NUCLEAR WASTE MANAGEMENT ORGANIZATION
SOCIÉTÉ DE GESTION DES DÉCHETS NUCLÉAIRES

Code of Conduct

NOVEMBER 2022

Scope

This *Code of Conduct* applies to all of us – as directors, officers, employees and contractors of the Nuclear Waste Management Organization (NWMO). It is also expected that suppliers, agents, representatives, consultants and other business partners and associates of the NWMO will abide by the high ethical standards reflected in this *Code of Conduct*. While the NWMO has separate policies on employment equity, workplace harassment and violence prevention, whistleblowing, Reconciliation, Indigenous Knowledge, transparency, procurement, media communications, environment, health and safety, financial management and internal control, and information technology management, they all describe appropriate business conduct and are incorporated into this *Code of Conduct*.

Policy

Our *Code of Conduct* sets out expectations of behaviour and guiding principles for all to act with fairness, honesty, integrity and openness. We are committed to treating people with respect, equality and dignity without regard to race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability or a conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.

All NWMO personnel are expected to perform their work to the best of their abilities, use company assets as intended, safeguard sensitive and confidential information, perform duties in accordance with all applicable laws, company policies, procedures and rules, and live the safety culture.

It is expected that all will support the vision and mission of the NWMO in all public interactions and demonstrate behaviours consistent with our values.

Honesty and common sense are the best guidelines for assessing whether or not an action will be in compliance with this *Code of Conduct*, and all are expected to use good judgment and maintain high ethical standards, and to have regard for the NWMO's vision, mission and values when conducting business activities. However, this *Code of Conduct* is not a complete guide to every legal or ethical issue that may be encountered in carrying out one's duties, and all must also consider the NWMO's other policies and procedures that may apply to each particular situation. Questions about how this *Code of Conduct* applies to certain situations, or about whether a particular action will be in compliance with this *Code of Conduct*, are encouraged.

When you are uncertain, you should speak with your manager, and you should also ask yourself the following questions, which may help to guide your decision:

- Will the action you are considering taking comply with the intent and purpose of this *Code of Conduct* and applicable laws, even with benefit of hindsight?
- Is the action you are considering appropriate, ethical and honest? Does it feel right to you?
- Would most people see the action as being appropriate, ethical and honest, and would you be comfortable defending it in front of your colleagues, superiors, friends and family?

If the answer to any of these questions is "no," then you should not take the action without further guidance. If your question remains unanswered after you have spoken to your supervisor, you should contact your Human Resources Manager or the Vice-President of Human Resources and Chief Ethics Officer for advice.

Vision

Our vision is the long-term management of Canada's nuclear waste in a manner that safeguards people and respects the environment, now and in the future.

Mission

The purpose of the NWMO is to develop and implement, collaboratively with Canadians, a management approach for the long-term care of Canada's used nuclear fuel that is socially acceptable, technically sound, environmentally responsible and economically feasible.

Values

The fundamental values that guide the work of the NWMO include:

Safety

We place all aspects of public and employee safety – including environmental, conventional, nuclear and radiological safety – first and foremost in everything we do.

Integrity

We act with openness, honesty and respect.

Excellence

We use the best knowledge, understanding and innovative thinking, and seek continuous improvement in all that we do in our pursuit of excellence.

Collaboration

We engage in a manner that is inclusive and responsive, and that supports trust, constructive dialogue and meaningful partnership.

Accountability

We take responsibility for our actions, including wise, prudent and efficient management of resources.

Transparency

We communicate openly and responsibly, providing information about our approach, processes and decision-making.

Requirements/decision rules

The NWMO is committed to providing a work environment that is safe, where everyone is treated with respect and dignity. Every employee has the right to a workplace free of harassment and discrimination.

Safe work environment

It is expected that you:

- Comply with all applicable occupational health and safety laws, regulations, codes and standards;
- Take responsibility for your personal health and safety;
- Report injuries, accidents and unsafe conditions in a timely fashion;
- Not endanger or put at risk the health and safety of others;
- Use and wear protective equipment, clothing and devices appropriate for your work activities;
- Demonstrate fitness for duty while performing work. Fitness for duty includes being free from the influence or aftereffects of any legal or illegal substance (including alcohol and drugs) that may impair judgment, co-ordination, and/or perception so as to adversely affect your ability to perform your job duties in a competent and safe manner;
- Comply with all the NWMO's workplace policies; and
- Treat others with dignity and respect.

EMPLOYMENT EQUITY

We are committed to being a workforce that is free of direct or indirect discrimination on the basis of race, ancestry, colour, place of origin, sex, sexual orientation, gender identity or expression, ethnic origin, age, marital or family status, physical abilities, creed, religion or citizenship, or any other grounds that are prohibited by applicable law. Our goal is to build a highly qualified workforce that reflects the diverse population of the communities in which we operate and respects Indigenous Knowledge and Reconciliation.

DISCRIMINATION, HARASSMENT AND SEXUAL HARASSMENT

Discrimination and harassment can take many forms such as abuse of power, bullying, sexual harassment, etc. We are committed to providing a work environment in which all individuals are treated with respect and dignity.

Harassing comments or conduct can poison someone's working environment, making it a hostile or uncomfortable place to work, even if the person is not being directly targeted. This is commonly referred to as a *poisoned work environment* and is also a form of harassment.

Some examples of actions that can create a poisoned work environment include:

- Distributing offensive email messages or attachments such as pictures or videos;
- Practical jokes that embarrass or insult someone; or
- Jokes or insults that are offensive, racist or discriminatory in nature.

Sexual harassment is defined as engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

What isn't harassment

Workplace harassment should not be confused with legitimate, reasonable management actions that are a part of the normal work function, such as measures to correct performance or requesting medical documents in support of an absence from work. It does not include normal workplace conflict that may occur between individuals, or differences of opinion between workers.

The test of harassment

The test of harassment is whether you knew or ought reasonably to have known that the comments or conduct were unwelcome to another person. For example, someone may make it clear through their conduct or body language that a behaviour is unwelcome, in which case you must immediately stop that behaviour.

The harasser does not necessarily have to have power or authority over the victim. Harassment can occur from co-worker to co-worker, supervisor to employee and employee to supervisor.

WORKPLACE VIOLENCE

We are committed to providing a violence-free workplace for all employees and contractors. The NWMO will not tolerate any acts of violence, harassment, sexual harassment, or intimidation and will take preventative measures to avoid violence or potential violence.

Violence that occurs outside the normal workplace but which has an impact on the working environment, including working relationships, may be considered violence in the workplace. For example, a physical altercation between two employees at a work-related function could be considered workplace violence.

DOMESTIC VIOLENCE

If you are experiencing domestic violence that would likely expose you, or other workers, to physical injury in the workplace, you should advise your manager or Human Resources. The NWMO will take every reasonable precaution to protect you and other employees. This may include some or all the following:

- Creating a safety plan;
- Contacting the police;
- Establishing enhanced security measures; and
- Facilitating your access to counselling through the Employee Assistance Program.

The NWMO appreciates the sensitivity of these issues and will assist you as discreetly as possible.

ZERO TOLERANCE

Workplace discrimination, harassment and violence are serious matters and will not be tolerated from any person in the workplace. All physical assaults involving an employee will be reported to the police. Threats of physical violence will be reported to the police, as appropriate.

An employee or contractor exhibiting violent behaviour is subject to discipline, up to and including termination from employment or engagement, as well as possible legal action. Any acts of violence made by an external party against an employee or a contractor may result in legal action.

You should report any incidents of workplace discrimination or harassment, as well as information about anyone who may have witnessed such an incident to the Vice-President of Human Resources and Chief Ethics Officer.

NO REPRISAL

Our *Code of Conduct* prohibits reprisals against employees who have made good faith complaints or provided information regarding a complaint or incident of workplace violence. Employees who engage in reprisals or threats of reprisals may be disciplined.

Reprisal includes:

- Any act of retaliation that occurs because a person has complained or provided information about an incident of workplace violence;
- Intentionally pressuring a person to ignore or not report an incident of workplace violence; and
- Intentionally pressuring a person to lie or provide less than full co-operation with an investigation of a complaint or incident of workplace violence.

An employee who makes a false complaint or otherwise abuses this policy may be disciplined up to and including termination from employment. Such discipline is not a reprisal or breach of this policy. For additional information, please see the “No reprisal” under “How to raise a concern.”

Conflict of interest

In order to maintain the good reputation of the NWMO, you should avoid any situation that may create, or even appear to create, a conflict of interest or a potential conflict of interest. Business decisions should be based solely on merit and not on any actual or potential financial gain or advantage for you, a family member or friend.

Our business is very complicated and we have many stakeholders, including the public. It may not always be apparent to you as an employee about what might be seen as a conflict in the eyes of our stakeholders, and as such, management reserves the right to determine what may conflict with the NWMO's interests.

In general, a conflict of interest is a situation where your own personal interests:

- Actually conflict with those of the NWMO;
- Have the potential to conflict with those of the NWMO, meaning a situation where your relationship to others or interest in a relationship to another business or organization could result in a conflict of interest in the future; or
- Could be perceived to conflict with those of the NWMO, meaning a situation where people inside or outside our organization could reasonably think that your personal interests do or could potentially conflict with those of the NWMO, even if you do not think a conflict does or might exist.

OUTSIDE BUSINESS INTERESTS

The NWMO recognizes and respects your right to engage in activities that are private in nature and do not conflict with or reflect poorly on the NWMO. In this situation, a conflict of interest could include a situation where you, or the organization you may represent or have an interest in, has a direct or indirect competing interest with the NWMO's activities. This competing interest may result in you being in a position to benefit from the situation, the NWMO not being able to achieve a result in the company's best interest, or the NWMO being presented poorly in the public eye.

While employed by the NWMO, it is expected that you will devote yourself exclusively to the NWMO's business and that you will not be employed, either directly or indirectly, or engaged in any capacity in another business activity without prior written consent of the Vice-President of Human Resources and Chief Ethics Officer.

Further, you shall have no financial interest in any business entity which would detract or interfere with your full-time attention to the work you perform at the NWMO. While employed by the NWMO, you must not be concerned with or have an interest in any relevant business or undertaking without the NWMO's written consent. Consent must be received from your manager/supervisor and the Vice-President of Human Resources and Chief Ethics Officer. Disputes will be directed to the President in the case of employees and officers, and to the Chair of the Board of Directors in relation to the President and other Board Directors.

COMMUNITY, PROFESSIONAL ORGANIZATIONS AND POLITICAL ACTIVITIES

The NWMO supports employees who wish to contribute to communities or professional organizations, or participate in political activities. You must seek approval in advance of engaging in any relevant outside activities, by providing full disclosure in writing to ensure the NWMO is satisfied there will not be any negative impact or conflict of interest (real or perceived). If you are unclear about whether an activity is relevant or not, please consult with your manager. Requests should be submitted to your manager/supervisor and the Vice-President of Human Resources and Chief Ethics Officer using the *NWMO Declaration of Conflict of Interest Form*.

Participation in outside activities should take place during non-working hours, must not interfere or conflict with your work responsibilities or obligations, and should not use NWMO supplies, facilities or other business assets. You may not serve as a director or an officer of any organization that supplies goods or services to the NWMO.

FAMILIAL RELATIONSHIPS

You cannot be directly or indirectly involved in a reporting relationship with someone with whom you have a familial relationship. Full disclosure to your manager/supervisor and the Vice-President of Human Resources and Chief Ethics Officer of such a relationship is required. When in doubt about a possible conflict, ask your manager/supervisor or Human Resources for direction.

Given the relatively small size of our organization, employee familial relationships can limit progression opportunities and can introduce complexity into the organization structure. To reduce the risk of a potential future conflict, the NWMO will generally not hire a candidate who has a familial relationship with any current employee or Board member. Exceptions may be considered when hiring from within local communities, provided there is pre-disclosure to Human Resources, reporting lines are clear of direct conflict, and the President approves the hire.

Understanding that the definition of family for Indigenous peoples includes an extension beyond the biological family, for the purposes of this document, the definition of familial includes anyone related by blood, marriage or common law.

GIFTS AND HOSPITALITY

Offering, giving, requesting or accepting gifts may influence or appear to influence your ability to make fair and objective decisions in the best interests of the NWMO. You should never accept or offer gifts or entertainment when doing so may influence improperly or even appear to influence improperly the NWMO's or the recipient's business decisions. However, in certain circumstances, it may be acceptable to give or receive a business-related gift or hospitality if it is of nominal value and is unsolicited. Examples could include receiving a gift like a calendar or a branded water bottle at an event.

Gifts of cash are not permitted, as this leaves the impression of a bribe, no matter how small the amount. In the event you are offered or provided with cash, please advise Human Resources immediately.

It is important to keep in mind our work program, relationships with our communities and cultural traditions. Gift giving is a tradition within Indigenous communities and an important part of many ceremonial gatherings. This tradition shows respect to the receiver of the gift, as well as to their family and ancestors. It is acceptable to give and receive a gift under these circumstances. The gift of tobacco for example is an important Indigenous tradition and is an acceptable gift to give and to receive when working with Indigenous communities. Before participating in Indigenous ceremony, you should ensure you understand the protocols, expectations and importance of the ceremony. Seek advice from communities as to what kind of gift would be appropriate to give, if you are unsure. Declining a gift in these circumstances would be seen as offensive to Indigenous communities and may potentially jeopardize the relationship.

Consult with your manager/supervisor, Human Resources or the Vice-President of Human Resources and Chief Ethics Officer for advice on the appropriateness of accepting or offering gifts and/or hospitality. Where not appropriate, gifts should be returned with thanks and clarification of our policy.

DEALING WITH PUBLIC OFFICIALS

You must deal with public officials in a transparent manner that upholds the integrity and reputation of the NWMO and the public officials with whom the NWMO deals. Bribery in any form or amount, made directly or indirectly, is strictly prohibited by the NWMO. Bribery occurs where something of value is given with the understanding that it will improperly influence a business decision, such as the procurement of business for the NWMO.

You must comply with all anti-bribery and anti-corruption legislation, both Canadian and foreign, which may apply to the NWMO's operations. Anti-bribery laws broadly prohibit the direct or indirect giving, promising, offering or payment of anything of value to the public official in order to gain an improper advantage.

A public official is broadly defined and may include, for example, an employee of any level of government or Indigenous government, organization or community. It is important that we avoid even the appearance of improper interaction with public officials or private counterparties.

The nature of the NWMO's business and operations mean that it will necessarily be in regular contact with public officials. As a result, if your job includes any contact with public officials in Canada or elsewhere, you must be familiar with and comply with the laws, rules and regulations relating to such communications, including conflict-of-interest rules or other rules that may be applicable to such communications.

If you have any questions about legislation or interactions with public officials, please consult the legal department or the Vice-President of Human Resources and Chief Ethics Officer.

PROCUREMENT ACTIVITIES

Many of you will have opportunities to participate in the reviewing, scoring and selection of vendors. To ensure we have integrity on the selection process, it is important that you disclose upfront if you have any actual or potential conflict with any of the potential suppliers. It is equally important that you keep the details of each proposal confidential. This includes sharing information contained in proposals to other staff or suppliers.

BREACH OF CONFLICT OF INTEREST

If you have a question as to whether a particular circumstance may place you in a conflict of interest, please discuss this with your manager/supervisor or the Vice-President of Human Resources and Chief Ethics Officer.

Social responsibility and the environment

The NWMO is committed to conducting our business in a social and environmentally responsible manner, respecting all applicable laws, Indigenous culture and the human rights of the communities we work with. We are committed to meeting all applicable regulatory standards and requirements for protecting the health, safety and security of people and the environment.

It is expected that you:

- Learn from and respect the cultures and communities you work in;
- Engage with Indigenous communities and members of the public in a respectful, ethical and sensitive manner, respecting individual human rights and the human rights of communities we work with;
- Not tolerate human rights abuses or be complicit in any actions that contribute to such abuse; and
- Comply with all applicable environmental laws, regulations, codes and standards.

If you have concerns that a supplier or other business partner may not be meeting our standards for social responsibility and ethical conduct, you should report such concerns to the Vice-President of Human Resources and Chief Ethics Officer.

Indigenous Knowledge and Reconciliation

In 2016, the NWMO made a commitment to interweave Indigenous Knowledge into our work through the release of the *Indigenous Knowledge Policy*. This policy outlines how the organization receives Indigenous Knowledge from different sources, including Indigenous communities, the Council of Knowledge Holders, and Indigenous Knowledge Holders. Principles that guide how we use Indigenous Knowledge are outlined in this policy as well.

In 2019, the NWMO made a commitment to contribute towards Reconciliation by acknowledging historical wrongs in Canada's past and the need to create a better future by addressing the challenges of today through the incorporation of a *Reconciliation Policy*. This policy sets out how the NWMO will contribute to Reconciliation in all our work.

The following considerations are intentional ways we can act on our commitments to Reconciliation and honouring Indigenous Knowledge:

- We must be cognizant of the diversity that exists within and across Indigenous communities. While there may be elements of beliefs that are similar, we must remember that each community has its own knowledge rooted in its own history and culture.
- Indigenous Knowledge is shared in relationship with Indigenous communities. It takes time to develop knowledge, to experience deep understandings, and to establish trust and respect. This knowledge does not become owned by us once we learn it.
- Before participating in Indigenous ceremonies, you should ensure you understand the protocols, expectations and importance of the ceremony. To gain a better understanding, ask questions from a learning stance. Listen for instructions to know what conduct is expected of you when you are asking for help or told to do something. Be respectful of the person who is helping you. If you do not understand something that is told to you, ask the person helping you to repeat it or explain it to you again. All the people in attendance should be mindful of others and show respect for others who want to learn during ceremonies, teachings and gatherings.
- We must be transparent in how we learn this knowledge and from whom, and work to honour the relationship with Indigenous Knowledge Holders. The relationship should continue to be cultivated and maintained with respect.
- Reconciliation is an individual journey – there is no recipe for this journey. Part of the work of Reconciliation is truth. Truth can come in the form of stories, experiences and dialogue, and should be respected as truth.
- Reconciliation is creating space for Indigenous voice and acknowledging that voice and knowledge.

Integrity and reputation

The NWMO's integrity is fundamental to the creation and maintenance of good relationships. They are also essential elements in establishing and maintaining positive relationships with Indigenous communities. All employees, despite tenure or subject matter expertise, are expected to request permission to post content or make public statements related to the NWMO or our employees.

While at work, you should not make any negative, false or harmful comments about the NWMO in public. You should also conduct yourself in a professional manner at all times, including in person, on the phone and in written correspondence.

Consistent with the NWMO Social Media Plan, you are permitted to like and share content published by Communications on the NWMO-branded social media platforms such as LinkedIn, Twitter, Instagram and Facebook. However, you should never make public statements about the NWMO to the media, on social media networking platforms or on social news websites (e.g., Reddit) unless specifically authorized to do so.

While we welcome you to share NWMO-owned content with your personal social media network, please be mindful you are not speaking on behalf of the organization, and refer public questions from your network to the NWMO's official channels.

This policy also extends to posting or responding in the comment section on news websites. Even if this is for personal use or behind a paywall or privacy wall, you are required to ask permission to publish content.

All requests for public comment should be directed to Communications. If provided with consent to comment, you must identify yourself as an NWMO employee. Any unauthorized comments related to the NWMO are considered a breach of trust.

OFF-DUTY CONDUCT AND SOCIAL MEDIA USE

You have a responsibility to protect the reputation of the NWMO. Negative comments or conduct could have damaging effects on the company and on employees who work here.

The NWMO respects your right to the personal use of social media; however, you should ensure your comments or conduct do not reflect negatively on the NWMO and are consistent with this *Code of Conduct* and other applicable policies of the NWMO, including those regarding confidentiality, information technology use, employment equity, workplace harassment and violence prevention. Employees should not post or publish any statements of fact or opinion that are, or may be reasonably taken by somebody to be, critical or disparaging of the NWMO's vision, mission, mandate, services, employees, members, partners or stakeholders.

No one should engage in any negative, defamatory, false or otherwise harmful comments or conduct against the NWMO either at work or outside work. This includes all aspects of social media, including but not limited to Facebook, Twitter, LinkedIn and YouTube, regardless of whether the comments or conduct take place on or off company property.

Working off-premises and business travel

The NWMO's *Code of Conduct* applies to all business activities and associated activities, including business travel or work performed off-premises. It applies even if conventional practice is different in foreign jurisdictions during international travel. This *Code of Conduct* continues to apply with respect to the offering, giving, receiving or accepting gifts, and with respect to the NWMO's relationships with public officials in those foreign jurisdictions.

Driving and use of electronic devices while driving

For some of us, driving is a regular part of our job. For others, it may be infrequent. In any case, it is important to take safety precautions such as not driving when tired, making frequent rest stops, and where possible, avoiding driving alone, in the dark or in bad weather.

Safety is very important to us, and as such, we want to make sure expectations are clear in terms of the use of these devices while working or for work purposes. First and foremost, we expect that all employees will obey the law.

Using hand-held devices while driving is against the law in Ontario, and as such, **you must not answer or operate any handheld electronic device while operating a vehicle**. We do not expect an immediate response to an email or phone call if you are driving, and you should not view, compose or send email or text messages while you are operating a motor vehicle.

Although the law allows the use of hands-free electronic devices, there is no expectation that you participate in conference calls or meetings while you are driving. If you are waiting for an important message, you should find a safe place to stop and park before reading or responding. The side of the road is not a safe place. Make sure you take the time to find an appropriately safe and legal place to park your vehicle (e.g., parking lot).

Anyone provided with a company phone will be asked to complete a form called *Use of Electronic Devices While Driving*.

Safeguarding company information and assets

You are provided with equipment, information, credit cards and access to technology in order to effectively perform in your job. While there are other policies that govern these areas, an overarching expectation is that you will protect and safeguard all NWMO information and resources and use them as the organization intended.

SENSITIVE AND CONFIDENTIAL INFORMATION

We all have the potential of receiving confidential or sensitive information in our positions. This confidential or sensitive information includes, but is not limited to, procurement activities, technical information, research reports and data; prototypes; demonstrations; Indigenous Knowledge; computer systems and passwords; financial data; business plans; personal information; trade secrets and any other proprietary information about the NWMO or our business or activities that is not publicly available.

It is important that you do not in any way divulge, furnish or make accessible to any unauthorized person or organization, either during employment or any time thereafter, any confidential or sensitive information entrusted to you relating to the business of the NWMO, NWMO member organizations or other parties.

Confidential or sensitive information should only be disclosed within the NWMO to the extent necessary for others inside the NWMO to perform their assigned duties. You should only disclose confidential or sensitive information to others outside the NWMO where it is required by applicable laws (including in response to enquiries by regulators and law enforcement agencies), or when such disclosure is made with the consent of the NWMO and any other person to whom the information relates. If you receive a request to share internal information with an external party, please consult your manager.

In order to protect this confidential or sensitive information, you must be aware of circumstances where the information could be inadvertently or accidentally disclosed, including conversations in public places or leaving devices containing or having the ability to access confidential or sensitive information unattended in public places. Additionally, it is important that you adopt appropriate practices to ensure that sensitive information is kept confidential and stored securely. Managers and supervisors also need to ensure any personal employee information is appropriately secured to respect and safeguard the individual privacy of employees.

At the end of your employment, directorship or contractual dealings with the NWMO, you will be required to return all confidential information acquired during employment. Misuse of information entrusted to you for purposes of conducting NWMO business is considered a serious breach of trust.

If you believe any confidential or sensitive information has been divulged, including through the loss or theft of a device containing or having access to confidential or sensitive information related to the NWMO, you should report that leak, loss or theft immediately to the Information Technology Director so that the NWMO can take appropriate steps.

INVESTIGATIONS

If you receive information about any investigation or inquiry of any government, regulatory body or law enforcement agency, including any request for information, you should communicate this immediately to the Vice-President and General Counsel, and Board Secretary, and the Vice-President of Human Resources and Chief Ethics Officer before any action is taken or promised so that appropriate steps can be taken by the NWMO in connection with that investigation or inquiry or request for information. You must not, in any circumstance, lie or make any misleading statement about any investigation, alter, destroy or conceal any documents or other records of the NWMO in connection with or in anticipation of any investigation, inquiry or request for information, nor should you attempt to influence any person inside or outside the NWMO to do any of these things.

COMPANY ASSETS

Assets of the NWMO include, but are not limited to, documents; computer systems and software; corporate logo and trademarks; facilities; vehicles; telecommunication devices; information; and office supplies. You have a responsibility to protect company assets, ensuring they are only used for NWMO business and are safe from theft and destruction.

While company systems such as email or internet are provided and intended for business purposes, limited responsible personal use is permissible. Usage must be limited and in accordance with the NWMO's policies and procedures. For security reasons, you must ensure your computer and office access passwords remain confidential. At the end of employment with the NWMO, you will be required to return all company assets acquired during your period of employment.

ELECTRONIC USE AND ACCESS

NWMO internet facilities and computing resources are provided to conduct the business of the NWMO and should not be used to knowingly violate any laws or regulations. Misuse of equipment or accessing non-work related data could cause harm to the NWMO, and you are expected to use IT assets appropriately.

Consistent with our IT policy, you should not:

- Attempt any unauthorized access of intranet, internet, email services or NWMO information. This includes the distribution of messages anonymously, use of other staff User IDs or using a false identity;
- Damage, delete, insert or otherwise alter NWMO information carelessly or with malicious intent;
- Use the intranet, internet or email in a way that could defame, harass or abuse other intranet, internet and email users, individuals or organizations;
- Create, knowingly access, download, distribute, store or display any form of offensive, defamatory, discriminatory, malicious or pornographic material;
- Deliberately propagate any virus, worm, Trojan horse, or trap-door program code; and
- Knowingly disable or overload any computer system or network, or circumvent any system intended to protect the privacy or security of another user.

Please do not consider your electronic communication, storage or access to be private if it is created, accessed or stored at work using company assets, including desktop computers, laptops, smartphones, tablets and other mobile devices. The NWMO reserves the right to monitor and audit any or all intranet, email or computing activity performed with company IT assets, including use of those assets for personal purposes. NWMO staff may be called on to explain their use of the intranet, internet, email or IT equipment.

Misuse of company IT assets as described may result in restricted access to information technologies, disciplinary action up to and including termination of employment, and reporting to relevant regulatory authorities as required by law. The NWMO may also turn over company IT assets to regulatory authorities to assist them in their investigation of unlawful activities.

If you become aware of any misuse of internet facilities or computing resources to create, access, download, distribute, store or display any form of offensive, defamatory, discriminatory, malicious or pornographic material, you are encouraged to report this to the Vice-President of Human Resources and Chief Ethics Officer.

INTELLECTUAL PROPERTY

All work including, but not limited to, documents, research work and business plans, created by employees, agents, representatives, contractors, consultants or business partners on behalf of the NWMO is designated as and remains the property of the NWMO in perpetuity. As an employee, you will respect the intellectual property of others, including Indigenous Knowledge and will adhere to all laws and contracts relating to intellectual property. You will disclose all intellectual property produced, made, composed, written or designed during the course of your employment with the NWMO and which relates to the NWMO or our business, and work with the NWMO to ensure that rights in that intellectual property are validly assigned to the NWMO.

How to raise a concern

The Chief Ethics Officer position exists to ensure a strong ethical framework and program is in place to guide behaviour and surface employee concerns. It also serves as a central point of contact for employees to raise concerns or ask questions related to ethical behaviour, conflicts of interests or notable deviations from expectations outlined in this *Code of Conduct*. It also ensures that all reports are investigated and dealt with appropriately.

Genuine and serious concerns should be brought forward to the Vice-President of Human Resources and Chief Ethics Officer in accordance with the terms of the *Whistleblower Policy* and *Whistleblower Procedure*.

As a first step, you might want to discuss your concern with your immediate supervisor, a Human Resources Manager or the Chief Ethics Officer. However, regardless of whether you discuss it with anyone first, serious concerns should be reported.

REPORT BY TELEPHONE, EMAIL, LETTER OR INTEGRITY COUNTS

There should be no barrier to reporting a concern. While it is preferred that you bring forward the concern in person, there may be situations where you are not comfortable doing so or you wish to do so anonymously. You can report the concern to the Chief Ethics Officer by phone, letter, email at ChiefEthicsOfficer@nwmo.ca or alternative method providing as much information as possible for the concern to be investigated.

If you prefer to report your concern anonymously, you may contact Integrity Counts, our confidential ethics reporting system via toll-free number at 1.866.921.6714, online at www.integritycounts.ca/org/nwmo or email at nwmo@integritycounts.ca. This service is available 24 hours a day, seven days a week, and is provided by Whistleblower Security Inc., an independent third-party service provider. Whistleblower Security Inc. does not have caller ID and will not attempt to determine the caller's identity.

INVESTIGATION

All reports will be taken seriously and will be documented and investigated.

The Chief Ethics Officer will be responsible for investigating reported concerns. This could include using an external investigator if appropriate. If involved in an investigation, you are expected to co-operate and treat the matter confidentially. The results of the investigation will be communicated internally as appropriate.

NO REPRISAL

Retaliation or reprisals for good faith reporting under the *Code of Conduct* will not be tolerated, including in connection with providing information or assistance to any investigation, or providing a law enforcement officer with truthful information regarding the commission or possible commission of an offence (unless the person reporting is involved in the offence), or providing any information or assistance to the Chief Ethics Officer or other person conducting an internal investigation. If you believe you have been a victim of retaliation or reprisals, or are aware of or suspect retaliation against anyone else for reporting a concern, you should report this to your direct supervisor, manager, a Human Resources Manager or the Vice-President of Human Resources and Chief Ethics Officer.

Retaliation or reprisals can include demotion, suspension, threats, harassment or other similar conduct. Anyone who engages in retaliation or reprisal against someone who has made a good faith report may be subject to discipline, which may include dismissal.

Consequences

Those who do not comply with the NWMO's *Code of Conduct* or anyone who knowingly makes a false statement, a malicious or knowingly false allegation or provides false information may be subject to disciplinary action up to and including termination from employment and/or legal action.

Understanding and acknowledgment

It is important that all staff understand the expectations outlined in our *Code of Conduct*.

- New hires will be provided with the NWMO's *Code of Conduct* in their offer letters, and it will form part of their orientation to the NWMO.
- Managers/supervisors will review the *Code of Conduct* with their staff each year or earlier if there are changes, to review the principles and reinforce the NWMO's expectations.
- All staff will refresh their understanding each year by completing a knowledge check quiz and an electronic confirmation that they have read the *Code of Conduct* and have had an opportunity to ask questions for clarification.

For more information, please contact:

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