

fmi*igf Partner Code of Conduct Reporting, Investigation and Resolution Process

The Financial Management Institute (fmi*igf) has created the Partner Code of Conduct to establish the expectations governing business and ethical conduct of the volunteer Board of Directors, Volunteers, Consultants, Suppliers and Vendors (collectively referred to herein as Partners) including:

- all partners understand the importance of fostering diverse, inclusive and safe environments by treating everyone associated with fmi*igf in a professional and respectful manner;
- conducting ethical business practices without conflicts of interest;
- safeguarding privacy and confidentiality;
- upholding fmi*igf's core values as critical to how we work;
- making fmi*igf aware of any breach or possible breach of the Code.

It is critical that our partners hold themselves accountable to applicable laws, regulations and the Code, and support others in being accountable through identification and reporting of misconduct relative to applicable laws, regulations or the Code.

The reporting, Investigation and Resolution process is built on principles of consistency and transparency to:

- provide a vehicle to raise justifiable concerns of behaviours that contravene applicable law, regulation or the Code without fear of reprisal.
- allow fmi*igf the ability to determine the facts through an investigation.
- provide all parties to the alleged misconduct the opportunity to participate in the investigation and to come to a mutually satisfactory outcome.
- determine appropriate outcomes in resolving cases of misconduct.

Process to Address Allegations of Wrongdoing

fmi*igf encourages feedback on compliance with the Partner Code of Conduct; provides Partners with an opportunity to respond to and, if applicable, work through concerns by defining a path to be followed by fmi*igf to address Partner concerns to the mutual satisfaction of all involved parties.

Partners of fmi*igf who violate the Partner Code of Conduct or any conduct that may be detrimental to fmi*igf, may be disciplined up to and including termination of relationship with fmi*igf. Where a matter is determined to fall within a legal jurisdiction, it will be referred to the appropriate authorities for action.

The reporting, investigation and resolution process starts with a written submission.

Where a Partner believes that they or another individual involved in the business of fmi*igf may be in contravention of any applicable law, regulation or the Code, the following steps will be followed:

1. A written report will be submitted to the Director of Governance at President@fmi.ca or, where the issue may involve the President, with notice to the CEO;
 - The Reporting and Investigation Form is available on the website, when completed, it contains all pertinent information required to initiate a complaint.
 - A written acknowledgement of receipt will be sent to the complainant within 5 working days.
2. The Director of Governance will advise the President of all reports and may either:
 - Attempt to resolve the matter; or
 - Refer the matter to the Governance Committee, which shall report to the Board.

3. If the Director of Governance attempts to resolve the matter and it cannot be resolved to the satisfaction of the Involved Parties, then the Director of Governance shall refer the matter to the Board's Governance Committee, which shall undertake any necessary action—including conducting an independent investigation if warranted—and report to the Board;
4. If a conflict cannot be resolved to the satisfaction of the Board, or if it has been determined that a breach of duty or trust has occurred, the Partner may be asked to resign and/or may be removed from their association with fmi*igf.

Investigating Complaints

- All claims of misconduct will be investigated by fmi*igf.
- The investigation will involve the collection of information from the complainant, the alleged party to the complaint and any witnesses. The identity of the complainant and the nature of the complaint will be kept confidential to the extent that is possible and practical. Anyone accused of misconduct has the right to be informed of the concern and to provide their understanding of events. An investigation may be carried out by fmi*igf or through a third party engaged by fmi*igf.
- Investigations and related reports shall be kept confidential, except as required by law or as can be reasonably required by the Governance Committee or the Investigator to facilitate an effective investigation, or as is in the best interest of fmi*igf.
- After a fair and impartial investigation, if it is determined that harassment, discrimination, conflict of interest or breach of privacy did occur; the Board will approve the appropriate resolution to the issues raised in the complaint and as recommended through the investigation process.
- The Director of Governance will report on the complaint and the current status of the investigation to the Board of Directors in writing, within 10 working days of the initial report.
- Within 20 working days of the initial report, the Director of Governance will respond to the complainant in writing, advising of the report of the investigation, disposition or resolution of the issue.

Resolving Complaints

If fmi*igf is not able to arrive at a mutually satisfactory resolution, and a formal dispute resolution is required, the Director of Governance may appoint a Facilitator to assist in the process between the parties. The process for such dispute resolution shall be as determined by the Facilitator.

False Accusations

A Partner who deliberately makes a false accusation will be dealt with in a disciplinary manner up to and including termination of relationship with fmi*igf, or referral to legal authorities if applicable.

Protection from Reprisal

All are protected from reprisal for enforcing their rights with respect to their Human Rights legislation. It is a violation of the human rights legislation for anyone to threaten, intimidate or discriminate against a person who makes a complaint, gives evidence about a complaint, or is associated with someone who makes a complaint in good faith.

Retaliation or reprisals are prohibited against any Partner who has complained under this policy, or has provided information regarding a complaint.

Harassment Categories:

(This would not be part of this document, but would be hot-linked to the Respectful Business Environments section of the Partner Code of Conduct.)

- **Discriminatory Harassment** is any unwelcome behaviour, conduct or communication, or display of pictures or materials directed at an individual or group that is offensive to the individual or group on any prohibited grounds of discrimination under provincial and federal human rights legislation which includes, but not limited to, age, race, sex, sexual orientation, ancestry, colour, ethnic origin, citizenship, mental or physical disability, political belief, etc. Discriminatory harassment, whether intended or not, is known or ought reasonably to be known to be unwelcome, has the effect of creating a hostile, intimidating, or offensive work environment, and results in negative impacts for an individual or group. Examples of discriminatory harassment include, but are not limited to:
 - Derogatory written or verbal communication or gestures that relate to any of the protected categories (e.g., name calling, slurs, graffiti, jokes, taunting, pictures),
 - Tasks assigned based on any of the protected categories,
 - Threats made or perceived based on any of the protected categories,
 - Application of stereotypes based on any of the protected categories.

- **Sexual Harassment** is any unsolicited conduct, comment, or physical contact of a sexual nature that is unwelcome by the recipient. Sexual harassment is by definition coercive, it is one-sided and all genders can be victims. Examples of sexual harassment include but are not limited to:
 - any unwelcome sexual advances (oral, written or physical), requests for sexual favours, sexual and sexist jokes, racial, homophobic, sexist or ethnic slurs;
 - unwelcome questions or sharing of personal information regarding a person's marital status, sexuality, sexual orientation, or gender/transgender concerns;
 - written or verbal abuse or threats; displaying sexually graphic or derogatory pictures or written materials (including on a computer screen);
 - physical or sexual assault, unnecessary physical contact such as patting, touching, pinching or hitting;
 - unwelcome remarks, jokes, taunts, or innuendoes regarding a person's body, appearance, or sexual life.

- **Personal harassment** is a type of harassment that may not be related to one of the Prohibited Grounds of Discrimination. Personal harassment is any inappropriate conduct, comment, display, action, or gesture by a person towards another person that the first person ought to have known would cause the other person to be humiliated or intimidated. To constitute personal harassment there must be:
 - a) repeated conduct, comments, displays, actions or gestures; or
 - b) a single serious occurrence of conduct, or a single serious comment, display, action or gesture that has a lasting, harmful effect on a person.

Personal harassment includes verbal or physical abuse, threats, violence, bullying, insults, belittling comments, or intimidation, and subtler forms of harassment such as unwelcome non-verbal gestures, manipulation, ignoring or isolating a person or treating a person adversely for no legitimate work purpose.

- **Poisoned Business Environment** is a hostile, intimidating or offensive activity or behaviour that is known to be unwelcome. This may not be directed at a specific individual but creates a hostile or poisoned workplace. For example: graffiti, sexual insults, racial slurs, sexual or racial jokes, display of offensive materials, gossip or excessive swearing, use of foul language or aggressive behaviour.

- **Health and Safety** in the business environment is essential and the wellbeing of our partners when engaging on behalf of fmi*igf a priority. Partners shall engage in business environments free of threats of violence and free from impairment of drug or other intoxicating substances that is deemed illegal. No Partner shall knowingly put another in any form of risk to their health and safety.