

TRIUMF

CODE OF FINANCIAL CONDUCT

TRIUMF's management and employees must, at all times, comply with all laws and regulations applicable to TRIUMF and to society as a whole. TRIUMF will not condone the activities of employees who achieve results for themselves or for TRIUMF through violations of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates and bribery. All TRIUMF activities must stand the closest possible public scrutiny.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, Division Head, Controller or Director who, if necessary, should seek the advice of legal counsel.

GENERAL EMPLOYEE CONDUCT

TRIUMF expects its employees to conduct themselves in a business like manner. TRIUMF maintains specific policies on alcohol and drug consumption and sexual harassment and these policies should be consulted if there are any questions on what is considered appropriate behaviour while at TRIUMF or representing TRIUMF.

CONFLICTS OF INTEREST

TRIUMF expects that employees will perform their duties conscientiously, honestly and in accordance with the best interests of TRIUMF. Employees must not use their position or the knowledge gained as a result of their position for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, are presently pursuing, or are contemplating pursuing, may involve them in a conflict of interest with TRIUMF, they should review the TRIUMF policy on Conflict of Interest and immediately communicate all the facts to their Supervisor or Division Head.

OUTSIDE ACTIVITIES AND EMPLOYMENT

All TRIUMF employees share a serious responsibility for TRIUMF's good public relations at all levels. Their readiness to help with religious, charitable, educational and civic activities brings credit to TRIUMF and is encouraged.

TRIUMF employees must, however, avoid acquiring any business interest or participating in any other activity outside TRIUMF that would, or would appear to:

- Create an excessive demand upon their time and attention, depriving TRIUMF of their best efforts at work.
- Create a conflict of interest - an obligation, interest or distraction - that may interfere with the independent exercise of judgement in TRIUMF's best interests.

RELATIONSHIPS WITH SUPPLIERS

TRIUMF employees should avoid knowingly making a personal investment in or acquiring a personal financial interest for their own accounts in any business or organization that has a contractual relationship with TRIUMF, or that provides goods or services, or both, to TRIUMF, if such an investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of TRIUMF.

GIFTS, ENTERTAINMENT AND FAVOURS

TRIUMF employees must not accept entertainment, gifts or personal favours that could, in any way, influence, or appear to influence, business decisions in favour or any person or organization with whom TRIUMF has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their position with TRIUMF might be inclined to, or be perceived to, place them under obligation.

KICKBACKS AND SECRET COMMISSIONS

In regard to TRIUMF's business activities, employees may not receive payment or compensation of any kind, except as authorized under TRIUMF's remuneration policies as outlined in a separate TRIUMF policy on Employee Remuneration. In particular, TRIUMF specifically prohibits the acceptance of kickbacks and commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

TRIUMF FUNDS AND OTHER ASSETS

Employees who have access to TRIUMF funds in any form must follow the prescribed procedures for recording, handling and protecting money as outlined in TRIUMF's organization procedures or other explanatory materials. TRIUMF imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud or dishonesty, they should immediately advise their Supervisor, the Controller, their Division Head, Director or Chair of the Board of Management, in accordance with TRIUMF's Financial Fraud Policy so TRIUMF can promptly investigate further.

When an employee's position requires spending TRIUMF funds or incurring any reimbursable personal expenses, that employee must use good judgment on TRIUMF's behalf to ensure that good value is received for every expenditure.

TRIUMF funds and all other assets of TRIUMF are for TRIUMF purposes only, and not for personal benefit.

TRIUMF RECORDS AND COMMUNICATIONS

Accurate and reliable records of many kinds are necessary to meet TRIUMF's legal and financial obligations and to manage the affairs of TRIUMF. TRIUMF's books and records must reflect in an accurate and timely manner all business transactions.

Employees responsible for accounting and recordkeeping must fully disclose all funding received and expenditures made, and must exercise diligence in enforcing these requirements. Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expenses, attendance records, production records, financial or similar reports and statements
- False advertising, deceptive marketing practices or other misleading representations

DEALING WITH OUTSIDE PEOPLE AND ORGANIZATIONS

TRIUMF employees must take care to separate their personal roles from their TRIUMF positions when communicating on matters not involving TRIUMF business. Employees must not use TRIUMF identification, stationary, supplies and equipment for personal or political matters.

When communicating publicly on matters that involve TRIUMF business, employees must not presume to speak for TRIUMF on any topic unless they are certain the views they express are those of TRIUMF and it is TRIUMF's wish that such views be publicly disseminated.

When dealing with anyone outside TRIUMF, including public officials, TRIUMF employees must take care not to compromise the integrity or damage the reputation of either TRIUMF or any outside individual, business or government body.

PROMPT COMMUNICATIONS

In all matters relevant to TRIUMF users, suppliers, government authorities, the public and others in TRIUMF, all employees must make every effort to achieve complete, accurate and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

PRIVACY AND CONFIDENTIALITY

TRIUMF employees handling financial and personal information about TRIUMF users, or others with whom TRIUMF has dealings with, must observe the following principles as outlined in TRIUMF's policy on privacy:

- 1.) Collect, use and retain only the personal information necessary for TRIUMF's business. Whenever possible, obtain any relevant information directly from the person concerned and use only reputable and reliable sources to supplement or confirm this information.
- 2.) Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
- 3.) Limit access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

It is TRIUMF policy to conform to the privacy laws currently enacted by the Government of Canada and the Province of British Columbia. If there are any questions concerning the application of these laws, please refer to TRIUMF's Policy on Privacy.