

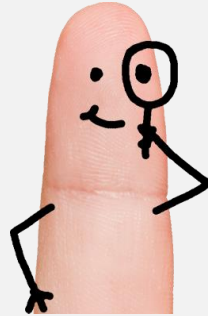


Your Company Name
Staff Policies Manual

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For example, to employees only, or to Everyone – this includes Independent Contractors and Consultants.

Applies to: Everyone

Last Updated: Jan 16, 2017

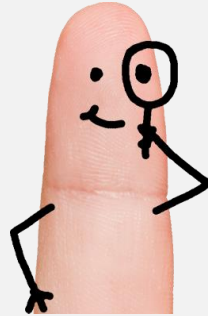
If a topic doesn't specify to whom it applies, it applies to Everyone.

Unauthorized Use of Staff Policies Manual

POLICY

The information contained in this Staff Policies Manual is strictly confidential and intended solely for your individual use and reference.

It is supplied to you with the understanding that you will not disclose, share, or distribute this Staff Policies Manual under any circumstances without the express written consent of the CEO.



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Consequences of Non-Adherence to Staff Policies

Applies to: Everyone

Topic Owner: <HR Services>

Last Updated: <Launch Date>

POLICY

Failure to adhere to Staff Policies may result in disciplinary measures, up to and including immediate termination of your Engagement with Just Cause.

Some policy breaches are more serious than others, and as such will result in more severe consequences. Certain breaches may also negatively and/or permanently affect the Company's business, and may even be life threatening to Company Stakeholders. In these situations, punitive measures, including legal or criminal action may be pursued.

No Expectation to Workplace Privacy

Applies to: Everyone

Topic Owner: <HR Services>

Last Updated: <Launch Date>

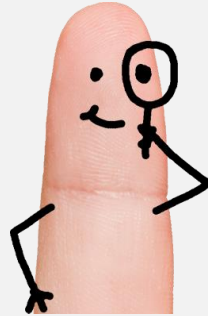
We must assume that everything we do while in the Workplace, and everything we store or access using Company Materials, Technology Tools, or Electronic Communications, is up for scrutiny.

POLICY

Here's what you need to know:

- ♦ The Company reserves the right to read, verify, inspect, audit, or monitor anything you do in the Workplace.
- ♦ Inspections may be conducted at any time, with or without notice, to monitor performance, conduct, and Workplace safety and security.
- ♦ Log in accounts, Company Materials, Electronic Communication tools, or other equipment belonging to the Company and supplied for the purposes of your work are not to be considered private as there may be times when another Staff Member is required, for business purposes, to access these materials in your absence.

This Policy is not intended as a punitive measure. It's in place to protect you, your co-workers, your belongings, and the Company's business interests. It's also designed to protect us all against potential liability.



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Conduct Policies

Not every situation you'll encounter is covered in our **Conduct Expectations** policies; some situations are black and white while others may have shades of grey. You're entrusted to use good judgment in your day-to-day activities, and to seek further information or assistance when you need it.

If you spend even a fraction of a second questioning the appropriateness of your actions, carefully reconsider the action, proceed with caution, or back away until you have considered and understand all possible consequences.

Code of Conduct

Applies to: Everyone

Topic Owner: <HR Services>

Last Updated: <Launch Date>

Ethical and appropriate conduct is expected in life, and in the Workplace. Misconduct won't be tolerated.

POLICY

Everyone is expected to conduct themselves in an ethical and appropriate manner. We strive to protect the Company and Company Stakeholders from inappropriate, damaging, or illegal actions committed either knowingly or unknowingly.

The Company will not tolerate Misconduct and will immediately take appropriate corrective or disciplinary actions when Misconduct occurs, up to and including immediate termination of your Engagement with Just Cause.

Here's what you're expected to adhere to:

- ◆ Conduct yourself in an ethical and appropriate manner.
- ◆ Understand and adhere to Staff Policies.
- ◆ Don't engage in Misconduct.

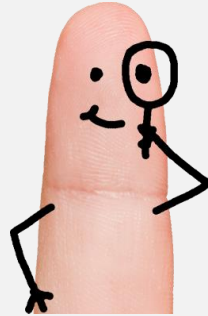
Attendance

Applies to: Employees

Topic Owner: <HR Services>

Last Updated: <Launch Date>

The effective operation of the Company depends on the commitment of each and every employee. We're expected to be on time for work and meetings and make an effort to avoid being absent.



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- ♦ Work in compliance with Occupational Health & Safety (OH&S) acts and regulations.
- ♦ Complete all safety training that applies to your position. You may be required to demonstrate your level of understanding of training through the completion of tests, quizzes and/or task observation.
- ♦ Adhere to policies that prescribe safety procedures and precautions as directed by the Company.
- ♦ Report Workplace hazards and dangers.
- ♦ Ensure you don't use or operate any equipment or work in a way that may endanger you or any Staff Member.
- ♦ Don't engage in any prank, contest, feat of strength, unnecessary running, or rough and boisterous conduct that could pose a risk to your safety or the safety of others.
- ♦ Don't engage in work while impaired by alcohol, drugs, or other causes.

Off-Duty Conduct

Applies to: Everyone

Topic Owner: <HR Services>

Last Updated: <Launch Date>

Just because we've left the Workplace doesn't mean we can do or say anything we want without consequences.

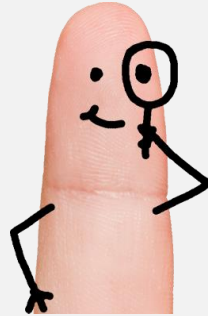
POLICY

Off-Duty Misconduct will not be tolerated. You'll be disciplined, up to and including immediate termination of your Engagement with Just Cause for engaging in Off-Duty Misconduct.

The Company has a right to maintain its brand and reputation and Staff have a right to work in a comfortable environment free of inappropriate conduct and statements by co-workers, including threatening or harassing behaviour.

Do these rights apply to your conduct or actions that occur outside of the Workplace? Yes. It makes no difference how these rights are violated, or if it happens during working hours or off-duty. Once Misconduct occurs, particularly if it's in the public domain, Staff may lose trust and respect for you and may even refuse to work with you.

You're not obliged to like your co-workers or agree with the Company or with everything in the Workplace, but you do need to be respectful, ethical, lawful, and professional when off-duty.



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which will hold you to the same higher standard used to measure positions that are entrusted with such Information.

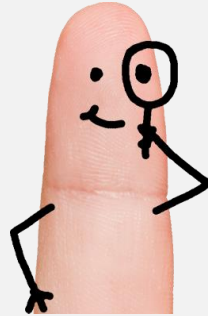
- ♦ ** For a period of 5 years after your Engagement with the Company is terminated, except as authorized by a Director or officer of the Company (other than you), you won't directly or indirectly, use, disseminate, or disclose any Confidential Information to anyone.
- ♦ ** If you're compelled by law or ordered by a Court to disclose any Confidential Information, you will not be deemed to have breached your obligations to the extent that you comply.

** Provisions of this Policy that survive termination of your Engagement for any reason.

PROCEDURE

Here's how we expect you to handle and secure Confidential Information when in the Workplace, including working remotely or in your home office:

- ♦ Confidential Information including all Company Materials will be safeguarded at all times.
- ♦ If, at any time, you become aware of any unauthorized access, use, possession, or knowledge of any Confidential Information by any third party, you'll immediately notify **INSERT: Position not the individual's name** and you'll take all reasonable steps requested by the Company to prevent the recurrence of such unauthorized access, use, possession, or knowledge.
- ♦ All printed Confidential Information residing in your place of work in the Workplace will be locked, safeguarded, and shredded when no longer required.
- ♦ All Confidential Information must be stored in secure folders on the Company server, which restricts access based on user permissions. **Elaborate if necessary and point to particular drives.** This enables IT to implement the appropriate back up and restoration procedures and ensure that confidentiality is maintained.
- ♦ Confidential Information will never be stored on any personal device, personal server, personal drive, personal cloud directory, or personal file sharing account. All electronic files will be saved in the Company's **EXAMPLE: Dropbox folders**.
- ♦ Company stationery, Company email, and other Company Technology Tools or Electronic Communication tools will be used exclusively for communicating Confidential Information.
- ♦ Personal devices or other personal methods will not be used to communicate Confidential Information.
- ♦ All final signed contracts and corporate documents must be kept in **EXAMPLE: Finance Department**.
- ♦ Everyone is responsible for protecting the security of Confidential Information on our servers and cloud-based websites. You must not reveal your passwords to anyone, under any circumstances.
- ♦ Data storage devices such as portable drives and CDs must be password-protected.



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DEFINITION

Competing Business

Any business, company, or entity in **INSERT: geography. Example: North America** that is, or is preparing to be, in competition with any product or service developed, in development, distributed or offered by the Company up to the date of termination of your Engagement, including, but not limited to, the following competing businesses:

- ♦ **CUSTOMIZER:** include specific names of competitive businesses and any of their affiliates or other strategic business units that may go by another name
- ♦ **Business Name**
- ♦ **Business Name**
- ♦ **Business Name**

The Company may expand or revise the list of Competing Businesses, which, subsequent to the latest date of this Policy, is determined by the Company, exercising its discretion reasonably, to have become a competitor of the Company, and the obligations set out in this section of the Policy will apply to such additional company or entity.

POLICY

Your obligations outlined in this Policy survive the termination of your Engagement for any reason.

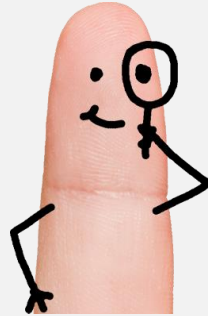
Non-Competition

You agree that during your Engagement, and for a period of **6 months** after its termination for any reason, you won't, without the prior written and informed consent of the Company's **INSERT: Position, example CEO**, be employed by, engaged with, or involved with a Competing Business — either directly or indirectly, whether as principal, agent, employee, Independent Contractor, advisor, Consultant, director, officer, or otherwise.

Non-Solicitation

You agree that during your Engagement and for a period of **1 year thereafter**, you won't, either directly or indirectly and either alone or with others, canvass, entice, or solicit:

- ♦ Customers and suppliers, as they relate to any **orders for any product or service** that is, or has been, researched, developed, manufactured, produced, provided, marketed, distributed or otherwise dealt in by the Company from any person, firm or company that has been, at any time within the previous 1 year period, **a customer or supplier of the Company, or any prospective customer or supplier of the Company** identified by the Company during the term of your Engagement.
- ♦ Company Stakeholders, including any **person who is a director, officer, employee, Independent Contractor, or Consultant** of the Company to **leave or terminate such Engagement** for the



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Use of Technology Tools & Electronic Communication

Applies to: Everyone

Topic Owner: Finance

Last Updated: <Launch Date>

The way our Technology Tools are used and our Electronic Communications delivered is a big deal. Most of what's written below speaks to common sense, but it's important that you review the rules around how to use the technology we have in place. Chances are, there are a few things included here you didn't know.

READ IN CONJUNCTION WITH

The following policies are closely related and are essential to understanding the context throughout this important Policy:

- ♦ **No Expectation to Workplace Privacy**
- ♦ **Code of Conduct**
- ♦ **Information Technology Security**
- ♦ **Personal Activities in the Workplace**
- ♦ **Off-Duty Conduct**
- ♦ **Confidentiality Agreement**
- ♦ **Use of Mobile Devices**
- ♦ **External Company Communication**

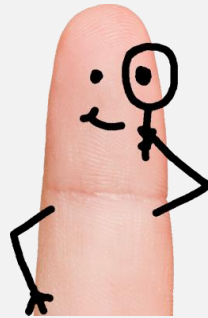
POLICY

Our Technology Tools and Electronic Communication tools are provided to assist us in the performance of our jobs. If used properly, they're valuable resources for increasing our daily efficiency and effectiveness. If used improperly, they can cause problems for you, your co-workers, the business, and other external stakeholders.

We expect Everyone to use our Technology Tools and Electronic Communication tools in a professional and appropriate manner, and not use them for any purpose that would reflect negatively on the Company.

This Policy applies in the following situations:

- ♦ When you're in the Workplace
- ♦ When you're accessing Technology Tools remotely (for example when using VPN)
- ♦ While you're off duty under circumstances outlined in the **Off-Duty Conduct** policy



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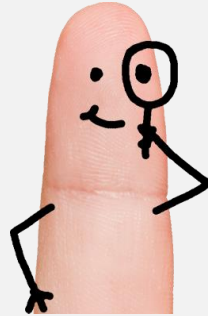
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- ♦ Advise IT immediately if any of the Company's Technology Tools have been lost or stolen.
- ♦ Respect the copyrights, software licensing rules, property rights, privacy, and prerogatives of others, just as in any other business dealings.
- ♦ Adhere to the security measures we've put in place to maintain system integrity.
- ♦ Uphold the principle of copyright at all times.
- ♦ Scan all permitted downloaded files for possible viruses.
- ♦ Understand that all software downloaded or installed is the property of the Company.

What You Can't Do — Technology Tools

Although not an exhaustive list, examples of prohibited activities relating to Technology Tools include:

- ♦ Using your personal equipment or property for the creation, transmission, or storage of Company information.
- ♦ Copying, destroying, or altering Technology Tools or other information that belongs to the Company or Company Stakeholders.
- ♦ Downloading unreasonably large files that may hinder network performance.
- ♦ Downloading your own software where the Company supports similar software used for the same purpose. For example, the Company uses **Example: Go to Meeting** as its web conference tool. You may not download Skype and use your own account to conduct web conferences as a Company representative.
- ♦ Leaving Technology Tools sessions logged on when not in use
- ♦ Disabling, uninstalling, or circumventing security measures put in place by the Company such as firewalls, authorization, virus protection, etc., thereby putting the Company Technology Tools at risk.
- ♦ Allowing others to use any of your login credentials or passwords.
- ♦ Divulging or sharing private or Confidential Information about the Company or Company Stakeholders to any person or entity not authorized to receive that information.
- ♦ Damaging the reputation and goodwill of the Company and Company Stakeholders.
- ♦ Attempting to monitor or read another user's profile, account, files, or communications.
- ♦ Using the Internet for illegal activities.
- ♦ Transmitting spam.
- ♦ Visiting sites for personal reasons, particularly sites that are considered inappropriate, pornographic or "obscene." If you connect unintentionally to a site that contains sexually explicit or offensive material, you must disconnect from the site immediately and advise the IT department.
- ♦ Displaying, storing, archiving, distributing, editing, or recording any kind of sexually explicit or obscene images, videos, documents or other materials using the Company Technology Tools.



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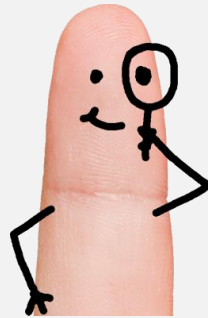
try to figure out what's bothering you. Then fix it. If you're still unsure, you might want to discuss it with your Manager. Ultimately, what you publish is yours – as is the responsibility. It's important that you're sure.

- That Social Media sites and Electronic Communication rules are continuously changing and evolving and as such, this Policy may be amended at any time and changes will be communicated as appropriate.

What You Can't Do — Electronic Communications

Although not an exhaustive list, the following includes examples of prohibited activities:

- ♦ Violating any laws, including those regarding Human Rights, defamation, copyright, or other intellectual property rights, securities, financial disclosure, and privacy rights, among others.
INSERT: Any applicable industry specific laws or considerations should also be included in this list
- ♦ Sending interactions or materials that violate the **Code of Conduct** policy, or that may be considered offensive to any other person, including, but not limited to, pornographic or sex-related links or content, any inappropriate reference or jokes that include references or insinuations to Protected Grounds.
- ♦ Using abusive or offensive language.
- ♦ Using the Company's trademark or copyrighted logos unless authorized to do so.
- ♦ Making libelous, slanderous, or maliciously false statements. Doing so constitutes fraud or libel, and may result in legal prosecution. Information made available to others must be accurate.
- ♦ Attempting to harass others by using Company Technology Tools to deliver obscene, vulgar, threatening, or unnecessarily repetitive information.
- ♦ Posting or sending sensitive, libelous, incendiary or personal information about Company Stakeholders.
- ♦ Disguising or attempting to disguise your identity.
- ♦ Using another person's account, including email accounts to deliver Electronic Communications.
- ♦ Copying or redistributing Electronic Communications or attachments belonging to another without permission from the originator.
- ♦ Engaging in any fundraising activity, endorsing any products or services, or participating in any political activity, unless formally authorized to do so.
- ♦ Sending chain letters, no matter how inspirational, informative, or alarming they seem to be.
- ♦ Sending credit card details, social insurance numbers, or other sensitive and private information that violates Privacy laws
- ♦ Delivering Electronic Communications that include solicitation or promotional communication that implies endorsement by the Company when no such endorsement exists.



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activities, including Company email messages, downloaded files, and internet usage may be viewed or monitored by the Company without prior notice.



Consequence of Violation of Policy

Given the potential for serious and irreparable consequences and damages caused by non-adherence to this Policy, be aware that violations of this Policy will be taken seriously, and will result in disciplinary measures, up to and including immediate termination of your Engagement with Just Cause.

Consequences relating to some of the prohibited activities included in this Policy may include you and the Company being held liable for damages. If you're found to be responsible as a result of a violation of this Policy, legal action may be taken against you and you may be required to repay the Company or others for any losses incurred. For example:

- ♦ If you electronically communicate any illegal, threatening, libelous, defamatory, offensive, racist, or obscene remarks, you may be held liable.
- ♦ If you forward Company Confidential Information or unlawfully divulge private information about Company Stakeholders, you may be held liable.

Additionally, if the violation of this Policy resulted in criminal conduct, the Company will provide the records to the appropriate authorities for possible criminal prosecution.

Personal Activities in the Workplace

Applies to: Employees

Topic Owner: <HR Services>

Last Updated: <Launch Date>

We probably don't always realize how much time we spend on Personal Activities, distractions, and interruptions in the Workplace and we're asked to be mindful about it and make sure that the sum of our Personal Activities doesn't exceed **EXAMPLE: 30** minutes a day.

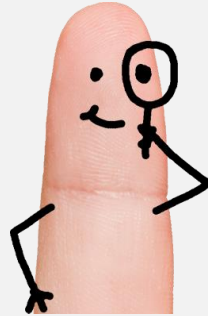
READ IN CONJUNCTION WITH

Personal Activities in the Workplace must adhere to all policies included in the Staff Policies Manual, but are particularly closely related to the **Use of Technology Tools & Electronic Communication** policy.

POLICY

It may be unrealistic to expect us not to attend to personal matters or engage in Personal Activities in the Workplace. However, decreased productivity as a result of distractions and Personal Activities has become a significant issue for businesses in general, and its effects escalate each year.

The purpose of this Policy is to clearly define "appropriate levels" of Personal Activities in the Workplace as no more than **EXAMPLE: 30** minutes per day during the days you're working a regular full day, or



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READ IN CONJUNCTION WITH

- ♦ **Alcohol Consumption at Company Events**

POLICY

If you're under the influence of non-prescription or illegal drugs ("Drugs") or alcohol while in the Workplace, you can pose a serious health and safety risk to yourself and Company Stakeholders, as well as create embarrassing situations. To help promote a Workplace that's safe and prevents awkward situations, you're expected to adhere to the guidelines escribed in this Policy.

You're prohibited from:

- ♦ Bringing Drugs or alcohol into the Workplace.
- ♦ Using Drugs in the Workplace.
- ♦ Consuming alcohol in the Workplace except in conjunction with authorized Company events as outlined in the **Alcohol Consumption at Company Events** policy.
- ♦ Being under the influence of Drugs or alcohol in the Workplace.
- ♦ Manufacturing, distributing, or dispensing Drugs or alcohol in the Workplace.
- ♦ Being under the influence of Drugs or alcohol when returning to the Workplace, or when you're asked to return to the Workplace once you're off-duty. It's your responsibility to ensure that you're fit to work.

Any illegal Drugs or drug paraphernalia found in the Workplace will be turned over to the appropriate authorities and may result in criminal prosecution.

As with any case of Workplace Misconduct, you'll be subject to disciplinary measures, up to and including termination of your Engagement with Just Cause for violation of this Policy, depending on the circumstances and severity and frequency of the violation(s).

Alcohol Consumption at Company Events

Applies to: Everyone

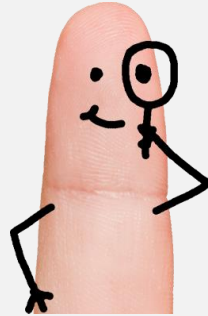
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Intoxication is distasteful, embarrassing, and dangerous. It's best to avoid it at Company events.

READ IN CONJUNCTION WITH

- ♦ **Drug & Alcohol Free Workplace**



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- ♦ Could influence the price of the stock

POLICY

When buying and selling our publicly traded stock, the onus is upon you to ensure that you're not engaging in insider trading.

If in doubt, we urge you to speak with **EXAMPLE: our Chief Financial Officer (CFO)** to discuss the situation relating to the undisclosed facts or changes you may be concerned about. The **EXAMPLE: CFO** may consult with the Company's counsel on the matter if deemed appropriate.

In addition, there may be periods when management issues a 'blackout' warning requesting that individuals don't trade for a specified period of time. This will only occur when there's a significant development with respect to Company matters, during which time there's a heightened risk of a trade that may constitute insider trading.

Dating Co-Workers

Applies to: Everyone

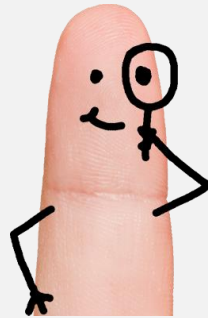
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Developing a consensual romantic relationship with a co-worker can work, provided certain guidelines are followed.

DEFINITIONS

For the purposes of this Policy:



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If the Dating Relationship Terminates

- ♦ The Parties' work performance won't be negatively impacted.
- ♦ Neither Party will retaliate or disclose personal information about the other Party and will refer to the definition of Misconduct to ensure their behaviours are not deemed bullying, harassing, or otherwise inappropriate.

Disclosure of Dating

Dating must be disclosed if:

- ♦ A reporting relationship exists between the Parties — including relationships where one Party is not necessarily the other Party's Direct Report. The relationship must be disclosed regardless of the number of reporting levels between the Parties.

Example: Sally is a junior employee in the sales department who reports to Salina who reports to Mark who reports to John. The relationship must be disclosed if either Salina, Mark, or John enters into a Dating relationship with Sally.

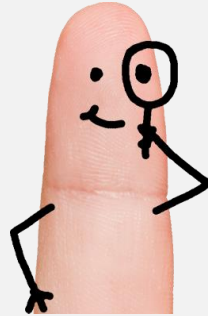
- ♦ Individuals in senior, sensitive, or influential positions are subject to more stringent requirements under this Policy and must disclose the existence of a Dating relationship with any Individual in the Company to prevent real or perceived favouritism or undue influence.
- ♦ Real or perceived conflict of interest can be deemed by a Reasonable Person.

PROCEDURE

Disclosing the Dating Relationship

When disclosure of a Dating relationship is required, the Party in the more senior position is expected to:

1. Meet with their Manager or <HR Services> to disclose the relationship and follow up the meeting with a written disclosure to <HR Services>.
2. <HR Services> will meet with the less senior Party to confirm that the relationship is consensual and the less senior Party will follow up the meeting with a written confirmation.
3. By disclosing in writing that Dating is consensual, both Parties confirm that they're both free to end the relationship at any time and neither will be subjected to negative work-related consequences.
4. <HR Services> together with appropriate stakeholders, will determine if a real or perceived conflict of interest exists because of the relative positions of the Parties involved.
5. <HR Services> will submit a written recommendation to **EXAMPLE: the CEO** who will make the final determination if a conflict of interest exists.



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- ♦ Any allegation that proves not to be substantiated, and which proves to have been made maliciously or knowingly to be false will be subject to disciplinary measures, up to and including immediate termination of your Engagement with Just Cause.
- ♦ Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- ♦ Anonymous complaints won't be dealt with under this Policy.

PROCEDURE

When observing a serious violation of the **Code of Conduct** policy, proceed as follows:

1. Share or report your concerns, suggestions, or complaints with the Compliance Officer.
2. The Compliance Officer will:
 - a. Investigate and resolve all reported violations of the **Code of Conduct** Policy, at their discretion.
 - b. Provide advice to the President & CEO and/or the audit committee.
3. In the event of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing, the Compliance Officer shall immediately notify the board audit committee of any such complaint and work with the committee until the matter is resolved.
4. The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within **EXAMPLE: five (5)** business days. All reports will be promptly investigated and appropriate disciplinary action will be taken if warranted by the investigation.

Conflict of Interest

Applies to: Employees

Topic Owner: <HR Services>

Last Updated: <Launch Date>

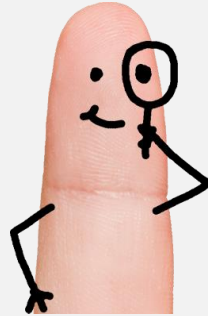
We're expected to disclose any outside work or personal activity if it puts the Company at risk, puts the Company in a competitive disadvantage, or negatively impacts the Company in any way.

POLICY

You may, from time to time, pursue personal and private business interests and ventures, and may participate in other forms of decision-making organizations/bodies.

It's your responsibility to clarify such outside activities and provide a full written disclosure to <HR Services> so that an assessment can be made and any potential conflict of interest, real or perceived, may be prevented.

We trust your judgment, but if you're unsure of a situation that may place you in a conflict of interest, please refer to the list below or discuss the situation with <HR Services>.



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If your manager feels your attire or grooming is not meeting the standards outlined below, you may be asked to leave the Workplace until you are properly dressed or groomed.

Appropriate Attire

In general, our dress code can be described as 'business casual which may include:

- ♦ Casual pants (excluding jeans)
- ♦ Casual dresses and skirts
- ♦ Casual shirts, sweaters and blouses
- ♦ Loafers, flats, and heels that are clean, neat in appearance, and in good repair. Shoes must be worn at all times. No flip-flops, athletic shoes, or slippers.

From time to time, you may be requested to dress more formally in the event of a visit from an important customer or when attending a special event.

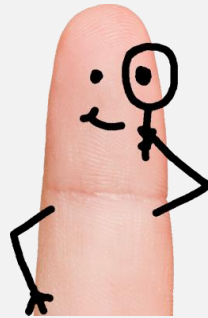
Casual Fridays

On Fridays, Staff are permitted to wear more casual attire in the office (i.e., jeans, runners), but are still expected to maintain neatness and grooming standards.

Inappropriate Clothing

Inappropriate clothing for both Business Casual and Casual Fridays includes, but isn't limited to:

- ♦ Wrinkled or unkempt clothing
- ♦ Beach wear
- ♦ Casual or worn-out t-shirts
- ♦ Muscle shirts
- ♦ Tank tops
- ♦ Tube tops
- ♦ Halter tops
- ♦ Shorts or skirts shorter than mid-thigh
- ♦ Strapless clothing (without jackets)
- ♦ Clothing with foul, obscene, or provocative language, or images that may offend a Reasonable Person
- ♦ Torn or patched clothing, or clothing that includes holes
- ♦ Sweatpants or sweatshirts
- ♦ Hats
- ♦ If your attire is something you'd wear around the house or to play sports, it's probably not appropriate.



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Giving Gifts

You're not permitted to give, pay, promise, or offer gifts or anything of value to Company Stakeholders for the purpose of securing or appearing to secure preferential treatment.

Solicitation on Company Premises

Applies to: Everyone

Topic Owner: <HR Services>

Last Updated: <Launch Date>

We don't ever really know someone else's financial situation or beliefs, and solicitation or distribution of literature can be uncomfortable for some of us. Therefore, solicitation or distribution of literature of any kind in the Workplace isn't permitted.

POLICY

Non-Company Individuals or Outside Vendors

Non-Company individuals are not allowed, at any time, to enter Company premises for the purpose of any form of solicitation or literature distribution. Third parties or strangers are forbidden from soliciting, selling, or handing out materials for political, charitable, or similar activities. The only exceptions to this prohibition are community benefit projects that are specifically authorized by the Company, and approved business-related vendor or Company events.

Staff

Staff are not permitted to distribute literature or other materials or to solicit for any cause in the Workplace.

Use of Mobile Devices

Applies to: Everyone

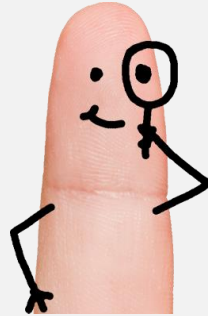
Topic Owner: <HR Services>

Last Updated: <Launch Date>

Whether we're using a Company-paid or personal Mobile Device, we need to use good judgment to help prevent accidents, make sure we're not harassing or annoying the people around us, and safeguard Company and Confidential Information.

READ IN CONJUNCTION WITH

- ♦ **Use of Technology Tools & Electronic Communication**



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Using Mobile Devices While Operating a Vehicle or Equipment

We all know the stats. Using a Mobile Device while operating a vehicle, machinery, or equipment kills people. Don't do it under any circumstances when you're in the Workplace or when using a Company-supplied Mobile Device.

Here's what you need to know and adhere to:

- ♦ Use of any Company-supplied or personal Mobile Device while operating a vehicle, machinery, or equipment in the Workplace, is strictly prohibited.
- ♦ Use of any Company-supplied Mobile Device while operating a vehicle, machinery, or equipment when off-duty, is strictly prohibited.
- ♦ Your Manager and/or any other Company individual has no authority, under any circumstances, to expect you to use a Mobile Device in any way while you're operating a vehicle, machinery, or equipment, or to conduct any activity where the lack of focus, even for an instance, can result in serious negative consequences for you or others.
- ♦ If you decide to use a Mobile Device while operating a vehicle, machinery, or equipment, you must only use the device once you have pulled over to a safe place and parked the vehicle, machinery, or equipment.

Using Cameras, Web Cams, & Recording Devices

The use of Mobile Devices with additional camera, video or audio recording functionality has resulted in legal and operational concerns for many businesses. Issues such as invasion of privacy, Harassment, spying, and loss of productivity associated with these devices have prompted the Company to prohibit their use at work.

As such, cameras or recording devices are not allowed in washrooms, shower areas, or confidential areas such as **INSERT: Restricted areas where sensitive, secret or confidential information is available..**

You're also prohibited from video or audio recording, or taking photographs of Company Stakeholders in the Workplace for any reason unless you have received prior written authorization to do so.

For the purposes of this Policy, "web cams, cameras and recording devices" include any device with the capability to capture photographic, video or audio recordings, regardless of whether or not this function on the device is selected or used.

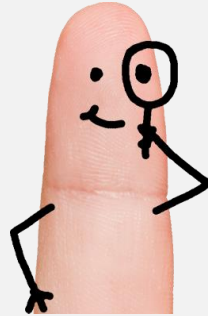
Temporarily Borrowing or Taking Company Materials Off Premises

Applies to: Everyone

Topic Owner: <HR Services>

Last Updated: <Launch Date>

When we borrow, or remove, any Company Materials from Company premises there's a process we need to follow. If we don't follow this process, the removal will be considered unauthorized and may be construed as theft.



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POLICY

There may be situations when you're approached to publish, interview, discuss, or present on behalf of the Company. These types of opportunities for Staff are highly encouraged.

However, the impact external communications may have on the Company's brand, minimizing the risks associated with potential disclosure of Confidential Information, and the legal risks associated with shareholders must be considered.

Before you engage in any external communication, you must obtain written or electronic approval as outlined in the following table.

Company Activity	Approval Required
When faced with a legal inquiry or action relating to an employee, former employee, Job Applicant, customer, office visitor, governmental agency, competitor, or any other outside presence	Immediately direct the inquiry to INSERT: Approval Title
Publishing content for the Company's website	INSERT: Approval Title
Publishing content that's distributed by general media including newspapers, magazines, radio, TV, brochures, and direct mail	INSERT: Approval Title
Advertising	INSERT: Approval Title
Advertising for open positions	INSERT: Approval Title
Publishing white papers or other such material relating to the Company, its products, services, or facilities	INSERT: Approval Title
Releasing Company information that's communicated, shared, or processed by vendors, customers, or third-party providers	INSERT: Approval Title
Making speeches or presentations	INSERT: Approval Title
Giving interviews	INSERT: Approval Title
Providing comments to the press	INSERT: Approval Title
Participating in panel discussions	INSERT: Approval Title
Participating in debates	INSERT: Approval Title