

Compliance with Laws  
 Quality Assurance  
 Accountability  
 Reporting  
 Use of Assets and Information  
 Trust  
 Conflict of Interest  
 Representing the Agency

# OCWA's CODE OF BUSINESS CONDUCT

Ethics  
 Education  
 Trust  
 Health & Safety  
 Work Environment  
 Protecting the Public Health and the Environment

Trust. It flows from experience & commitment

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## Joint Message from the Chair & President and CEO

OCWA's promise to build and maintain trusting relationships with employees, clients, suppliers, partners and the Province is fundamental to our reputation and our ongoing success.

One of the ways in which we build that trust is by being honest and ethical in the way in which we do business. Our Code of Business Conduct is not simply a good business practice, but a commitment to always do the right thing. Guided by strong social responsibility, it helps us make decisions and act in a way that reflects well on all our stakeholders.

OCWA, not unlike many organizations, is faced with increasing challenges and the need to make difficult decisions every day. The principles set out in this Code are not new and simply formalize the policies and ideals to which we have long been committed. Everyone at OCWA – employees and members of OCWA's Board of Directors – is expected to read, understand and comply with the Code. If you encounter a situation that could be, or appears to be, a violation of the Code and are unsure about how to act, talk to your Manager or one of the individuals listed in the Who to Contact for Guidance section of the Code. At OCWA we are committed to treating all of our stakeholders with integrity and respect. Following the principles outlined in the Code will help us to uphold our values and achieve our vision to be "A trusted world leader in water."



**Michael Garrett**  
Chair



**Rob Andrews**  
President and CEO

### PURPOSE

The Code of Business Conduct ("the Code") is part of the Ontario Clean Water Agency's internal control framework. Its primary purposes are to set out the standards of behaviour expected of everyone who works at OCWA in conducting the Agency's business, help employees make the right business decisions, and to reinforce the importance of acting in a manner that reflects the highest ethical standards. The Code applies to all OCWA employees and members of OCWA's Board of Directors, and to the extent feasible, OCWA agents, consultants, contractors and business partners.

### REVISION

This version of the Code was approved by OCWA's Board of Directors on March 26, 2014.



### Our Vision

A trusted world leader in water.

### Our Mission

To demonstrate service excellence through the delivery of safe, reliable and cost-effective clean water.

### Our Values

OCWA's values are focused on building **TRUST** with clients and other stakeholders.

<b>Transparent</b>	Open and honest communication of our business activities.
<b>Respectful</b>	Build sound relationships with our staff, clients, and other stakeholders, by embracing diversity, acting responsibly and doing what is right.
<b>Understanding</b>	Confidence in the knowledge and ability of our people to meet the challenges of the water and wastewater industry. Continuously learn current trends and innovative technologies and/or processes in our industry.
<b>Safe</b>	Deliver clean water services to protect our employees, the communities we serve, and the environment.
<b>Teamwork</b>	Work together and share our collective expertise and be innovative in delivering exceptional results and achieving our mission.

## Our Code

At OCWA we conduct our business honestly, ethically and with integrity. We take our responsibilities to our stakeholders seriously and in so doing, we build their trust. Their trust is vital to the ongoing and future success of our organization.

OCWA's Code of Business Conduct (the "Code") sets out the standards of behaviour expected of everyone who works at OCWA in conducting the Agency's business. It was developed to help employees make the right business decisions and to act in a manner that reflects the highest ethical standards.

The Code aims to achieve the following goals:

- Describe OCWA's Values and the Agency's standards of business conduct
- Describe key OCWA and Ontario Public Service (OPS) policies and procedures that apply to our business dealings
- Provide guidance on how to identify and resolve difficult situations
- Promote principles of fairness, integrity and respect in the workplace and in dealings with all of our stakeholders
- Demonstrate to our stakeholders that we are committed to fair and ethical conduct

### Stakeholders

A stakeholder is someone who has an interest or concern in something. For OCWA, stakeholders include clients, suppliers, communities, government, bargaining agents, and all OCWA employees.

All OCWA employees and members of OCWA's Board of Directors are expected to be familiar with and comply with the Code. The Code applies to staff regardless of where they conduct business on behalf of OCWA. All employees are expected to read the Code and acknowledge.

We also advise consultants and contractors with whom we work of the Code and the importance of adhering to its requirements.

## How to Apply the Code

Because having the trust of all of our stakeholders is critical to our success, compliance with this Code is mandatory and all employees and directors will be expected to acknowledge that they have read, understood and will comply with the Code. In most situations it will be relatively easy to determine how to apply the Code. Unfortunately, the Code cannot address every possible situation that you may be faced with in your work for OCWA. As always, you will be expected to use good judgment and be guided by OCWA's Values.

If you are unsure of how to apply the Code in any situation, please speak with your Manager or one of the persons noted on the Who to Contact for Guidance list at the end of this document.

If you wish to report a possible violation of the Code, and do not feel comfortable reporting it to your Manager, OCWA's General Counsel, Director of Human Resources or the Vice-President of Operations, or President and CEO. You may also send an email to [code@ocwa.com](mailto:code@ocwa.com). This non-anonymous email account will be monitored daily by the Director of Human Resources and the General Counsel].

If you are faced with a situation that the Code does not specifically cover, answering the following questions may help you to determine what to do. If the answer to any of the questions is "no", don't do it or speak with your manager

- Can I proceed without threatening the life, health or safety of any person, including myself?
- Is the action legal?
- Is the action fair and ethical?
- Is the action in accordance with OCWA's values and commitment to environmental stewardship?
- Would my family, fellow employees or my client approve of my actions?

## Compliance with Laws

### Public Service of Ontario Act, 2006

At a minimum, behaving ethically requires that we comply with all laws and regulations that apply to our activities. Training programs have been developed to help employees understand the laws and regulations that apply to OCWA's business. In addition, standard operating procedures and policies have been put in place to help us meet contractual and regulatory requirements.

As public servants, OCWA employees and Board members are also subject to the requirements of the [Public Service of Ontario Act, 2006](#) (PSOA) and related Ontario Public Service (OPS) policies and directives. The Code does not override, but rather supports all such laws and policies while addressing concerns specific to OCWA.

The PSOA provides support for key OPS values of professionalism, integrity, accountability and excellence and sets out the ethical and human resource management frameworks for public servants. Components of the Act include Disclosure of Wrongdoing, and Conflict of Interest.

Key OPS policies, directives and procedures are available on [OCWA's Intranet](#) and the [MyOPS intranet](#) /web sites.

OCWA's key policies are referenced within relevant sections of the Code. For other OCWA policies and OPS directives see the [OCWA's Intranet](#).

### IF YOU'RE NOT SURE WHAT TO DO, ASK.

If you are unsure about what course of action to take or have any question about the application of this Code, discuss it with your Manager, OCWA's General Counsel, Director of Human Resources or the Vice-President of Operations, or President and CEO. You may also send an email to [Code@ocwa.com](mailto:Code@ocwa.com). This email will be monitored daily by the Director of Human Resources and the General Counsel. Specific questions about a topic set out in the Code may be referred to a representative from the relevant service group.

## Work Environment

Each of us is entitled to a workplace that is safe and that fosters trust and respect. OCWA is committed to ensuring a professional work environment and to cultivating a positive work experience for all employees.

### Health, Safety and Wellness

At OCWA, health, safety and wellness are a top priority. Our goal - always - is zero health and safety incidents. All employees are expected to take personal responsibility for ensuring a healthy and safe workplace for themselves and their co-workers. This means coming to work fit for duty, including wearing the appropriate personal protective equipment (PPE) for the job. OCWA as an employer and its employees are required to comply with the [Occupational Health and Safety Act](#) and relevant regulations as well as OCWA safety procedures. Everyone at OCWA has a duty to report, and where appropriate, correct workplace hazards.

[OCWA's Occupational Health & Safety Policy](#) (OHSP) is the cornerstone of our Occupational Health & Safety System (OHSS), which includes standards and procedures to help ensure that work is performed safely and in compliance with applicable laws. A copy of the OHSP is posted in each OCWA workplace and a copy of the OCWA Safety Manual is also available to every OCWA employee.

### Drugs and Alcohol in the Workplace

OCWA operates in a safety-sensitive environment and is committed to protecting and safeguarding the health and safety of its employees, customers, contractors, suppliers, environment, property and the public it serves.

Recognizing that OCWA employees are essential to the production of safe and clean water, we have a zero tolerance policy for use of alcohol and/or illegal drugs in the workplace.

The use of illegal drugs and the inappropriate use of alcohol can adversely affect our operations, job performance, productivity, the work environment, and the safety and well being of employees. It can also place the integrity of clients' assets at risk. The use of alcohol and/or illegal drugs in the workplace may result in discipline up to and including dismissal.

### OCWA's Occupational Health & Safety System (OHSS) Policy

OCWA's OHSS Policy is to:

- Ensure the health, safety and wellness of our employees is the top priority.
- Expect every employee to take personal responsibility for a healthy and safe workplace and to actively support individual and collective well-being.
- Provide an environment that enables all employees to participate and work collaboratively in developing, promoting and improving health and safety at work.
- Meet or exceed all regulatory requirements.
- Continuously improve our comprehensive health and safety system with the goal of zero lost-time for occupational injuries and illness.
- Ensure managers and supervisors equip, educate and train employees to work safely and to identify and take immediate action on workplace hazards.
- Monitor our workplaces and communicate the status and outcomes of our health and safety system to OCWA employees and our stakeholders.
- Require contractors hired by OCWA to meet or exceed all regulatory requirements.

Our Board of Directors, Officers and entire staff will act to ensure the implementation of this Policy and will monitor the progress of the health and safety system.



OCWA Health & Safety Representative Conference 2013

## Diversity

OCWA values the background, experience, perspective, and talent of each individual. By valuing and respecting our differences, we create an inclusive work environment based on merit and fairness where all employees can contribute to their full potential.

An important aspect of diversity is ensuring that OCWA's employment practices uphold all legislative requirements and the removal of any barriers that may impede the recruitment, retention, or promotion of members of designated groups.

### Accessibility for Ontarians with Disabilities Act

The purpose of the [Accessibility for Ontarians with Disabilities Act](#) (AODA) is to develop, implement and enforce standards for accessibility related to goods, services, facilities, employment, accommodation and buildings. OCWA is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. OCWA is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA. All employees are

#### Ontario Human Rights Code (OHRC)

The [OHRC](#) is for everyone. It is the cornerstone of the WDHP policy and is a provincial law that gives everybody equal rights and opportunities without discrimination in specific areas such as jobs, housing and services.

The OHRC's goal is to prevent discrimination and harassment, on the following prohibited grounds: race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy), gender identity, gender expression, sexual orientation, age, marital status, record of offences, family status or disability.

#### Occupational Health & Safety Act (OHSA)

The [OHSA](#) informs the Workplace Violence Prevention Policy which sets out that the employer will take every precaution reasonable in the circumstances to protect workers from violence and harassment.

Additional obligations are imposed on employers with respect to domestic violence and providing information regarding a person with a history of violent behaviour.

expected to complete the necessary training to meet Ontario's accessibility laws. All new employees are required to complete the courses through OCWA's New Employee Orientation program.

## Workplace Violence & Harassment Prevention

Employees have the right to a positive and respectful workplace that is free from violence, discrimination and harassment.

At OCWA, we are committed to:

- Preventing, identifying, and correcting actions of one employee toward another that, left unchecked, would expose an employee to workplace violence, discrimination or harassment
- The investigation of all complaints in a timely manner and in accordance with the [OPS Workplace Discrimination & Harassment Prevention Policy](#) (WDHP Policy) and [Workplace Violence Prevention \(WVP\) Policy](#)
- Ensuring that employees are made aware of their rights under the WDHP and WVP Policies, including complaint procedures, and the various internal and external complaint mechanisms available
- Providing WVP and WDHP training to all employees



## Protecting Public Health and the Environment

In conducting OCWA's business, we are committed to acting in an economically, socially, and environmentally responsible manner. We are mindful of our responsibilities to help protect public health and the environment, and we consider the impact that our business decisions may have in the communities we serve.

[OCWA's Quality & Environmental Management System \(QEMS\) Policy](#) is in place to help ensure that we deliver on many of these commitments. Our commitment to quality and environmental management is set out in the QEMS Policy, which is posted in each OCWA workplace. All employees are expected to be familiar with the QEMS Policy and how their specific roles and responsibilities relate to local implementation and maintenance of QEMS programs, processes and procedures. OCWA encourages all employees to take an active role in ensuring the continuous improvement of the QEMS.

### Quality & Environmental Management System (QEMS) Policy

OCWA's QEMS Policy is to:

- Maintain and continually improve upon a comprehensive quality and environmental management system to support the delivery of safe, reliable and cost-effective clean water services that protect public health and the environment.
- Establish clear objectives against which OCWA's environmental performance can be measured and assessed with the goal of continual improvement.
- Understand and comply with all applicable legislation and regulations and audit the facilities we operate to ensure compliance.
- Utilize a risk-based approach to quality management that accounts for the complexity and specific challenges of providing operation and maintenance services.
- Promote client and consumer confidence through service excellence and effective communications.
- Collaborate with its clients to prevent pollution and contribute to a more sustainable future by promoting the use of operational efficiencies and improved technology.
- Train staff on their responsibilities under the QEMS and how meeting these responsibilities assist with the protection of public health and the environment.

Report on facility performance to its employees, clients and stakeholders.

## Emergency Planning

OCWA takes a proactive approach to risk management and preventing emergencies from occurring. In the event that an emergency situation does occur, OCWA has developed a number of plans to assist with an appropriate response:

- OCWA's [Continuity of Operations Plan \(COOP\)](#) provides preparedness for emergencies related to OCWA's critical business systems
- OCWA's [Emergency Response Plan \(ERP\)](#) is the corporate level plan for preparedness for serious operations emergencies
- A [Facility Emergency Plan](#) has been developed for each facility OCWA operates to provide preparedness for operations emergencies that can be managed by plant staff and local resources. Each facility plan is available in a binder as a hard copy at each facility location.

All OCWA employees must be familiar with the emergency plan(s) applicable to their job and workplace.



## Proper Use of Assets and Information

### Use of Property and Materials

It is expected that OCWA's assets (both physical and intangible) will be used for legitimate business purposes. We are expected to protect property and materials of both OCWA and our clients from misuse, damage, destruction, theft, fraud, vandalism, and neglect. At all times, such property and materials must be used responsibly and in a manner that serves the best interests of OCWA and our clients.

### Confidential Information and Maintaining Privacy

All information about OCWA and its business must be treated as confidential unless it has been published, publicly discussed or is otherwise generally available to the public. Confidential information may include financial and business information, information on proposals, personal employee information, legal documents, and information about clients, suppliers, and the public. We are prohibited from using confidential information for business or personal reasons, outside the scope of our work for OCWA.

Under the [Public Service of Ontario Act, 2006](#), all employees of OCWA are required to affirm or swear an Oath of Allegiance to the Crown as well as an Oath of Office. In affirming/swearing these Oaths, employees agree that they will not disclose sensitive government information, unless authorized or legally required. This applies even after an employee has left OCWA's employment. Personal information about our employees, clients, and the public gathered through the course of OCWA's business must also be managed in a confidential manner and in accordance with the requirements of the [Freedom of Information and Protection of Privacy Act](#). Guidance is available in the [Freedom of Information and Privacy Directive](#).

### Integrity of Books and Records

#### Operational Data

Various types of records must be established and maintained to ensure effective management of OCWA's business affairs. Many of these records, for example records related to the operation of our clients' facilities, are required to be kept in accordance with specific legislative and regulatory requirements or OCWA's own record management program. Under no circumstance should you ever conceal or falsify any document or record.

### Financial Records

All of OCWA's financial records must be prepared with care and honesty and only for lawful purposes. They must clearly and accurately reflect the true nature of business transactions and comply with all relevant legal, accounting and reporting requirements, and OCWA policies. False or misleading entries and undisclosed or unrecorded revenues, expenses, assets or liabilities are prohibited.

Business expenses must be reasonable and necessary for the performance of OCWA's business. Employees who incur expenses will be reimbursed in accordance with the [Management Board of Cabinet Travel, Meal and Hospitality Expenses Directive](#). Employees who must regularly purchase goods and services for OCWA business or who travel extensively on OCWA business are eligible to apply for an OCWA Purchasing or Enhanced Business (travel) credit card. Although issued in the name of the employee, these credit cards are to be used for business-related expenses only.

### Records Retention

Proper management of records is important to all businesses whether private or public sector. OCWA is required to follow the OPS Common Series of Records Schedules and the OCWA-specific Series of Records Schedules for document retention. These schedules set out both record retention timelines and disposition requirements. These schedules are available on the [OCWAnet](#) under Legal Services.





## Preventing Fraud

There are numerous controls in place at OCWA to prevent and detect fraud. If you have reason to believe that an act of fraud has been committed against OCWA or one of OCWA's clients by an OCWA employee, consultant, vendor, contractor and/or any parties doing business with OCWA, you must report the fraud in accordance with [OCWA's Anti-Fraud Policy](#).

Examples of fraud include:

- Theft or misappropriation of funds, supplies or other property
- False claims for any benefit, contribution or payment
- Forgery or the alteration, with intent to misrepresent, of any document

## Information Technology Resource Usage

OCWA's computer systems and networks must be used in a manner that protects all information contained in them (particularly confidential information). They must be used for "acceptable uses", as defined in the [Acceptable use of I&IT Resources Policy](#) and [relevant OPS directives, policies and procedures and guidelines](#).

Examples of unacceptable uses of OCWA's computer systems and networks include:

- Downloading software/data files not already supported by OCWA
- Accessing or downloading from websites that contain illegal content (e.g., child pornography, obscenity, incitement of hatred) or material which violates the WDHP Policy (e.g., pornography, other offensive material)
- Using email to send material which is offensive or harassing according to the WDHP Policy
- Using OCWA's information resources to engage in business outside of OCWA's business
- Using OCWA's information resources to transmit confidential information to parties prohibited from receiving it under applicable privacy laws

### Reporting "Wrongdoing" Under PSOA

You may also [disclose "wrongdoing" under the PSOA](#). In order for any alleged "wrongdoing" to be reportable under the PSOA, it must relate to actions of another public servant. The definition of "wrongdoing" in the PSOA includes fraud, but also covers a more extensive range of prohibited behaviour than OCWA's Anti-Fraud Policy such as contravening any law or regulation.

Under the PSOA, employees may report "wrongdoing" of other public servants to their Ethics Executive. For OCWA employees, the President and CEO is designated as the Ethics Executive. Employees may also report wrongdoing to the Integrity Commissioner, if they feel that internal disclosure would not be appropriate.

## Use of Social Media

OCWA employees who engage in social media activities are personally and legally responsible for the content of the commentary they post. Please refer to the [Social Media Policy](#) for more information and general guidelines on types of prohibited postings.

## Conflicts of Interest

### Avoiding Conflicts of Interest

A conflict of interest is any situation where an employee's private interest is in conflict with the interests of OCWA or the OPS. All employees of OCWA must avoid any personal, financial, or family interest that could prevent them from acting in OCWA's best interest. Even the appearance of a conflict of interest could negatively affect OCWA's reputation and our ability to do business effectively.

Examples of conflicts of interest include:

- Engaging in any outside work or business that interferes with the performance of your duties and responsibilities for OCWA or the OPS
- Granting preferential treatment in relation to any OCWA matter in which either you, a family member, a friend or an organization to which you belong has an interest
- Hiring a member of your immediate family to work for OCWA

Additional examples of conflicts of interest are provided in [O.Reg. 381/07 under the PSOA](#). Further guidance regarding conflict of interest rules is provided in the OPS document [Conflict of Interest What You Need to Know](#) and in the [OPS Guide to Public Service Ethics and Conduct](#).

### Declaring Conflicts of Interest

All OCWA employees must declare any actual, perceived or potential conflict of interest to OCWA's Director of Human Resources or the President and CEO. Under the PSOA, OCWA's President and CEO has been designated as the "Ethics Executive" for OCWA employees. It is the President and CEO's responsibility to provide advice and give direction to employees regarding conflicts of interest.

## Political Activity Rights

All employees are entitled to participate in political activity (with some restrictions). The PSOA does, however, set boundaries to balance the non-partisanship of the public service with individuals' ability to engage in political activity. One specific example is where an employee who intends to be a candidate in a federal, provincial or municipal election must notify OCWA's President and CEO, in writing.

Specific guidance is provided in the OPS document entitled [Political Activity Rights What You Need to Know](#) and in the [OPS Guide to Public Service Ethics and Conduct](#).

## Accepting Gifts

A conflict of interest arises when an employee accepts a gift (which includes a benefit of any kind) and a reasonable person might conclude that the gift, hospitality, gratuity or other benefit could influence the employee's ability to perform his/her duties for OCWA.

You are not permitted to accept, either directly or indirectly, gifts from any person, group or entity:

- Having dealings with OCWA
- Receiving services provided by OCWA
- Seeking to do business with OCWA

You may, however, accept a gift of nominal value given as an expression of courtesy or hospitality if doing so is reasonable in the circumstances (for example a pen, coffee mug or T-shirt).

When employees are in a position where they cannot refuse an unauthorized gift, they must immediately report the matter to OCWA's President and CEO or the Director of Human Resources.

## Purchasing and Suppliers

It is important to protect OCWA's reputation by refusing to make purchasing decisions based on preferential treatment, favouritism, prejudice, or personal favour.

Employees responsible for obtaining goods and services for OCWA must ensure that any process for outside vendors to compete for OCWA's business is fair, open, transparent, and accessible to qualified vendors. Conflicts of interest, as defined above, must be avoided in acquiring goods and services.

OCWA staff must secure price quotations from potential suppliers and ensure that a fair and competitive process is followed. Requirements for procurement methods vary depending on the dollar value of goods and services to be obtained. Additional guidance regarding responsibilities of individuals and organizations in the procurement process is provided in the [OPS Procurement Directive](#).

All of OCWA's suppliers should be treated in a professional manner and be reminded of our responsibilities under the Code.

## Representing the Agency

We are committed to interacting with our stakeholders in a manner that is transparent, fair, and ethical. How well we work with and present ourselves to our clients and the public also impacts OCWA's reputation.

## Customers and the Public

In representing the Agency it is important to that each one of us conduct ourselves in a professional manner, whether performing work or whenever we are visibly associated with OCWA (i.e. wearing an OCWA uniform or driving an OCWA vehicle). OCWA employees are expected to be respectful and courteous to clients and the public. To reflect our expertise in operations and maintenance, uniforms, vehicles, and branded equipment should be well maintained. Employees who are not required to wear a uniform are expected to dress in a manner suitable to their work environment.



## Media

OCWA has a [Communications Policy](#) that provides guidance on issues management and communications with the media. OCWA has designated media contacts that are familiar with this protocol and have received training to respond to inquiries.

If you are approached by a member of the media for information or comment on a local issue:

- Do not attempt to answer a reporter's questions
- Be polite and gather the following information about the nature of the request:
  - Reporter's information (name, affiliation, contact information)
  - The reporter's deadline
  - The time of the call
- Tell the reporter that you will have someone get back to him/her
- Forward the media request information to the designated media contact
- When in doubt, direct the reporter to a member of the Corporate Communications Group

### Designated OCWA Media Contacts for Local Issues

- Senior Operations Managers
- Operations Manager
- Business Development Managers
- Manager, Proposals, Marketing and Communication

## Regulators

As OCWA is in a highly regulated industry, we often engage with regulatory officials from the Ministry of the Environment or the Ministry of Labour. All employees are expected to interact with regulators in a professional and courteous manner. [Specific procedures for dealing with regulators](#) are in place to assist you.

## Off Duty

Wherever we go, we carry our professional responsibility with us. Maintaining a sense of professionalism means thinking about your surroundings when discussing OCWA or clients. Conversations in public places should be limited to information that is non-confidential and does not include references that could identify a person, client or situation.

## Accountability

### All Employees

All OCWA employees are expected to:

- Read, understand, and comply with the Code
- Participate in on-line training and informal seminars provided by management on the Code
- Acknowledge they have read and understood the Code, and provide assurance that they will comply with it. Refusal to complete the Acknowledgement form does not affect the applicability of the Code.
- Report violations or suspected violations of the Code in accordance with the [Reporting Violations of the Code](#)
- Maintain confidentiality of the identity of an individual raising concern about conduct covered by the Code to the extent permitted by law and OCWA's ability to address the concern

### Managers

In addition to complying with requirements outlined for employees, Managers are expected to:

- Lead by example by providing a model of ethical conduct and creating a work environment that reflects the content and spirit of the Code
- Ensure that all of their employees understand and comply with requirements set out in the Code
- Ensure that all of their employees complete training on the Code
- Ensure that all of their employees sign the Code acknowledgement form
- Work with Executive Management to investigate and address known or suspected violations of the Code
- Provide advice to employees regarding the Code or seek advice from the appropriate OCWA representative

### IF YOU'RE NOT SURE WHAT TO DO, ASK.

If you are unsure about what course of action to take or have any question about the application of this Code, discuss it with your Manager, OCWA's General Counsel, Director of Human Resources or the Vice-President of Operations, or President and CEO. You may also send an email to [Code@ocwa.com](mailto:Code@ocwa.com). This email will be monitored daily by the Director of Human Resources and the General Counsel. Specific questions about a topic set out in the Code may be referred to a representative from the relevant service group.

## President and CEO

OCWA's President and CEO has ultimate responsibility for OCWA's compliance with the Code. In addition to complying with requirements outlined for employees and Managers, the President and CEO must also:

- Provide advice and direction to employees on conflicts of interest and political activity rights
- Deal with disclosures of “wrongdoing” in accordance with requirements set out in the PSOA
- When appropriate to do so, refer conflict of interest and political activity matters to the Conflict of Interest Commissioner
- Ensure the Code is reviewed annually and that changes to the Code are made as necessary
- Report to the Board on a regular basis regarding compliance with the Code

## Board of Directors

OCWA's Board of Directors is responsible for:

- Approving, understanding and complying with the Agency's Code
- Ensuring that the President and CEO and Executive Management promote ethical conduct in the Agency
- Ensuring appropriate action is taken with respect to any violations of the Code brought to its attention

## Contravention of the Code

OCWA's business activities are rooted in public trust. Our continued success depends on maintaining our reputation. For this reason, violations of the Code will be taken extremely seriously and may result in disciplinary action, up to and including dismissal.

If you believe you have contravened the Code, you are required to advise your Manager or OCWA's General Counsel, Director of Human Resources, Vice-President of Operations or President and CEO.

Employees also must immediately report any violations or potential violations of the Code as soon as they become aware of it. [See “Reporting Violations of the Code” below.]

## Reporting Violations of the Code

Should you become aware of conduct that violates or appears to violate the Code, it is expected that you will report it immediately to your Manager or OCWA's General Counsel, Director of Human Resources, Vice-President of Operations or President and CEO. You are also encouraged to report if you have or believe you have inadvertently contravened the Code.

If you do not feel comfortable reporting to your Manager, you may contact any of the people listed in the [Who to Contact for Guidance](#) section below.

Bargaining unit employees continue to have the rights and protection offered under their collective agreement.

There shall be no reprisal or retaliation against an employee who, in good faith, reports a violation or suspected violation of the Code. The identity of individuals who report a violation or suspected violation of the Code will be kept confidential to the extent permitted by law and OCWA's ability to address the concerns raised. Depending on the nature of the potential violation, OCWA may have a legal obligation to report non-compliance to the appropriate authorities.

The PSOA protects public servants with respect to disclosure of “wrongdoing”. These rights and protections are explained in detail in the OPS document entitled [Disclosure of Wrongdoing What You Need to Know](#).

## Who to Contact for Guidance

SName	Title	Phone	Email
Rob Andrews	President and CEO	416-775-0575	<a href="mailto:randrews@ocwa.com">randrews@ocwa.com</a>
Robin Kind	General Counsel	416-775-0530	<a href="mailto:rkind@ocwa.com">rkind@ocwa.com</a>
Bev Mollard	Vice-President, Operations	416-775-0524	<a href="mailto:bmollard@ocwa.com">bmollard@ocwa.com</a>
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or send an email to: [code@ocwa.com](mailto:code@ocwa.com)

## Links

Set out below are a list of URLs noted in this document.

Reference	URL
<i>Accessibility for Ontarians with Disabilities Act (AODA)</i>	<a href="https://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm">https://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm</a>
Freedom of Information and Privacy Directive	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2008.04.10.11.09.36.KSK_res/\$File/FreedomOfInformationAndPrivacyDir.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2008.04.10.11.09.36.KSK_res/\$File/FreedomOfInformationAndPrivacyDir.pdf</a>
<i>Freedom of Information and Protection of Privacy Act</i>	<a href="http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90f31_e.htm">http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90f31_e.htm</a>
MyOPS intranet	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/ops2006.03.16.16.49.59.TLS_page?OpenDocument">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/ops2006.03.16.16.49.59.TLS_page?OpenDocument</a>
<i>Occupational Health and Safety Act (OHSA)</i>	<a href="http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90o01_e.htm">http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90o01_e.htm</a>
OCWA Anti-Fraud Policy	<a href="http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Anti%20Fraud%20Policy.pdf">http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Anti%20Fraud%20Policy.pdf</a>
OCWA Communications Policy	<a href="http://ocwanet.ocwa.com/Resources/Sales%20and%20Marketing/default.aspx#com">http://ocwanet.ocwa.com/Resources/Sales%20and%20Marketing/default.aspx#com</a>
OCWA Continuity of Operations Plan	<a href="http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Emergency%20Response%20Plan/Continuity%20of%20Operations%20Plan%20Final%20Draft%20June%202013.pdf">http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Emergency%20Response%20Plan/Continuity%20of%20Operations%20Plan%20Final%20Draft%20June%202013.pdf</a>
OCWA Emergency Response Plan (ERP)	<a href="http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Emergency%20Response%20Plan/Emergency%20Response%20Plan%20final%202013%20-%20June%2027th%202013.pdf">http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Emergency%20Response%20Plan/Emergency%20Response%20Plan%20final%202013%20-%20June%2027th%202013.pdf</a>
OCWA Facility Emergency Plan	<a href="http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Emergency%20Response%20Plan/Continuity%20of%20Operations%20Plan%20Final%20Draft%20June%202013.pdf">http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/Emergency%20Response%20Plan/Continuity%20of%20Operations%20Plan%20Final%20Draft%20June%202013.pdf</a>
OCWA Information Technology Policy	<a href="http://ocwwfe/Resources/Information%20and%20Information%20Technology/Pages/IT%20Policy%20Directives.aspx">http://ocwwfe/Resources/Information%20and%20Information%20Technology/Pages/IT%20Policy%20Directives.aspx</a>
OCWA Intranet	<a href="http://ocwanet.ocwa.com/pages/home.aspx">http://ocwanet.ocwa.com/pages/home.aspx</a>
OCWA Occupational Health & Safety Policy	<a href="http://ocwanet.ocwa.com/Resources/Health%20and%20Safety/default.aspx">http://ocwanet.ocwa.com/Resources/Health%20and%20Safety/default.aspx</a>
OCWA Procedures for Dealing with Regulators	<a href="http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/default.aspx">http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/default.aspx</a>
OCWA Quality & Environmental Management System (QEMS) Policy	<a href="http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/QEMS%20Policy%20-%20Printer-Friendly%20(2013-03-27).pdf">http://ocwanet.ocwa.com/Resources/Operations%20and%20Compliance/Documents/QEMS%20Policy%20-%20Printer-Friendly%20(2013-03-27).pdf</a>
OCWA Social Media Policy	<a href="#">Social Media Policy</a>
Ontario <i>Human Rights Code</i> (OHRC)	<a href="http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm">http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm</a>

Reference	URL
OPS Freedom of Information and Privacy Directive	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2008.04.10.11.09.36.KSK_res/\$File/FreedomOfInformationAndPrivacyDir.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2008.04.10.11.09.36.KSK_res/\$File/FreedomOfInformationAndPrivacyDir.pdf</a>
OPS I&IT: Acceptable use of I&IT Resources Policy	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2011.04.01.13.19.10.NBJ_res/\$File/acceptableI&amp;IT_Policy.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2011.04.01.13.19.10.NBJ_res/\$File/acceptableI&amp;IT_Policy.pdf</a>
OPS I&IT: Other directives, policies and procedures and guidelines for I&IT resources	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/cpd2008.10.06.16.24.55.RXL_page?open">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/cpd2008.10.06.16.24.55.RXL_page?open</a>
OPS Procurement Directive	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/scm2011.04.21.15.23.14.QR3_res/\$File/MBC-ProcurementDirectiveApril2011.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/scm2011.04.21.15.23.14.QR3_res/\$File/MBC-ProcurementDirectiveApril2011.pdf</a>
OPS Travel, Meal and Hospitality Expenses Directive	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2010.03.19.09.39.41.J2C_res/\$File/TMHE_Directive_2010.htm">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2010.03.19.09.39.41.J2C_res/\$File/TMHE_Directive_2010.htm</a>
OPS Workplace Discrimination & Harassment Prevention Policy (WDHP Policy)	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2010.05.28.14.42.27.PXL_res/\$File/wdhpPolicy.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2010.05.28.14.42.27.PXL_res/\$File/wdhpPolicy.pdf</a>
OPS Workplace Violence Prevention Policy	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2010.05.28.14.43.00.PXX_res/\$File/workplaceViolencePreventionPolicy.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/cpd2010.05.28.14.43.00.PXX_res/\$File/workplaceViolencePreventionPolicy.pdf</a>
PSOA - Conflict of Interest: What You Need to Know	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/pad2010.08.23.11.54.44.LNR_res/\$File/Fact%20Sheet%2004%20Conflict%20of%20Interest%20(Public%20Bodies)_SA2.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/pad2010.08.23.11.54.44.LNR_res/\$File/Fact%20Sheet%2004%20Conflict%20of%20Interest%20(Public%20Bodies)_SA2.pdf</a>
PSOA - Disclosure of Wrongdoing: What You Need to Know	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/pad2010.08.30.14.07.35.P9S_res/\$File/Fact%20Sheet%2002%20Disclosure%20of%20Wrongdoing_SA3.pdf">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadResourcesByRefId_Content)/pad2010.08.30.14.07.35.P9S_res/\$File/Fact%20Sheet%2002%20Disclosure%20of%20Wrongdoing_SA3.pdf</a>
PSOA - Guide to Public Service Ethics and Conduct	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/pad2011.01.11.11.38.23.MHZ_page?open">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/pad2011.01.11.11.38.23.MHZ_page?open</a>
PSOA - O. Reg. 381/07 under the PSOA	<a href="http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_070381_e.htm">http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_070381_e.htm</a>
PSOA - Political Activity Rights: What You Need to Know	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/pad2010.07.29.10.57.45.KK5_page?open">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/pad2010.07.29.10.57.45.KK5_page?open</a>
<i>Public Service of Ontario Act, 2006 (PSOA)</i>	<a href="http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/pad2007.07.25.14.11.59.PCJ_page?open">http://intra.ops.myops.gov.on.ca/cms/tiles.nsf/(vwReadPagesByRefId_Content)/pad2007.07.25.14.11.59.PCJ_page?open</a>

### **Acknowledging Your Commitment to the Code**

*[Refusal by any individual to complete this Acknowledgement form does not affect the applicability of the Code to such individual.]*

I have received and read the Ontario Clean Water Agency's Code of Business Conduct. I understand the Code is intended to provide guidance on decisions I may need to make in performing my job and to direct me to the policies and legal requirements applicable to my job. Further, I agree to comply with the Code.

If I have questions concerning the meaning or application of the Code, any OCWA or Ontario Public Service policies, or the legal requirements applicable to my job, I know I can consult with my Manager, OCWA's Director of Human Resources Consultant, OCWA's General Counsel, OCWA's Vice-President of Operations, or OCWA's President and CEO.

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Name (please print)

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Signature

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Date