



**BC IMMIGRANT INVESTMENT
FUND LTD**

STANDARDS OF CONDUCT

NOVEMBER 2014

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1. INTRODUCTION

BC Immigrant Investment Fund Ltd. (the “Corporation” or “BCIIF”) was incorporated on September 19, 2000 under the *Company Act* of British Columbia and is wholly-owned by the Province of British Columbia.

BCIIF is responsible for managing BC’s allocation of funds under the federal Immigrant Investment Program (“IIP”). The funds are targeted broadly for economic development and job creation in the province. Specifically, they have been directed to three asset classes: public sector infrastructure investments, venture capital fund investments, and money market and central depository investments.

BCIIF reports to the Minister of International Trade and Minister Responsible for Asia-Pacific Strategy and Multiculturalism and is governed by an independent six-member Board of Directors (the “Board”) appointed by the Province of BC.

B.C. Renaissance Capital Fund Ltd. (“BCRCF”) is a Crown corporation established in 2007 and wholly-owned by the BCIIF. The purpose of BCRCF is to attract successful venture capital managers and their capital to BC to develop promising, innovative technology companies in the province. BCRCF invests with venture capital fund managers who have a proven track record of investing successfully in key technology sectors and have committed to undertake investment-related activities in BC. BCIIF’s management and Board also administer BCRCF.

The following Standards of Conduct have been prepared under the direction of the Board and apply to management and staff, including both direct employees and contractors of BCIIF and BCRCF. The Standards of Conduct align with best practices for good corporate governance and comply with the Taxpayer Accountability Principles introduced by the Government of British Columbia in September 2014.

Unless otherwise indicated, all references to BCIIF in the Standards of Conduct apply equally to BCRCF as its wholly-owned subsidiary.

Management and staff are responsible for complying with the Standards of Conduct and the Board is accountable for ensuring that the Standards of Conduct are upheld. BCIIF will review and approve any changes to the Standards of Conduct on an annual basis as recommended by the Board’s Governance and Human Resource Committee. Any requests for exceptions to the Code of Conduct must be submitted in writing to the Board for consideration; exceptions also require approval by the Minister responsible for Public Sector Employees Council.

2. CODE OF CONDUCT

2.1. OVERVIEW

Employees of BC Immigrant Investment Fund (“BCIIF”) are required to uphold the highest standard of care and to act honestly and in good faith in the course of BCIIF employment. The Code of Conduct (“Code”) establishes minimum standards of conduct that BCIIF expects from its employees. Employees, when acting in the course of their duty, are required to adhere to all applicable laws and regulations. Employees are responsible for learning and understanding the Code and ensuring they clarify any questions or concerns about the Code with their supervisors.

An obvious or deliberate breach of the Code is considered a serious violation, and will be investigated, and may result in disciplinary action up to and including termination.

Appendix A provides a template for the Code of Conduct Declaration required of all employees.

2.2. CONFLICT OF INTEREST

As outlined in **Section 3**, BCIIF recognizes that employees may find themselves in a position of conflict with the interests of the organization and has introduced protocols to safeguard its reputation and that of its employees. The management of conflicts of interest must be able to withstand scrutiny, and in order to mitigate risk, employees are required to disclose any conflicts at the time of hire or as situations arise with their supervisor at the first reasonable opportunity.

A conflict of interest situation is not limited to financial gain; non-financial gain is a reputational risk that may have long standing effects on any organization or individual. Employees should consider whether a reasonable and informed individual would perceive a conflict. It is prudent to err on the side of caution and discuss possible conflicts of interest with an immediate supervisor. In the event that a conflict or a perception of conflict exists, the employees will remove themselves from any decision-making involving the business and avoid influencing any decision-makers.

2.3. RESPECTFUL BEHAVIOUR

BCIIF expects that employees will conduct themselves with integrity, treat their fellow employees with respect and dignity, build a safe workplace free of bullying or harassment, and will not engage in any behaviour that contravenes the *Human Rights Code*.¹

In dealings with fellow employees, discussions should be frank and honest in meeting the obligations of a duty of care to BCIIF; frank and honest discussion must be done with respect and dignity.

¹ In British Columbia, it is illegal to discriminate or harass a person based on: race; colour; ancestry; place of origin; religion; marital status; family status; physical or mental disability; sex; sexual orientation; age; criminal conviction; political belief; and a lawful source of income. The *Human Rights Code* recognizes employers’ rights to set conditions of employment and a listing herein of prohibited discriminatory grounds should not be considered in isolation or out of context of the full *Human Rights Code*.

2.4. PERSONAL CONDUCT

Conflicts of interest arising out of personal relationships in the workplace must be avoided. Employees must never have influence, input or decision-making over the hiring, evaluation, promotion or establishment of terms and conditions of employment of anyone with whom they have a close personal relationship. This includes influence over the hiring, evaluation or retention of contractors.

Employees and contractors in close personal relationships must not be employed or retained in positions where the Corporation requires that the incumbents be unrelated for risk management or audit purposes (e.g. a close personal relationship between two employees who are jointly required to approve a type of financial transaction for risk management purposes). If an employee is in doubt as to whether a close personal relationship falls within this Code the employee should err on the side of disclosure and seek advice.

This Code also applies to personal business arrangements outside of work. While BCIIIF respects the right of employees to operate side business or provide services to others for a fee, employees should declare their outside business activities at the time of engagement. Executive and management employees must obtain prior approval of the Board before engaging in outside business, the approval for which may not be unreasonably withheld. However, in conducting such business, employees must ensure that their outside business activities do not interfere with their ability to perform their work for BCIIIF, create a real or potential conflict of interest or compete with the business or intended business of BCIIIF.

2.5. POLITICAL ACTIVITIES AND ASSOCIATION

It is a right and a privilege of a citizen to engage in political activities and BCIIIF supports employees who choose to engage in activities that are clearly separated from duties related to employment with BCIIIF. Political activities during working hours or use of BCIIIF offices, equipment and resources are prohibited. Employees must remain impartial and retain the perception of impartiality in relation to their duties and responsibilities.

2.6. FUTURE EMPLOYMENT RESTRICTIONS

Restrictions apply to prevent the appearance of any real or perceived conflict of interest with parties engaged in business activities with the Corporation. BCIIIF management, specifically the CEO and Executive who have delegated signing authority for BCIIIF, both during employment and for a period of twelve (12) months following the termination of employment for any reason (including resignation) may not, without the prior written consent of the Board, carry on, or be engaged in, or be concerned with, or interested in, or employed by, any General Partners (for the purposes of BCRCF investments in venture capital) or other entity that receives funding from BCIIIF during employment.

2.7. ENTERTAINMENT, GIFTS AND OTHER BENEFITS

Employees shall not accept from any individual, corporation, or organization, directly or indirectly, any personal gift or benefit that arises out of employment with BCIIIF, other than:

- gifts, entertainment or benefits that may arise in the normal exchanges common to business relationships, the cost of which must be less than \$50 in value and should not incur a sense of obligation for either party.

Employees will not solicit a gift, benefit, or service on behalf of themselves or other employees. Inappropriate gifts received by a BCIIIF employee should be returned and, if appropriate, may be accompanied by a copy of the Standards of Conduct.

Travel loyalty program benefits that are accumulated by employees while travelling at BCIIIF expense must not be used for personal benefit. Such benefits or discounts should only be applied against future business travel or donated to charities associated with the program. Benefits accumulated while travelling at BCIIIF expense should not be used beyond the term of employment.

Employees must keep in mind BCIIIF's reputation when choosing venues and remember that their behaviour reflects on the organization's values.

2.8. ALLEGATIONS OF WRONGDOING

Employees must report suspicion of wrongdoing or illegal activity. Employees who report their suspicion will be afforded confidentiality as far as the law permits. In the event that an employee wishes to make an anonymous report they may do so to the Board's Governance and Human Resources Committee. BCIIIF will not discriminate or harass employees who make a report.

Employees must report to their immediate supervisor or to the next higher authority unless they choose to report anonymously. In the event that the suspected wrongdoing or illegal activity involves an external investment manager, the matter will be escalated to the Investment Committee for the respective fund and may be reported to the Board and applicable securities commission.

It is expected that the matter will be investigated and dealt with internally within BCIIIF unless there is a requirement to report to regulators, commissions or a police force. Vexatious or frivolous allegations, as determined by the Board, do not have to be investigated. **Section 4** describes additional policy and protocol for whistleblower protection.

2.9. COMMUNICATIONS

The Chair is the spokesperson for the Board as the CEO is the spokesperson for management and employees; designates may be appointed. The Chair and the CEO work in concert when addressing the government, media or the public. The government may consult the Chair and/or the CEO on matters where BCIIIF has expertise. Employees may comment on public issues but should not comment or speak in public where it may be seen as representing BCIIIF unless authorized to do so on behalf of the organization. **Section 5** describes the policy and protocol for corporate communications.

2.10. USE OF BCIIIF PROPERTY

BCIIIF provides equipment, material and resources (the "Property") for employees to use in the conduct of its business. The employees may not use BCIIIF's Property for their personal matters.

Contractors must use their own equipment, e.g. laptop or cell phone. **Section 6** provides additional protocol for the use of personal property.

2.11. CONFIDENTIALITY AND PRIVACY

Employees may receive information in the course of employment that is confidential; however, they may not disclose or transmit this information in any manner to anyone other than authorized persons or entities. Questions on whether information is deemed confidential should be directed to the management and directors of the Corporation. Employees who are required to handle sensitive and confidential information are expected to do so with the utmost care and diligence and follow any additional protocols or procedures that BCIIIF may establish.

Information obtained in the course of employment must be used only for the purpose for which it was obtained. Information is not to be used for personal gain or interest. **Section 6** provides additional detail with respect to confidentiality and privacy.

2.12. COMPLIANCE AND BREACH OF THE CODE

Compliance with the Code is a condition of employment and any breach may result in probation or dismissal.

Employees will be required to sign a declaration at the time of hire and thereafter on an annual basis that they have read, understood and will abide by the Code. See **Appendix A** for the declaration form.

3. CONFLICT OF INTEREST POLICY

3.1. CONFLICT OF INTEREST

A conflict of interest occurs when an employee's personal interests conflict with those of BCIIF. Employees should avoid conflicts of interest whenever practicable but also understand how to manage situations as they arise to minimize risk.

3.2. TYPES OF CONFLICT OF INTEREST

There are three types of conflict of interest: real, potential and perceived.

1. Real conflicts are sometimes referred as actual conflicts. For example, this occurs when an employee's duties at BCIIF conflict directly with personal financial interest.
2. Potential conflicts occur when, for example, personal interests could influence an employee in conducting business on behalf of BCIIF.
3. Perceived conflicts occur when, for example, an informed person could consider a scenario and doubt that the employee can make a reasonable and neutral decision.

Conflicts may be financial or non-financial in nature. It is the latter that can often result in reputational damage.

3.3. REPORTING AND RECORD KEEPING

At the time of hire and on an annual basis, an employee is required to disclose all conflicts of interest. **Appendix B** includes a sample conflict of interest declaration form. Employees must also disclose to their supervisor conflicts of interest as they arise, including situations where there may be the perception of a conflict of interest.

Consistent with practices for records management outlined in **Section 7**, BCIIF will maintain records of information provided by employees on conflicts of interest. Records will also be maintained on assessments of conflicts of interest.

3.4. VIOLATIONS OF THE CONFLICT OF INTEREST POLICY AND PROTOCOL

If an employee fails to disclose a conflict of interest, the employee will be asked by their management or executive to provide an explanation to their supervisor or directly to the CEO. The Governance and Human Resources Committee will recommend a decision, with the input of the CEO, on whether the employee acted in good faith, and whether any corrective or disciplinary action is warranted. A record of such proceedings will be kept on file. See **Appendix C** for a reporting template to be used for any review of employee conflict of interest.

4. WHISTLEBLOWER PROTECTION POLICY

4.1. OVERVIEW

As outlined in **Section 2.0**, BCIIIF has introduced the Code to address the accountability of all employees to report allegations of wrongdoing; the following Whistleblower Policy supports the Code, and outlines procedures for employees to bring forward a report in good faith and without fear of reprisal. Confidentiality will be maintained as far as practicable and as far as the law permits.

BCIIIF does not tolerate harassment, discrimination or reprisals against those individuals who make a report in good faith. This right is also afforded to individuals that participate in investigations, including witnesses and investigators.

BCIIIF retains the right to determine if an investigation is necessary and will determine the nature and scope of such an investigation. An informal process may be taken if appropriate, and if agreed to by the parties involved. While investigations are handled internally, BCIIIF in its sole judgment may make the facts, based on its investigations, known to the appropriate enforcement agency, regulatory body, and/or seek legal advice or proceedings to seek resolution.

Vexatious or frivolous allegations do not have to be investigated². If BCIIIF determines that an individual made a report in bad faith or with malicious intent, it can take appropriate action, which may include disciplinary proceedings, including termination. This policy does not protect employees from legal claims of defamation.

4.2. REPORTING

Employees should report alleged wrongdoings based on reasonable grounds to an immediate supervisor or, if warranted, to the Governance and Human Resources Committee³ by the anonymous allegation reporting process (see below). If the allegation involves an external investment manager, the report will be escalated to the Investment Committee for the respective fund and may be reported to the applicable securities commission.

A report may be made in person, by telephone or by electronic or regular mail. If a written report is made by email, the sender should include the words “Private and Confidential” in the subject heading or if the report is sent by post then the envelope should be similarly marked.

Reports should include as much information as possible, including the following:

- a) Nature of the alleged wrongdoing;
- b) Name of the person(s) involved;
- c) Date(s) if relevant; and

² A report is deemed vexatious or frivolous if no reasonable person would treat the allegation as bona fide.

³ It is a current practice to have a Director of Internal Audit overseeing a Whistleblowing or Confidential and Anonymous Reporting process. Currently, BCIIIF does not have the operational scale to support its own Internal Audit Department. The Office of the Comptroller General, Internal Audit and Advisory Services, provides internal audit functions if requested by a Crown Corporation. This policy falls under the mandate of the Governance and Human Resources Committee.

- d) Other pertinent information, including supporting documentation.

Reports involving the CEO or management should be addressed to the Governance and Human Resources Committee. Reports involving Directors of the Board must be addressed to the Chair of the Governance and Human Resources Committee; reports involving the Chair of that Committee or the Board Chair must be addressed to the Minister responsible.

Anonymous Allegations: Employees are encouraged to provide their name when making an allegation of wrongdoing, as this will allow investigators to seek additional information if warranted. However, employees have the option to make an anonymous report to the Governance and Human Resources Committee by submitting a written report through the mail. It should be noted that investigations might not be possible if the source of information is not available or if the information provided is not comprehensive.

4.3. INVESTIGATIONS

Unless prohibited by law⁴, individuals accused of a wrongdoing must be informed of the allegation and must be afforded the right to respond in full. Employees must participate in any investigations and must make every effort to make themselves available.

Reports will be reviewed promptly, and within forty-five (45) days of an allegation being reported, a decision on whether to proceed with further action will be reached. Providing there is no legal impediment, and keeping in mind the confidential nature of the investigation, a report on the outcome of an investigation will be provided to the individual(s) who reported an allegation of wrongdoing.

4.4. CONFIDENTIALITY

All information gathered during the investigation will be kept in confidence to the fullest extent possible except as necessary to conduct a fair investigation or take corrective action in accordance with applicable law. BCIIF retains the right to take action if individuals involved fail to maintain confidentiality during and after an investigation.

4.5. GOVERNANCE AND HUMAN RESOURCES COMMITTEE OVERSIGHT

The Governance and Human Resources Committee will receive a confidential report of any allegations. With the consent of the Committee Chair, the CEO will designate a member of management to oversee the preparation of the report. The report will include the aggregate number of allegations submitted, the nature of the allegations, and how the allegations were resolved; for example, by mutual resolution or investigation. The report to the Committee will not identify individuals involved.

4.6. RECORDS

A record will be maintained for a period of two years from the closing date of a file; the file will contain the following information: the allegation, summary of investigation, and outcome. Records will be kept in confidence according to policy set forth in **Section 7**.

⁴ An example of the law prohibiting disclosure to the alleged wrongdoer during an ongoing investigation would be a case of money laundering.

5. COMMUNICATION POLICY

5.1. OVERVIEW

The purpose of this policy is to establish guidelines for BCIIIF for communication, including the release of information to the public, media and stakeholders.

5.2. SPOKESPERSONS

BCIIIF has two designated spokespersons. The Chair of the Board is the spokesperson for the Board and the CEO is the spokesperson for BCIIIF's employees. Both the Chair and the CEO work in concert to respond to requests for information from the public or media. The Chair and the CEO may also be required to address questions from the government, and may be asked to speak with media on areas of expertise or responsibility; addressing media on behalf of the government will be pre-arranged and will be done in consultation with the government. The Board Chair and the CEO reserve the right to contract external expertise, specifically for issue and reputation management.

5.3. COMMUNICATIONS AND CONFIDENTIAL INFORMATION

Employees may not disclose confidential information unless authorized to do so or as required by law. Precautions should be taken to protect the Corporation's privacy as outlined in **Section 6** and comply with the protocol for records management as outlined in **Section 7**.

Employees have a duty to protect the confidentiality of corporate information by taking measures including but not limited to:

- storing confidential material in locked cabinets or in secure electronic storage;
- not discussing confidential business in a location where the conversation may be overheard;
- removing all confidential material from meeting rooms;
- not copying unnecessarily or discarding information/documents where it may be readily retrieved by unauthorized individuals; and
- making a report to a manager for action when an employee misplaces information/documents.

5.4. GENERAL

- **Information Provided to the Board of Directors:** Employees should ensure that information is disseminated through or with the approval of the CEO and Corporate Secretary.
- **Communication with Employees:** Management communicates with employees on various matters including strategic and day-to-day operations. Management may elect to use a variety of methods in communicating BCIIIF business. It is expected that management will communicate with employees regularly to foster employee knowledge and understanding of the business. This communication may be conducted face-to-face, by email, learning workshops and other methods. Employees are encouraged to meet face-to-face whenever practicable but may be required to conduct business by phone, or email.

- **External Communication:** BCIIIF expects employees to communicate with courtesy; every employee represents BCIIIF and their conduct affects the reputation of the organization. BCIIIF may establish email and telephone procedures that will provide a consistent brand for the organization.

5.5. VIOLATIONS OF THE POLICY

Failure to comply with this policy may result in disciplinary action including termination. Breach of this policy may also result in violation of certain security laws and BCIIIF may refer the matter to the appropriate regulator or police force.

6. INFORMATION AND PRIVACY PROTECTION POLICY

6.1. OVERVIEW

This policy outlines policy and protocol to ensure that BCIIIF employees achieve a balance between the protection of confidential corporate information and the requirement to release information to the public in accordance with the *Freedom of Information and Protection of Privacy Act* of BC.

6.2. PROTECTION OF CORPORATE INFORMATION

All data/information held by BCIIIF, its subsidiary, BCRCF, the Board, staff and stakeholders is the property of the Corporation. Employees who have access to this information must not use it for personal benefit or in any way that could be detrimental to BCIIIF.

Unless required by law or court order, or expressly agreed to in writing by BCIIIF, both during and after employment with BCIIIF, employees must not communicate any corporate information and must not disclose it to anyone inside or outside the Corporation, except as required by business duties.

6.3. INVESTMENT AND TRADING

As a financial corporation, BCIIIF and its subsidiary BCRCF may make operational decisions based on confidential investment information. Employees must not use for private speculation or personal advantage, data or information that is not available to the general public.

Employees may not, directly or indirectly, through friends, relatives or associates, acquire or dispose of any interest, including publicly traded shares, in any entity when in possession of confidential information obtained in the performance of their duties with BCIIIF which could affect the value of such interest.

6.4. DISCLOSURE OF INFORMATION

BCIIIF may be required to disclose information prescribed by legislation, and will do so in an appropriate manner with timely, accurate and complete information. Examples of information that may be disclosed are financial reporting to regulatory bodies and annual reports.

The Board may call for “black out” periods and during such a period only information readily available to the public may be disclosed. These periods may precede the public disclosure of financial information. The control of disclosure may be required to ensure accurate and complete information is communicated at the appropriate time. Incomplete information may be detrimental to the Corporation’s interests.

6.5. REQUESTS FOR INFORMATION

Requests for information or inquiries from the public will be responded to and within the parameters of the *Freedom of Information and Protection of Privacy Act*. Responses will be handled promptly.

6.6. USE OF CORPORATE PROPERTY AND DATA

Corporate assets, whether in physical or intangible form, are intended to help employees achieve business goals. Corporate assets are primarily to be used for business purposes. Employees may not use corporate assets for personal gain or to operate a personal business of any kind, nor may they allow any other person, not employed or authorized by BCIIIF, to use them.

6.7. USE OF PERSONAL PROPERTY

BCIIF adheres to BC government policy with respect to the use of government devices including access to and downloading of software.⁵

⁵ http://www.cio.gov.bc.ca/local/cio/appropriate_use/policy.pdf

7. RECORDS MANAGEMENT: DOCUMENT RETENTION AND DESTRUCTION POLICY

7.1. OVERVIEW

The purpose of this policy is to ensure that BCIIIF has implemented a practice to retain and safeguard records in accordance with regulatory and legislative requirements. The policy will be reviewed on an annual basis.

7.2. GENERAL INFORMATION

Currently, BCIIIF utilizes BC government servers and information technology support and, therefore, relies on the provincial data storage practices. The Chief Information Officer of the Province is accountable for ensuring that information is managed and protected in accordance with legislation. BCIIIF reserves the right to seek assurances in the form of a letter or agreement that the data is stored with sufficient controls. Records that are “backed up” electronically must be retrievable and restored in a readable format. Confidential records will be kept in locked storage (see communication policy).

7.3. RETENTION SCHEDULE

Category	Minimum Retention Period
HR	
Personal Information	Immediate destruction unless required ⁶
Employee name and address	Three years from end of employment
Employment start date record	Three years from end of employment
Records of hours worked	Three years from current
Wages paid	Three years from current
Records related to protected leaves	Three year from date leave expires
Excess hours and overtime	Three years from end of employment
Vacation time and pay records	Three years from date of creation
Financial	
Income tax records (records and books of account), including GST/HST returns, EI, CPP, and withholding taxes	Six years from the end of last taxation year to which they relate
Financial records and supporting documentation	Seven years from date of creation
Board/ Committees	
Board/ Committee meeting minutes	Permanent record
Board/ Committee meeting reports and	Permanent record

⁶ While the *Personal Information Protection and Electronic Documents Act* requires that personal information that is no longer required to fulfill the identified purposes should be destroyed, erased or made anonymous, rulings in Ontario have challenged the minimum retention period as information used to make a decision about an individual should be retained long enough for the person to access the information. In British Columbia, *Personal Information Protection Act* requires secure destruction when it is reasonable to assume that the stated purpose is spent and when the retention is no longer necessary for legal or business purposes.

documents used to make decisions	
Contracts and agreements signed by the Board of Directors	Permanent record
Operations	
Working or Transitory Records	May be destroyed once the final record is completed and stored
Electronic Mail (Email)	May be deleted unless required for ongoing legal, fiscal, audit or operational purposes
Procurement documents (RFP, contracts)	Seven years from date of creation

The BCIIF may utilize a government approved file storage business to retain records that are not required for the day-to-day operations. Records sent off-site for storage must be classified with a destruction date or be clearly marked as a permanent record (no destruction date).

7.4. SECURE DESTRUCTION

Care should be used to prevent personal information from falling into unauthorized hands.

Electronic media must be destroyed or made unusable and this may require overwriting the media or data using “wiping” technologies provided by software companies. Wiping technology will be based on how “irretrievable” the data is once wiped.

BCIIF may utilize an agent or company that destroys documents providing that adequate controls and security measures are in place. An agreement with an agency that is accredited by the National Association of Information Destruction, or one that upholds similar principles, should include the following measures:

- How destruction will be accomplished. Cross shredding rather continuous shredding (single strip) technology is recommended, as continuous shredding can be re-constructed
- How quickly after a scheduled pick-up the information will be destroyed
- Prohibiting sub-contracting without BCIIF’s consent
- Reserving the right to audit the process
- Requiring a certificate of destruction which indicates the time, place and location where the information was destroyed

7.5. VIOLATION OF THE POLICY

An obvious or deliberate breach of this policy or the Code of Conduct or Communications is considered a serious violation, and will be investigated and may result in disciplinary action, including termination. Where necessary, BCIIF reserves the right to forward violations to the appropriate regulatory body or police force.

APPENDIX A: EMPLOYEE CODE OF CONDUCT DECLARATION

I have read and understood this Code of Conduct, and by signing below I agree to comply with and conduct myself in accordance with all of its terms. I have taken the opportunity to discuss any questions or concerns with my supervisor.

I agree to sign a new declaration as may be required by changed circumstances.

Employee's Name

Date

Employee's Signature

APPENDIX B: CONFLICT OF INTEREST DISCLOSURE FORM

I have read the Code of Conduct and the Conflict of Interest policy, and agree to abide by the terms of both documents.

A real or potential conflict of interest may exist as a result of my association with the following:

Other than as disclosed above, I do not have any relationships or interests that could compromise, or be perceived to compromise, my ability to exercise judgment with a view to the best interests of BCIIF. I have read and considered this Code of Conduct and agree to conduct myself in accordance with its terms.

I agree to promptly provide an updated Declaration annually or as may be required by changed circumstances.

Employee's Name

Date

Employee's Signature

APPENDIX C: CONFLICT OF INTEREST REPORT

Date:	
Employee Name:	
Conflict of Interest:	
Report of deliberation:	
Finding and Action:	