



Effective date: Sept. 29, 2023  
Review date: Jan. 1, 2025

## Code of Conduct Policy

### 1. PURPOSE

To outline the standard of business conduct and ethical behaviour that is expected of all Ontario Medical Association (OMA) employees. This Code of Conduct (Code) is a guiding principle that applies to all that we do.

### 2. SCOPE

The Code applies to all OMA permanent and contract employees (“OMA Staff”). This Code is in addition to any responsibilities or obligations that may arise as a result of an employee being part of a regulated profession.

### 3. DEFINITIONS

#### Conflict of Interest

A conflict of interest arises when the personal interests of an employee conflict with the interests of the OMA. A conflict of interest includes an employee using or attempting to use their position, any confidential information gained through their employment at the OMA, or company time and materials for private gain or advancement (or the expectation of private gain or advancement).

### 4. POLICY STATEMENT

The OMA is committed to providing and maintaining a workplace environment where all persons are treated with fairness, dignity, and respect. To that end, the OMA has established a high standard of conduct and expects all OMA Staff to conduct themselves in a manner consistent with the core values of the OMA.

The OMA requires all employees to observe the standards set out in this policy.

#### Compliance with the Law

Employees must comply with the laws, rules and regulations which relate to their particular position and responsibilities. As part of that responsibility, employees must complete any training programs that are required in order to maintain compliance with the relevant laws, rules, and regulations. If there is any doubt as to their applicability and interpretation, the employee should consult with their supervisor or Human Resources.

#### Compliance with OMA Policies and Procedures

This Code provides an overview of the standard of business conduct and ethical behaviour that is expected of all OMA Staff. It is by no means exhaustive but summarizes some of the

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OMA's key policies. All OMA Staff are responsible for knowing and complying with all OMA policies and procedures, including those mentioned below.

The OMA expects all staff to conduct themselves in a respectful, professional, and ethical manner at all times, and to follow this Code while attending events or otherwise performing work-related activities in any location and at any time while conducting any OMA business.

#### Confidentiality, Privacy, and Security

All employees will, by virtue of their positions with the OMA, acquire confidential information about the OMA and its members. Such confidential information is the exclusive property of the OMA and must be maintained in strict confidence except when disclosure is authorized by the OMA or legally mandated or permitted by applicable regulatory whistleblowing legislation or privacy legislation. All employees also have duties of privacy and security as per obligations set out in relevant legislation and OMA policies and procedures. The obligation to safeguard the OMA's confidential information continues even after employment with the OMA ends. The duty of confidentiality is set out in more detail in the Confidentiality Agreement signed by employees at the start of their employment.

#### Protection and Personal Use of OMA's Assets

All employees are required to use OMA assets in a way that respects privacy, security, and record-keeping requirements and in keeping with relevant OMA policies. OMA assets must be protected from loss, damage, theft, and misuse. OMA assets include an employee's work time and work product, as well as the OMA's equipment, computers, software, bank accounts, records, phones, confidential information, and reputation. OMA phone, email, voicemail and other electronic systems are primarily for business purposes. Personal communications using these systems should be kept to a minimum and no employee should have an expectation of privacy while using OMA assets or systems. Employees should exercise prudence in incurring and approving business expenses, work to minimize such expenses and ensure that such expenses are reasonable and serve the OMA's interests.

Moreover, OMA employees are only permitted to communicate with members using their OMA-issued email and phone number, unless there is an exception agreed upon by the employee's manager—for example, when there is an approved pre-established or ongoing working relationship with a member(s). No personal emails or phone numbers may be otherwise used at any time, and upon leaving the OMA, all OMA-associated email and phone numbers shall be surrendered/retired as applicable.

Upon notice by the OMA, and/or upon termination of employment, an employee must return all OMA confidential information and any other OMA property in their possession.

### Conflict of Interest

All OMA Staff are required to inform their supervisor and Human Resources of any course of action they have pursued, are pursuing, or are contemplating pursuing, that may create a perceived or actual conflict of interest.

### Equality, Equity and Discrimination

OMA Staff are expected to adhere to the principles of human rights, equity, dignity, and respect in the workplace.

The OMA is committed to equity, diversity and inclusion and providing a work environment that:

- Enables and values diversity in its people, ideas and perspectives
- Ensures a workplace where staff are able and encouraged to be their full authentic self
- Ensures our systems and processes are anchored in the principles of fairness and equity

To guide us through our EDI journey, we have developed the following principles that build upon existing OMA values.

- Humility
- Accountability
- Collaboration
- Courage
- Integrity

The OMA provides staff with Equity, Diversity, and Inclusion training to ensure the OMA is an inclusive workplace where everyone can thrive and bring their authentic selves to work. Any conduct contrary to this value will not be tolerated.

### Workplace Violence and Harassment

The OMA will not tolerate any acts of harassment and/or violence and will take all reasonable and practical measures to prevent and protect workers from harassment and/or violence in the workplace. All OMA Staff have a shared responsibility for maintaining respect and civility in the workplace and should refer to the Respect in the Workplace Policy.

### Integrity of Records

All OMA records require the accurate and proper recording of information. This includes both financial and non-financial records. All employees must honestly and fairly record information within their job responsibilities. No false or misleading entries should be made in any books or records of the OMA for any reason.

Employees shall not ask or encourage another person to report anything other than truthful and accurate information. All errors and adjustments should promptly be corrected and recorded when discovered.

All OMA records are to accurately reflect all business dealings. All supporting documents, including agreements, invoices, cheque requisitions, and expense reports are likewise to be true and accurate.

In particular, financial records, books of account, and financial statements are to be maintained with scrupulous integrity. No fund, asset or account should be established for any purpose unless it is accurately and fairly recorded in the books and records of the OMA. Accounting and financial information should be prepared in conformity with the internal accounting policies, which are to conform to generally accepted accounting principles and audit standards.

## 5. PROCEDURE

### Implementation of Code

Strict observance of the Code is fundamental to the activity and reputation of the OMA. Every employee has a responsibility to ask questions, seek guidance, and report known or suspected violations of this policy. Violations of this policy should be reported to Executive Vice President, People & Culture or if the alleged violations involve the Executive Vice President, People & Culture then the report can be made to the Chief Executive Officer. [The process for reports and complaints is outlined in the Respect in the Workplace Policy.

There will be no repercussion for any employee who, in good faith, reports a known or suspected violation of the Code.

If it is determined that an employee has violated the Code, the OMA reserves the right to implement discipline in accordance with the nature and grievousness of the violation.

### Annual Code Acknowledgement

All employees, as a condition of employment, must sign an acknowledgement of this Code as evidence that they have read and understood the Code, and thereby agree to adhere to its contents. All employees must affirm compliance with the Code on an annual basis, which indicates the employee's continued understanding of the Code.

### OMA Use of Employee Likeness

From time to time, the OMA uses photos and/or video of employees for external purposes. The OMA does not profit financially from the use of such photography and/or video.

In the interests of respecting both privacy laws and the preferences and sensitivities of all employees, the OMA asks each employee to consent to, or decline the use of, their image

for the OMA's own purposes. All employees will do so with the acknowledgement of this Code.

### Questions

Questions about specific ethical or compliance issues should be directed to an employee's supervisor or Human Resources.

## 6. SUPPORTING/REFERENCED DOCUMENTS

Use type	Document title
Mandatory	<a href="#">Privacy Policy</a>
Mandatory	<a href="#">Respect in the Workplace Policy</a>
Mandatory	<a href="#">Workplace Violence &amp; Harassment Policy</a>

## 7. RESPONSIBILITIES

Position	Actions
CEO	Approve operating policies and/or procedures. For escalated cases, confirm the validity of the allegation and determine the course of action to resolve the issue.
Process owner/author	Communicate this policy to all employees and ensure employees understand the standard of conduct that is expected of them. Enforce and reinforce acceptable conduct. Provide guidance and interpretation on components of the Code of Conduct and any other OMA policies, procedures and applicable laws.  Executive vice-president, People & Culture, will investigate the validity of any allegations, determine a course of action to resolve the issue and escalate the allegation to the appropriate level, if necessary.
Knowledge & Records	Review and provide additional metadata as required. Publish to StaffSpace. Notify authoring department when each policy reaches its review date. Maintain original documentation for archiving.
Department directors	Communicate expectations contained in this policy to all employees under their supervision and take necessary steps to ensure employees conduct themselves in an appropriate manner. Monitor compliance with this policy by employees. Respond promptly and impartially to incidents that transpire. Obtain training for employees if required.
Employees	Read, understand and agree to adhere to the contents of the Code. Acknowledge as required and comply with all OMA policies/procedures. Communicate any concerns with their supervisor or Human Resources.

Author: Human Resources

Process/Service Owner: People & Culture



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Approved By: CEO

Sept. 29, 2023

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Approval Date