



# CODE OF ETHICS



## Message from the President and Chief Executive Officer

To ensure strength and longevity, a business relationship must be based on mutual trust between the Client, the Company, and its Stakeholders. We will establish and maintain trust that is built upon principles, ethics and morals that will guide our corporate goals and actions.

To continue to grow, Bouthillette Parizeau (BPA) must remain trustworthy. We all have a duty to understand ethical expectations, comply with guidelines, make informed decisions, and behave wisely. Our organizational values, which support and reinforce the achievement of our mission, impact the way people in the Organization act, both inside and outside the Company. Ethical behaviour is the basis for trust among stakeholders. Communicating clear ethical expectations is therefore essential within our organization, as well as with our clients and business partners.

This requires a commitment to the principles of integrity and ethical behaviour from everyone in the Company. To achieve this, we have developed this Code of Ethics. In it, you will find the guiding principles that must govern our relationships with the Company, our clients, colleagues, suppliers, peers, and business partners.

It is important to act in accordance with these principles and our organizational values to actively participate in maintaining our reputation.

A handwritten signature in blue ink, appearing to read 'D. Latour', written over a horizontal line.

Dominic Latour, P. Eng.  
President and Chief Executive Officer

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## **APPENDICES:**

### **APPENDIX A – ACKNOWLEDGMENT FORM**

### **APPENDIX B – NON-CONTENTIOUS DISCLOSURE FORM**

### **APPENDIX C – COMPLAINT FORM**

*This Code of Ethics was adopted by the Bouthillette Parizeau Inc. (BPA) Board of Directors on February 11<sup>th</sup>, 2022 and modified with the approval of the Ethics Committee. It replaces all other versions of the Code of Ethics.*

*The Ethics Committee is responsible for the application of this Code.*

## 1. OBJECTIVES

### 1.1 General

This Code of Ethics (hereinafter the “Code”) of Bouthillette Parizeau Inc. (referred to as “BPA”, the “Company” or the “Organization”) is intended to establish guidelines for the relationships and behaviour expected between the members (the “members” include Office Directors, Executives, Shareholders, and employees including trainees), the Company, and between the Company and the public.

The Code:

- Supports the mission and organizational values;
- Establishes the rules governing the behaviour expected in accordance with the mission and organizational values;
- Describes the mechanisms for enforcing the mission, values, and rules of the Code of Ethics.

The purpose of this Code is to ensure that each member working within BPA:

- Is committed to preserving the Company’s reputation in the performance of their duties as a representative of the Company;
- Adheres to ethical principles and values;
- Is equally committed to the Code of Ethics specific to their profession (if applicable); and
- Understands that defamatory statements about the Company will not be tolerated.

### 1.2 Scope of Application

#### 1.2.1 General

This Code applies to all members of BPA. Members must also comply with the Employee Manual available on the intranet. In case of ambiguity between the provisions of this Code and those of the Manual, the provisions of the Code shall prevail.

#### 1.2.2 The Code and the Members

It is the responsibility of every member of the Company to become familiar with the Code and to understand how it applies to their day-to-day work.

It is essential that each member is aware of the possible consequences of their actions on all affected persons, whether they are members of the Company, clients, suppliers, employees, colleagues, or business partners.



The Code has been written to help each member challenge the status quo, make the right decisions, promote industry best practices, and comply with BPA policies.

The Company expects all members of the Company, at all levels, to respect and comply with the guidelines of this Code. This Code must be applied in conjunction with all other Company procedures, standards, and rules (e.g., professional association code of ethics, employee orientation guide, organizational policies, etc.).

All Members are required to confirm that they have read the Code and its amendments, if applicable, by submitting the Acknowledgement Form in Appendix A and are also required to attend awareness sessions organized by the Ethics Committee. This applies also to all new members upon their hiring. New members are provided with the Code for review and confirmation that they have read, understood, and will comply with the provisions.

## 1.2.3 The Code and Business Partners

Members of BPA must ensure the integrity of business partners and forward them a copy of this Code. For the purposes of understanding, the expression “business partner” mentioned in this Code refers to business partners with whom the Company has entered into a joint-venture agreement, as well as its subcontractors. The Company reserves the right to suspend or terminate a business relationship with a business partner that refuses to comply with the provisions of this Code.

## **2. PRINCIPLES**

### **2.1 General**

Each member of BPA agrees to:

- Respect applicable laws and regulations in effect, as well as the Code and organization's policies;
- Perform work and conduct business relations with integrity, honesty, and fairness;
- Avoid conflicts of interest and reduce the perception of conflict of interest;
- Avoid favouritism, both with BPA members and with suppliers, clients, and business partners;
- Promote transparency and accountability in the workplace;
- Preserve health and safety in the workplace;
- Promote a culture in which respect and ethics are recognized, valued, and exemplified by all members;

- Report, in good faith, any actual or perceived violations of this Code;
- Cooperate with any internal investigation into a reported violation at the request of the person responsible for the internal investigation; and
- Avoid associating with activities, causes or persons that could directly or indirectly involve BPA in illegal, questionable, or compromising activities.

## 2.2 Legal Obligations and Codes of Ethics

In the course of work, BPA expects all members to be aware of the various legal provisions, as well as the various policies and directives that apply to them, particularly in relation to the position held by each of them, and to comply with them. BPA expects a member governed by a code of ethics to respect the ethical standards and to ensure that the professional acts performed are in accordance with professional standards.

In the event of a discrepancy between provisions and this Code, the most stringent standard will be retained and applied.

## 2.3 Compliance with Client Policies

When the Client issues and requires the application of its own ethical policies, the members of BPA must take cognizance of them and are required to respect them when they are more stringent than the Code.

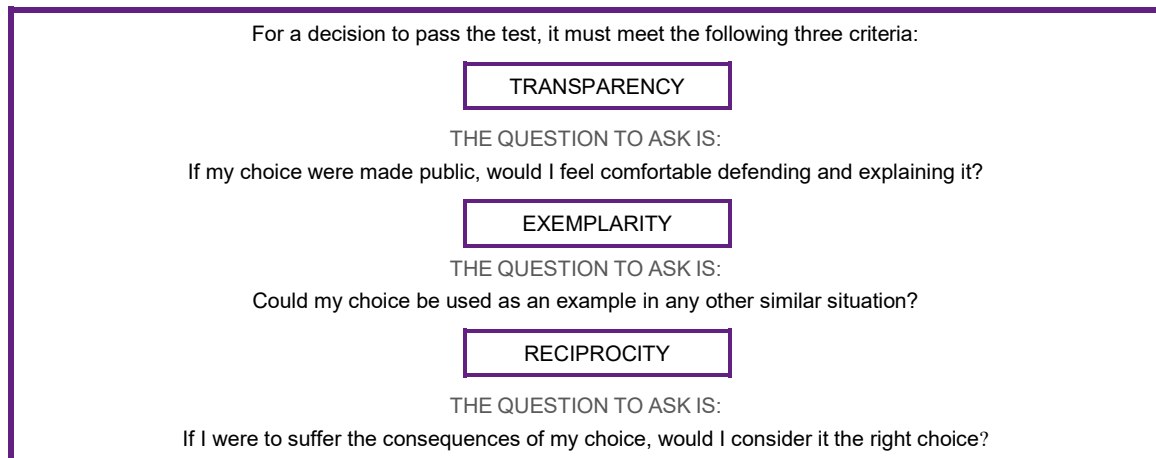
## 3. DECISION MAKING PROCESS

In a situation where a member has doubts about the ethical significance of a decision, action or behaviour, the member is required to follow the steps detailed in the following process:

- Confirm the legality of the decision, action, or behaviour in question, i.e., confirm or deny that it is legal or complies with applicable laws and regulations;
- Ask yourself the following three (3) questions, as detailed in the *Guide de pratique professionnelle* (in French only) published by the *Ordre des ingénieurs du Québec*<sup>1</sup>.

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<sup>1</sup> Ordre des Ingénieurs du Québec, “*Guide de pratique professionnelle*” (August 2021) online: [Publications \(oig.qc.ca\)](https://publications.oig.qc.ca)



If the member has additional questions, or wishes to discuss other considerations, they must contact a member of the Ethics Committee promptly (section 5).

## **4. BUSINESS CONDUCT**

### **4.1 Public Safety**

Members shall ensure public safety by monitoring and ensuring the safety of the work being carried out and that it does not endanger the health and safety of others. Members are responsible for considering the consequences of the work they carry out on the environment, health, safety, and property of others.

### **4.2 Acting in the Best Interest of the Client**

Each member shall ensure that the work entrusted to them is carried out in the best interests of the Client with due diligence. Members must promptly advise the Client of any detrimental error that could impact them.

The fees charged by BPA must always comply with applicable laws and regulations and must be reasonable considering the specific circumstances of each client mandate.

### **4.3 Competency**

The members of BPA must demonstrate competence in the exercise of their role or position and must always act ethically. A professional has the right to request exemption from a task if they believe that they do not possess the skills or adequate means to accomplish the task.



Each member is obliged to carry out their service in accordance with the rules and legislation that apply to them. For this reason, each member has full autonomy in this respect and has the right to refuse to act or to offer their services if they believe that they do not possess the adequate resources to enable them to perform their duties in accordance with their obligations. The member must consider the limits of their competence, and the means at their disposal (human resources, time allocation, etc.) in the performance of their services.

It is important to remember that if the member finds themselves in a situation where they are faced with a choice between directives ordered by a business partner or a user, those of the Employer or the Company, or those dictated to protect the public interest, the member must always prioritize the public interest.

#### **4.4 Training and Professional Development Activities**

BPA actively encourages its members to regularly engage in various training and professional development activities to allow them to develop and perfect skills in relation to their responsibilities and to acquire new skills from a professional development perspective.

## **5. ETHICS COMMITTEE**

### **5.1 Duties of the Ethics Committee**

The Ethics Committee (hereinafter the “Committee”) has five main missions:

- Ensuring that the Code of Ethics and reporting procedures meet the highest standards;
- Raising awareness among the members about the importance of adhering to BPA's Code of Ethics, both to maintain a healthy internal working environment and to uphold the company's reputation and integrity within the industry and with the public;
- Providing guidance on appropriate behaviour to avoid conflicts of interest;
- Investigating all reports;
- Making decisions and, where necessary, recommend sanctions against any person found to have violated any of the provisions of the Code of Ethics.

### **5.2 Composition and Responsibilities**

The Ethics Committee (hereinafter the “Committee”) is BPA's regulatory body for ethical matters and is made up of seven people:

- |                             |                 |
|-----------------------------|-----------------|
| • Director, Eastern Quebec: | Martin Bergeron |
| • Executive Vice-President: | Patrick St-Onge |
| • Director, Electrical:     | Julie Lefebvre  |
| • Director, Electrical:     | Michael Moore   |

- Director, Structure, Special Projects: Brent Weatherdon
- Administrative Director: Patrice Langlois
- A member of the legal department: Salem Samné

Any vacancy may be filled directly by the Committee for the remainder of the replaced member's term of office.

To conduct investigations, issue opinions and make decisions, the Committee must consist of at least three (3) Committee members.

If the Committee deems it to be impossible to conduct an investigation or that the costs would be unreasonable, it may appoint a specialized firm to conduct an investigation and, as necessary, recommend sanctions against any member found to have breached any of the provisions of the Code of Ethics.

The main responsibilities of the Ethics Committee are as follows:

- Conduct a biannual meeting to discuss developments in legislation and current events regarding ethics, discrimination, and harassment in the workplace;
- Record and date meeting minutes;
- Receive requests, questions, reports, complaints, and denunciations regarding ethics;
- Providing opinions on non-contentious questions and requests;
- Conducting investigations related to reports, complaints, and disclosures, consult and analyze relevant correspondence and interview the people involved;
- Making substantiated decisions on complaints submitted to it;
- Plan and manage awareness sessions for BPA members;
- Provide periodic updates of the Code and make them known to the public.

All seven members of the Ethics Committee convene to prepare their annual report, to appoint independent external members to the company, and for any significant matters regarding all the provinces of Canada.

## **5.3 Non-contentious disclosure form (Appendix B)**

The non-contentious disclosure form covers the following situations:

- Participating in an event;
- Clarifying any provision of the Code of Ethics;

- Authorizing the use of BPA information or intellectual property for non-employment purposes;
- Political commitment;
- A relationship between two or more people, either internally or with business partners, which could cause a problem or give rise to favouritism;
- Other voluntary disclosure.

The discloser is invited to submit the appropriate non-contentious disclosure form to the Ethics Committee at [ethique-ethics@bpa.ca](mailto:ethique-ethics@bpa.ca). If the member submitting the form wishes to remain anonymous, the Committee will not share any information identifying the discloser outside the Committee without the discloser's consent.

## **5.4 Complaint form (Appendix C)**

Any member who is aware of or witnesses a breach of a provision of the Code of Ethics is encouraged to submit a complaint form to the Ethics Committee at [ethique-ethics@bpa.ca](mailto:ethique-ethics@bpa.ca). If the member submitting the complaint form wishes to remain anonymous, the Committee will not share any information identifying the discloser outside the Committee without the discloser's consent.

No sanction of any kind may be taken against a member who submits a form to the Committee.

## **5.5 Ethics Committee evaluation process**

When a non-contentious disclosure form is received, the information is shared with all the Committee members. The Committee may meet to discuss the situation and decide to conduct an investigation if its members deem it necessary.

As soon as a complaint form is received, the Committee must meet to decide whether the complaint is well-founded. If the complaint is deemed to be well-founded, the Committee will conduct an investigation.

## **5.6 Duration of investigations, confidentiality and powers of the Ethics Committee**

If an investigation is necessary, it must be carried out as quickly as possible and in no more than 15 calendar days.

The investigation is conducted in a confidential manner, and the Committee commits to keeping all evidence and testimonies gathered and consulted confidential.

To conduct its investigation, the Committee may ask any member at any time to provide any document it deems relevant, and to make themselves available for questioning. Any refusal

to cooperate or to share documents constitutes a breach of the Code of Ethics, and the member is liable to sanctions.

## **5.7 Substantiated decision of no breach**

If, following the investigation, the Committee concludes that there is no breach of the Code of Ethics, it informs the person who made the complaint, if their identity is known, of its substantiated decision in writing within five (5) business days of the investigation's conclusion. If the member in question has been interviewed by the Committee, a copy of the decision is also sent to them. The decision must remain confidential and must not be divulged to third parties, including the company's management and human resources.

All information and documents collected by the Committee will be kept confidential for three (3) years from the decision, after which they will be shredded.

## **5.8 Substantiated decision acknowledging a breach**

If, following the investigation, the Committee determines that a member has breached any of the provisions of the Code of Ethics, its written and substantiated decision is provided to the person who made the complaint within 15 days of the investigation's conclusion, if their identity is known, to the member and to the company's human resources department.

In its written decision, the Committee must specifically mention each of the breaches found and may recommend sanctions. The Committee's recommendations are not binding on the company's human resources department.

All information and documents collected by the Committee will be kept confidential for three (3) years from the decision, after which they will be shredded.

## **5.9 Annual report**

In February of each year, the Committee will provide the company's management with an activity report, which will include the number of non-contentious requests and enquiries, the number of Committee opinions, the number of complaints, the number of substantiated decisions of no breach, the number of substantiated decisions acknowledging a breach, the number of recommendations followed by human resources, and the number of recommendations not followed by human resources. The Committee will append to the report the opinions and substantiated decisions acknowledging breaches issued during the year.

## **5.10 Recusal**

Should a member of the Committee consider that the members of BPA involved in the case may have valid reasons for doubting their impartiality, they must declare this without delay to

the other members of the Committee and recuse themselves. Serious grounds for doubting impartiality may include:

- The Committee member is the spouse of a party to the case in question, or they/their spouse is related to one of the parties;
- The Committee member is themselves a party to the case in question;
- The Committee member has acted or is currently acting as a representative for one of the parties;
- There is or was a serious conflict between the Committee member and one of the parties to the case in question;
- The Committee member has a clear interest in the case in question.

After submitting the request to withdraw, the other members of the Committee shall decide whether to accept the request. If the majority of the other Committee members approve the request, the member who made the request withdraws from the case in question. If not, that member shall remain active in the case. In the event of a tie, it is presumed that the other members of the Committee have approved the request.

## 6. MANDATORY DISCLOSURE

### 6.1 Political involvement

Any member of the company must disclose any form of **active political involvement** (e.g., volunteering during an election campaign to solicit support and donations).

Members of BPA must, in the course of their duties, make decisions independently of any partisan political considerations. Members must also show reserve in the public communication of their political opinions, regardless of the communication platform.

This political involvement should not prevent members from fully performing their professional responsibilities. It is also strictly forbidden for all members to make any electoral contribution on behalf of the firm or to express a political opinion on behalf of BPA.

### 6.2 Using information for purposes outside normal use

In addition, any request to use information or intellectual property outside of normal work use must be approved in advance by the Committee (e.g., in the case of academic research).

## 6.3 Close ties

Finally, any relationship between two or more people internally that may cause a problem or raise a situation of favouritism must be disclosed to the Committee. This includes, without limitation, family relationships, romantic relationships, and serious interpersonal conflicts.

## 7. BUSINESS INTEGRITY

### 7.1 General

It is essential in business relationships to behave with integrity and honesty to maintain any existing bonds of trust and to avoid undermining the reputation of the Company.

### 7.2 Conflict of Interest

A conflict of interest is a situation in which a member is entrusted with a function of general interest that competes with professional or personal interests.

Self-interest need not be financial in nature; it may indeed be familial, emotional, or simply cause feelings of gratitude or animosity. Members may not, directly, or indirectly, solicit, accept, or offer a gift, gratuity or other benefit to a company or person with whom the Company does business that would create a sense of entitlement or that would influence or appear to influence the judgment of the person receiving such a gift or benefit.

It is also important to understand that the appearance or perception of a conflict of interest can be just as damaging to a company's reputation as an actual conflict of interest, as it may raise doubts about the integrity, impartiality, and credibility of company members in positions of authority.

#### 7.2.1 Collusion and Corruption

Collusion is a secret agreement between two or more persons to act in fraud of another person's rights and is punishable by law.

Corruption is the misuse of an interaction with one or more persons to obtain benefits or retribution in exchange for leniency. Several forms of corruption exist, such as fiscal, economic, legal, and political. All forms of bribery and diversion are strictly prohibited.

#### 7.2.2 Bribes and Other Benefits, Including Gifts

A bribe is a sum of money, or a form of advantage offered clandestinely to obtain an illegal advantage. It is strictly forbidden to solicit or accept any bribe.

Other benefits may take the form of gifts or invitations from suppliers and business partners.



In general, gifts and other benefits **should never be accepted from suppliers or business partners**, particularly if the recipient is able to offer (or be perceived to be offering) an advantage, privileged access, preferential treatment, or any other favour to the donor. Such gifts and other benefits should be politely declined and returned to the donor. You must also disclose the situation to the Committee. It is strictly forbidden to solicit any gift or other benefit.

If a gift or other benefit comes from a customer, or if the advocacy or business development context allows for the acceptance of a gift or other benefit from a supplier or business partner without impact, BPA members may accept the gift under the following conditions:

- All gifts received or offered and all activities in which members participate at the invitation of clients, suppliers or business partners must be recorded in the Register maintained for this purpose by the Business Development department. This record must include the date, location, name of the member receiving the gift or invitation and the name of the offering customer, supplier, or business partner, as well as the estimated market value. In addition, the recipient's supervisor must be notified;
- Similarly, all gifts or benefits received from clients, suppliers or business partners remain the property of BPA and not of the person who received them. Thus, gifts must, as much as possible, be redistributed to other members of the company by way of a draw;
- In the case of a gift or benefit received from a supplier or business partner, and where authorization has been given that it is acceptable to retain it, it is the responsibility of the member receiving the gift or benefit to inform the donor of our policy of refusal, for the future.

It is possible for BPA members to offer gifts to clients (current or potential) or business partners if (i) these gifts are modest or customary; (ii) the member has received authorization from his or her supervisor; and (iii) the member has inquired about the rules to this effect with the recipient.

It is recommended that a member consults the Ethics Committee if in doubt about gifts and other benefits.

## IN SUMMARY

The members of BPA must refuse gifts and other benefits from suppliers and business partners.

If a gift or other benefit is accepted:

- The gift or other benefit is to be recorded in the Business Development Register;
- The gift or other benefit is the property of BPA and will be distributed among other members by way of a draw (if possible);
- the donor of the gift or other benefit must be warned that any future donation will be refused and will be subject to a draw among members.

A member may offer a gift or other benefit if:

- The gift or benefit is modest or customary;
- The member has received permission from their supervisor;
- The member has enquired about the rules to this effect from the recipient.

### 7.2.3 Request for Proposal

Each member must respect the rules dictated by the clients during the proposal process, mainly regarding communication with client representatives during the proposal period and avoid trying to extract inappropriate information or influence the members of the selection committee.

### 7.2.4 Loyalty and Competition

Members must respect their duty of loyalty to BPA.

Paid or unpaid activities pursued by members in addition to their work must not give rise to a conflict of interest or reduce the availability required to adequately perform their work.

### 7.2.5 Positive Measures

All members shall take positive steps to avoid any situation of conflict of interest or appearance of conflict of interest and advise stakeholders of their obligations in this regard.

Moreover, members are subject to several provisions relating to impartiality, disinterestedness, and independence. They must obviously subordinate their personal interests to those of the client.

## 8. CONFIDENTIALITY

For definitional purposes, the term “confidential information” is divided into two categories: confidential personal information and non-personal confidential information. Confidential personal information is information that identifies a natural person. For example, this information may include signature, social insurance number, date of birth, employee record and salary. The disclosure of this information can break the bond of trust with BPA and lead to legal action.

Non-personal confidential information is information that is shared in the course of employment. It includes, but is not limited to, financial information, business plans, sales and marketing information, customer and supplier information, corporate legal records, e-mails, computer files and technical data. This type of information, if disclosed, could alienate BPA’s business partners, provide a significant competitive advantage to third parties, and compromise our internal security.

It is the responsibility of everyone in possession of confidential information to keep it confidential and to disclose it only to those parties entitled to it and only to the extent necessary. This obligation remains even after employment ends or the project for which we obtained the confidential information is completed.

It is also forbidden for anyone to use information obtained in the course of their duties for personal purposes or to use it for any purpose other than the specific purpose of the project concerned, unless authorized by the Committee. Members shall treat any information obtained from a client as confidential information and shall ascertain from the relevant Project Manager the parameters agreed with the client regarding confidentiality. In addition, members’ responsibility for confidentiality is increased for projects with a high level of security.

Here are some guidelines for the protection, retention, and destruction of confidential information:

- Do not reveal confidential information in public, or even with those close to you;
- Always safeguard and protect confidential information;
- Always ensure the mandatory retention period for confidential information;
- Always shred or destroy documents (digital or physical) containing confidential information when the mandatory retention period has expired;
- Be sure to indicate the confidential nature of the documents transmitted;
- Contact the Ethics Committee if there is any doubt about the security of confidential information.

## **9. PUBLIC RELATIONS**

A member who is contacted by a journalist, media representative or any other person seeking official testimony or comment must immediately refer that person to the President and Chief Executive Officer or the Committee. No member shall make any comment whatsoever in connection with the Company unless expressly authorized by the President and Chief Executive Officer or the Committee.

At all times, the member must show restraint in their public comments about the company on all public communication platforms. Not only must no information about BPA be divulged, but members must also be diligent in making comments that could tarnish the company's image or reputation, or comments about other members, clients or business partners that could be construed as discriminatory or damaging to their reputation.

Each member must ensure that they do not damage the reputation of the Company or anyone working in or with BPA and that the legitimate interests of the Company are protected.

## **10. INTELLECTUAL PROPERTY**

During their professional activities, members create, produce, or carry out models, calculations, standards, expertise, processes, plans, drawings, etc. The achievements remain the exclusive property of BPA considering that they are a direct result of the members employment within the Company and that they use its resources. Consequently, this information shall not be disclosed or transferred for personal use or for use by another organization, unless prior authorization is obtained from the Committee.

However, the use of products, documents or concepts belonging to others may constitute an infringement of intellectual property rights which may have serious consequences. Members should check with the Committee beforehand to ensure that such use does not infringe any of the Company's intellectual property rights.

## **11. USE FOR BUSINESS PURPOSES**

### **11.1 Use of Resources**

Members are responsible for ensuring that all BPA resources, including time and material resources, are used appropriately, efficiently and for professional purposes. All Company resources must also be protected against access, loss, damage, vandalism, misuse, unauthorized or improper use or destruction, and theft.

## **11.2 Use of Funds**

Members must use and protect Company money, cheques, mail, etc., and ensure that all receipts for expenses and invoices are accurate and properly authorized. Members must use Company credit cards only for business purposes.

## **11.3 Information Technology**

Computers and computer networks are now essential in the working world. Members should strive to prevent disruption, overload and misuse of these resources and services. The use of e-mail or the internet to access material containing defamatory or disruptive statements, comments or images of a sexual nature is strictly prohibited. This includes, but is not limited to, discriminatory comments or images based on race, national or ethnic origin, colour, language of expression, age, gender, sexual orientation, marital status, family status, religious beliefs, disability or handicap, or pardoned conviction.

## **12. FRAUD**

The Company takes a zero-tolerance approach to any act of fraud.

## **13. LABOUR RELATIONS**

### **13.1 Respect and Civility**

A culture of respect and civility requires the cooperation of the members of the Company. Courtesy, mutual respect, good manners, and cooperation are part of the attitudes and behaviours to be adopted at work.

BPA is committed to promoting an inclusive and safe work environment that:

- Recognizes the dignity and integrity of each member;
- Values and promotes diversity, equity, and inclusion;
- Enables every member to work without fear of intimidation, discrimination, harassment, or violence;
- Promotes transparent and honest relationships.

## **14. ORGANIZATIONAL ASSERTIONS**

### **14.1 Mission**

Building a sustainable future.

### **14.2 Vision**

- A strong national presence;
- Perfectly integrated expertise;
- Solutions to the most complex challenges.

### **14.3 Values**

- Accomplishment;
- Excellence;
- Integrity;
- Passion;



## APPENDIX A

### ACKNOWLEDGEMENT FORM

I, the undersigned, confirm and acknowledge that I have read and understood the Code of Ethics and hereby undertake to comply with its provisions which form an integral part of my employment contract.

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Signature

---

Date

---

Surname and Name

Please send the signed copy to the Ethics Committee: [ethique-ethics@bpa.ca](mailto:ethique-ethics@bpa.ca)

## APPENDIX B

### NON-CONTENTIOUS DISCLOSURE FORM

See attached document.

## NON-CONTENTIOUS DISCLOSURE FORM

This non-contentious disclosure form is sent to the Ethics Committee, which will process it diligently.

### Identification of the discloser

- ☐ I wish to remain anonymous.
- ☐ I wish to declare my identity

(Mandatory for disclosures relating to sections 1, 3, 4 and 5 described below):

First and last name:

Personal details:

Job Title:

Date:

Select the date

Please send this form to the Ethics Committee: [ethique-ethics@bpa.ca](mailto:ethique-ethics@bpa.ca)

### Reason for disclosure

- ☐ I would like to know if I can take part in an event (complete Section 1)
- ☐ I would like clarification on any of the provisions of the Code of Ethics (complete Section 2)
- ☐ I wish to obtain permission to use information or intellectual property for purposes other than my employment (complete Section 3)
- ☐ I wish to disclose my political involvement (complete Section 4)
- ☐ I wish to disclose an intimate relationship with another BPA member or business partner that may cause a problem or raise a question of favouritism (complete Section 5)
- ☐ Other voluntary disclosure (complete Section 6)

## Section 1: Participation in an event

Participation as:

☐ Organizer ☐ Panelist ☐ Participant

Type of event:

Date of the event:

Please describe the event:

If applicable, please describe why it is important for you to participate and whether or not it is related to your position at BPA

Please attach to this form any invitation to the event, as well as any program mentioning the content of the event.

The Ethics Committee will reply as soon as possible.

## Section 2: Clarification of the Code of Ethics

Deadline (if applicable):

Please describe the provision requiring clarification.

Please specify your question

The Ethics Committee undertakes to reply as soon as possible and, if possible, before the deadline.

## Section 3: Authorization to use information or intellectual property for purposes other than employment

Type of information: ☐ Information ☐ Intellectual property ☐ Other

Authorization expiry date:

Please describe the information you need.

Please describe the intended use for the information

The Ethics Committee undertakes to reply as soon as possible and, if possible, before the deadline.

## Section 4: Political involvement

Government level: ☐ Federal ☐ Provincial ☐ Municipal

Are you considering running in an election? ☐ Yes ☐ No

Are you just a party member or are you actively volunteering: ☐ Party member ☐ Active member/volunteer

If you are an active member, please describe your tasks within the political party:

If you are an active member, please describe to the best of your knowledge whether your position, your experience and the information to which you have access at BPA serve you in any way in your political involvement

If necessary, the Ethics Committee may contact you to obtain further information, and to prevent any situation of a conflict of interest or the appearance of conflict of interest.

*We would like to remind you that it is forbidden to make electoral contributions or express political opinions in the name of BPA. It is also forbidden to engage in electioneering in the workplace.*

## Section 5: Intimate relationship with another BPA member or business partner, which may cause a problem or raise a question of favouritism

Please provide the details of the person with whom you have a relationship:

First and last name:

Professional contact details:

Job Title:

Are they a member of BPA or an external person?

☐ BPA member ☐ External person

If a BPA member, is he or she:

Your superior?

☐ Yes ☐ No

Your subordinate?

☐ Yes ☐ No

Your main internal source of work?

☐ Yes ☐ No

If they are a business partner, please describe the nature of their relationship with BPA and with you:

If necessary, the Ethics Committee may contact you to obtain further information, and to prevent any situation of a conflict of interest or the appearance of conflict of interest.

## Section 6: Other voluntary disclosure

Please describe the reason for your voluntary disclosure:

The Ethics Committee will acknowledge receipt of your voluntary disclosure within 10 days and may contact you for further information.



## **APPENDIX C**

### **COMPLAINT FORM**

See attached document.

## COMPLAINT FORM

This complaint form is forwarded to the Ethics Committee, which has the power and duty to investigate and determine whether a breach of any of the provisions of the Code of Ethics has occurred.

### Identification of the discloser

- ☐ I wish to remain anonymous.
- ☐ I wish to declare my identity and agree to be interviewed by the Ethics Committee:

First and last name: \_\_\_\_\_

Personal details: \_\_\_\_\_

Job Title: \_\_\_\_\_

Date: \_\_\_\_\_ Select the date

Please send this form to the Ethics Committee: [ethique-ethics@bpa.ca](mailto:ethique-ethics@bpa.ca)

### If applicable, identification of the victim, if different from the discloser

First and last name: \_\_\_\_\_

Job Title: \_\_\_\_\_

### Ethics complaint

Name(s) of person/people involved: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date or period of the facts, behaviour or acts in question: \_\_\_\_\_

\_\_\_\_\_

Please state whether witnesses were present.  
If so, please provide their names: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# COMPLAINT FORM



Please describe the events or facts on which the complaint is based. Provide as much information as possible so that the complaint can be fully investigated.

Do you have or are you aware of any documents (e.g. correspondence or e-mails) illustrating the facts, acts or behaviour in question? Please describe the documents or provide copies where possible.

The Ethics Committee's investigation may last up to a maximum of 15 calendar days.

The Ethics Committee then has 5 business days to issue a reasoned decision finding no violation, and 15 calendar days to issue a substantiated decision acknowledging a breach.

In the event of a breach, the Ethics Committee will recommend to the company's human resources department the sanctions it deems appropriate under the circumstances.