

Document Title: Code of Business Conduct, Ethics and Whistleblowing		Policy Number: LGAF-U-105
Department: Legal Affairs		Page 1 of 9
Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors	Effective Date: 03/17/2017 Last Reviewed Date: 06/23/2023 Next Review Date: 06/23/2026 Origination Date: 11/01/2012

Code of Business Conduct, Ethics and Whistleblowing

TABLE OF CONTENTS

<i>Policy</i>	1
<i>Purpose</i>	1
<i>Scope</i>	3
<i>Definitions</i>	3
<i>Process</i>	3
<i>Expectations Regarding Behaviours in our Workplace</i>	3
<i>Disruptive Behaviours:</i>	3
<i>Expectation Regarding Supporting Human Rights:</i>	3
<i>Expectations Regarding Behaviours in our Workplace:</i>	3
<i>Expectations Regarding Employment of Family Members/Personal Relationships:</i>	4
<i>Expectations Regarding Environment & Health and Safety:</i>	4
<i>Expectation Regarding Third Party Relationships:</i>	4
<i>Expectations Regarding Public Relations:</i>	6
<i>Expectations Regarding Government Relations:</i>	6
<i>Expectations Regarding Legal Compliance:</i>	6
<i>Expectations Regarding Information and Records Confidentiality/Privacy:</i>	6
<i>Expectations Regarding External Directorship:</i>	7
<i>Expectations Regarding Cooperating with Investigations</i>	7
<i>Expectations Regarding Personal Integrity</i>	7
<i>Expectations Regarding Use of Corporate Property:</i>	7
<i>Expectations Regarding Financial Reporting/ Corporate Record Retention:</i>	8
<i>Expectations Regarding Reporting to Local Health Integration Network and Ministry of Health and Long-Term Care</i>	8
<i>Expectations Regarding Using this Code/ Waivers and Reporting Violations</i>	8
<i>Expectations Regarding Whistleblowing, Non-Retaliation and Protection</i>	8
<i>General</i>	9
<i>Commitment</i>	9


POLICY

As a responsible public hospital and corporate citizen, the Corporation is committed to conducting its affairs to the highest standards of ethics, integrity, honesty, fairness and professionalism – in every respect, without exception, and at all times. This Code of Conduct and Ethics applies to every employee, professional staff member, students, affiliates and the Board of Directors. Everyone to whom this policy applies is expected and required to assess every decision and every action they make in their individual role and to ensure the same is made on behalf of the organization in light of whether it is right, legal, ethical, fair and in the best interests of the Corporation. These expectations extend to all levels of the Corporation, from major decisions made by the Board of Directors to day-to-day management decisions. The following Code is intended to help you meet these expectations and make such assessments.

PURPOSE

The Corporation is committed to ensuring that in all aspects of its affairs it will maintain the highest standards of public trust and integrity. To this end, the purpose of this Code is to document the principles of conduct and ethics to be followed as those identified above.

All hard copies of this document to be considered REFERENCE ONLY. Always refer to WRH Intranet Policy & Procedure Library for latest version.

 <p>POLICY</p> <p>WRH Universal (WRU)</p>	Document Title: Code of Business Conduct, Ethics and Whistleblowing		Policy Number: LGAF-U-105
	Department: Legal Affairs		Page 2 of 9
	Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors	Effective Date: 03/17/2017 Last Reviewed Date: 06/23/2023 Next Review Date: 06/23/2026 Origination Date: 11/01/2012

The Code establishes the standards that govern the ways we deal with each other, our stakeholders, patients, suppliers, other health services providers and communities. Where necessary, reference is made to formal corporate policies in specific areas.

The Code establishes the standards that govern the way we deal with each other, our stakeholders, patients, suppliers, other health services providers and communities. Where necessary, reference is made to formal corporate policies in specific areas.

In addition, certain businesses or roles in the Corporation have supplementary codes of conduct and policies, compliance manuals, operational procedures, regulatory rules, etc. that apply to their employees, professional staff or Board of Directors that must also be complied with. In addition, some employees, professional staff or Board of Directors owe professional responsibilities to professional associations, self-regulatory organizations or regulators. Within this framework, all governed by this Code are expected to exercise good judgment and be accountable for their actions. For those who are members of a profession and/or discipline which is governed by standards and codes specific to their profession they will be expected to adhere to those professional codes and standards in addition to the Corporation's policies, codes and By-Laws, as applicable. In the event that there is a conflict between the Corporation's policies, codes and By-Laws and the requirements imposed by a professional code or standard, the professional code or standard shall prevail.

The purpose of the Code is to:

- Promote honest and ethical conduct including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Promote disclosure in order to avoid conflicts of interest, including disclosure to an appropriate person of any material transaction or relationship that reasonably could be expected to give rise to such a conflict;
- Promote compliance with applicable governmental laws, rules and regulations;
- Promote accountability for adherence to this Code;
- Provide guidance to all governed by this Code to help them recognize and deal with ethical issues;
- Provide mechanisms to report unethical conduct;
- Promote positive public reputation for the Corporation; and
- Help foster the Corporation's culture of trust respect and integrity.

Compliance with this Code is part of your contract with the Corporation.

All Professional Staff and members of the Board of Directors are required to review this Code and will be provided with a copy at the time this Code is revised or replaced.


Employees, students and affiliates are required to review this Code as a condition of their hire/placement with the Corporation and are required to promptly notify the Corporation, as required by law and/or collective agreement provisions as the case may be, if there are any significant changes that affect their ability to continue to commit to adhere to these expectations. They will also be made aware of revisions or replacements to this Code.

To ensure effectiveness, ongoing training and education concerning content and principles contained herein will be provided to all governed as deemed appropriate.

In any situation where the appropriate conduct is unclear or ambiguous, all governed by this policy must seek the advice and direction in their reporting chain of command and/or the Vice-President of their Department/Service. For Professional Staff, such advice and direction is to be sought from the Chief of Service and Chief of Staff. For Board of Directors, such advice and direction is to be sought from the Chair, Board of Directors and President and C.E.O. The Chief of Staff, Chair, Board of Directors and President and C.E.O will determine if legal counsel is needed for advice on the possible issue. Furthermore, all governed by this Code are obliged to report, in a timely fashion, any violations of the Code they may witness or reasonably suspect.

The Corporation will expect all governed by this Code to comply and act in accordance, at all times, with the principles stated above and the more detailed provisions provided hereinafter. One or more violations of this Code by those governed may be grounds for disciplinary action up to and including immediate termination of privileges, employment/office or placement with the Corporation. In circumstances where performance reviews

All hard copies of this document to be considered REFERENCE ONLY. Always refer to WRH Intranet Policy & Procedure Library for latest version.

 <p>POLICY</p> <p>WRH Universal (WRU)</p>	Document Title: Code of Business Conduct, Ethics and Whistleblowing	Policy Number: LGAF-U-105
	Department: Legal Affairs	Page 3 of 9
	Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors

SCOPE

This Code shall apply to the Windsor Regional Hospital (the “Corporation”).

DEFINITIONS

Affiliate – includes students, volunteers and independent contractors.

Professional Staff – Medical and Dental professional staff with privileges with the Corporation

PROCESS

Expectations Regarding Behaviours in our Workplace

Disruptive Behaviours:

Intimidating and disruptive behaviours can foster clinical errors, contribute to poor patient satisfaction and to preventable adverse outcomes, increase the cost of care, and cause qualified clinicians, administrators and managers to seek new positions in more professional environments.

Expectation Regarding Supporting Human Rights:

The Corporation fosters a work environment in which all individuals are treated with respect, fairness and dignity. The Corporation is an equal opportunity employer and does not discriminate against all governed by this Code on the basis of race, colour, religion, sex, national origin, age, sexual orientation or disability or any other category protected by Canadian federal and provincial laws and regulations. The Corporation is committed to actions and policies to assure fair employment, including equal treatment in hiring, promotion, training, compensation, termination and corrective action and will not tolerate or condone discrimination by anyone governed by this Code.

Supporting Policy:	Applicable Campus:
Human Rights Code	All
Employment Equity	All
Protection of Human Rights in the Workplace	All

Expectations Regarding Behaviours in our Workplace:

Intimidating and disruptive behaviours can foster clinical errors, contribute to poor patient satisfaction and to preventable adverse outcomes, increase the cost of care, and cause qualified clinicians, administrators and managers to seek new positions in more professional environments.


The Corporation will not tolerate such behaviour, nor will it condone harassment (in any form and including sexual), violence or bullying in our workplace by anyone governed by this Code or by patients or clients.

The Corporation is also committed to providing guidance to those governed by this Code to address issues related to domestic violence.

The Corporation is also committed to maintaining a safe and healthy work environment free of alcohol and substance abuse. All governed by this Code are expected to perform their duties and responsibilities in a professional manner free from the influence of drugs and/or alcohol that could adversely affect the ability to perform their role for the Corporation.

Anyone governed by this Code who fails to uphold these expectations regarding acceptable behaviours in our workplace may be subject to discipline, loss of privileges, or the conclusion of their relationship with the Corporation as applicable.

Supporting Policy:	Applicable Campus:
Creating a Safe Workplace	All
Creating a Safer Workplace – Professional Staff Member Complaint Management Policy	All
Intimate Partner / Domestic Violence Policy	All
Code White	All
Flagging the Charts of Violent Patients	All

 <p>POLICY</p> <p>WRH Universal (WRU)</p>	Document Title: Code of Business Conduct, Ethics and Whistleblowing	Policy Number: LGAF-U-105
	Department: Legal Affairs	Page 4 of 9
	Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors

Expectations Regarding Employment of Family Members/Personal Relationships:

The employment of more than one family member at the Corporation is permissible however relatives will not work together in a direct supervisor/subordinate relationship. (Note: for employment purposes, family member is defined as first cousin or closer, naturally, by law or by marriage). Where the potential for an actual or perceived conflict of interest is determined by the Corporation, one of the parties may be relocated.

All governed by this Code must not give to or receive from any friend, relative or someone with whom they are involved in a close personal relationship, any special consideration relating to their relationship with the Corporation. The business decisions of all governed by this Code must be based on sound ethical business practices, and human resources decisions must be based on sound management practices and not be influenced by personal concerns.

Supporting Policy:	Applicable Campus:
Employment Policy	All

Expectations Regarding Environment & Health and Safety:

The Corporation is committed to sound environmental management. It is the intent of the Corporation to conduct itself in partnership with the environment and community at large as responsible and caring corporate citizens. The Corporation is committed to managing all phases of its affairs in a manner that minimizes any adverse effects of its operations on the environment, while balancing its obligations under the Hospital Service Accountability Agreement.

The Corporation is also committed to providing a healthy and safe workplace in compliance with applicable laws, rules and regulations. All governed by this Code must be aware of the safety issues and policies that affect their roles, other stakeholders and the community in general. Employees must immediately advise their managers of any workplace injury or any circumstance presenting a dangerous situation to them, other co-workers or the community in general, so that timely corrective action can be taken.

Supporting Policy:	Applicable Campus:
Hazard Identification and Risk Assessment Policy	All
Occupational Health and Safety Program Policy	All

Expectation Regarding Third Party Relationships:

a) Conflict of Interest

A conflict of interest occurs when a person’s private affairs or financial interests are in an actual or perceived conflict with their duties to the Corporation. Each person governed by this Code owes a duty to the Corporation to advance its legitimate interests when the opportunity to do so arises and to refrain from activities which could hinder their ability to act in the Corporation’s best interest, have the potential to do so or could be perceived as doing so.

Those governed by this Code are free to engage in outside employment, business, and community activities; however, in doing so they should seek to avoid acquiring any interests or participating in any activities that would tend to deprive the Corporation of the time or attention required to perform their duties properly, or create an obligation or distraction which would affect their judgement or ability to act solely in the Corporation’s best interest. Those governed by this Code shall not use their status or position with the Corporation or misuse information of the Corporation for personal gain.

Employees are required to disclose in writing to their immediate supervisor all clinical, research, business, commercial or financial interests or activities that might reasonably be regarded as creating an actual or potential conflict with their duties. Directors of the Board are subject to the conflict of interest provisions contained in the Corporation’s By-Law.

b) Gifts and Entertainment



POLICY

WRH Universal (WRU)

Document Title: Code of Business Conduct, Ethics and Whistleblowing		Policy Number: LGAF-U-105
Department: Legal Affairs		Page 5 of 9
Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors	Effective Date: 03/17/2017 Last Reviewed Date: 06/23/2023 Next Review Date: 06/23/2026 Origination Date: 11/01/2012

All governed by this Code and their immediate families shall not use their position with the Corporation to solicit any cash, gifts or free services from any patient, client, supplier or contractor of the Corporation for their or their immediate family's or friend's personal benefit.

Gifts or entertainment from others should not be accepted unless they could be considered to be nominal for the person(s) governed by this Code who receive(s) it. The following are guidelines regarding whether such gifts and entertainment are reasonable:

- Nominal gifts and entertainment, such as logo items, pens, calendars, caps, shirts and mugs are acceptable.
- Reasonable invitations to business-related meetings, conventions, conferences or product training seminars may be accepted.
- Invitations to social, cultural or sporting events may be accepted if the cost is reasonable and attendance serves a customary business purpose such as networking (e.g. meals, holiday parties and tickets).
- Invitations to golfing, fishing, sports or similar cultural or entertainment events that are usual and customary for the position within the Corporation and the industry and promote good working relationships with customers and suppliers may be accepted provided, in the case of Employees, they are approved in advance by the person's manager.

If you have any doubt about whether the gift is of nominal value or may otherwise be accepted, offered or given, you should seek guidance from your supervisor.

Supplier and Contractor Relationships and Gifts:

The Corporation shall comply with the Broader Public Sector Accountability Act (Ontario), its guidelines and directives.

Gifts or entertainment should not be offered or given to existing or potential suppliers or contractors or others with whom the Corporation is seeking a business relationship (hereinafter collectively referred to as a "Supplier") if such gifts or entertainment would not be considered to be reasonable having regard to the circumstances.


The following are guidelines regarding gifts and entertainment which may be provided to the Supplier:

- Nominal gifts and entertainment, such as logo items, pens, calendars, caps, shirts and mugs.
- Reasonable invitations to business-related meetings, conventions, conferences or product training seminars.
- Invitations to social, cultural or sporting events may be extended if the cost is reasonable and attendance serves a customary business purpose such as networking (e.g. meals, holiday parties and tickets).
- Invitations to golfing, fishing, sports events or similar trips that are usual and customary for the position within the Corporation and the industry and promote good working relationships with customers and suppliers.
- Employees must inform their managers, and members of the Board of Directors must inform the Chair of the Finance/Audit Resources Committee of any relationships that appear to create a conflict of interest.

c) Reasonable Expenses

All those governed by this Code must comply with the Corporation's expense policy. Only reasonable expenses may be incurred.

Supporting Policy:	Applicable Campus:
Business Expense Reimbursement	All

 <p>POLICY</p> <p>WRH Universal (WRU)</p>	Document Title: Code of Business Conduct, Ethics and Whistleblowing	Policy Number: LGAF-U-105
	Department: Legal Affairs	Page 6 of 9
	Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors

Expectations Regarding Public Relations:

The Corporation’s Chair and Chief Executive Officer are responsible for all public relations, including all contact with the media. Unless specifically authorized to represent the Corporation to the media, a person governed by this Code may not respond to inquiries or requests for information. This includes newspapers, magazines, trade publications, radio and television as well as any other external sources requesting information about the Corporation. If the media contacts a person governed by this Code about any topic, the contacted person should immediately refer the call to the Vice-President of Public Affairs, Communications & Philanthropy or designate of that department. The Vice President will then contact the President and CEO.

All governed by this Code must be careful not to disclose confidential, personal or business information through public or casual discussions to the media or others.

Supporting Policy:	Applicable Campus:
Release of Information – Media Interviews	All

Expectations Regarding Government Relations:

All those governed by this Code may participate in the political process as private citizens. It is important to separate personal political activity and the Corporation’s political activities, if any, in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. The Corporation’s political activities, if any, shall be subject to the overall direction of the Board and limited so as not to compromise any of the charitable registrations.

The Corporation will not reimburse employees for money or personal time contributed to political campaigns. In addition, employees may not work on behalf of a candidate’s campaign while at work or at any time use the Corporation’s facilities for that purpose unless approved by the Chair of the Finance/Audit Resources Committee.

Expectations Regarding Legal Compliance:

All those governed by this Code are expected to comply in good faith at all times with all applicable laws, rules and regulations and behave in an ethical manner.

No person governed by this Code may offer improper payments when acting on behalf of the Corporation. In addition, the Corporation and all governed by this Code are strictly prohibited from attempting to influence any person’s testimony in any manner whatsoever in courts of justice or any administrative tribunals or other government bodies.

Expectations Regarding Information and Records Confidentiality/Privacy:

All members of the Board of Directors are subject to the confidentiality provisions contained in the Corporation’s By-Law. All employees, professional staff, students and affiliates must be aware of the privacy and confidentiality related policies that affect their roles.


Those governed by this Code may be exposed to certain information that is considered confidential by the Corporation, or may be involved in the design or development of new procedures related to the business of the Corporation. All such information and procedures, whether or not the subject of copyright or patent, are the sole property of the Corporation. Those governed by this Code shall not disclose confidential information to persons outside the Corporation, including family members, and should share it only with others bound by this Code who have a "need to know" without the prior written authorization of the Vice-President of their area and Chief of Service.

All governed by this Code are responsible and accountable for safeguarding the Corporation’s documents and information to which they have direct or indirect access as a result of their relationship to the Corporation.

The Corporation is committed to maintaining the privacy rights of its patients and all governed by this Code. The Corporation requires all to whom this Code applies to maintain the confidentiality and correctness of all personal information in a manner consistent with the Freedom of Information and Protection of Privacy Act (Ontario) (“FIPPA”) and, with respect to personal health information, the Personal Health Information Protection Act (Ontario, “PHIPA”).

While it is understood that those governed by this Code may engage in social networking during personal time, it is considered unprofessional, and in some cases, a breach of confidentiality and/or legislation, to air workplace issues, grievances, or discuss information about patients. Any violation of privacy and confidentiality is regarded by the

All hard copies of this document to be considered REFERENCE ONLY. Always refer to WRH Intranet Policy & Procedure Library for latest version.

 <p>POLICY</p> <p>WRH Universal (WRU)</p>	<p>Document Title: Code of Business Conduct, Ethics and Whistleblowing</p>	<p>Policy Number: LGAF-U-105</p>
	<p>Department: Legal Affairs</p>	<p>Page 7 of 9</p>
	<p>Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)</p>	<p>Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors</p>

Corporation as a serious offense and is subject to corrective or disciplinary action, up to and including termination, as appropriate.

Supporting Policy:	Applicable Campus:
Privacy Policy	All

Expectations Regarding External Directorship:

No employee shall act as Director or officer of any other corporate entity or organization, public or private, without the prior written approval of the Chief Executive Officer or, in the case of the Chief Executive Officer, the Board Chair. Directorships or officerships with such entities will not be authorized if they are considered to be contrary to the interest of the Corporation. The Chief Executive Officer may provide authorizations for Directorships/officerships that are necessary for business purposes or for Directorships/officerships with charitable organizations or other entities that will further the Corporation's profile in the community or the Corporation's interests.

Expectations Regarding Cooperating with Investigations

All governed by this Code are required to cooperate with internally and externally led investigations audits or reviews which may, from time to time, occur. This includes attending all necessary meetings and accurately and fully answering all questions and maintaining the confidentiality of the investigation. Further, no one governed by this Code will in any way obstruct, hinder or delay any investigation.

Expectations Regarding Personal Integrity

In order to ensure the health and safety, all governed by this Code and in accordance with their relationship with the Corporation will be required to provide a police clearance to commence their relationship with the Corporation. The Chief Executive Officer, Vice-Presidents and employees who have responsibilities for payroll, finance and purchasing and/or fundraising are expected to ensure they can meet their individual financial obligations. Staff experiencing personal financial difficulties are encouraged to discuss their circumstances with their manager or Director of Human Resources in order that financial counselling may be arranged to help the person regain control of their financial circumstances.

Supporting Policy:	Applicable Campus:
Employee Police Clearance	All
Process for Handling Student and Volunteer Police Clearances	All

Expectations Regarding Use of Corporate Property:

All those who are governed by this Code who maintain personal blogs, Facebook and Twitter accounts, etc., are not allowed to do so on company time using company resources. Improper or unlawful use of the Corporation's technology resources is prohibited because of the potential risks to the Corporation and the person involved.


The use of Corporation property for individual profit or any unlawful unauthorized personal or unethical purpose is strictly prohibited. The Corporation's information, technology, intellectual property, buildings, land, equipment, machines, software and cash must be used only for business purposes.

No person governed by this Code shall intentionally damage or destroy the property of the Corporation or others or commit theft.

No person governed by this Code may reproduce, distribute or alter copyrighted materials without permission of the copyright owner or its authorized agents. Software used in connection with the Corporation's business must be properly licensed and used only in accordance with that license.

The Corporation's information technology systems, including computers, e-mail, intranet and internet access, telephones and voice mail are the property of the Corporation and are to be used primarily for business purposes. The Corporation information technology systems may be used for minor or incidental personal messages provided that such use is kept at a minimum and is in compliance with policies.

All hard copies of this document to be considered REFERENCE ONLY. Always refer to WRH Intranet Policy & Procedure Library for latest version.

 <p>POLICY</p> <p>WRH Universal (WRU)</p>	Document Title: Code of Business Conduct, Ethics and Whistleblowing		Policy Number: LGAF-U-105
	Department: Legal Affairs		Page 8 of 9
	Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors	Effective Date: 03/17/2017 Last Reviewed Date: 06/23/2023 Next Review Date: 06/23/2026 Origination Date: 11/01/2012

All those governed by this Code shall not use the Corporation’s information technology systems to:

- Allow others to gain access to the Corporation’s information technology systems through the use of their password or other security codes;
- Send harassing, threatening or obscene messages;
- Send chain letters;
- Access the internet for inappropriate use;
- Send copyrighted documents that are not authorized for reproduction;
- Make personal or Corporation solicitations unless authorized by a senior officer; or

The Corporation may monitor the use of its information technology systems including conducting random audits to ensure compliance with this Code and any other applicable policies.

Expectations Regarding Financial Reporting/ Corporate Record Retention:

The Corporation maintains a high standard of accuracy and completeness in its financial records. These records serve as a basis for managing our business and are crucial for meeting obligations to all our stakeholders, as well as for compliance with regulatory, tax, financial reporting and other legal requirements. Any person governed by this Code who makes entries into business records or who issues regulatory or financial reports, has a responsibility to fairly present all information in a truthful, accurate and timely manner. No such person shall exert any influence over, coerce, mislead or in any way manipulate or attempt to manipulate the independent auditors of the Corporation.

The Corporation maintains all records in accordance with laws and regulations regarding retention of business records. The term "business records" covers a broad range of files, reports, business plans, receipts, policies and communications, including hard copy, electronic, audio recording, microfiche and microfilm files whether maintained at work or at home. The Corporation prohibits the unauthorized destruction of or tampering with any records, whether written or in electronic form, where the Corporation is required by law or government regulation to maintain such records or where it has reason to know of a threatened or pending government investigation or litigation relating to such records.

Expectations Regarding Reporting to Local Health Integration Network and Ministry of Health and Long-Term Care

The Corporation maintains a high standard of accuracy and completeness in its reporting obligations to the Local Health Integration Network and the Ministry of Health and Long-Term Care, including without limitation, its reporting obligations under its Hospital Service Accountability Agreement and to the Canadian Institute for Health Information.

Expectations Regarding Using this Code/ Waivers and Reporting Violations

It is the responsibility of all governed by this Code to understand and comply the matters set out herein. To ensure compliance, ongoing training and education concerning this Code will be provided. Additionally, all Corporation Members have access to the Corporation’s ethics program, where information relating to all matters discussed in this Code maybe obtained anonymously and on a confidential basis.

The Board of Directors are ultimately responsible, acting through the Finance/Audit Resources Committee, for this Code and monitoring compliance. Any waivers of the provisions of this Code may be granted only by the Board of Directors. Where a member of the Board of Directors becomes aware of any violation to this Code they shall promptly report the same to the Chair of Board of Directors.

Expectations Regarding Whistleblowing, Non-Retaliation and Protection

Any violation of this Code is considered a “Wrongdoing” and each person governed by this Code has an obligation and the ability to disclose (“Whistleblowing”) any good faith concern in respect of a “Wrongdoing”.

The Corporation prohibits discrimination, harassment and/or retaliation against any person governed by this Code who reports, in good faith, conduct which they reasonably believe to be a Wrongdoing (a “Protected Disclosure”). The Corporation will not discharge, demote, suspend, threaten, harass or otherwise discriminate or retaliate against a person



POLICY

WRH Universal (WRU)

Document Title: Code of Business Conduct, Ethics and Whistleblowing		Policy Number: LGAF-U-105
Department: Legal Affairs		Page 9 of 9
Author: Adam Paglione (Manager Legal Affairs & Privacy Officer)	Authorized By: Todd Bested, VP People & Culture David Musyj, CEO Board of Directors	Effective Date: 03/17/2017 Last Reviewed Date: 06/23/2023 Next Review Date: 06/23/2026 Origination Date: 11/01/2012

governed by this Code who has reported a “Wrongdoing”. Anyone who is of the opinion this Code has been violated can share their concern with the President and CEO and/or Board of Directors, Chair.

All persons governed by this Code are required to cooperate with the Finance/Audit Resources Committee and senior administration as they, from time to time, audit or investigate issues under this Code or otherwise within the Corporation. This includes attending all necessary meetings, accurately and fully answering all questions and maintaining the confidentiality with respect to the investigation. Those governed by this Code may not in any way obstruct, hinder or delay any internal audit or investigation.

Any person governed by this Code who violates this Code and related policies may be subject to progressive disciplinary action up to and including termination of employment, privileges, office and/or the conclusion of their relationship with the Corporation.

It is the responsibility of all governed by this Code to be aware of and understand the provisions outlined herein as well as other applicable corporate policies, including those specifically identified in this Code. Failure of a person governed by this Code to comply with the Code and Corporate policies may result in disciplinary action up to and including termination of employment, privileges or office and/or the conclusion of their relationship with the Corporation and may also impact upon performance rating and incentive pay as applicable. The Board of Directors are also required to comply with the Code. Failure of a member of the Board of Directors to comply with the Code will be dealt with in accordance with the policies and procedures of the Board of Directors of the Corporation.

General

The Governance Committee shall review and assess the adequacy of this Code and submit any proposed amendments to this Code to the Finance/Audit Resources Committee and the Board of Directors for approval.

Commitment

All employees, students and affiliates are required to abide by this Code as a condition of hire and/or as a condition of the commencement of their relationship with the Corporation. If there are material changes thereafter that directly impact their ongoing ability to comply with the expectations of the Corporation as defined by this Code, employees, students and/or affiliates are required to advise the Finance/Audit Resources Committee of the same in a timely fashion.

Similarly, all Professional Staff are required to abide by this Code as a condition of their privileging with the Corporation. Finally, all members of the Board of Directors shall abide by this Code as a condition of their membership to the Board of Directors.