



innovate BC

CODE OF ETHICS

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STANDARDS OF CONDUCT

COMMITMENT AND COMPLIANCE

The Chief Executive Officer will submit the Policies and Code of Ethics for approval by the Board of Directors of Innovate BC and is accountable for development and implementation of any policies and procedure required for putting the policies into practice. The Chief Executive Officer is responsible for Innovate BC's compliance with the Policies and Code of Ethics and this ensures the compliance of all employees. The Board of Directors of Innovate BC monitors and reviews and reassesses the Policies and Code of Ethics annually.

CODE OF ETHICS

This Code of Ethics is applicable to all directors, officers and employees of Innovate BC.

Each Officer and Employee of Innovate BC is expected to:

1. Act with honesty and integrity, avoiding actual or apparent conflicts of interest between personal and professional relationships. As a reminder, Innovate BC has a Conflict of Interest policy that provides guidelines for all Innovate BC employees to follow in order to avoid a conflict, or appearance of a conflict, between their responsibilities to Innovate BC and their outside activities.
2. Disclose to the appropriate person identified in Innovate BC's Conflict of Interest policy any material transaction or relationship that could be reasonably expected to give rise to a conflict of interest. Innovate BC does not offer or solicit gifts, benefits or favours that do not serve a legitimate business purpose. Use good judgment and consider all implications before accepting or giving gifts so as to not reflect unfavourably if subjected to public scrutiny.
3. Promote the full, fair, accurate, timely and understandable disclosure in reports and documents that Innovate BC files with, or submits to any government body and in other public communications made by Innovate BC.
4. Act in good faith, responsibly, with due care and diligence, and without misrepresenting or omitting material facts and without seeking improperly to influence or hinder Innovate BC's independent auditors in the performance of their engagement.
5. Comply with laws of federal, provincial and local governments applicable to Innovate BC.
6. Promote ethical behavior in the work environment.
7. Promote responsible use of and control over all assets and resources of Innovate BC.
8. Promptly report any violation of this Code to the Chief Executive Officer or the chairman of the Audit and Finance Committee of the Innovate BC Board of Directors. Failure to comply with this Code of Ethics may result in disciplinary action, up to and including termination.

CONFLICT OF INTEREST AND CONFIDENTIALITY GUIDELINES

These Guidelines apply to all directors, officers, employees or agents, committee members, council members, external reviewers, consultants, and tenants of Innovate BC, and describe the standards of conduct expected of such persons. These Guidelines are intended to ensure that no circumstances arise that may damage the reputation of either Innovate BC or such persons.

General Standards of Conduct

Persons who provide services to and on behalf of Innovate BC must conduct themselves in such a way so as to deserve and retain the confidence of both the public and Innovate BC's clients ("Clients"). Their conduct should instill confidence and trust in the public and in clients that Innovate BC is at all times fulfilling its obligation to carry out its functions impartially. The conduct of directors, officers, employees or agents, committee members, council members, external reviewers, consultants and tenants must not bring Innovate BC into disrepute.

Conflicts of Interest

Innovate BC recognizes the right of persons who provide services to and on its behalf to be involved in activities as members of the community. However, such persons must keep their role as private citizens separate and distinct from their responsibilities to Innovate BC and avoid conflicts of interest. Conflicts of interest include situations:

- where a person's private affairs or financial interests are in conflict with their responsibilities to Innovate BC or its Clients, or result in a public perception that such a conflict exists;
- which could impair a person's ability to act in the interests of Innovate BC and its Clients; or
- where a person's actions compromise or undermine the trust which the public and Clients place in Innovate BC.

Persons who provide services to and on behalf of Innovate BC must not place themselves in any situation where they are obligated to any person who might benefit from or seek to gain special consideration or favour from Innovate BC. The honesty and impartiality of such persons in carrying out the functions of Innovate BC must be above suspicion.

Persons who provide services to and on behalf of Innovate BC have a responsibility to conduct themselves in a way that does not compromise the ability of Innovate BC to accomplish its mandate or undermine the public's and Innovate BC's Clients' confidence in such person's ability to discharge their responsibilities properly.

Relationship of Responsibilities to Innovate BC to Private Affairs

No conflict or public perception of conflict should exist between the private interests of persons who provide services to or on behalf of Innovate BC and the discharge of their responsibilities to Innovate BC. Such persons are required to arrange their private affairs in a manner that will prevent any conflict or perceived conflict of interest from arising. Such persons, when performing their official duties, must not give preferential treatment to relatives or friends or to any other person or organization in which they or their relatives have an interest, financial or otherwise. Such persons must not use their position, office or affiliation with Innovate BC to pursue personal interests and must exercise care in the management of their private affairs so as not to benefit, or be perceived by the public or Innovate BC's Clients to benefit from the use of information acquired solely by reason of their relationship with Innovate BC or any Innovate BC transactions which involve decisions over which they have influence, including awards for funding or other approvals and appointments.

Procedure when a Conflict of Interest Arises

These Guidelines cannot cover all possible situations. It is the responsibility of all persons who provide services to and on behalf of Innovate BC to immediately declare the existence of any conflict of interest; it is Innovate BC's duty to decide whether the individual may participate in any discussions or voting on the issue that has given rise to the conflict. Such persons must withdraw from participating in any way in decisions in which they have a personal interest, other than an interest shared in common with members of the general public. In particular, when an individual involved in evaluating applications and granting awards or funding on behalf of Innovate BC is:

- the applicant, co-applicant or co-signer;
- from the same industrial organization as an applicant;
- belongs to the same research centre or research unit as an applicant;
- is an applicant's departmental colleague;
- is a competitor of the applicant or involved in an industrial organization or business that is a competitor of the applicant; or
- is an industrial or government representative directly involved in collaborative activities with the applicant;

Then unless otherwise directed in writing by Innovate BC, such person must:

- disclose the fact of the conflict to Innovate BC;
- not be assigned the applications for review;
- not participate in any evaluation of the application or competing proposals for the competition; and
- if such a person is director, officer, employee or agent, committee member, council member, external reviewer, consultant and tenant, absent themselves

without comment prior to any discussion or voting in respect of the application or, if such a person is an officer or employee of Innovate BC, such person may remain in meetings dealing with the situation that has given rise to the conflict of interest in order to fulfill their administrative responsibilities but may not participate in any discussion regarding the application or other issue that has given rise to the conflict of interest.

Any proposal for funding submitted by a director, officer, employee or agent, committee member, council member, external reviewer, consultant and tenant to Innovate BC must be forwarded to a minimum of two external reviewers for independent evaluation.

Confidentiality

As a consequence of their responsibilities and affiliation to Innovate BC, a director, officer, employee or agent, committee member, council member, external reviewer, consultant or tenant to Innovate BC will have access to information and material that is confidential in nature. Such persons must not use such information for personal gain or the gain of any other person or disclose such information to any other person without the prior authorization of Innovate BC. Contravention of these requirements may result in irreparable injury to both Innovate BC and its Clients and may give rise to the personal liability of the person who improperly uses or discloses such confidential information.

The requirements with respect to use, disclosure and protection of confidential information apply throughout and continue after employment with Innovate BC ends.

Conflict of Interest and Confidentiality Agreement

Each director, officer, employee or agent, committee member, council member, external reviewer, consultant, and tenant of Innovate BC is required to sign a Conflict of Interest and Confidentiality Agreement. Each such person should review the agreement they are asked to sign carefully. Any questions regarding the nature or terms of the agreement should be raised with the Chief Executive Officer of Innovate BC.

Post-Employment Restrictions for Senior Management

The requirements with respect to use, disclosure and protection of confidential information apply throughout and continue after employment with Innovate BC ends.

<http://www2.gov.bc.ca/myhr/article.page?ContentID=e5f47ecb-23d3-2873-ad1b-072fd896c2ee>

CODE OF ETHICS, CONFLICT OF INTEREST AND CONFIDENTIALITY AGREEMENT for Directors, Officers, Employees and Agents, Committee Members, Innovate BC Members, External Reviewers, Consultants and Tenants

I, _____ being a director, officer, employee or agent, committee member, council member, external reviewer, consultant, and/or tenant of Innovate BC, formerly the British Columbia Innovation Council (“the Agency”), hereby acknowledge that I have read and understand the Agency’s [Code of Ethics](#), including Conflict of Interest and Confidentiality Guidelines, and agree to abide by them. Further, I agree as follows:

1. Defined Terms

- 1.1 “Confidential Information” means any information relating to the Agency which is not generally available to the public and which is disclosed to or learned by me as a director, officer, employee or agent, committee member, council member, external reviewer, consultant, and/or tenant of the Agency, excluding only the following:
- (a) information that is or becomes generally available to the public through no act or omission by me or anyone connected with me;
 - (b) information that at any time is received by me in good faith, without notice of an obligation of confidentiality, from a third party other than the Agency or any applicant to or client of the Agency who I reasonably believe to be lawfully in possession of and having the right to disclose the same;
 - (c) information that the Agency agrees in writing to release from the terms of this Agreement.
- 1.2 “Conflict of Interest” means any real, perceived or potential conflict of interest and includes, without limitation:
- (a) any conflict between my personal interests and those of the Agency or any applicant to or client of the Agency, or any conflict between my personal interests and the discharge of my duties, office, employment or contract.

2. Duties Regarding Conflict of Interest

2.1 While I am a director, officer, employee or agent, committee member, council member, external reviewer, consultant, and/or tenant of the Agency, immediately upon becoming aware of any Conflict of Interest between myself and the Agency or any applicant to or client of the Agency, I will:

- (a) disclose in writing the details and nature thereof to the Chief Executive Officer;
- (b) deliver to the Chief Executive Officer all copies of the Agency, applicant, or client materials relating to the matter that has given rise to the Conflict of Interest; and
- (c) not participate in any discussion or evaluation or administration in respect of the matter that has given rise to the Conflict of Interest unless otherwise instructed in writing by the Agency.

3. Duties of Confidentiality

3.1 While I am a director, officer, employee or agent, committee member, council member, external reviewer, consultant, and tenant of the Agency and forever thereafter, I will hold in strict confidence all Confidential Information and not use Confidential Information for my own benefit.

3.2 While I am a director, officer, employee or agent, committee member, council member, external reviewer, consultant, and/or tenant of the Agency, I will:

- (a) take all due precautions to prevent disclosure of Confidential Information, in any manner whatsoever, to third parties not authorized in writing by the Agency to receive it, and the Agency so authorizes, only disclose Confidential Information to such third parties upon such terms and conditions and for such purposes as the Agency has so authorized;
- (b) use Confidential Information only for the purpose of performing my duties as a director, officer, employee or agent, committee member, council member, external reviewer, consultant, and/or tenant of the Agency;

- (c) after evaluating any Confidential Information for the purpose of performing my duties as a director, officer, employee or agent, committee member, council member, external reviewer, consultant, and tenant of the Agency, destroy such material (including all copies) in a secure manner, or at any time upon request by the Agency, return all materials to the Agency.

Agreed to on _____
(Date)

Signature of director, officer, employee
or agent, committee member, council
member, external reviewer, consultant
and/or tenant

Name (please print)

COMPLIANCE WITH LAWS

You must fully comply at all times with both the letter and the spirit of all laws applicable to your job. Because Innovate BC is constantly under public scrutiny, you must avoid any situation that could be perceived as improper or indicate a casual attitude towards compliance. You must never commit or condone an illegal act or counsel another employee, contractor or consultant to do so. As a Crown Agency, the actions of Innovate BC's employees are under higher scrutiny. Accordingly, employees who engage in any illegal activity will be subject to disciplinary action, up to and including termination.

POLITICAL PARTICIPATION

It is critical that we maintain impartiality in relation to our Innovate BC duties and responsibilities when any of us engages in political activities. The resources of a Crown Agency cannot be used in such a way as to create an impression that the company favours one political party or candidate over another.

To avoid a perceived conflict of interest, we must avoid:

- Introducing partisan politics into the workplace. This does not apply to informal private discussion among co-workers.
- Situations where your position as an employee may have an impact, or be seen to have an impact, on political activity.
- Using Innovate BC facilities, equipment, systems (including email), or resources in support of political activities.
- Using our position to lend weight to the public expression of personal opinions, nor divulge any confidential information.

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY

Innovate BC is required to comply with the information access and protection of privacy requirements established in B.C.'s Freedom of Information and Protection of Privacy Act. (FIPPA). FIPPA grants the Office of the Information and Privacy Commissioner the power to audit or investigate Innovate BC's freedom of information and privacy protection practices and to order changes where there are findings of non-compliance.

Records created by you may be subjected to an access of information request and if requested, you are required to provide them to Innovate BC's CEO, who will apply FIPPA in Innovate BC's response to the request.

FIPPA affords you Whistleblower protection if you report an unauthorized disclosure of personal information.

ETHICAL RESEARCH PRACTICES

Purpose

The following policy relates to all research projects being carried out with financial support from Innovate BC, and in particular, those which include research involving human or animal subjects, biological or chemical hazards, or other ethical or safety considerations.

Policy

All Council funded projects require a minimum of ethical conduct. The project leader, as identified in the individual Letter of Agreement between Innovate BC and the organization receiving funding, is responsible for ensuring that all research practices carried out in conjunction with the project comply with specific applicable ethical codes of conduct adopted by Innovate BC. Those codes include:

- National Research Council Canada. 1996. NRC-CNRC Research Involving Human Subjects: Guidelines for IRAP, 42 p.
- Tri-Council Working Group. 1997. Code of Ethical Conduct for Research Involving Humans. 98 p.
- Kennedy, M.E. (ed.). (1996), Health Canada, Laboratory Biosafety Guidelines (2nd ed.). Minister of Supply and Services Canada. (Catalogue No. MR21-1/1996-E)
- Canadian Council on Animal Care. Guide to the Care and Use of Experimental Animals. Vol 1 (1993) and Vol. 2 (1984). Ottawa, Ont.: CCAC.

Failure to comply with the aforementioned codes constitutes grounds for the immediate termination of the identified research project, and the return of any previously advanced funds to Innovate BC.

Projects dealing with complex ethical considerations may be required, at Innovate BC's request, to undergo a thorough external ethics review by an appropriate Ethics Review Board as identified by Council. Any expense incurred as a result of such a review will be the responsibility of the awardee organization.

ACCEPTABLE USE OF INFORMATION TECHNOLOGY RESOURCES

Purpose

The following policy pertains to the use of Innovate BC's information technology facilities and to resources accessed using Innovate BC's computer network. This includes hardware such as computers, disk drives, scanners, printers, and other peripherals, modems and phone lines, photo copiers, fax systems and equipment, software such as database and word processing, data such as computer files, databases and financial records, and services such as Internet connectivity and Email.

The primary purpose and use of these resources is for undertaking the business of Innovate BC. Information exchange is expected to be consistent with the purposes of Innovate BC. Limited personal use (for example to encourage development of skills, personal growth and education applications) is permitted as long as it is consistent with this policy. Personal use would usually only be outside of regular business hours. It is expected that any significant direct costs associated with personal use would be identified and reimbursed.

Unacceptable uses:

The following are unacceptable uses of Innovate BC's information technology resources:

- 1. Illegal Activities.** Any use for illegal purposes, or in support of such activities. Illegal activities shall be defined as any violation of local, provincial or federal laws.
- 2. Commercial Activities.** Any use for commercial purposes, product advertisement or "for profit" personal activity.
- 3. Pornography.** Any pornographic use, whether visual or textual. You should not view, transmit, retrieve, save, or print any electronic files which may be deemed as pornographic. Use of the system to access, store or distribute obscene or pornographic material is prohibited.
- 4. Religious or Political Lobbying.** Any use for religious or political lobbying, such as using Email to circulate solicitations or advertisements.
- 5. Copyright Infringement.** Duplicating, transmitting, or using copyrighted software not in compliance with software license agreements maintained by the Information Systems Officer. Unauthorized use of other copyrighted materials or another person's original writings.

6. Security Violations.

- Accessing accounts within or outside Innovate BC's computers and communications facilities for which you are not authorized or do not have a business need.
- Copying, disclosing, transferring, examining, renaming or changing information or programs belonging to another user unless you are given permission to do so by the user responsible for the information or programs.
- Violating the privacy of individual users by reading Email or private communications.
- Representing yourself as someone else, fictional or real.
- Knowingly or carelessly spreading computer viruses. "Computer viruses" are programs that can destroy valuable programs and data. To reduce the risk of spreading computer viruses, do not import files from unknown or disreputable sources. If you obtain software or files from remote sources, follow proper procedures to check for viruses before use.

Use of Social Media:

To help ensure that Innovate BC employees have a productive, positive experience while participating in social media means contributing content or comment, here are a few guidelines for employees participating in social media:

1. **Being Professional.** When using social media sites in a professional capacity, you should identify your role as an Innovate BC employee. When in conversation, be a good judge of content. Respect confidentiality and privacy.
2. **Being Personable.** Being personable will help you build productive relationships, manage your own and Innovate BC's reputation, and help you become a valued and proactive contributor to online conversations and communities.
3. **Being Relevant.** Provide information that is timely and useful for your audience. Work hard to create conversations that are productive, and be responsive to questions and input that come in through your site.

For more detail on the use of social media guidelines, you can read the [provincial guidelines on use of social media](#).

EMPLOYMENT EQUITY POLICY

Innovate BC occupies a unique position in the science and technology/ economic community in British Columbia. Recognizing its responsibility and accountability to this community, Innovate BC will seek to achieve an environment where all people are treated with dignity and respect and within which equity can be realized.

Innovate BC, therefore, affirms its commitment, at all levels, to the principle that all people, regardless of gender, sexual orientation, race, colour, gender identity or expression, religion or disability, have a right to equal opportunity in employment. Innovate BC will seek to embody equity, by the design of employment and operational practices which ensure that no one is denied opportunity for reasons unrelated to ability.

Innovate BC will identify and remove any discriminatory barriers which prevent access to equal opportunity in employment and education. Special measures, which represent reasonable accommodation for diversity, will be implemented when and if needed, in order to help achieve the representativeness that is at the heart of equity.

Consideration of qualifications and appropriate skill sets to fulfill job requirements will continue to be selection criteria for the hiring or advancement of employees at Innovate BC. The aim of employment equity practices is to enlarge the applicant pool from which candidates are selected. By hiring from an expanded applicant pool, Innovate BC seeks to achieve an employee profile which is representative of both the population from which it is drawn and the community it serves.

As a provincial crown agency, Innovate BC aims to set a positive example for the community it serves. Commitment to an employment and gender equity policy is one way in which Innovate BC can seek to fulfill its mission and strengthen its leadership image.

ANTI-DISCRIMINATION, BULLYING AND HARASSMENT

Purpose

Bullying and harassment is not accepted or tolerated at Innovate BC. Innovate BC is committed to a healthy, bullying and harassment free work environment for all its employees. To this extent, Innovate BC has developed an organization wide policy intended to prevent bullying or harassment of or by its employees and to deal quickly, fairly and effectively with any incident that might occur. Management and employees are directed to abide by the following policy in every aspect of their day-to-day work.

Application

This policy applies to all workers, including permanent, temporary, casual, contract, and student workers. It also applies to interpersonal and electronic communications, such as email.

Policy

This policy responds to Innovate BC's responsibility under British Columbia's Human Rights Code and Worker's compensation Act to prevent bullying and harassment, and to provide procedures to handle complaints, to resolve problems, and to remedy situations where bullying and harassment occurs. It is a contravention of this policy for an employee to discriminate against, bully or harass a co-worker, candidate for employment, client or member of the public having business with Innovate BC on the basis of:

- Race
- National or Ethnic Origin
- Colour
- Gender Identity or Expression
- Religion or Creed
- Age
- Sex
- Political Beliefs
- Marital/family Status
- Physical or Mental Disability
- unrelated Conviction for a Criminal or Summary Conviction Charge
- Sexual Orientation

Source: *Worker's Compensation Act*

Bullying and Harassment

Bullying and harassment (a) includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but

(b) excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the rest of employees.

Bullying and harassment does not include:

Management of the workforce: Bullying or harassment may occur because of an abuse of authority. However, supervision, direction or management of employees undertaken in a good faith manner for a work-related purpose does not constitute bullying or harassment. For example, bullying or harassment does not include changes to working conditions, corrective action, discipline, termination of employment, decisions relating to workload and deadlines, performance evaluation, transfers, changes in job duties, lay-offs, demotions and reorganizations unless such conduct is carried out in an abusive or threatening manner or is intended to cause emotional harm.

It is not bullying or harassment for a manager or supervisor to informally or formally investigate behaviour or incidents of concern that occur at or arise from the workplace by interviewing employees unless an interview is carried out in an abusive or threatening manner or intended to cause emotional harm.

It is not bullying or harassment for a supervisor or manager during an investigation to warn an employee of the disciplinary consequences that may result from failure to comply with this Policy including engaging in bullying and harassment, failing to cooperate with the company's investigation, failure to report bullying and harassment, breaching confidentiality or retaliation.

Interpersonal conflict between persons at the workplace is not bullying or harassment unless the conflict results in behaviour that is considered threatening or abusive. Expressing difference of opinion is not harassment.

Conduct unrelated to an employee's employment is not bullying or harassment. Personal disputes over non-related matters should not be engaged in at the workplace. Disputes over work-related matters should be resolved respectfully between the persons involved or with the assistance of supervisor, manager or human resources.

Source: Worker's Compensation Act

Harassment and the Canadian Human Rights Act

The Canadian Human Rights Act gives each of us equal opportunity to work and live without being hindered by discriminatory practices. Harassment is a form of discrimination. Harassment is any behaviour which denies individuals their dignity and respect, such as bullying, aggressive or intimidatory behaviour by one person towards another. The behaviour need not be intentional in order to be considered harassment. It is offensive and in many cases negatively affects others' self-esteem and motivation. It will not be tolerated within Innovate BC.

Sexual Harassment

One form of harassment is sexual harassment. Sexual harassment is unsolicited and is generally comprised of unwanted sexual comments, gestures or physical contact that are objectionable or offensive either on a first-time basis or as a continuous series of incidents. It may also involve favours or promises of favours, or advantages in return for submission to sexual advances or alternatively, the threat of reprisal for refusing them.

It must be stressed that sexual harassment is not the accepted social banter that occurs regularly in the work environment, nor is it related to flirtation or a workplace romance between two consenting persons. Sexual harassment, by definition, is coercive and one-sided and both males and females can be victims of it.

What Sexual Harassment is not:

- people in a relationship of mutual consent
- a hug between friends and co-workers
- a mutual flirtation
- a discussion about sexuality between co-workers

Examples of Harassment

- unwelcome remarks, jokes, innuendoes, or taunting about a person's body, sex, or sexual orientation
- threats, intimidation, or verbal abuse
- unwelcome or intimidating invitations or requests with sexual overtones
- displaying pornographic or offensive pictures or other material
- practical jokes which cause awkwardness or embarrassment
- leering, ogling or obscene gestures.
- unnecessary physical contact such as touching, patting, or pinching
- someone persistently using sexual suggestive language which another person finds offensive, demeaning or otherwise inappropriate

Source: Worker's Compensation Act

- unwelcome invitations or requests, whether implicit or explicit, or intimidation
- condescension which undermines self-respect
- vexatious or unfounded allegations of harassment or misbehaviour

Discipline Guidelines

Management has a constant responsibility to ensure that the workplace is free of bullying and harassment. Innovate BC workplace consists of any and all locations where its business is undertaken, during or outside normal working hours provided such acts are committed within the course of employment. Supervisors/managers who fail to take appropriate corrective action when made aware of bullying or harassment of an employee will themselves be subject to disciplinary action. If a complaint is found to have substance, timely disciplinary action will be taken.

Employees must:

- not engage in the bullying or harassment of other workers
- report if bullying and harassment is observed or experienced
- apply and comply with Innovate BC's policies and procedures on bullying and harassment

An individual employee who believes he or she is the subject of any type of discrimination, bullying or harassment should:

1. Inform the harasser that his or her actions or words are not welcome. The person may not realize his/her behavior is offensive. To avoid ambiguity, clearly indicate that his or her action/behavior is perceived as harassment under the terms outlined in this policy
2. If a simple request doesn't solve the problem, remind the harasser that his/her behavior is against policy and it is illegal. Be sure to keep a record. Make notes. Write down dates, times, places, witnesses, what was said and what was done. The harasser's supervisor or the Chief Financial Officer or CEO or equivalent may also be advised at this time.
3. If there is subsequent occurrence of any further incident make a written record of all incidents. In the statement include the nature of the behaviour, dates, times, witnesses (if any), and the action taken by the employee to notify his/her objections to the alleged harasser, the harasser's supervisor and the employee's supervisor. Forward the statement to the Chief Financial Officer or CEO or equivalent as soon as possible.

Source: Worker's Compensation Act

Supervisor/Managers

All harassment complaints whether from a harassed employee or an uninvolved observer or management and supervisor of staff - must be investigated immediately. In coordination with the CFO or CEO, the following steps should be taken:

- Interview separately both the complainant and the alleged harasser.
- Interview any witnesses.
- Document situation accurately and completely.
- Ensure all information concerning the matter is kept confidential. Disclosure of any information is allowed only if it is necessary for investigation or disciplinary measures.
- Render a decision/recommendation as soon as possible and advise the parties involved of the action to be taken, if any. (i.e. formal apology, reprimand, unpaid leave, dismissal with cause)
- If the parties are not satisfied with the recommended proposal for settlement of the grievance, then the matter will be brought to the attention of the CEO of Innovate BC and subject to a formal investigation.

Volunteers

Council volunteers are expected to behave in a respectful, socially responsible manner towards other volunteers and Council staff. Any incidents of harassment or discrimination should be discussed with the volunteer, and may be brought to the attention of the CEO of Innovate BC.

Innovate BC will:

- Provide education and training to support this policy annually
- Provide established procedures for reporting, investigating and resolving complaints
- Comply with this policy by not engaging in discrimination, harassment, bullying or disrespectful behavior
- Conduct an annual review of the policy, procedures and any related forms
- Provide all Innovate BC employees with a copy of policies and procedures.

Source: Worker's Compensation Act

Volunteers

Council volunteers are expected to behave in a respectful, socially responsible manner towards other volunteers and Council staff. Any incidents of harassment or discrimination should be discussed with the volunteer, and may be brought to the attention of the CEO of Innovate BC.

EXTERNAL DIVERSITY POLICY

Encouraging diversity in BC's technology sector is important to Innovate BC. Innovate BC's programs and initiatives provide support to entrepreneurs at the grassroots level, encouraging and fostering the success of innovative companies. We make every effort to ensure balance is achieved and that both male and female technology leaders, regardless of gender, sexual orientation, race, age, religion, political beliefs or abilities, fairly and accurately represent our sector.

WHISTLEBLOWER POLICY

The Innovate BC Code of Ethics and Conduct (“Code”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Corporation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Innovate BC rather than seeking resolution outside Innovate BC.

Reporting Violations

The Code addresses Innovate BC’s open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Chief Executive Officer and after that, the Chair of the Audit and Finance Committee. Supervisors and managers are required to report suspected violations of the Code of Conduct to the CEO, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud or securities law violations, or when you are not satisfied or uncomfortable with following Innovate BC’s open door policy, individuals should contact the Chair of the Audit and Finance Committee directly.

Accounting and Auditing Matters

The Audit and Finance Committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Chair of the Audit and Finance Committee will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.