

# Administrative Procedure 4360 PRINCIPLES OF BUSINESS CONDUCT FOR BOARD EMPLOYEES

Responsibility: Superintendent, Business Services & Treasurer of the Board

Legal References: Education Act Section 217 (1-4)

Related References: Administrative Procedures 4570 - Procurement

Administrative Procedures 4370 - Ethical Purchasing of Apparel

Broader Public Sector Procurement Guidelines

Revisions: February 2017, October 2019, November 2023

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## 1. Preamble

The Principles of Business Conduct procedure describes the manner in which the Waterloo Region District School Board (WRDSB) does business and specifies the standards of behaviour expected from employees. They are a formal guide to ethical practices to be followed in all business dealings. They are not a substitute for personal integrity and good judgement; they are intended to serve as a minimum standard of behaviour.

The Principles of Business Conduct provide guidance to WRDSB employees to ensure its relationship with the private sector is beyond reproach. The overall image of the WRDSB would clearly be harmed by cases of employees receiving, or perceived to be receiving, any undue benefits or otherwise benefiting or appearing to benefit from their relationships with the private sector.

#### 2. General

The WRDSB is committed to the highest level of personal and corporate ethical standards in the conduct of doing business. A key ingredient in its business dealings is the treatment of all suppliers in a fair and equitable manner.

# 3. Principles

- 3.1 WRDSB employees must act honestly and uphold the highest ethical standards. This will maintain and enhance public confidence and trust in the integrity, objectivity and impartiality of the organization.
- 3.2 Employees are obligated to perform their official duties and conduct themselves in a manner that will bear the closest public scrutiny.
- 3.3 Employees shall not have private interests in companies that either supply the WRDSB or wish to supply the WRDSB with goods and/or services that would be affected particularly or significantly by WRDSB actions in which the employees participate.
- 3.4 When dealing with suppliers, employees must declare any conflict of interest (e.g. where an employee's personal interest may be in conflict with the employee's role and responsibility to the WRDSB).

3.5 Civil or criminal action may be taken against any employee who fails to comply with the WRDSB's Principles of Business Conduct; additional disciplinary action, including dismissal, may also be pursued.

## 4. Guidelines

## 4.1 Personal Benefits

- 4.1.1 An employee must not use confidential information obtained as part of their job for personal benefit.
- 4.1.2 An employee must not use their influence to award a contract or other commitment to a related party (i.e. relative, friend, business partner).

## 4.2 Gifts. Hospitality and other Benefits

4.2.1 An employee must refuse from any persons or organizations doing business with the WRDSB all personal gifts, benefits or hospitality. Gifts, hospitality or other benefits of a nominal nature (i.e. under \$50) are permitted.

## 4.3 Bribery and Fraud

- 4.3.1 To conform to the laws of Canada an employee must not accept or offer money, valuable consideration, office, place of employment for themselves or someone else while doing their job.
- 4.3.2 Employees will not give, offer or agree to give, offer, demand, accept or agree to accept a loan, reward, advantage or benefit of any kind as consideration for cooperation, assistance, exercise of influence or an act of omission in connection with the transaction of procurement or a claim against the WRDSB regardless of whether the employee has the ability to do so or not.

#### 4.4 Preferential Treatment

- 4.4.1 An employee must not give any advantage or preferential treatment to anyone.
- 4.4.2 An employee must not enter a contract on the WRDSB's behalf with a related party.
- 4.4.3 An employee must refuse to help outside entities or organizations in any transactions or dealing with the WRDSB in a way that contravenes the provisions of the Principles of Business Conduct.

## 4.5 Discrimination

4.5.1 An employee must not knowingly participate in acts of discrimination or harassment towards any person with whom that employee has business relations.

### 4.6 Environmental Issues

4.6.1 Employees should recognize their responsibility to environmental issues/conflicts consistent with the WRDSB's goals or mission.

When in doubt on the interpretation of the above, the employee should consult with the Superintendent, Business Services & Treasurer of the Board.