

CODE OF CONDUCT

BOARD OF DIRECTORS, MANAGEMENT, STAFF AND VENDORS

PURPOSE

The Code of Conduct (“Code”) provides a general statement of HomeEd’s expectations regarding the ethical standards that each director, employee, and contractor should adhere to while acting on behalf of HomeEd.

BACKGROUND

Each director, employee, and contractor is expected to read and become familiar with the ethical standards described in this Code.

HomeEd endorses the following principles:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest
- Full, fair, accurate, timely, and clear disclosure in all reports to members and the public
- Compliance with all applicable government laws, rules, and regulations
- Accountability by all directors, employees, and contractors to adhere to this Code

This Code provides broad legal principles of ethical conduct embraced by HomeEd. It is not a complete answer to all legal or ethical questions that may arise during the course of business, and therefore the Code must be applied using common sense and good judgment.

POLICY DETAILS

A. Administration

HomeEd’s Board of Directors (“Board”) is responsible for setting the standards of the conduct contained in this Code and updating these standards as necessary to reflect changes in the legal and regulatory framework applicable to HomeEd and prevailing ethical standards of the communities in which HomeEd operates. While it is the Board’s duty to oversee procedures designed to implement this Code, it is the individual responsibility of each director, employee, and contractor of HomeEd to comply with this Code.

B. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which HomeEd ethical standards are built. All directors, employees, and contractors must respect and obey the laws and governmental rules and regulations of the country, province, city, and local communities in which HomeEd operates.

HomeEd is engaged in a variety of relationships with companies, individuals, organizations, and levels of government. In all interactions, HomeEd directors, employees, and contractors are required to act ethically, honestly, and with integrity and to comply with all laws, rules, and regulations governing their activities. In all dealing with others, directors, employees, and contractors must avoid even the perception that favourable treatment is sought in exchange for the services and/or support of HomeEd.

C. Fair Dealing

HomeEd is committed to promoting the values of honesty, integrity, and fairness in the conduct of its business and sustaining a work environment that fosters mutual respect, openness, and individual integrity. Directors, employees, and contractors are expected to deal honestly and fairly with HomeEd clients, stakeholders, and other third parties.

D. Discrimination, Bullying, and Harassment

HomeEd is committed to providing a working environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional workplace that prohibits discriminatory practices. Harassment is a form of discrimination and it will not be tolerated by HomeEd. Workplace bullying is characterized as actions that include: rudeness and hostility that disrespects the target; threats and intimidation, including the abuse of power; and/or deliberate acts that interfere with the target's work.

E. Health and Safety

HomeEd strives to provide each of its employees with a safe and healthy workplace. Each employee has responsibility for maintaining a safe and healthy workplace for other employees by following health and safety rules and practices instituted by HomeEd and by reporting accidents, injuries, and unsafe equipment, practices, or conditions.

Violence and threatening behaviour are not permitted. Employees should report to work in appropriate condition to perform their duties, free from the influence of illegal drugs, cannabis, and/or alcohol. The use of illegal drugs, cannabis, and /or alcohol while working will not be tolerated.

F. Reporting and Effect of Violation

Directors, employees, and contractors are encouraged to report any conduct that they believe, in good faith, to be a violation or apparent violation of this Code. Reports should be made to the CEO or a member of the HomeEd Board as described in the *Code of Conduct Complaint Procedure*.