



POLICY NUMBER: OPPO.9002

EFFECTIVE DATE: NOVEMBER 1, 2012

CODE OF ETHICAL CONDUCT

1. POLICY STATEMENT:

Indus Community Services (Indus) is committed to the highest ethical standards. Indus' personnel are expected to follow the Code of Ethical Conduct and to act with honesty, integrity and openness in all their dealings as representatives of the organization. This Code of Ethical Conduct reflects our commitment to the Mission, Values and Guiding Principles of Indus.

2. PURPOSE:

The purpose of this policy is to provide guidelines for decision-making that reflects Indus' mission, values and guiding principles. This code is intended to promote a high standard of ethical conduct for service delivery and business conduct by the organization's personnel.

3. SCOPE:

This policy applies to all personnel in all departments within the organization.

4. PROCEDURE:

4.1. Indus' personnel are required to deal honestly and fairly in a manner which fosters a climate of mutual respect with our funders, members, networking partners, clients, suppliers, vendors, consultants and other third parties including the communities in which we operate.

4.2. Business, Financial, Contractual Relationships and Marketing Practices

4.2.1. Personnel shall act in the best interests of the organization and its stakeholders, when promoting, marketing, or representing the organization. They are expected to adhere to ethical practices, and respect all confidentiality and privacy requirements.

4.2.2. Indus's business and financial practices and contractual relationships shall be carried out in accordance with applicable legislation, requirements and standards. The organization shall be transparent in its financial and business transactions and contractual relationships, exercise integrity in financial practices and be accountable to its funding bodies and stakeholders. Indus' financial practices shall comply with generally accepted Canadian accounting principles and practices.

4.2.3. Indus and its personnel are prohibited from accepting or offering bribes, kickbacks and any other form of improper payment, direct or indirect to anyone.

4.2.4. Indus' promotional, marketing and outreach practices shall be ethical, legal, and respectful and conducted with truth, fairness and responsibility to clients, the community and the public at large. The organization shall abide by all applicable laws, regulations, standards and ethical practices. Practices such as coercion by means of guilt or obligation, or motivated by personal gain are prohibited.

4.2.5. Indus invoices clients or third party payers in a fair and understandable manner only for services actually provided. Indus shall provide assistance to clients or third party

payers seeking to understand the costs relative to their care/service. Indus shall strive to resolve issues and objections to the satisfaction of the client or third party payers while considering the organization's best interests.

4.3. Fundraising

4.3.1. All fundraising conducted by or on behalf of Indus shall:

- i. Follow established procedures that ensure ethical, fiscally responsible practice.
- ii. Be truthful, accurately describe our activities and the intended use of donated funds, and are carried out by personnel who identify themselves and disclose our name and the purpose for the request.

4.4. No personal fundraising (e.g. selling of chocolates for school programs etc.) shall be conducted on Indus's premises or with Indus's clients.

4.5. Personnel are required to abide by Indus' Fundraising policy.

4.6. Media Relations

4.6.1. Personnel must exercise caution and discretion in making public comments or entering into public debate regarding any aspect of Indus and are required to abide by Indus's Communications and Media Release policy.

4.7. Excellence in Service Delivery

4.7.1. Indus' clients and the community we serve shall be provided with the highest possible standard of service.

4.7.2. Personnel shall be earnest in their efforts and thoughtful in their undertakings, always striving to find efficient and effective ways of conducting business and providing support.

4.7.3. Indus shall ensure the delivery of efficient and effective programs and services to our clients and the community we serve. Service delivery shall be carried out in a respectful, responsive, professional and ethical manner.

4.7.4. All programs and services shall be developed and implemented in a manner that ensures that the clients are treated with respect, dignity and compassion. Indus' personnel shall always be sensitive to the changing needs, expectations and rights of individuals and respect the legislative, funding, and policy requirements that apply to the organization.

4.8. Conflict of Interest

4.8.1. Personnel shall avoid creating or becoming involved in situations which give rise to a conflict of interest or which may be reasonably perceived as a conflict of interest and are required to abide by Indus' Conflict of Interest policy.

4.9. Confidentiality

4.9.1. Personnel are required to abide by Indus's Statement of Confidentiality.

4.10. Gifts, rewards or compensation

4.10.1. Personnel may not accept gifts, rewards or compensation from clients and/or their caregivers, vendors and/or suppliers of the organization. Money or other gifts, rewards or compensation offered should be firmly but kindly refused.

4.10.2. Personnel are encouraged to suggest alternative ways for clients and/or their caregivers, vendors and/or suppliers to express their gratitude. Some examples include:

- i. Charitable donations directly to Indus; with the donation assigned either to a specific program or a general donation to the organization.
 - ii. Writing a letter/card/email to express thanks or feelings; such documents shall be reviewed and copies placed in the personnel's file.
- 4.10.3. Where it is impossible to decline gifts, rewards and other benefits that do not meet the principles set out above, or where it is believed that there is sufficient benefit to Indus to allow their acceptance, personnel must notify their Manager, who will seek direction from their Director and/or CEO.
- 4.10.4. Personnel may participate in a client/supplier/community partner sponsored events, including events with a value in excess of \$50.00 when there is a valid business purpose and it is approved by the Director and CEO.

4.11. Gifts – from Indus to others

- 4.11.1. Indus from time to time may give small tokens of appreciation to its personnel, members, donors, vendors, funders and community partners.
- 4.11.2. Such gifts shall be nominal and reasonable in value and are meant to convey a sense of gratitude on behalf of the organization. Indus shall at all times avoid the appearance of improperly influencing any relationship.

4.12. Personal Property

- 4.12.1. To prevent breakage or loss, personnel are strongly encouraged to not bring their personal property on to Indus's work sites. Exceptions may occur with the Manager's permission. Personnel may not borrow or buy the personal property of clients and/or their caregivers, vendors and/or suppliers of the organization.

4.13. Professional Boundaries

- 4.13.1. Boundaries are the framework within which the staff/volunteer/student placement & client relationships occur. Boundaries make the relationship professional and safe for the client as well as for the staff/volunteer/student placement. They are a set of parameters within which services are delivered.
- 4.13.2. The role of every Indus staff/volunteer/student placement is professional, very specific and quite distinct from that of, for example a friend, family member, or advocate.
- 4.13.3. Indus staff/volunteers/student placements:
- i. Have a job/position description that outlines the expectations the organization has of them in respect of their role and responsibilities.
 - ii. Receive support and supervision associated with their role, and have supervising managers from whom they can seek advice/guidance on the boundaries of that role.
 - iii. Are expected to maintain high personal standards of professional conduct, avoiding any acts that may bring their profession or the organization into disrepute or which may diminish the trust or confidence of any of the organization's stakeholders.
 - iv. Must carry out their professional duties and obligations with integrity and objectivity and to recognize how personal values, opinions, experiences, limitations and biases can affect personal judgment.
 - v. Maintain appropriate boundaries between personal and professional relationships at all times.

4.13.4. Indus discourages relationships of a romantic or sexual nature between personnel as well as with those they serve. Personnel shall maintain respectful and professional relationship boundaries during the course of their services with the organization.

4.14. Witnessing of Documents

4.14.1. Personnel are not permitted to witness any documents on behalf of clients and/or their caregivers. Requests for witnessing of documents on behalf of clients and/or their caregivers must be forwarded to the Manager/Director.

4.15. Professional Responsibilities & Competence

Personnel must maintain a reasonable standard of professional practice and as such shall:

4.15.1. Limit their work to their demonstrated areas of professional competence.

4.15.2. Remain up-to-date in their professional knowledge and practice, including maintaining membership in relevant regulatory bodies and other relevant professional associations as required.

4.15.3. Maintain a good knowledge of Indus's policies, procedures, protocols, legislation, and issues affecting their work.

4.15.4. Ensure that their knowledge and skills are used to the greatest advantage in service delivery.

4.16. Protection of Assets

4.16.1. Indus assets are to be used only for the benefit of the organization, legitimate business purposes or other purposes approved by management. Indus's assets should never be used for illegal purposes.

4.16.2. Personnel have a duty and responsibility to protect the organization's assets and to ensure that they are used efficiently and exclusively for valid Indus business and not for their personal benefit or for the personal benefit of any other party.

4.16.3. Indus's assets can be both tangible (such as buildings, furniture, equipment, supplies, computer systems and funds) as well as intangible (such as intellectual property, work time, use of facilities and services).

4.16.4. Indus shall strive to establish and maintain adequate systems, procedures and controls to prevent and detect waste, fraud, theft, abuse and any other form of wrongdoing in relation to any of the organization's assets.

4.16.5. Any suspected incidents of fraud or theft should be immediately reported to the Manager, who will escalate it to the relevant Director. The Director shall notify the Director – Finance & Corporate Services and the CEO for investigation.

4.17. Human Resources

Indus's human resources are a valuable resource and are key to ensuring quality services and programs to our clients and the community. In our pursuit of excellence in Human Resources, Indus shall:

4.17.1. Ensure that its programs and services are delivered by a qualified multidisciplinary team dedicated to the principles of quality compassionate care.

4.17.2. Promote a human resources management approach based on best practices, Indus's guiding principles and values, promotes quality improvement and uphold applicable legislations and regulations.

- 4.17.3. Provide a supportive environment which encourages individualized personal and professional growth for its personnel. Internal and external educational opportunities will be supported within financial parameters.
- 4.17.4. Support the learning goals and objectives of its personnel and encourage professional development and continuous learning.
- 4.17.5. Respect the rights of its personnel including but not limited to:
 - i. Right of privacy and confidentiality
 - ii. Rights as defined by the Human Rights Code
 - iii. Right to work in a safe environment free of harassment and abuse
- 4.17.6. Promote a safe and healthy work environment and encourage pride, satisfaction, responsibility, loyalty and good working relationships within the organization.
- 4.17.7. Respect and value the contribution and effort of individuals.
- 4.17.8. Ensure work time is a resource committed to service delivery and not diverted to personal pursuits.
- 4.17.9. Ensure that discipline, where necessary, is based on thorough investigation and fair and objective treatment of culpable personnel.

4.18. Protection against Harassment and Discrimination

- 4.18.1. Indus is committed to diversity and equity in the workplace. Every person has the right to be treated fairly, with decency and respect, and must treat others, including fellow personnel, clients, contractors, suppliers, stakeholders and the public in the same way.
- 4.18.2. Harassment or discrimination of any sort is prohibited. Complaints of harassment, abuse or discrimination will be investigated promptly and thoroughly and will be kept confidential to the extent possible. Retaliation for reporting alleged harassment or discrimination is also prohibited.

4.19. Safety in the workplace

- 4.19.1. The safety and security of all those present on Indus' premises are of primary importance to the organization. Therefore, personnel are responsible for maintaining clean and orderly work facilities that are free from recognized hazards. They must also obey all safety statutes and regulations as well as the organization's safety policies, procedures, rules and guidelines.
- 4.19.2. Equipment must be operated in a safe manner, with all safety devices in place. Personnel must wear personal protective equipment in areas where it is required. All injuries, to any person, while on Indus' premises, no matter how minor and all violations of health and safety policies, laws or regulations, must be reported.

4.20. Corporate Citizenship

- 4.20.1. Good corporate citizenship is the cornerstone of Indus' mission, values and guiding principles. Indus strives to be a good corporate citizen through:
 - i. Practicing good governance and ethics
 - ii. The programs and services we offer our community and clients
 - iii. Educational workshops/sessions to community members
 - iv. Participating/memberships on community groups/networking agencies
 - v. Encouraging, promoting and providing meaningful opportunities for volunteers within the organization and within the community

- vi. Ensuring positive social impact and quality of life within the community

4.21. Ethical Code Violations

- 4.21.1. Personnel and stakeholders are required to immediately report violations of the Code or situations liable to constitute a violation of the Code.
- 4.21.2. Allegations of violations shall be made in writing, in a sealed envelope indicating "CONFIDENTIAL" to:
Attn: CEO
Indus Community Services
3038 Hurontario St., Suite 206, Mississauga, ON, L5B 3B9
- 4.21.3. All reports of violations will be handled promptly and confidentially and dealt with in a fair and consistent manner.
- 4.21.4. Reporting violations of the Code shall have "no reprisal" to the person(s) reporting. Those reporting shall not be discriminated against or otherwise penalized for reporting in good faith any violations of the Code.

4.22. Education on Ethical Codes of Conduct

- 4.22.1. Personnel shall receive a copy of the Ethical Code of Conduct during their orientation process.
- 4.22.2. Annually, during the performance evaluation, the Ethical Code of Conduct shall be reviewed with all personnel.
- 4.22.3. This Code shall be posted online at www.induscs.ca.

5. RESPONSIBILITY:

- 5.1. It is the responsibility of all personnel within Indus to adhere to this policy. Failure to do so may result in disciplinary action which if deemed appropriate by the CEO may include further action up to and including termination.
- 5.2. The Direct Supervisor is responsible for ensuring that all personnel are properly oriented regarding this policy.
- 5.3. Human Resources will ensure that this policy remains current with respect to any changes to legislation and will notify the CEO of such changes to ensure that this policy and any related forms are revised to reflect current and applicable legislation.

6. DEFINITIONS:

- 6.1. "**Stakeholder**" is defined as a person, group, or organization that has direct or indirect stake in the organization because it can affect or be affected by the organization's actions, objectives, and policies. For the purposes of this policy, stakeholders include the following: clients, funders, members, donors and personnel.
- 6.2. "**Personnel**" for the purposes of this policy refers to all Indus employees, purchase of service contractors, student placements, volunteers and other third parties who deal with the public on behalf Indus.

7. REFERENCES:

- 7.1. Confidentiality Policy # HRPO.9015
- 7.2. Statement of Confidentiality Form # HRFO.9004 & BGFO.9003

- 7.3. Conflict of Interest Policy # HRPO.9021 & BOPO.9002
- 7.4. Board Member's Code of Conduct Policy # BOPO.9005
- 7.5. Communications and Media Release Policy # OPPO.9007
- 7.6. Theft-Loss-Vandalism of Property Policy # OPPO.9006
- 7.7. Workplace Violence & Harassment Policy # HSPO.9004
- 7.8. Whistleblower Policy # OPPO.9014

Policy Approvals

Date	Approved by
June 20 th , 2018	Vinitha Miranda, Director
June 25 th , 2018	Gurpreet S. Malhotra, CEO