



GLOOSCAP·KLUSKAP
VENTURES

Glooscap Ventures Employee Code of Conduct

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1. APPLICATION

1.1 This Code of Conduct policy applies to **all** employees of the Glooscap Ventures, including Full-time, Part-time, Term, Casual, and senior management employees.

1.2 This Code of Conduct policy forms part of each employee's employment contact and all employees are required to abide by the standards and rules set out herein.

1.3 At the outset of their employment, each employee shall receive, review and sign a copy of this Code of Conduct.

2. STATEMENT OF CORE BELIEFS

2.1 Employees will act fairly and honestly in individual as well as group decision making which will provide a foundation of trust in their relationships with all partners and stakeholders.

2.2 Employees will act in good faith in all business dealings with fellow employees, partners and shareholders.

2.3 Employees will act in a manner that will uphold the good reputation of the Glooscap Ventures.

3. EMPLOYEE RESPONSIBILITIES

3.1 To Other Employees: Employees will treat each other in a respectful manner. All employees will respect the rights of other employees and will refrain from discrimination or harassment based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, or disability and conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.

3.2 To Band Members: Employees will respect Glooscap First Nation Band members and work on their behalf to create and maintain a positive and successful community. Band Members are the shareholders in Glooscap Ventures.

3.3 To Band Council: Employees will show respect and professionalism in their dealings with the elected Chief and Council of Glooscap First Nation.

3.4 To the Board of Directors: Employees will show respect and professionalism in their dealings with the Glooscap Ventures Board of Directors.

3.5 To Government Staff and Representatives: Employees will show respect and professionalism in their business dealing with all government agencies including federal, provincial and local governments and their representatives.

3.6 To the Band Property and the Environment: Employees will show respect for and will do nothing in the course of their work to intentionally harm the property of the Glooscap Ventures or the natural environment.

4. CONFIDENTIALITY

4.1 Any information learned by an employee during the performance of his / her work that is not commonly available to the public must be kept confidential. This includes information concerning fellow employees of Glooscap Ventures, the Band Council of Glooscap First Nation, Band members or those who work closely with the Band Council on any official matters.

4.2 An employee's duty of confidentiality applies both during their employment with Glooscap Ventures and following the end of their employment.

4.3 Any information gathered for the purpose of work as outlined in the employee's Job Description will be used for the purposes of that work only.

5. CONFLICT OF INTEREST

5.1 A conflict of interest is a situation where an employee is, or is seen to be, taking advantage of their employment position in order to gain a personal benefit, or to benefit the interest of family member or friend. Such a benefit is not restricted to a monetary benefit.

5.2 The situations that can raise an actual or perceived conflict of interest are many. The following is a non-exclusive list of potential conflicts of interests:

- When an employee is involved in making a decision (i.e., hiring, awarding of contracts, etc.) directly affecting a close family member or a friend.
- When an employee uses confidential information obtained through their employment to gain a benefit for themselves or a close family member or friend.
- When an employee has a material or financial interest in a business or an organization with which the Band Council enters into transactions (funding, contract, etc.).

5.3 All employees must scrupulously avoid any actual or perceived conflicts of interests.

5.4 Any employee who suspects that they are in a conflict of interest should immediately inform their immediate supervisor and take appropriate action to address the actual or perceived conflict of interest. Depending on the situation, this may involve:

- Withdrawing or removing himself / herself from an activity or group.

- Where the potential conflict arises from the employee's participation in a decision, the employee should immediately disclose the potential conflict to all those involved in the decision-making and withdraw themselves from the discussion and decision-making.

6. DISCRIMINATION AND HARASSMENT

6.1 Definitions:

- a) "Discrimination" means an action or a decision that treats a person or a group negatively for reasons such as race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability and conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.
- b) "Harassment" means any behaviour that demeans, humiliates, or embarrasses a person, and that a reasonable person should have known would be unwelcome. It includes actions, comments, or displays. It may be a single incident or continue over time.

6.2 Glooscap Ventures is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices and harassment.

6.3 Prohibited work-related discrimination or harassment includes:

- a) Conduct that takes place between co-workers, between managers and employees, between people of the opposite sex or the same sex, between an employee and a client, or between an employee and a job applicant; and
- b) Conduct that takes place in the workplace itself, or outside the workplace in a situation that is in some way connected to work such as off-site meetings or business trips.

6.4 An employee who believes they have been the victim of work-related discrimination or harassment or believes they have witnessed such conduct should discuss their concerns with their immediate supervisor.

6.5 In addition, individuals who believe they are being subjected to such conduct promptly to advise the offender that his or her behavior is unwelcome and request that it be discontinued. Often this action alone will resolve the problem. Glooscap Ventures recognizes, however, that an individual may prefer to pursue the matter through their immediate supervisor.

6.6 An employee who believes they have been the victims of work-related discrimination or harassment may submit a formal written complaint to their immediate supervisor.

6.7 Upon receipt of a formal written complaint of work-related discrimination or harassment, the immediate supervisor shall promptly investigate. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

6.8 Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

6.9 Following completion of his / her investigation of a work-related discrimination or harassment complaint, the immediate supervisor will complete a report and take appropriate action:

- a) Where there is not enough evidence to support an allegation of work-related discrimination or harassment, the immediate supervisor will not recommend any further action.
- b) Where there is sufficient evidence to support an allegation of work-related discrimination or harassment, appropriate corrective action may include training, referral to counseling and/or disciplinary action such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination for cause, depending on the circumstances.

6.10 Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is strictly prohibited and will be subject to disciplinary action up to and including termination for cause.

6.11 False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.

6.12 If a party to a complaint does not agree with its resolution that party may appeal to the Glooscap Ventures Board of Directors Human Resource Committee under the procedures set out in Section 15 of Glooscap First Nation's Employment Policy.

7. VIOLATION OF POLICIES

7.1 Violation of the policies outlined in the Code of Conduct can be subject to disciplinary measures as outlined in the Employment Policies.

8. CONFIRMATION OF ACCEPTANCE OF THE POLICY

All employees of the Glooscap Ventures are required to sign and date below in order to confirm their understanding and acceptance of the Code of Conduct Policy.

Employee Name (Please Print)

Employee Signature Date

Witness Signature Date