

Research & Ethics Committee

AGENDA

Tuesday, October 22, 2024 @ 5:30pm

Item	Description	MRP
1.0	Call to Order and Introductions	Tracey Burkhardt
2.0	Approval of the Agenda	Tracey Burkhardt
3.0	Declaration of Conflict of Interest	Tracey Burkhardt
4.0	Approval of Previous Minutes: September 10, 2024*	Tracey Burkhardt
5.0	Business Arising from the Minutes	
	5.1 Data Sharing Process – NBIRDT	
6.0	Standing Report	
	6.1 Research & Ethics Report for Q2 – July 1, 2024 – Sept 30, 2024*	Geri Geldart
	6.2 Operating Plan Progress Report*	Geri Geldart
7.0	New Business	
	7.1 Code of Ethics & Professional Conduct Review*	Geri Geldart
	7.2 Suzy-Q Demonstration – possible date	Geri Geldart
8.0	Next Meeting: January 28, 2025 @ 5:30pm	

**Denotes attachment*

Proposed Motions

1. That the minutes of September 10, 2024, be approved.



**Minutes of Meeting
Research and Ethics Committee
on September 10, 2024 at 5:30pm**

Present: Tracey Burkhardt (Chair), Bryanna White-Aubé, Donna Curtis-Maillet, Wayne Albert, Geri Geldart (ex-officio)

Regrets: Marjorie Belzile

Staff: Kelsey Rusk, Jamie Roy

1. Call to order and introductions

Tracey Burkhardt, Chair called the meeting to order at 4:33 pm and introduced Kelsey Rusk of CiRA and new board member Wayne Albert.

2. Approval of agenda

The agenda was approved as presented.

3. Declarations of Conflict of Interest

Ms. Burkhardt asked the members present if there was a need to register a conflict of interest. None identified.

4. Approval of previous minutes – April 23, 2024

The minutes were approved as presented.

Motion:

It was moved by Bryanna White-Aubé, and seconded by Tracey Burkhardt that the minutes of April 23, 2024 be approved as presented.

Motion carried.

5. Business arising

None

6. Standing Reports

6.1 Research & Ethics Report for Q1 April 1 – June 30, 2024

K. Rusk presented the report for Q1. The report was included in the meeting package. Highlights included:

Aging Care & Research Symposium 2024

- September 26, 2024, at the Fredericton Inn + virtual. There are 6 speakers and over 25

exhibitor booths. Currently there are 100 people registered for this all day event.

Research Projects

- Active research projects include Human Rights of Older Persons, Suzy Q and Antibiotics.
- Current research funding applications; PHAC dementia and New Horizons for Seniors GENIE funding. The GENIE funding would provide the opportunity to share knowledge with other settings and assist with the implementation of the GENIE system in assisted living and other community settings in Moncton and Saint John.

6.2 Operating Plan Progress Report

K Rusk presented the Operating Plan Q1 progress report.

- The Suzy-Q equipment has been trialed once on Tower 1. A 2nd trial is scheduled for later this week providing additional resident choices. Results will be provided at the next meeting.
- The Research Symposium currently has 100 registrations, we expect an additional 60 – 70 participants through Social Development.

7. New Business

7.1 Terms of Reference Review

G. Geldart provided the current Terms of Reference document. Committee members were asked to review in preparation for the strategic planning work that will occur over the course of the next year.

7.2 Annual Work Plan 2024 - 2025

G. Geldart shared the Annual Work Plan for 2024 – 2025 outlining items that should be considered.. Suggestions for future meetings include:

- Sustainability of CiRA – the value of research at YCC
- SuzyQ demonstration
- PHAC – sharing results of the antimicrobial project

7.3 Master Data Sharing Agreement (MDSA) - UNB

A review of the MDSA was circulated in the meeting package. The 2014 Originated Agreement was updated, creating a need to update the MDSA. It appears that we have not shared the data, as outlined in the MDSA, since 2019.

Donna Curtis-Maillet will organize a follow up meeting with Geri, Kelsey and Megan (UNB) to provide further information on the data sharing process.

8. Date of Next Meeting – October 22, 2024.

On a motion by Bryanna White-Aubé, the meeting was adjourned at 6:37 pm.

Tracey Burkhardt, Chair

Jennifer Vos, Recorder



REPORT TO THE RESEARCH & ETHICS COMMITTEE

October 2024

The purpose of this report is to apprise the Board's Research and Ethics Committee of key activities within each quarter of the fiscal year, including an update on key performance indicators and the strategic plan's research pillar. Accordingly, the Committee receives four reports per year with content from the following senior leaders.

Senior Leaders

Kelsey Rusk, Acting Director of CiRA
Jamie Roy, Vice President, Care Services & Quality

Key Areas of Reporting

Research Services
Ethics

Operational Updates

1. 14th Annual Aging Care & Research Symposium Sept 26, 2024

- a. 175 in-person registrations and another 30 virtual (220 total in 2023, 286 in 2022). Social Development initially agreed to pay for 45 people but increased to a final total of 51 in-person and 7 virtual (65 in 2023). Feedback survey: All good or excellent ratings, food was great, 1 day format preferred, time of year good. Good speaker and booth variety. Ben McLaughlin from Alzheimer Society was excellent. Due to Her Honour's illness, photo op with award winners to be scheduled at a later date.

2. New Staff:

- a. Oct 1: Molly Schriver started (previous employee) all project support until March 31, 2025.

3. New Research funding applications:

- a. PHAC Dementia funding on 3 applications with Person Centred Universe, Loch Lomond Villa, and Centivizer still pending – no update until likely Jan 2025
- b. New Horizons for Seniors GENIE funding (\$2.8 million over 4 years)
 - i. Innovator Marc Kanik is on board to proceed and PHAC determined he was eligible to be our partner even with a concern for his selling products for profit.
 - ii. Step 2 of project proposal + budget to be submitted Oct 18, 2024. \$ Not guaranteed.

4. NB-IRDT / YCC Data:

- a. Meeting scheduled with Donna for Nov 19, 2024

5. Conferences:

- a. AGEWELL/APPTA Oct 23+24: Norma's PHAC Human Rights project accepted for a poster
- b. Canadian Association on Gerontology Oct 24-26: CiRA exhibit booth
- c. HSPP Symposium Nov 6+7 Fredericton: MedReviewRx presenting and CiRA in attendance

Current Research Projects

1. Antibiotics (PHAC, we are a participant), finishes Oct 2024

- a. Rose + Jamie reviewing Momentum charts and Kelsey is acquiring data until Nov (Oct is last month of data collection). Third and final payment to us pending for Nov/Dec
- b. Staff interviews /surveys will be requested from PHAC in Dec
- c. Knowledge translation doc to be created by CiRA to share with YCC/PHAC on findings in Dec/ Jan 2025

2. SuzyQ – Mealtime Improvement on T1 (CABHI Discover + Adopt), finishes Oct/ Nov 2024

- a. Oct 1: Implemented 7x/week at lunch until Oct 31. Goal to start doing supper on Mon, Nov 4 in T1 too. Staff still getting used to process.
- b. Surveys: Interviewing staff, family members and residents and compiling data for October
- c. Implementation plan and final report due Dec 2

3. Human Rights of Older Persons (PHAC), finishes March 31, 2025

- a. Ethics approval at U of Regina approved so recruitment can begin. Schedule created for following up with pre-recruited stakeholder organizations to begin collecting data through surveys and interviews.
- b. Website developer Orange Sprocket secured Oct 10 to host the online data repository we are creating.

Recently Completed Projects

4. 2 CABHI Spark Reports due Oct 31: Passive Aware / Person Centred Universe. Results to be shared.

Pillar 5: Research – Discovery, Innovation, Knowledge Transfer

YCC wants to build a self-sustaining research centre that will focus on improving care, delivering services through a person-centered approach, and to implement evidence based best practices to the betterment of YCC clients.

Key Results
<p>A. Improved quality of life for residents, clients, families and staff.</p> <p>B. Situated at the forefront of health and aging research and recognized as a reputable research organization.</p> <p>C. Increase level of quality research projects, partnerships and collaborations.</p> <p>D. Increase amounts of monetary support from granting agencies, governments, communities and foundations.</p>

Strategic Goal	Operational Goal	Measure of Performance	Responsibility / Progress
To increase involvement in research activities that focus on promoting and improving the social, emotional and physical well-being of seniors.	Improve the dining experience through the introduction of the Suzy-Q method of meal delivery (CABHI Grant)	<ul style="list-style-type: none"> Acquire the Suzy-Q equipment by June 2024 Implementation process complete by Sept 2024 Final evaluation report by Dec 2024 	<ul style="list-style-type: none"> Complete Complete <p>Resp - Kelsey Rusk, Michel Boyer & Jamie Roy</p>
To foster relationships with researchers, stakeholders and members of the community.	Increase the enrollment of long term care staff at the annual research symposium	<ul style="list-style-type: none"> December 2024 	<ul style="list-style-type: none"> In-progress <p>Resp - Kelsey Rusk</p>
To promote and support the translation and transfer of research outcomes, new knowledge and innovation for the betterment of the aging population.	Develop a sustainability plan for 2 RACE with Me	<ul style="list-style-type: none"> Plan developed by September 2024 	<ul style="list-style-type: none"> Not started <p>Resp - Kelsey Rusk</p>
	Develop a sustainability plan for Genie	<ul style="list-style-type: none"> Plan developed by September 2024 	<ul style="list-style-type: none"> Not started <p>Resp - Kelsey Rusk</p>



CODE OF ETHICS & PROFESSIONAL CONDUCT

For Employees and Members of the Board

February 2023



CODE OF ETHICS & PROFESSIONAL CONDUCT

Message from the Board Chair and the President and Chief Executive Officer

The reputation of our organization is shaped by our actions, choices, and decisions each day. Together, we must:

- Work in the best interests of our residents and clients
- Act fairly and objectively
- Recognize and address conflicts of interest
- Think about how our actions may impact our residents, co-workers, clients, and community partners

Exercise our best judgment

- Protect the confidentiality of the information entrusted to us
- Come forward if we see something significant or material that we think is not in the best interests of the people we serve or our organization
- Have the courage to stand up for what is right

Our Code of Ethics & Professional Conduct (Code) outlines the values, principles and standards of conduct that guide our actions and interactions.

The Code is at the heart of our bylaws, principles, directives, policies, procedures, protocols, standards, codes of practice and any other applicable guidelines, regulations and directives that set out how we conduct ourselves as we carry out our work on behalf of York Care Centre, The Centre for Innovation and Research in Aging, and York Developments, herein referred to “The Organization”.

Sincerely,



Lyne St. Pierre-Ellis
Board Chair



Geri Geldart
President & CEO

CODE OF ETHICS & PROFESSIONAL CONDUCT

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CODE OF ETHICS & PROFESSIONAL CONDUCT

APPLICABILITY

The provisions of this Code are mandatory and full compliance is required from all board members, employees, contractors, and volunteers.

Although specific elements of this Code are employee-specific, contractors and business partners are also required to comply where the provisions are relevant to doing business with the organization. For greater clarity, where applicable, the term ‘employees’ is inclusive of everyone working or doing business (paid or unpaid) with the organization.

This Code will be supplied to each employee at the time of hiring and will be reviewed by employees, when doing their annual on-line education modules. Any employee who becomes aware of a contravention of the Code must report the facts promptly to his or her supervisor or to a higher authority or see that they are so reported. Employees who make reports in good faith regarding another employee will be protected against retaliation, discipline, and other sanctions as stipulated in the *Whistleblower Protection Policy and the Public Interest Disclosure Act*.

Employees who are members of professional bodies, such as nurses, licensed practical nurses, and accountants must also conform to their respective professional codes of conduct.

Each department may have additional Operational Policies and Procedures that may be applicable in a particular situation. Employees should familiarize themselves with the applicable rules within their department as well as Corporate Policies and Procedures.

The Research and Ethics Committee of the Board of Directors has been charged with the responsibility for monitoring compliance of the Code with respect to the Board of Directors and the Chief Executive Officer.

CODE OF ETHICS & PROFESSIONAL CONDUCT

PURPOSE OF THE CODE

Employees continue to show their support for maintaining a commitment to excellent care to residents of the nursing home, tenants of its independent and supportive living units, and clients in the community.

This Code was developed with an understanding that personal integrity is quality of character and cannot be created by written rules. However, in assessing their conduct against general standards of integrity, employees may require some guidance.

The primary purpose of this Code is to provide such guidance to employees in making lawful and ethical decisions during employment.

Employees must fully comply with the rules contained herein which, when used with sound judgment and common sense, protect the organization, its employees, residents, tenants and clients in the community. Employees who breach the Code may be subject to disciplinary actions up to and including termination of their employment.

BASIC OBJECTIVES

Underlying the Code of Ethics are the following objectives:

- To provide information about standards and practices for employees, prospective employees and other stakeholders.
- To promote universal understanding and application of ethical standards.
- To assist employees and directors in avoiding situations that might give rise to unprofessional conduct and/or conflict of interest.
- To encourage the most efficient and productive use of corporate resources while discouraging wasteful or fraudulent practices.
- To promote fair and honest dealings amongst employees, fair hiring and promotion practices, and equitable treatment of all employees, .
- To assist Senior Leadership and the Board of Directors in carrying out their responsibility of ensuring integrity of operations.

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ABIDING BY THE LAW

The organization has an obligation to comply with all applicable laws and regulations. Employees play a key role in maintaining such compliance.

Employees should make themselves aware of the complex and changing laws and regulations applicable to their functions. Should an employee be in doubt about these legal requirements or their responsibilities, they should contact Human Resources. A safeguard for employees is strict adherence to this Code, policies and procedures, operating rules, and regulations, including governance rules and financial signing limitations.

NON-DISCRIMINATION/RESPECTFUL BEHAVIOUR

All persons are equal in dignity and human rights without regard to race, colour, national origin, place of origin, ancestry, religion, age, marital status, sex (including pregnancy and gender identity), sexual orientation, physical disability, mental disability, social condition (includes source of income, level of education and occupation), political belief or activity.

All employees are required to understand and adhere to the *York Care Centre Code of Professional Conduct*.

We seek to foster and promote safety, competence, care, respect, recognition, and inclusion in the workplace.

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HIRING

The organization has implemented and follows policies governing the hiring of new employees. Employees involved in a hiring process are required to be familiar with and adhere to these policies.

RELATIONSHIPS WITH SUPPLIERS

The organization strives to maintain the highest ethical standards in its buying practices. In purchasing materials and services from numerous suppliers within and outside of New Brunswick, we subscribe to the principles outlined in the *Procurement Act* and the *Crown Construction Contracts Act*.

This section will need to be updated to reflect that the Crown Construction Contracts Act was repealed in 2022, and elements incorporated into the Procurement Act.

Employees responsible for buying, leasing, or otherwise acquiring materials and services are required to be familiar with these Acts and are required to follow the various procedures laid out by their department.

The organization does not require suppliers to forgo trade with others seeking similar service or products in the marketplace. It may, however, refuse to deal with a supplier who is in an actual or perceived conflict- of-interest situation.

REQUESTS FOR INFORMATION

Unless prohibited by law, the organization meets all reasonable requests for information and provides information that is accurate, complete, and comprehensible. All requests for information are dealt with by the President & CEO and/or their designate.

PUBLIC STATEMENTS/COMMENTS

On behalf of the Board of Directors, the President & CEO and/or their designate is the official spokesperson for the organization. Other than the CEO, board members, employees, volunteers, and contractors may not make any public statement or comment on policy issues on behalf of the organization, unless authorized by the President & CEO. This restriction applies to all forms of expression, including use of social media.

All employees, are required to be familiar with and adhere to the Statements of Policy and Procedures related to internet usage and social media.

The reputation of the organization represents significant effort to generate goodwill. No

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employees may make any public remarks that disparage its services, brand, reputation, or personnel.

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PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWER PROTECTION)

The organization maintains a position of public trust and employees are expected to conduct themselves with honesty and integrity throughout the course of performing their duties. The *Public Interest Disclosure Act*, known as whistleblower legislation for the public service, provides the framework for the disclosure and investigation of significant and serious matters in the public service that are potentially unlawful, dangerous to the public or injurious to the public interest. The Act also provides protection to those employees who make a disclosure.

All employees are encouraged to become familiar with the *Whistleblower Protection Policy* and

I am not sure that providing a reference to the governments Public Interest Disclosure Act is sufficient guidance for such situations. We may wish to develop something more specific to York Care Centre

to make disclosures about any serious wrongdoings. The *Whistleblower Protection Policy* and related procedures are supplement to the Code of Ethics.

CONFIDENTIAL INFORMATION – NON-PERSONAL

Confidential information gained by virtue of employment with the organization shall not be used for personal gain, and disclosure of said information to anyone outside is strictly prohibited without permission either during the employee's term of employment, or at any time thereafter. As a function of their employment, employees should share confidential information on a need-to-know basis only.

CONFIDENTIAL INFORMATION – PERSONAL

Employees may from time to time collect, use, and have the need to disclose the personal information of its residents, tenants, or clients in the community . The collection, use and disclosure of personal information shall be in strict compliance with the *Personal Health Information Privacy and Access Act*.

All employees shall adhere to the security measures as set out under the corporate policy *C-08-Confidentiality - Employees* as well as any procedures and guidelines approved by their department.

CORPORATE PROPERTY

Employees are responsible for the protection of all corporate property, including intellectual property, documents, electronic data and information, equipment, tools, materials, supplies and vehicles, including exercising safeguards to prevent theft, negligence or misuse. Without permission from the appropriate Director, employees may neither loan nor borrow corporate property for their personal use or the personal use of others. Specific processes exist and must be followed for the sale or destruction of corporate property.

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MISAPPROPRIATION

Employees are prohibited from making use of corporate funds, assets, or property, including electronic and information facilities, for their own personal gain or benefit, or from knowingly assisting another in such misappropriation.

The acquisition, disposal or removal of funds and assets by employees in the course of their employment must be transparent, and funds or assets must not be diverted for other than their proper use.

CORPORATE BUSINESS RECORDS

Corporate business records must be prepared reliably and accurately. They are of critical importance in meeting our financial, legal, technical and management commitments. They are to be carefully safeguarded and kept current, relevant and accurate. Records should be disclosed only to authorized personnel or in accordance with lawful processes. In addition:

1. No unrecorded or inadequately recorded fund or asset shall be established or maintained.
2. No false, artificial, or misleading entries in the books and records shall be made.
3. No transaction shall be affected, and no payment shall be made with the intention or understanding that the transaction or payment is other than as described in the documentation evidencing the transaction or supporting the payment.
4. Records may only be destroyed according to the applicable retention standards.

Our C.F.O. has identified the need to update the wording of this section.

SOFTWARE USAGE

Software agreements licensing the use of software permit the use of that software only in a specific manner. The agreements also typically contain clauses restricting the duplication, modification, conversion or otherwise alteration of the product. All employees must strictly adhere to provisions contained in the various agreements.

INTERNET USAGE

The organization may provide employees with access to the information resources of the Internet with the intention of providing access to knowledge while increasing productivity. It is important to use the Internet in a manner that ensures any actions fall within the corporate policies and acceptable levels of performance.

In addition to corporate restrictions, employees must be aware of and abide by restrictions relative to the downloading or copying of any material on the Internet including, but not limited to copyright

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restrictions regarding multimedia and music.

All employees are required to be familiar with and adhere to the corporate policy on *Use of wireless devices in the Workplace and Social Media Policies*.

Revisions may be required to reflect expectations regarding cybersecurity practices.

WORK ETHIC

Employees are expected to show a strong work ethic, both with honesty regarding working hours and with concentration while at work. However, lack of concentration is sometimes not deliberate but is due to personal circumstances beyond the employee's control. Theft of time, that is, doing more than a nominal amount of personal business on company time, is prohibited.

Employees who find themselves distracted or preoccupied by personal issues during working hours should talk to their manager and/or seek assistance from Employee and Family Assistance programs which can be accessed through the Human Resources department.

EXPENSES

Employees, volunteers, and contractors are required to ensure that reasonable expenses are charged only in accordance with corporate policy.

Anyone spending corporate money or personal money that will be reimbursed is expected to strive to ensure good value.

RELATIONSHIPS

The organization makes substantial efforts to avoid compromising, or the appearance of compromising, the objectivity and reputation of our employees or the organization. Employees must maintain an appropriate relationship with those who report to them or to whom they report.

In addition, employees are required to maintain a professional boundary between themselves and the residents, tenants, clients, and their partners and families, and other people chosen by the residents and/or tenants to be involved in their care. Interactions of a sexual nature between a staff member and a resident/tenant/client are prohibited. All employees are required to understand, sign and adhere to York Care Centre's Code of Professional Conduct.

This section of the Code is not intended to impede the development of strong working relationships between employees or the development of appropriate relationships with our residents, tenants and/or clients.

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DRUG AND ALCOHOL-FREE WORKPLACE

The organization is committed to the highest practical standards of health and safety by providing a safe and comfortable work environment for all its employees. Due to the nature of our operations, all employees are considered to be in ‘designated safety-sensitive positions’.

The organization recognizes that the use of illegal or non-prescription drugs, alcohol or any other controlled substances can adversely affect job performance, the work environment and the safety of our employees, residents, and the public.

To help ensure a safe, healthy workplace, the organization strictly prohibits its employees and/or its contractors from reporting to work while under the influence of any illegal or non-prescription drugs, alcohol or any other controlled substances including recreational and/or medical cannabis.

OUTSIDE EMPLOYMENT

While the organization recognizes its employees’ right to privacy and their right to make use of their spare time as they see fit, care should be taken by employees in accepting outside employment. For example, employees should not accept outside employment:

1. When the employment or business activities encroach on working hours or otherwise adversely affect, in a real or perceived way, an employee's performance on the job;
2. When the employment results in an obligation that could affect, in a real or perceived way, the employee's judgment or ability to act in the best interests of the organization.

COMMUNITY ACTIVITIES

Employees have the right and are encouraged to become active members of their respective communities. With appropriate management approval, support of non-profit organizations may occasionally involve the provision of "in-kind" services.

Outside activity must not be allowed to interfere with the employee's performance on the job, nor must it conflict with the organization’s responsibilities or best interests.

Political activity by any employee is governed by provincial government guidelines and employees are required to be familiar with and adhere to these guidelines.

We should modify this section to outline our principles / policies rather than say that we are governed by provincial guidelines.

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CONFLICT OF INTEREST

All employees must conduct their duties in a manner reflecting the best interests of the organization. Conflict of interest exists in any situation where an employee's ability to fulfill their responsibility may be adversely affected by their private interests or personal considerations. While it is difficult to provide a comprehensive list of conflict-of-interest situations, in general terms it can be said that an employee should avoid any situation that could:

1. Impair the employee's judgment, initiative, or efficiency on the job.
2. Give rise to questions of integrity in relation to employees exploiting the vulnerability of persons who are or have been in our care.
3. Be harmful or detrimental to the organization's activities or reputation.

GIFTS AND BRIBERY

The organization subscribes to the principles outlined in the *Procurement Act and the Crown Construction Contracts Act* and holds a position of public trust. It is essential to preserve its reputation for fair and unbiased business dealings by avoiding any reasonable apprehension of bias in its relationship with suppliers. Bribery or kickbacks in the criminal sense (the giving or accepting of money or valuables intended to influence decisions) is generally obvious and is strictly prohibited. However, exchanging of gifts on a lesser scale can be a grey area, since it is a routine aspect of modern business practice that organizations give and receive small gifts for promotional or recognition purposes. It is acceptable for employees to participate in the giving or receiving of such gifts provided the item has a real or perceived value that is nominal (generally considered to be under \$100 Canadian). If you are offered or receive a gift whose value is greater than nominal, you should refuse and/or return the item promptly, together with an explanation of the organization's policy.

In addition, employees are expected to act in ways that cannot be interpreted as, or do not result in employees gaining personal benefit from their position. Accepting gifts or favours of hospitality may compromise the professional relationship with our residents and/or tenants. Gifts of more than a token value could be interpreted as the employee gaining personal benefit and/or taking advantage of a vulnerable resident and/or tenant in an attempt to gain preferential treatment. Under no circumstances are employees to ask for or accept loans or bequests from residents and/or tenants or anyone close to a resident and/or tenant.

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ENTERTAINMENT

An employee may not participate in excessive or extravagant entertainment while conducting business on behalf of the organization. This is not intended to preclude the exchange of reasonable meals, social amenities or hospitality between persons doing business together.

We have identified the need to expand upon our employee expense policy to address reasonable expenses. Not sure if the Code of Ethics needs to be modified, but an updated policy is in order.

PRIVATE BUSINESS BENEFIT

It is a conflict of interest for an employee to participate in, or attempt to influence, a corporate decision that could result in financial benefit to that employee or his/her immediate family. Examples include the awarding of contracts for the supply of goods or services to a company in which the employee has a private interest.

Transactions with a business owned or controlled by an employee are prohibited unless written approval is requested and received from the Board of Directors.

CONCLUSION

This Code is designed to reaffirm the value of high ethical standards and to provide employees with certain rules of behavior. The topics included herein are neither complete nor exclusive but will serve to give employees a clearer understanding of what is expected. Ethical conduct however is, and always will be, every employee's responsibility.

Employees must fully comply with the rules contained herein which, when used with sound judgment and common sense, protect the organization, its residents and/or tenants, its employees and the public. Employees who breach the Code may be subject to disciplinary actions up to and including termination of their employment.

In the event questions arise concerning the application of a specific rule or policy, an employee should consult his or her supervisor. Should the situation not be resolved at this point, the employee or supervisor shall refer the matter to Human Resources.