Policy Direction – Code of Conduct and Ethical Behaviour Policy

Rationale and Relationship to Vision, Mission, and Values

The reputation of MS Canada is one of its highest assets. Our reputation and work environment are based on the actions and behaviors of all our employees and volunteers. Through comprehensive and effective screening of employees and volunteers, MS Canada aims to engage with individuals who best embody our values. However, the private conduct of any employee or volunteer is a private matter except when such conduct compromises the reputation, image or integrity of MS Canada.

Policy Objective

The Code of Conduct and Ethical Behaviour Policy aims to ensure MS Canada activities are conducted in an open, fair and transparent matter.

This policy is intended to strengthen the ethical environment of MS Canada by providing guidance on the principles, standards, and responsibilities of conduct for all employees and volunteers in the performance of their duties.

Policy Application

This policy applies to all MS Canada employees and volunteers, including the Board of Directors.

This policy represents expected behaviour only – it cannot anticipate all circumstances and situations that employees and volunteers may encounter. The exercise of good judgment is still expected from employees and volunteers at all times. If in doubt in regard to appropriate behaviour or course of action, MS Canada strongly encourages employees and volunteers to seek out guidance from others in the organization.

Authorization

The policy was approved by the MS Society of Canada Board of Directors on May 20, 2015.

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Applies to:	All staff and volunteers
Frequency of review:	Every five years
First approved:	May 20, 2015
Last reviewed:	June 22, 2026
Next scheduled review:	June 2031

The Executive Team is authorized to develop detailed procedures for this policy direction following its approval.

Policy Details

MS Canada requires its employees and volunteers to observe high standards of professional and personal ethical behaviour in all matters involving their association with MS Canada.

Employee and volunteer actions should be driven by the values of MS Canada. They are expected to practice honesty, integrity and principled behaviour in fulfilling their responsibilities and to comply with all applicable laws and MS Canada policies.

To this end MS Canada employee and volunteers will:

1. Acquaint themselves with the MS Canada's vision, mission, values, strategic directions and all organizational policies, and comply with both the letter and the spirit of these in relation to their responsibilities.

2. Not participate in, or condone or engage in dishonesty, fraud, deceit, misrepresentation or illegal activities.

3. Protect all assets of MS Canada (which belong to the organization and not to an individual or group). Such assets include but are not limited to: people (employees, volunteers, clients, donors), real property (includes buildings, facilities), income (donations, membership fees, grants & contributions, investment earnings), goodwill (reputation, stature in the community, ability to raise funds, appeal to prospective volunteers, board members, & employees), information (about employees, volunteers, clients, donors, members, research funding applications, other).

4. Comply with MS Canada policies that address specific areas of conduct and ethical behaviour:
    - Privacy and Confidentiality
    - Conflict of Interest
    - Respectful Workplace and Environment
    - Substance Management

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- Ethical Fundraising and Financial Accountability
- Volunteer Engagement
- Accessibility Standards
- IT Acceptable Use
- Delegation of financial and signing authority
- Disclosure and Protection (Whistleblower)

5. Take responsibility for their actions and decisions, follow reporting lines to facilitate the effective resolution of problems, ensure that they do not exceed the authority of their position.

6. Follow MS Canada communication protocols in regard to public comments and contact with media.

Responsibility and Authority

All members of leadership are responsible for implementing and enforcing this Policy in consultation with the People team.

If an employee or volunteer becomes aware of a serious breach of this Policy, they have a responsibility to report that breach to the Applicable Authority. Any employee or volunteer who reports a breach in good faith is protected from reprisal for doing so, even if the reported breach is not confirmed through investigation.

Implementation

- Strict observance with this policy is fundamental to the activity and reputation of MS Canada. Employees and volunteers will be asked to confirm they have received a copy of the policy, have read it and commit to complying with its provisions. Employees shall complete an annual sign-off to reaffirm their continuing commitment and compliance with the policy.
- All employees and volunteers shall be required to review and acknowledge their understanding and acceptance of this Policy to facilitate compliance.
- This Policy is supported by MS Canada **Disclosure and Protection (Whistleblower) Policy** which creates conditions and process by which serious violations to ethical policy or fraud and financial impropriety can be

raised without fear or harassment and retaliation; and the **Resolving Constituent Concerns Policy** which provides an avenue for external individuals to communicate with MS Canada in the event that they wish to register a concern or complaint.

- If it is alleged that an individual has not been in compliance with this Policy, an investigation will be conducted under established procedures for specific policies, of if there are none, under the auspices of the Executive Champion of this policy or chair of the board of directors based upon the circumstances. Violations of this Policy will be considered as a serious matter and subject to disciplinary action up to and including termination.
- This Policy shall be publicly disclosed on MS Canada's website.

Executive Champion

The MS Canada Vice-President, People and Community is the Executive Champion for this policy.

Monitoring and Compliance

The Executive Champion is responsible for leading the communication, monitoring of the application of and compliance with this policy direction in conjunction with other members of the Executive Team.

If an investigation under the policy is initiated, the Executive Champion will work with appropriate employees to carry out the investigation and ensure compliance.

The board shall receive information from management that satisfies them that compliance is appropriately measured and monitored.

Policy Review

The policy is to be reviewed at a minimum every five (5) years following its approval.

- Revised and approved May 19, 2021
- Revised and approved December 15, 2021
- Revised and approved June 22, 2026

Definitions:

Appropriate Authority - Any delegated MS Canada employee who has the authority to make final decisions regarding workers, wrongdoing, harassment claims, and resulting actions. At MS Canada, the appropriate authority is the Vice President, People and Community.

Executive Team - The most senior level of staff leadership within MS Canada comprised of the president and chief executive officer; division presidents; senior vice-president(s) and vice-president(s). One person may hold more than one position. The President and Chief Executive Officer may alter the composition of the executive team as required from time-to-time.

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