

## CODE OF CONDUCT COMPLAINTS | PROCEDURE

HomeEd is committed to the highest ethical standards. We do this by conducting our operations with integrity and by achieving full compliance with all applicable laws, regulations, and bylaws.

In line with this commitment, HomeEd provides an avenue for its employees, contractors, and other stakeholders to raise concerns about the subjects covered by **HomeEd's Code of Conduct**, and to be assured that in making allegations, they will be protected from retaliation for raising their concerns in good faith.

This procedure covers instances where an employee, contractor or other stakeholder has evidence of activity ("Reportable Activity") by any employee or retained contractor (including external auditors) to their knowledge constitutes:

- Accounting, auditing, or other financial reporting fraud or misrepresentation, including misuse of HomeEd funds or assets, authorizing or accepting compensation for services not performed;
- Violations of laws that have could negative consequences to HomeEd, or that could otherwise significantly harm HomeEd's reputation or public image;
- Unethical business conduct in violation of any HomeEd corporate policy;
- An act or omission that creates a substantial and specific danger to the health, safety, or well-being of employees, board members, or stakeholders;
- Fraudulent activities;
- Abuse of power or authority;
- Discriminatory behaviour;
- Concealment of any of the above or any other breach of this policy.

This procedure does not cover complaints regarding matters unrelated to Code of Conduct and the items noted above. This procedure also does not cover personal situations related to employment. HomeEd provides an avenue for employees to raise concerns under its internal Human Resources policies and procedures.

Anyone who reports a Reportable Activity must be acting in good faith. Allegations that are not made in good faith will be viewed as a serious offence and may be subject to discipline up to and including termination of employment in the case of employees, and/or the severing of the relationship with contractors or other stakeholders.

HomeEd will not permit any employees or contractors to harass, retaliate or discriminate against those other employees, contractors and stakeholders (the Complainant) who, in good faith, report a Reportable Activity. Retaliation in any form will not be tolerated and should be reported using the channels detailed in this procedure.

Any violation of this procedure may subject the violator to disciplinary action, which may include, in appropriate circumstances, termination of employment or contract, or legal action.

## ***Who manages a Code of Conduct Complaint?***

1. Complaints about staff (excluding the CEO) and contractors will be directed to and managed by the CEO. The Human Resources & Governance (HR&G) Committee of the Board will be notified that a complaint has been received and the CEO will provide regular updates to the HR&G Committee.
2. Complaints about the CEO will be directed to and managed by the HR&G Committee. They will notify the Board of the complaint and the HR&G Committee will provide regular updates to the Board.
3. Complaints about a Board member will be directed to and managed by the HR&G Committee. If the complaint relates to a member of the HR&G Committee, the Finance, Audit & Risk (FA&R) Committee of the Board will manage the complaint.
4. Complaints related to financial matters (regardless of the complainant) will be directed to and managed by the FA&R Committee. They will notify the Board of the complaint and the FA&R Committee will provide regular updates to the Board.

## ***How is a complaint submitted?***

1. A Complainant shall email [info@myhomeEd.ca](mailto:info@myhomeEd.ca) with Code of Conduct Complaint in the subject line. The complaint should be addressed to the applicable party noted above that will manage the complaint.
2. The complaint will be delivered to the appropriate party noted above that will manage the complaint.

## ***What is done with a Code of Conduct Complaint?***

1. The individual or group responsible for managing the complaint will confirm the process they will use to review, evaluate, and report on the complaint. External parties such as legal counsel, investigators, and consultants may be engaged to support the complaint process.
2. Prior to requesting information from the individual(s) named in the complaint, the individual or group responsible for managing the complaint will confirm the complaint was received and explain expectations of non-retaliation against the complainant.
3. Information will be requested from the individual who submitted the complaint and any parties named in the complaint. Objective, verifiable, and documented evidence is preferred.
4. The individual or group managing the complaint will evaluate all evidence and determine if wrongdoing has occurred. With this analysis completed, a report will be prepared on the complaint and shared with the Board.
5. The consequence of proven misconduct will be developed by the individual or group responsible for the complaint and recommended to the Board for review and approval (except matters related to staff and external contractors).

6. Decisions regarding the complaint and any subsequent actions will be communicated to the involved parties.
7. Results of the investigation, decisions, and actions filed along with any accompanying legal documents. Recommended storage to be a minimum of seven (7) years and to meet or exceed any legal requirements concerning the nature of the complaint.

Complaints received with actions related to a breach of the law may be forwarded to other processes for additional investigation.