

Policy Name:	Program / Department:	Issue Date:
Code of Conduct Policy (Volunteer/Student)	Chief People Officer	April 2024

### 1. Introduction/Objective:

March of Dimes Canada (MODC) is committed to conducting activity in an open and ethical manner. We accomplish this by creating a workplace built on the strength of trust, accountability, and integrity in all our activity and business practices.

The Code of Conduct (the “Code”) provides rules and guidelines for ethical behaviour in keeping with MODC values, policies and applicable laws and regulations. Without exception, the Code applies to all MODC employees, volunteers, and students who are expected to read this Code and demonstrate a personal commitment to the standards set forth. The Code shall be reviewed and signed by every volunteer and student upon hire, and every volunteer upon new volunteer assignment.

### 2. Policy Statement:

As a national charity, MODC places the utmost importance on acting with integrity. At MODC, we must approach all aspects of our work honestly, fairly and in good faith. In other words, the way we approach our work is just as important as the impact and results we achieve.

MODC’s Code of Conduct Policy outlines the responsibilities, behaviors and practices that guide our decisions, enabling MODC to fulfill its mission in the right way. The purpose of the Code is to facilitate and promote ethical behaviours across MODC. Every employee, volunteer, and student is expected to read, understand, and comply with all portions of this Code, in addition to MODC policies and procedures that apply to their role. Violations of the Code may result in disciplinary action, up to and including termination of employment, volunteer or student assignment.

No policy can provide definitive answers to all questions. It is difficult to anticipate every decision or action that you may face or consider. Whenever there is doubt about the right ethical or legal choice to make, or questions regarding any of the standards discussed or policies referenced in this Code, you should fully disclose the circumstances, and seek guidance about the right thing to do from your manager or director. The earlier a potential problem is detected and corrected, the sooner MODC can address any issues to protect against harm to our employees, volunteers, students, service users, and our reputation.

### 3. Definitions:

**Conflict of Interest** refers to a situation where an volunteer or students financial interest(s) or personal relationship(s) are or could be at odds with MODC’s best interests. It is important that we act without self-interest and that we are also seen and perceived to be acting without self-interest.

**Ethical Behaviour** is characterized by honesty, fairness and equity in our interpersonal and professional relationships and activities. Ethical behaviour respects the dignity, diversity and rights of individuals and groups of people. Fundamental principles of ethical behaviour within the context of MODC focuses on relationships among and between staff, volunteers, students, and people we serve – MODC service users, as well as donors, delivery partners, and suppliers. The fundamental principles of ethical behaviour are:

- i) each person is personally accountable for their actions; and,
- ii) all persons have a shared responsibility to uphold ethical behaviour at MODC.

**Fraud** refers to any deliberate act of deception or misrepresentation carried out for personal gain or to the detriment of others. This encompasses activities such as falsifying financial records, misappropriating assets, engaging in bribery, providing false information, embezzling organizational resources, among other deceptive practices.

**Improper Activity** or wrongdoing is a suspicion based on reasonable grounds concerning any activity at the workplace that is in breach or violation of a law or regulation or MODC policy including, but not limited to:

- a) Misleading or falsified financial reporting
- b) Conflict of Interest
- c) Fraud, Theft, or Kickback
- d) Illegal or unauthorized activity in which MODC assets are diverted, or information or property is falsified, destroyed, or misused
- e) Misconduct or failure to act that may significantly threaten the health and safety of people or impact the reputation of MODC
- f) Any other suspected violation of a law, regulation, or MODC Policy

**Volunteer** refers to the voluntary act of an individual or group freely giving time and labor, often for community service.

**Student** refers to an educational experience integrated into academic programs as a requirement for completing a degree, diploma, or certification program.

#### 4. Roles and Responsibilities:

##### a) MODC Volunteers and Students

All volunteers and students are expected to work together to promote a workplace built on trust, accountability, and openness. Volunteers and students must:

- Conduct MODC activity in a legal and ethical manner in keeping with MODC's Code of Conduct Policy. At all times, follow applicable laws, regulations, and MODC policies.
- Always act with honesty and integrity, avoid conflicts of interest, and disclose any potential conflict of interest regarding your position at MODC.
- Respect differences in colleagues, customers and third parties.
- Participate in required trainings to comply with MODC's Code and MODC Policies.

- Promptly speak up if you become aware of possible violations of the Code. Report if you suspect improper activity or a possible violation of the Code by using any of the channels and resources outlined in MODC's Safe Disclosure Policy. Seek guidance where necessary from a manager or supervisor.
- Cooperate with any internal investigation into a report of unethical behaviour.

**b) MODC Managers and Supervisors**

Managers and Supervisors are expected to lead by example in order to build and maintain a culture of trust, accountability, and integrity:

- Lead by example, and listen to concerns and diverse opinions in a manner that encourages individuals to raise issues when something doesn't seem right.
- Ensure that volunteers and students are aware of the process and channels available to report concerns including suspected improper activity.
- Handle responsibly any report or disclosure by ensuring disclosures are reviewed and reported to the appropriate line management in a timely fashion. Management shall ensure investigation when required, and appropriate action is taken to correct the situation, in keeping with MODC's policy for handling and responding to issues.

**5. Procedures**

All MODC volunteers and students shall comply with standards of behaviour described above and in specified MODC policies outlined below that address areas of conduct and ethics, which together encompass MODC's Code of Conduct. Specific rules and guidelines are further outlined in relevant MODC policies referenced below. Failure to follow this Code and related MODC Policy may lead to disciplinary action up to and including termination of volunteer or student assignment.

**5.1 MODC Operating Policies and Procedures**

All volunteers and students are required to adhere to and follow **MODC Operating Policies**, which cover different aspects of the volunteer or student role. Volunteers and students are to receive all relevant policies and procedures from their supervisor and should speak directly to their supervisor or supporting personnel for more information.

**5.2 Respectful Behaviour - Fostering a Safe and Healthy Workplace**

Volunteers and students have a shared responsibility to create and foster a healthy, respectful, and inclusive workplace culture. MODC will take all reasonable steps to prevent and rectify conduct that is contrary to MODC Values (Culture Code) and the Respectful and Inclusive Workplace Policy. Discrimination or harassment on grounds articulated in provincial Occupational Health & Safety Acts or Human Rights Codes, and any form of incivility, is prohibited and shall not be tolerated.

A variety of resolution options are accessible to volunteers and students who believe they may have encountered harassment or discrimination. Individuals found to have engaged in improper activity or conduct contrary to MODC policies may be subject to disciplinary measures, including termination of assignments.

Comprehensive details can be found in MODC's Respectful and Inclusive Workplace Policy, Health & Safety Policy, and Workplace Violence Policy. Volunteers and students are also encouraged to seek guidance from their manager for further assistance.

### 5.3 Suspected Abuse or Neglect - Safeguarding Children and Vulnerable Persons

All MODC volunteers and students must actively safeguard children, youth, and vulnerable adults by creating safe environments. Behave appropriately towards who we serve including children and vulnerable persons, and never abuse the position of trust that comes with being an MODC volunteer or student.

**5.3.1** A volunteer or student who suspects abuse of a child or vulnerable adult, including suspected human trafficking, in the course of their MODC activity, must:

- Fulfill the obligation required under the duty to report, by reporting directly to a child protection authority (e.g. Children's Aid Society) if you **suspect abuse of a child**. If you **suspect abuse of a vulnerable adult** or elder, you should contact the police. **Note: Program Volunteers/Students** shall refer to program procedures or speak with their manager or director for more information about safeguarding procedures including the process to report suspected abuse of a client or program/service user.
- Contact the police immediately if a child or vulnerable adult is in **immediate danger** (e.g., physical assault, threat of violence, or an emergency medical need).
- If suspicions or complaints of abuse arise against another staff member, volunteer or student, promptly inform your Director or Vice President, who will notify the Chief Operating Officer and Chief People Officer for appropriate handling and management response. Maintain confidentiality.

**5.3.2** Managers and supervisors shall ensure appropriate screening of potential volunteers and students, adhering to MODC police records check requirements, enhanced supervision during probation periods, ensuring annual compliance declarations are followed among other requirements, in keeping with MODC People and Culture policies/procedures and guidelines.

### 5.4 Conflict of Interest

Volunteers and students must take all steps to avoid activities, behaviour or relationships which would constitute a conflict of interest. A conflict of interest arises when a volunteer or student's personal relationship(s) or financial interest(s) could reasonably be seen as influencing the volunteer or student's duty to act in MODC's best interests. Every volunteer and student must demonstrate the highest standards of ethical conduct by taking the following action:

- Avoid situations that may create a Conflict of Interest.
- Put the interests of MODC above any conflicting personal or private interests.
- Immediately disclose any actual or potential Conflict of Interest to a manager or senior leader by completing a Conflict of Interest Declaration form, and submit it to your manager for review who will take steps to protect MODC's interest. Potential actions include removing the volunteer or student from

decision-making around the matter in question, or increased oversight depending on the nature of the situation. Volunteer and students may refer to MODC's Conflict of Interest Policy or speak with their manager for more information.

- If the Conflict of Interest concerns another staff member, report the concern to your manager or alternatively, report the concern through a third-party administered mechanism. Refer to MODC's Safe Disclosure/Whistleblower Policy for more information.

### 5.5 Confidentiality

Volunteers and students must maintain strict confidentiality, including information about the following: personal information about our service users, donors, employees, volunteers; clients receiving services (service users) including all medical/health information; donor information; purchasing transactions including pricing, contract terms; materials related to the business of MODC that are not available generally to the public, unless a Vice President authorizes it; and any other seemingly confidential information (check with your manager if any questions).

### 5.6 Privacy

At MODC, we take our commitment to privacy seriously. Volunteers and students with access to personal information are required to protect the privacy and security of personal information we collect and use, including personal information of employees, volunteers, students, service users and their families, donors, and members of the public. All volunteers and students must follow privacy protection procedures when collecting, using, disclosing, or safeguarding personal information on behalf of MODC. Managers and supervisors shall ensure that volunteers and students in their program or functional area(s) are aware of MODC's responsible information handling procedures, which includes reporting immediately any privacy incident or concern to their manager, or contacting the Chief Privacy Officer or Privacy Office at: [privacy@marchofdimes.ca](mailto:privacy@marchofdimes.ca). Volunteers and students may refer to MODC's Privacy Policy for more information about responsible information handling expectations and requirements at MODC.

### 5.7 Incident Reporting and Crisis Escalation

All volunteers and students shall follow MODC's **Incident Reporting Procedure** to ensure incidents are documented properly to facilitate appropriate response and escalation to Management when needed. If a serious or critical incident, such as serious injury, emergency situation or crisis event that impacts or has the potential to impact the organization or program delivery, volunteers and students must notify their manager or director who shall follow MODC's **Crisis Escalation Protocol** procedures. Senior managers and leaders shall ensure managers and supervisors in their program or shared service area are familiar with and follow MODC's **Crisis Escalation Protocol** procedures, to ensure a level of preparedness is maintained at all times, and there is timely response to a critical incident or major disruption event. For more information, managers and supervisors may refer to MODC's **Incident Reporting Procedures** and **Crisis Escalation Protocol** available in MODC Management Procedures.

### 5.8 Information Security

MODC relies on its volunteers and students to remain vigilant and help prevent cybersecurity attacks from threatening the organization. Given the impact a cybersecurity incident could have

on our work, every volunteer, and student needs to take action to manage and mitigate information security risks. Key requirements include complying with MODC's Technology policies and procedures when working on a MODC-issued device or IT environment, and to report a suspected or known security incident immediately at [cybersecurity@marchofdimes.ca](mailto:cybersecurity@marchofdimes.ca). This enables IT to respond quickly to contain the situation and protect MODC against any prolonged disruption.

### 5.9 Protecting Financial Assets (Expense Claim, Signing Authority, Contracts, Procurement)

In order to manage MODC business processes with integrity and in compliance with legal obligations, MODC maintains a framework of accountability, transparency, and fairness to ensure the use and expenditure of MODC funds is properly authorized, with controls established for financial commitments. Misuse of MODC funds is a serious offense and is also a threat to the organization's reputation.

What follows are key expectations for volunteers and students to be mindful of when performing their role:

- a) Conduct MODC business including all financial transactions in a legal and ethical manner in keeping with MODC's Code of Conduct and Finance Policies/Procedures.
- b) Accurately account for expenses, hours worked, reimbursement requests, and use of assets and resources in keeping with MODC policies and procedures.
- c) All expenses incurred on behalf of MODC must be authorized. MODC reserves the right to refuse in whole or in part, reimbursement of claimed business expenses that do not meet MODC expense claim requirements. Approvers (executives, directors, managers, supervisors) are required to exercise due diligence when reviewing expense claims. Approvers are prohibited from approving their own expenses. Written approval from a Vice President is required **before** any arrangements can be made for out-of-province or international travel. Refer to MODC's Business Travel and Expense Policy and expense claim procedures, or speak with your manager, or contact the Finance Department for more information.
- d) Signing authorities (executives, directors, managers) may authorize only at their delegated level for financial expenditures or contractual commitments on behalf of MODC, **after** properly reviewing the financial expenditure or contractual commitment including contracts, agreements, purchase orders, or invoices. Managers may refer to the Signing Authority Policy, Financial Governance Policy, or Contract Review/Approval Procedure, or contact Finance for more information.
- e) When engaging in procurement activity on behalf of MODC, follow the Procurement Policy and Procedures that outline the process involved when procuring goods and services, to ensure we promote fairness, transparency, and accountability.
- f) Report any suspected fraud, theft, misuse, or misappropriation of MODC assets to a manager once removed, or alternatively you may submit a report using a third-party administered reporting tool as outlined in MODC's Safe Disclosure Policy.
- g) Manage and preserve records as required for legal, regulatory, audit or other compliance-related purposes as outlined in the Records Retention Procedures.

For more information, volunteers and students may speak with their manager or director or contact the Finance Department for further guidance on financial internal controls, systems, processes for financial transactions and contractual commitments. For more information about MODC's Procurement Policy, contact the Procurement Department for further guidance.

### 5.10 Lobbying and Political Activity

As a national charity, MODC maintains its impartiality and complies fully with legal requirements that address lobbying activity and political activity. Depending on the role, an MODC manager, volunteer or student may communicate with elected officials or other public officer holders. Volunteers and students are required to report any communications with public office holders to the Public Affairs Department by completing the Communications with Public Office Holders Reporting Form. For more information, staff may speak with their manager or refer to the Lobby Registries and Communication with Public Office Holders Procedure in MODC Management Procedures.

Furthermore, we must avoid any partisan political activity in order to protect MODC's charitable status. A volunteer or student may choose to attend a political event as a private citizen (entirely outside their MODC capacity). A volunteer or student must not attend a political event, such as a fundraising dinner or political convention, in any official MODC capacity, unless they have received explicit written approval and direction from the VP External Affairs to do so. Also, MODC funds must not be used to register or purchase tickets to attend a political event.

### 5.11 Social Media & Media Relations

MODC views social networking sites in a positive manner and welcomes volunteers and students to participate in MODC's online communities. Use of social media must always be inclusive and respectful and never compromise the legal rights of others including their safety and privacy rights. While we encourage volunteers and students to share MODC content on their personal platforms, remember that when you state your MODC affiliation you are representing the organization online. All social media postings and reshares must comply with MODC social media guidelines. Any requests for information from the media and other external organizations shall be forwarded to the Marketing and Communications Department for handling, at [marketingandcommunications@marchofdimes.ca](mailto:marketingandcommunications@marchofdimes.ca). Do not make statements on behalf of MODC unless you have prior approval from the Vice President of External Affairs.

## 6. Reporting a Concern - Safe Disclosure Policy

Reporting a known or suspected improper activity or wrongdoing at MODC may be done directly by a volunteer or student by contacting a manager or the Chief People Officer, or through a reporting tool administered by a third-party service provider that is available 24 hours a day, 7 days a week, in English and French, via an online website or toll-free number. Refer to MODC's Safe Disclosure/Whistleblower Policy for more information. No adverse employment action or retaliation may be taken directly or indirectly against anyone who in good faith reports a concern or provides assistance or information related to any concern.

**7. Contacts and Other Resources**

For more information about the Code and this policy, volunteers and students may speak with their manager or director or contact the Chief People Officer or Chief Financial Officer for further guidance.

MODC Policies and Procedures referenced in this Code of Conduct Policy can be reviewed online at: [Volunteer & Student Policy Reference.](#)

**Code of Conduct Declaration**

I have read the MODC Code of Conduct Policy, and I agree to conduct myself in a manner that corresponds to expectations outlined in MODC’s Code of Conduct. I understand failure to comply with the Code of Conduct, or to conduct myself in a manner that is inconsistent with the Code, may lead to disciplinary action up to and including termination of my role with MODC.

Volunteer/Student First and Last Name:

Volunteer/Student Signature:	Date:
Signature of Parent/Guardian (if not over the age of 18):	Date:

*This document can be available in alternative formats and with communication supports upon request. Please contact [humanresources@marchofdimes.ca](mailto:humanresources@marchofdimes.ca) to let us know your needs. We will work with you to provide the information in a way that is accessible for you in a timely manner.*