

### *Policy*

**All employees are expected to report to work fit for duty, without risk to the health and safety of themselves or others, and remain so while on company premises or on business. Impairment of any kind is not tolerated in the workplace.**



## *Procedures*

Impairment is defined as being mentally or physically unable to perform assigned work functions safely due to the use or after-effects of alcohol, cannabis, illegal drugs, prescription drugs or over-the-counter medications, or any other substance that may impair judgement or performance.

Employees are prohibited to possess, use, consume or distribute alcohol, recreational cannabis, drugs, or any prescription medications without a legally obtained prescription or authorization during work hours or while on KNC premises. Upon verification and investigation of intentional misuse of any drugs or substance, violation of this policy may result in discipline, up to and including dismissal.

An employee using prescribed or authorized medication that may cause impairment at work must immediately notify their department Director or Human Resources, and provide information about possible effects as well as any accommodation required. Employees must not knowingly do work where their impairment may create an undue risk to themselves or others.

Employees are expected to notify the department Director or Human Resources if substance abuse is identified. Human Resources may refer the employee to the Employee Assistance Program.

The consumption of alcoholic beverages may be permitted at authorized Knowledge Network sponsored events and special occasions. Employees are expected to be responsible in their alcohol consumption and use of other impairing substances. Knowledge Network supports a safe ride home and encourages employees to elect a designated driver or use public transportation. Knowledge Network may also, in certain circumstances, contribute to or cover the cost of a taxi home from sponsored events.

## **1.12 WORKING RELATIONSHIPS**

### *Policy*

**Conflicts of interest arising out of personal relationships in the workplace must be avoided. Employees involved in a personal relationship outside work which compromises objectivity, or the perception of objectivity, should avoid being placed in a direct or indirect reporting relationship to one another. This includes employees who are immediate family members or who permanently reside together.**

### *Procedures*

Decisions such as hiring, evaluation or promotion are not acceptable by a decision-maker who has a personal relationship with an employee who could benefit from the decision.

Hiring managers are expected to disclose any potential contravention of this policy to the Human Resources Department prior to conducting a hiring interview.

*Definitions*

A reporting relationship exists where one employee has influence, input, or decision-making power over the other employee's performance evaluation, salary, conditions of work, and similar matters, or where the working relationship affords an opportunity for collusion between the two employees.