
CODE OF CONDUCT POLICY

MIAG Centre for Diverse Women & Families

INTRODUCTION

MIAG Centre for Diverse Women & Families (MIAG) is a non-profit charitable community-based organization that strives to address community needs, identify gaps in service delivery, and ensure the active participation of diverse communities including women, youth and seniors. MIAG has embraced capacity building approach to enhance community development. MIAG's values of Collaboration, Diversity, Empowerment, Inclusion and Innovation are applied actively. We integrate creative responses to existing and emerging ethno-cultural communities' needs by applying effective outreach, leadership training and skills development programs.

Our mission is to enhance the capacity of individuals and families from different ethno-cultural communities through empowerment, innovation, and well-being based programs and services.

MIAG contributes to the success of families in our diverse communities by providing services in the areas of addictions, mental health, aging, parenting, health promotion, violence prevention, diversity, arts, research and resource development for seniors, adults, youth and children in a welcoming, compassionate and culturally appropriate environment.

SCOPE OF POLICY

This policy applies to all employees of MIAG including all Volunteers who work for MIAG. The word "Employee" when used throughout this policy will mean Employee or Volunteer and "Employees" shall have a corresponding meaning.

POLICY OBJECTIVE

MIAG is well respected by the general public, clients, employees, elected officials, vendors, communities and governments due to its excellent track record of good ethical conduct and high integrity. As our organization continues to grow, it is crucial that we all work together to ensure that its reputation remains positive with all audiences and that employees benefit from an atmosphere of good ethical conduct.

Name of Policy: Code of Conduct

Reviewed: March 2013
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The purpose of this handbook is to formalize the standards by which MIAG employees must operate, serve as a useful reference guide, help to ensure consistency, alert employees to potential problems and inform them of MIAG's overall mission and commitment.

As a condition of employment with MIAG, employees are expected to adhere to MIAG's Code of Conduct. Employees are encouraged to discuss any situations of concern or doubt regarding the Code of Conduct with the Executive Director.(E.D.)

It is the responsibility and duty of all employees to ensure they understand and follow MIAG's Code of Conduct. Each employee will be required to confirm compliance with this policy on an annual basis, to the extent it is not inconsistent with any agreement which may be in effect from time to time.

As MIAG evolves and new issues arise, this document will be reviewed from time to time and modified appropriately to ensure it reflects current situations.

MIAG STANDARDS OF EXCELLENCE

Excellence is the standard for service at MIAG. MIAG values the contribution of all employees to the goals of the Organization. MIAG's performance is measured on the following criteria.

- Leadership
- Planning
- Client Centered Service
- Process Management
- Partner Focus
- Organizational Performance

We believe that our performance as an Organization depends on respect for our employees, and on the intelligent use and development of their abilities and our resources. We therefore encourage our employees to work as a team, to take an active part in reaching our goals and to feel pride in their work. Our reputation rests on the highest integrity and ethical conduct in dealings with the general public, clients, employees, elected officials, vendors, communities and governments.

1.0 Respectful Workplace / Human Rights Policies and Procedures

The Ontario Human Rights Code RSO 1990, Ch.19 (the Code) states that it is public policy in Ontario to recognize the dignity and worth of every person and to provide equal rights and opportunities without discrimination. The aim is to create a climate of understanding and mutual respect for the dignity and worth of each person, so that each

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

person feels a part of and able to contribute to the community.

MIAG adheres to the Code.

1.1 Workplace Harassment

The Workplace Harassment and Respectful Workplace policy is indicated in MIAG's Personnel Policy

It is the policy of MIAG to provide all employees with a work environment that is free from any form of discrimination; including harassment and one that respects the dignity, self-worth, and human rights of every individual.

Harassment may be related to race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offences, marital status, same-sex partnership status, family status or disability.

Harassment is a misconduct that can present itself in many forms including, but not limited to: unsolicited remarks made once or repeatedly, questions, suggestions, or decisions based on prohibited grounds of discrimination.

Every complaint of harassment will be treated as a serious matter as harassment will not be tolerated at MIAG

1.2 MIAG's Conflict & Complaint Resolution Policy

A comprehensive Conflict and Complaint Resolution policy and procedure is in place at MIAG that indicates the various procedures and the policy for addressing any conflicts or complaints.

2.0 INTEGRITY IN ALL OUR RELATIONSHIPS

2.1 Our Employees

MIAG maintains equality of opportunity for the employment, development and advancement of its employees. We strive to compensate our employees through remuneration and benefits that are competitive with similar non-profit organizations.

MIAG is committed to maintaining a safe, secure and clean working environment for its employees, and to communicating with its employees on all matters of concern. Communication channels will encourage self-expression and open discussion about employee opinions, attitudes and concerns.

All employees of MIAG are encouraged to discuss any concerns they might have with the Supervisor that they feel is appropriate to deal with those concerns; or with the E.D.

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

Using this open-door policy will not in any way affect any performance evaluations of employees, or subject them to any other adverse consequences.

MIAG strives to balance the personal needs, corporate needs, values and aspirations of employees in plans for individual development. MIAG maintains accurate employee records and safeguards employees' privacy in accordance with the *Freedom of Information and Protection of Privacy Act*.

MIAG's respect for employee privacy includes concern about personal conduct off the job, where conduct impairs the employee's work performance or impairs the trust and confidence that an employer is entitled to expect in an employee or that anyone is entitled to expect in a not-for-profit organization. MIAG therefore expects that its employees will at all times be conscious of their public duty, as well as their own, and conduct themselves with the same high degree of ethical behaviour and integrity off the job, as they are expected to employ on the job.

MIAG also seeks to encourage, educate and support its employees in the development of their skills and abilities to meet the Organization's future needs for experienced people, and to best use each employee's capabilities.

2.2 Our Suppliers

MIAG is committed to dealing fairly with its suppliers. It is the Organization's policy to purchase all equipment, supplies and services based on merit in accordance with the general practice of purchasing. Suppliers will be treated with fairness and integrity. The Conflict of Interest section of this Code will guide employees who deal with suppliers or potential suppliers.

2.3 Our Clients

The provision of excellent and courteous service is central to MIAG's continued success. Responses to client concerns and identified needs are achieved efficiently and equitably. MIAG provides services in compliance with legislated rights and standards for safety, health and environmental protection.

2.4 Our Communities

MIAG is committed to being a responsible corporate citizen. MIAG will abide by all applicable laws. It will strive to improve the well-being of its communities through the encouragement of employee participation in community affairs, and the integration of community objectives into those of the Organization.

2.5 Our Communications

At MIAG, we believe that successful human relations, good morale and a constructive atmosphere of teamwork depend on good communication among all MIAG employees

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

and volunteers. Communication to all employees of the principles and expectations of MIAG is a fundamental part of this approach.

The (E.D.) is committed to ensuring that communication takes place throughout the organization, by actively encouraging such communication to all levels of management, for the benefit of all employees. Its goal is that employees view every Supervisor as the first source of information on any business issue.

Employees are the cornerstone of MIAG. Only well-informed employees, who feel entirely free to express themselves, will continue to contribute to our success now and in the future.

3.0 COMMITMENT TO EXCELLENCE AND QUALITY

MIAG promotes and seeks excellence in all its endeavours. Excellence is an attitude or state of mind within each person, and collectively within the organization which promotes the improvement of what we achieve, and how it is achieved. It is a spirit of caring for others - clients and fellow workers; the will to fulfill one's objectives every day, pride in being a MIAG employee, commitment to improving the success of the enterprise, and our image to all outside the organization. Excellence is acknowledgement by our clients that MIAG delivers value and quality service while being cost effective.

4.0 RECOGNITION and ENCOURAGEMENT

4.1 Staff and Board members

Give recognition to others who contribute to the success of the organization and its activities. MIAG appreciates the contributions of its employees to the organization, whenever it is possible and suitable to express recognition. Staff and employees are given opportunities and encouraged to develop professional skills and are supported by the organization.

MIAG recognizes Staff and the Board during the AGM verbally; and also in the Annual report.

4.2 Volunteers

An annual volunteer recognition event is conducted to highlight and reward the contribution of volunteers to the organization. Volunteers will be consulted and involved in order to develop an appropriate format for the event.

5.0 ABIDING BY THE LAW

In acting on behalf of MIAG, no employee shall take any action which they know, or reasonably should know, violates any applicable law or regulation.

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

The operation of MIAG is subject to many complex and changing provincial and federal laws. Ignorance of the law is not a valid defense if the law has been violated. MIAG's standard operating procedures, even if they are of long standing, do not take precedence over legal obligations. Appropriate recommendations for change will be brought forward where a practice is in clear conflict with an overriding legal obligation.

Any time an employee is uncertain about the application or interpretation of a law or regulation, that employee will consult the appropriate supervisor, who in case of doubt will seek the advice of the E.D.

It is important to note that legal difficulties usually can be avoided or minimized if such consultation takes place at the outset of business dealings, rather than at a later stage. E.D. is to be informed immediately where litigation or a prosecution of MIAG, or of MIAG employees in connection with MIAG duties, is either threatened or becomes reasonably foreseeable as a possibility.

5.1 Fraud

Management of MIAG is responsible for protecting the assets, public trust and confidence of the Organization. This is accomplished by creating systems and procedures to prevent and detect fraud, breach of trust and other forms of wrong doing. Advice is available from the E.D. and our Auditors on effective control practices and procedures.

All employees of MIAG are responsible for immediately reporting grounds for suspected fraud, breach of trust and other forms of wrongdoing to their supervisors, or more senior management, up to and including the E.D. as appropriate. Appropriate protection for the confidentiality of such information will be observed.

5.2 Procedure for addressing fraudulent conduct

Prior to taking action on suspicions of wrongdoing, management should seek the advice of E.D. or a Lawyer, to protect MIAG's interests in subsequent disciplinary actions; to protect the rights of the person under suspicion; and to assist in preventing further losses or damage to MIAG.

All suspected wrongdoings will be investigated fully, and all persons accused or suspected of wrongdoing will be treated fairly. All employees are required to co-operate fully with law enforcement and regulatory officials.

Supervisors and the E.D. are required to prepare a report of the results of complete investigations of discovered wrongdoing to the Chair of the Board of Directors of MIAG and the steps being taken to reduce the risk of wrongdoing in the future.

All wrongdoings which involves misappropriation of money or property must be reported to the Insurance and the E.D. as soon as possible; to permit the initiation of any claim of

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

indemnity which MIAG may have available to it.

5.3 Accounting Principles and Practices

MIAG's accounting books and records shall be maintained with the utmost integrity, reflecting accurately and punctually all transactions, assets and liabilities of the Organization. All business records, expense accounts, invoices, vouchers, bills, payroll and employee records, and other reports are to be prepared with care and honesty.

False or misleading entries in the books and records of the Organization, or any unrecorded bank accounts, are strictly prohibited. No secret or unrecorded cash funds or other assets will be established or maintained for any purpose. No transaction is to be concealed from management or MIAG's external auditors. Satisfactory accounting and auditing procedures and controls must be maintained, and full compliance with statutory requirements regarding external audit procedures is imperative.

6.0 TRAVEL AND RELATED BUSINESS EXPENSES

Travel expenses will be consistent with the needs of business. Reimbursement is for actual, the approved expenses incurred on MIAG's business only.

Supervisors who approve travel and related business expense reports are responsible for the appropriateness of the business related expense and related expense reports.

Employees are responsible for the propriety and reasonableness of expenditures, for ensuring that expense reports are submitted promptly, and that receipts and explanations properly support reported expenses.

7.0 INFORMATION

7.1 Inside Information

It is every employee's responsibility to ensure that all the information they communicate, whether by reports, memos or orally, is as accurate as possible. No employee shall willfully mislead other employees, and management, about any issue of organization's concern. Only with proper authority will employees give or release to anyone not employed by MIAG, or to another employee who has a need for it, confidential data or confidential information acquired in the course of that person's duties with MIAG.

Any information which is personal information, or might reasonably be regarded as having been disclosed to the employee in confidence, or as being of a sensitive nature, or as imparting to the person in possession of such information an advantage not available to the public generally, must not be used or disclosed, except in accordance with the *Freedom of Information and Protection of Privacy Act*, and after consulting with

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

the E.D.

7.2 Protection of Proprietary Information

Employees frequently have access to proprietary information of MIAG or of others, which is confidential and must be protected from unauthorized or inadvertent disclosure. This includes but is not limited to information contained in business strategies and plans, pending proposals or contracts, unannounced services, research results, financial projections, client and prospect lists, proposed acquisitions and divestitures, computer programs and software, know-how, inventions and the like.

Safeguarding such information is a high-priority responsibility of all employees, as it is respecting any proprietary or copyright conditions that may exist.

Such information may be given or released only to employees who have a need for such information, or otherwise in accordance with the *Freedom of Information and Protection of Privacy Act*.

Employees are not to divulge the proprietary information of their former employers. Employees, whether currently employed or after they leave employment of MIAG, will not disclose any proprietary information of MIAG or of any other person where such information was acquired during employment with MIAG; unless the release or disclosure is properly authorized by MIAG, individual, or firm owning the information.

Employees of MIAG shall not directly or indirectly disclose or use, at any time, either during or subsequent to their employment with MIAG, any proprietary information, or data obtained in the course of their employment (whether or not acquired or developed by the employee), unless they have obtained the written consent of the E.D. of MIAG for the disclosure or use. Information acquired by employees during the course of their employment is the exclusive property of MIAG. The collection, use or disclosure of any information must be in compliance with the *Freedom of Information and Protection of Privacy Act*. All rights and title to any tangible or intellectual property produced by an employee during the course of employment shall remain with MIAG.

7.3 Media and Public Relations

Communications with the media and public shall be conducted so that all information originates from an authoritative source within the Organization. **Ensure that proper permissions have been obtained before posting photos or content from MIAG's events.** The conduct of media relations should be consistent with MIAG's policies and procedures. The E.D. will be the spokesperson for MIAG policy in their respective programs.

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

It is not the intent of this Code to restrict the ability of employees to express an opinion on general interest matters, where the employee makes it clear that he or she is commenting as a private citizen, and not in the employee's capacity as a MIAG employee. In such instances, extreme caution should be exercised so that MIAG is not compromised in any way, either using MIAG letterhead, or by any other implication.

8.0 CONFLICT OF INTEREST

A conflict of interest occurs when, in the course of his or her duties, an employee is called upon to deal with any matter in which he or she has a direct or indirect personal interest, whether or not the employee acts or intends to act in a way which is inconsistent with the interests of MIAG.

A direct personal interest is an interest through which the employee may derive an economic benefit or avoid an economic loss.

An indirect personal interest arises where another person or organization having a financial relationship with the employee would experience the potential economic benefit, or avoidance of economic loss. This may include, but not be limited to, ownership of shares or other securities, or the loan of money or property by, or to, the employee. An indirect personal interest also occurs when the potential benefit, or avoidance of loss, would be experienced by a person who is a relative or spouse of the employee, or based upon the facts of the particular case, the employee could reasonably be considered to have a personal interest in the economic well-being of that other person.

A personal interest in common with all or a substantial portion of the employees of MIAG, by reason of the terms and conditions of employment, will not be considered to create a conflict of interest.

Each employee shall make prompt and full disclosure in writing to the employee's immediate Supervisor of any conflict of interest, including a description of the nature of the direct or indirect personal interest, and the identity of any persons or corporations in respect of which there is a personal interest. Upon receiving disclosure of a conflict of interest, the immediate Supervisor shall take such steps as may be reasonable in the circumstances, to ensure the employee is not required to deal with the matter giving rise to the conflict of interest. It must be remembered that a conflict of interest will most often arise without any wrongdoing or improper conduct on the part of the employee. Therefore, employees shall not be disciplined or treated adversely for making prompt and full disclosure of the circumstances.

8.1 Breach of Trust

On the other hand, an employee who, during the course of his or her duties, seeks to advance a direct or indirect personal interest, whether or not there is a detriment to MIAG, commits a breach of trust. A breach of trust would include:

Name of Policy: Code of Conduct

Reviewed: March 2013
Reviewed, Updated and Approved: October 2019

- 8.1.1 Influencing or attempting to influence MIAG to contract with a person, partnership or corporation for any purpose in which the employee has an undisclosed direct or indirect personal interest, or for which the employee reasonably anticipates receipt of some payment, compensation, gift, benefit or favour of any kind whatsoever
- 8.1.2 Accepting from any person or corporation any profit, commissions or other payments or favours in the way of price or other advantages, such as loans, services, travel, entertainment or gifts, which are not in accordance with the policies respecting gifts and entertainment in section 6.1 where:
- a) A person or corporation has had, has, or may reasonably be expected to have, or desire to have, any contract with MIAG,
 - Or**
 - b) A person or corporation is seeking any decision, act, advice, comment, endorsement or anything whatsoever from MIAG and its employees
- 8.1.3 accepting from any person or corporation any share of profits, commissions or other payments or favours in the way of price or other advantages, such as loans, services, gifts, travel or entertainment in exchange for referral of third parties to any such person or corporation.

A breach of trust is just cause for immediate dismissal without notice and employees will be disciplined for breach of trust.

8.2 Gifts and Entertainment

Employees are expected to take action and make decisions based on an impartial and objective assessment of each situation, free from the influence of gifts and favours. MIAG must avoid both the fact and the appearance of impropriety with the organizations or individuals with whom it deals.

MIAG will purchase goods and services only in accordance with the Purchasing By-law. Employees must not represent themselves as being in a position to commit MIAG to the purchase of goods or services, except when acting in accordance with the Purchasing By-law and established policies and practices.

8.2.1 Employees

Employees shall not seek or accept any gifts, entertainment, payments, fees, services, valuable privileges, or other favours from any person or business organization that has any dealings with the Region, except as provided below.

1. a) Employees may accept entertainment usually associated with accepted

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

business practices if:

- It is infrequent,
- It legitimately serves a definite business purpose,
- It is appropriate for the business responsibilities of the individuals involved.
- It is not in violation of a policy directly prohibiting receipt of gifts, in effect in any business unit.

b) Employees may not give or receive gifts with more than a \$50 value.

2. An especially strict standard is expected with respect to gifts, services or considerations of any kind from clients and suppliers. Entertainment at the expense of clients or suppliers beyond that contemplated in (a) above should not be accepted under any circumstances. Suppliers will be reminded periodically of this corporate policy.
3. It is never permissible to accept a gift in cash or cash equivalent of any amount (i.e. stocks or other form of marketable securities).
4. All donations to MIAG must be properly receipted according to Canada Revenue Agency requirements, and no employee or board member shall personally accept donations intended for the organization.

8.2.2 MIAG Centre for Diverse Women & Families

Gifts, favours and entertainment may be given to others at MIAG's expense only if they are consistent with accepted business practice, such as providing vendors with a better understanding of MIAG's operations. MIAG must avoid the appearance of improperly influencing any relationship.

8.3 Outside Business Activity

Employees considering, or already engaged in any outside business, or income-producing activity, must be aware of the following possible points of conflict:

- Employees may not participate in outside business or financial activities that compete, or potentially compete, with services offered by MIAG.
- Where such outside activity exists, there is the potential for a conflict of interest as described above. In the case of a conflict of interest, which impairs the employee's ability to carry out the employee's duties on a regular basis; Employees may be asked to transfer to other duties or choose between continued employment at MIAG and the outside activity.
- Conflicting outside employment or activities may lead to discipline up to and

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

including dismissal.

- Employees participating in an outside business will not use MIAG's time, facilities, technology or property (i.e. photocopying, stationery, stenographic, etc.) for the benefit of that business.
- Proprietary or confidential information, or data acquired through employment, may not be used, or disclosed in any personal external activity.

Responsibility to avoid conflict of interest, or the perception of conflicts of interest arising from outside activities, lies with the individual employee. If in doubt, the employee should discuss the situation with his or her supervisor. It is expected that employees will act in the best interest of the Region at all times.

9.0 EMPLOYEE POLITICAL ACTIVITY

Employees shall not engage in any political activity -- federal, provincial, municipal or regional -- during working hours or utilize MIAG's assets, resources, or property. The responses to requests for contributions addressed to employees will, at all times, remain a personal decision.

MIAG employees who are elected officials require their supervisors' approval to arrange appropriate time off for political responsibilities.

10.0 ALCOHOL AND DRUG USE

All employees will abide by applicable laws and regulations governing the possession or use of alcohol and drugs. The illegal use, sale, purchase, transfer or possession of any restricted or controlled drug, narcotic or any other substance while at work, on MIAG premises or while attending MIAG-Sponsored events is prohibited.

Similarly, MIAG prohibits the sale or purchase of alcohol or the possession of opened alcoholic beverages by employees while at work, on MIAG premises or at MIAG-Sponsored Events.

Employees shall not be under the influence of or otherwise impaired by alcohol or other such substances, while on MIAG premises or while attending MIAG-Sponsored Events. For further details see MIAG's Human Resources Policy.

11.0 SOLICITATION OF MIAG's EMPLOYEES

In the interest of the orderly and efficient operation of our business, it is necessary to restrict soliciting, and distribution of material to employees.

Name of Policy: Code of Conduct

Reviewed: March 2013

Reviewed, Updated and Approved: October 2019

Any solicitation of employees, or distribution of non-work related materials of any kind to employees, on MIAG premises or during working hours, will require the prior approval of management. However, an individual employee may solicit or distribute materials to the employee's co-workers without prior approval, provided that the activity and materials are not disruptive to the workplace environment. Further, no employee will approach anyone unless the materials are of a charitable nature.

Facilities such as electronic mail, voice mail, internal mail, bulletin boards and social media are for MIAG's business and sponsored activities. Use of these must be restricted to those activities unless otherwise approved by management.

12.0 USE OF PROPERTY OF MIAG

Employees shall not make use of any property of MIAG for their personal benefit, gain, or enjoyment, other than property specifically provided by MIAG for such use as a benefit of employment.

Employees shall only use MIAG property, equipment, supplies, and services for activities associated with the discharge of their duties, unless proper authorization has been granted.

No employee shall sell, transfer, publish, disclose, display, or otherwise make available computer programs, purchased software programs, technological innovations, or other intangible property or rights owned, or used, by MIAG either while in employ of MIAG, or thereafter.

All such property or rights, and any other printed or computer records prepared by an employee during MIAG time will remain the exclusive property of MIAG (e.g. control logs, forms, daily calendars).

Upon termination of employment, employees shall deliver to the MIAG all correspondence, drawings, documents, and all other property belonging to MIAG, which may be in the employee's possession, or under his or her control. This includes property made or prepared by the employee and relating in any way to the affairs of MIAG.

13.0 OWNERSHIP OF INTELLECTUAL PROPERTY

Employees are reminded that if the subject matter of an outside interest or activity that relates in any way to their work for MIAG, or if it arises from confidential information acquired in the course of employment with MIAG, then all inventions, products, processes and ideas that the employee has developed will belong to MIAG. Employees will be required to sign documents confirming ownership by MIAG.

14.0 CONSULTANTS, REPRESENTATIVES AND AGENTS

When it is necessary to engage the services of an individual or firm to consult for, or otherwise represent MIAG, special consideration must be given to avoiding conflict of interest between MIAG and the person or firm to be employed. Hiring of consultants, and the appointment of representatives and agents, must be in accordance with MIAG's Purchasing By-law. Consultants, representatives and agents of MIAG must not act on MIAG's behalf in any way that is inconsistent with our Code of Conduct or any applicable laws or regulations (including MIAG's By-laws and policies).

15.0 COMPLIANCE AND INTERPRETATION

As a condition of employment with MIAG, employees are expected to comply with MIAG's Code of Conduct and related policies and procedures. When in doubt, employees have the responsibility to seek clarification from their supervisor, or if necessary, from the E.D. Violations of MIAG's Code of Conduct will be grounds for disciplinary action up to, and including, dismissal and legal prosecution.

All employees benefit from an atmosphere of good ethical conduct. Employees are encouraged to discuss any situations of existing or potential non-compliance, involving themselves or others; with their supervisor, or if they prefer, with the E.D.

Understanding of, and compliance with, MIAG's Code of Conduct is the continuing responsibility and duty of all employees.