

# #05 Code of Conduct

## BOARD POLICY

<b>Board Approval:</b>	November 28, 2018
<b>Effective Date:</b>	December 1, 2018
<b>Amendment Dates:</b>	N/A
<b>Review Dates:</b>	December 2, 2020

## PURPOSE

The purpose of this policy is to outline expectations of exemplary standards of business conduct to be adhered to and modelled by all staff, directors, and service providers of Headwater Learning Group (HLG).

## DEFINITIONS

**Board** – the Boards of Directors of HLG

**Chief Executive Officer** – the head of operations of HLG

**Code** – this Code of Conduct

**HLG** – Headwater Learning Group, the term for three independent charitable organizations — Calgary Academy Society, Headwater Learning Foundation and Headwater Learning Solutions Foundation

**IP** – intellectual property, which is proprietary knowledge and skills owned by HLG once generated

**Representatives** – directors, employees and service providers of HLG

**Reprisal** – a measure taken, direct or counselled, that leads to an adverse employment action as a result of reporting wrongdoing

**Wrongdoing** – activity that may be considered ethically, morally, or legally inappropriate specifically in relation to this Code

## GUIDELINES

1. HLG will conduct its business in accordance with high ethical and legal standards. HLG is committed to being a good corporate citizen and, as such, will comply in all respects with all laws and regulations that are applicable to its business and operations.
2. Representatives will model the core values, beliefs, principles and standards of conduct established by the Boards of HLG including all forms of digital communication.
3. Representatives, when dealing with conflicts of interest (real or potential), must act in the best interest of HLG and avoid any situation which may result in a conflict between their personal interests and the interests of HLG.
4. All information regarding the business and activities of HLG is considered confidential unless publicly disclosed as part of HLG's reporting obligations.
5. Representatives with confidential information may not communicate such information to a third party, without written approval from the Chief Executive Officer.
6. IP of HLG is considered strictly confidential and wholly owned by HLG. Sharing of IP requires written approval of the Chief Executive Officer.

7. The Representative, as author or co-author of any program, technology, literature or any other proprietary information, hereby waives all rights to claim authorship thereof, unless such agreement to share in the ownership of this data is agreed upon with HLG.
8. HLG and its Representatives will comply with all provincially-legislated obligations to ensure the private information of internal and external stakeholders is protected.
9. In the event that a Representative has knowledge of a violation of this Code, the Representative has the obligation to report it to the Chief Executive Officer or another senior leader of HLG, without fear of reprisal.
10. Violations of this Code will be subject to disciplinary action, up to and including termination of the Representative's employment for cause or service provider's contract with HLG for cause.

## REFERENCES

Alberta Human Rights Act, RSA 2000, c.A-25.5, as amended

Personal Information Protection Act, SA 2003, c. P-6.5, as amended

## CROSS-REFERENCES

Board Policy – Information Technology & Services

Board Policy – Occupational Health and Safety

Board Policy – Privacy & Security

Board Policy – Respectful Learning & Work Environment

Board Policy – Whistleblower

Occupational Health and Safety Operating Procedure

CA Student Handbook

HLG Employee Manual