



CODE OF CONDUCT POLICY

POLICY STATEMENT: At STARS, we recognize the value of growing and developing trusting relationships with our Team Members (any individual that is part of STARS' workforce), contractors, volunteers, health regions and government, donors, and the community at large. These relationships are based on integrity and trust and our commitment to maintaining high ethical standards throughout our day-to-day dealings with others.

For STARS' reputation to be maintained, we require high standards of professional and ethical conduct from all of our Team Members. The Code of Conduct (the "Code") reflects our commitment to a culture of honesty, integrity, respect, and accountability, and outlines the basic principles and policies with which all STARS' Team Members are expected to comply. We embrace the highest moral and ethical standards, respect for diversity and we operate with integrity and fiscal prudence.

SCOPE: This Code applies to Team Members while they are present on STARS premises and while they are engaging in business activities or community events in relation to STARS.

DETAILS: At STARS we will do what is required by law and will do what is fair and right. Guiding questions are simple:

- Is there any reason you would not want a co-worker, member of the leadership team, a neighbour, a donor, our partners, or the government to be fully aware of your conduct and motives?
- Is anyone's life, health or safety, or the environment endangered by the action?
- By conducting this behavior, am I putting anyone's reputation or personal/health information at risk?

If the answer to any of the above questions is "Yes", then another approach must be considered, and guidance sought from STARS' leadership before moving forward.

All STARS' Team Members are expected to know their obligations under this Code and will be asked to reconfirm, at a minimum every three years, that they have both read and understood the most recent version of the Code. Should you have questions or be confused about STARS expectations, do not hesitate to contact your Leader, the Human Resources department, or any other appropriate authority.

In the event that Team Members, or other stakeholders, wish to file a complaint, procedures have been outlined in the attached Complaint Handling Process. In addition, a STARS' Ethics & Integrity Hotline has been established and mechanisms put in place for confidential reporting of significant financial irregularities, unreported conflicts of interest or other significant breaches of STARS' policies. These mechanisms are put in place to ensure accountability and transparency in STARS' operations and to ensure that issues or concerns are appropriately addressed and resolved. The number for the STARS' Ethics & Integrity Hotline is 1-877-392-



6595. Team Members calling the phone line will be asked to leave a message providing as much detail as possible associated with their concern. These messages will be heard by the Chair of the Audit & Finance Committee. Whistleblower concerns can also be sent by email to ethics&integrityalerts@stars.ca, or by regular mail, courier, or any other means of delivery directly to STARS Head Office, addressed below:

Chair, STARS Audit & Finance Committee Box 570, 1441 Aviation Park NE

Calgary, AB T2E 8M7

Ethics & Integrity communications should be addressed as "Confidential". All ethics & integrity concerns will be addressed in a manner that is deemed appropriate to the concern raised.

COMMITMENTS AND RESPONSIBILITIES

Leadership Commitment

The STARS' leadership team is committed to high standards of ethical behavior and integrity. This Code has been read, discussed, and adopted by all of the Executive Team and Board of Directors. Every team member makes decisions on behalf of STARS in the conduct of our business, and we are all accountable for making the right decisions for the right reasons. This Code of Conduct provides guidance for our decisions.

To Our Team Members

STARS is committed to treating all Team Members with dignity, respect, and fairness. We will value and respect each Team Member and their contributions to our success. STARS commitment to our people is to provide a safe and healthy workplace.

Health and Safety

Safety is a core value. Safety includes both the physical and psychological well-being of an individual. Our goal is to protect people from harm by eliminating or managing risks and hazards to acceptable levels. In doing so we strive toward excellence in the care of both our patients and our fellow STARS' Team Members.

Everyone has a role to play in our commitment to health and safety. This means that we all take responsibility for understanding the health and safety rules and regulations that inform the tasks we perform. Abiding by these expectations protects us and others from accidents, injury, unsafe conditions, or unacceptable harms.

STARS' Team Members are to abide by the applicable Occupational Health and Safety legislation and departmental Standard Operating Procedures that governs them. Please refer to our Safety Policies for more detailed information.

Respectful Workplace

STARS believes in the prevention of discrimination, violence, harassment or other disrespectful or negative behaviours in the workplace. STARS promotes equal opportunities and is committed to treating all STARS' Team Members and those with whom we interact in a respectful manner.

We are committed to providing a safe and professional workplace where harassment and discrimination are not tolerated and maintaining a workplace that is free of violence or the threat of violence. STARS anticipates that Team Members will hold different opinions and views during the course of meetings or projects, and that the constructive discussion and examination of these views can be positive, ultimately benefiting the organization. At all times, Team Members are expected to be open, tactful, respectful in dealings with others, including those who may hold different opinions. Therefore, conduct that is disrespectful, aggressive, or personal in nature is viewed differently than passionately advocating a position.

STARS shall take prompt action where conduct contravenes the STARS' Respectful Workplace Policy. Team Members are encouraged to immediately advise their Leader or the Human Resources department with regard to concerns of discrimination, workplace violence or harassment.

Please refer to our Respectful Workplace Policy for more detailed information.

Business Ethics

STARS is committed to conducting business with honesty, integrity, accountability, and fairness on the part of its Team Members and all business partners.

We will deal honestly and fairly with our fellow Team Members, external stakeholders, including but not limited to contractors, volunteers, donors and any and all business partners. We will not take unfair advantage of anyone through illegal conduct, manipulation, concealment, abuse of privileged information, misrepresentation of material facts or other dishonest or unfair practices.

Accuracy of STARS Records and Reporting

Full, timely, understandable, honest, and accurate recording and reporting of information is critical to our ability to make responsible decisions. STARS' records are relied upon to produce reports for our leadership team, creditors, government agencies, donors, and others. Our

financial statements, and records on which they are based, must be complete in addition to accurately and fairly reflecting all transactions and conforming to all legal requirements and applicable accounting principles and policies.

STARS believes in open access for its auditors and other advisors to all of its documents and records as required, and full and open communication with respect to their engagement. It is illegal to fraudulently influence, coerce, manipulate, or mislead an auditor who is auditing STARS' financial statements.

Business records and communications may become public through legal or regulatory processes or the media. This includes e-mail, voice mail, text messages, or memos and hence, Team Members should not record inappropriate notes or comments that would cause embarrassment to themselves or the organization, should they be made public.

Confidentiality

In the normal course of our business, STARS' Team Members, contractors and / or volunteers may become aware of confidential information. Confidential Information means all information and data of or related to STARS and its affiliates and related persons and their past, present or future operations, businesses, or undertakings, in whatever form or medium, whether or not designated as confidential (or like designation). In all cases, STARS' Team Members must do all things reasonably required to ensure that they are not exposing STARS's Confidential Information to any risk of unauthorized use or disclosure, including: taking all measures required to maintain the strictest confidentiality and security of all Confidential Information that they receive, use or access; not using or reproducing Confidential Information for any purpose other than and to the extent expressly permitted by STARS or as may be reasonably necessary to carry out their employment duties and responsibilities; and not disclosing, providing access to, transferring or otherwise making available any Confidential Information except as expressly permitted by STARS or as required by law. Departing Team Members who have had access to Confidential Information have a continued responsibility to protect this information and shall return to STARS all proprietary and Confidential Information upon departure from STARS. STARS' Team Members are obligated to preserve the confidentiality of information entrusted to them even after departing from STARS.

Privacy

Privacy legislation clearly outlines responsibilities for the collection, use, destruction, and disclosure of both personal and health information. We value and respect the rights of all individuals to their privacy, including our patients, Team Members, donors, volunteers, and any other stakeholder for whom we hold personal information. We collect, use, and disclose only information that is necessary for us to administer our business effectively, efficiently and in a safe and reliable fashion, while always remaining cognizant of the right to privacy, and the risks associated with the inappropriate release of personal or health information. Team Members acknowledge and consent that STARS may share, use, or disclose Team Members' personal

information among its related and affiliated organization, to the extent reasonably necessary during the course of employment. As such, this information is only for the internal use of STARS and will not be shared externally or used for other purposes unless permitted and required by law.

Privacy – Personal Health Information Policy

Please refer to this Policy for more detailed information on the handling of personal health information.

Alcohol and Drugs

The use of alcohol and drugs at work can have adverse effects and create unacceptable risks to the health and safety of Team Members, our patients, and the members of the public that we interact with. We are all expected to report to work fit to work, to remain fit to work and to be free from the impact of alcohol and drugs at the workplace. Each of us is expected to:

- Read, be aware of, and comply with STARS' Fit to Work and Alcohol and Drug Policies. Anyone working in a Safety Sensitive Position should be aware of the specific expectations associated with these roles.
- Participate in alcohol or drug testing when required to do so, as outlined in our Alcohol and Drug Policy and Procedure.
- Ask for advice and follow appropriate treatment if you have a known, suspected, or potential problem with alcohol or drugs. Our Employee and Family Assistance Program (EFAP) is available to you for support.
- Encourage and support other team members to seek assistance before alcohol or drugs impacts their job performance or the health and safety of any person.
- Notify your Leader of any team member, contractor, volunteer, partner, or affiliate who appears to be under the influence of alcohol or drugs while at work.

Please refer to our Alcohol and Drug and Fit to Work Policies for more detailed information.

Protection and Proper Use of STARS' Assets

We are each entrusted with STARS assets that we must protect from loss, damage, misuse, or theft. STARS' assets may only be used for legitimate business purposes and may never be used for illegal purposes. Team Members are to immediately notify their leader in the event any STARS asset is misplaced or may be stolen.

Proprietary information includes any information that is not generally known to the public, would be helpful to other similar organizations, or harmful in any way to STARS.

Use of STARS' IT – Electronic Equipment, Data and Software

STARS provides computers, electronic equipment, mobile devices, internet access, software, and electronic data to assist Team Members in their work. Incidental and occasional personal use is permitted, but never for personal gain or any improper purpose. STARS has a formal Acceptable Use Policy with regard to the use of computers and information technology equipment. All STARS' Team Members who use such computers and information technology equipment have signed the Acceptable Use Policy and are expected to maintain awareness and compliance.

Ownership of Inventions

"Inventions" means any inventions, designs, ideas, discoveries, works, creations, trademarks, developments, programs, software, schematics, codes, drawings, sketches, specifications, compilations of information, analyses, experiments, data, formulae, methods, processes, techniques, prototypes, products, samples, equipment, or tools and machines, which are conceived of, developed, created, modified or improved by a Team Member, either solely or with others who are not Team Members (the "Co-Inventors"), in whole or in part, in the course of the Team Member's performance of their responsibilities or service to STARS, whether at STARS' facilities or otherwise, together with all intellectual property rights therein.

Unless a Team Member has entered into a specific written agreement with STARS stating otherwise, each Team Member on behalf of itself and any Co-Inventors automatically assigns to STARS and its successors with and provide to STARS all assistance that it may reasonably request from time to time related to the application for, and prosecution and enforcement of STARS's rights in and to the Inventions.

Reporting of Illegal or Unethical Behaviour

All STARS' Team Members are encouraged to talk to their Leader when in doubt about the best course of action in a particular situation and all STARS' Team Members are encouraged to report any concerns they have about violations of laws, rules, regulations, or this Code. STARS will not allow any retaliatory action against any Team Member who, in good faith, reports a possible violation or concern. Reference is made to both the Complaints Handling Process, attached as Appendix "A", as well as the STARS' Ethics & Integrity Policy

Conflicts of Interest

STARS is committed to fulfilling its mission in an ethical manner and maintaining a standard that preserves and enhances public confidence in the integrity, safety, and impartiality of STARS' operations.

Team Members are to conduct themselves with personal integrity and in an ethical and honest manner at all times when performing their duties. Team Members must exercise diligence and

care to avoid situations in which their personal interests might conflict, or appear to conflict, with those of STARS.

A conflict of interest is a situation in which a Team Member has, or may have, conflicting loyalties caused by having multiple interests, financial or otherwise, which could unduly influence or affect their motivations, decision-making, or impartiality in performing their duties for STARS. We expect Team Member's impartial professional judgment to fulfill the Team Member's duties and responsibilities.

In the event that there are any questions as to whether a specific situation would constitute either an actual or perceived conflict of interest, Team Members should immediately report the conflict to their Leader and complete the Declaration of a Conflict-of-Interest form. The Leader will review with Human Resources and determine if a conflict of interest exists. If so, the Leader and Human Resources will establish the appropriate course of action or manage the conflict.

Please refer to our Conflict of Interest Policy for more detailed information.

Non-partisan Representation of STARS

STARS must maintain a non-partisan stance to protect its charitable status with Canada Revenue Agency. As stated in Canada Revenue Agency's Registered Charities – Political Activity, Information Circular: "All registered charities are required by law to have exclusively charitable purposes." The formal purposes of an organization are set out in its governing documents. They state the objectives, or goals for which the organization is established. A charity may not engage in an activity that is illegal or partisan political or they will risk losing their charitable status. A partisan political activity is one that involves direct or indirect support of, or opposition to, any political party or candidate for public office, public office meaning a position of authority or service within the government involving responsibility to the public (e.g., Member of Parliament, Member of the Legislative Assembly).

From time to time, STARS' Team Members express an interest in running for a particular political office, whether it be for a position in municipal, provincial, or federal government. To ensure that there are never any questions with respect to partisan political activity at STARS, STARS' Team Members must inform both their Leader and Executive Team Member of their intentions prior to their candidacy. Further, if the intent of the STARS' Team Member is to become a candidate for any political office, that Team Member must take a leave of absence without pay. Generally speaking, Team Members are not encouraged to hold a public office.

STARS' Team Members may not make any political statement or comment, or take any political action, on behalf of the organization.

Gifts and Entertainment

In business, it is common to foster relationships by exchanging courtesies, such as meals, gifts, and entertainment. The gifts and entertainment we accept and give must not be intended or

designed to influence our business judgment on behalf of STARS or inappropriately influence someone else's business judgment.

Gifts are anything of value given or received in relation to STARS' business. We may only give or accept gifts that are customary, modest, and culturally sensitive. We must never accept or give cash, bonds, or negotiable securities, although gift certificates or gift cards are allowed as long as they cannot be converted into cash. The value of any gifts received may not exceed \$100. If you are offered a gift of value that exceeds \$100, Leader approval must be obtained prior to acceptance.

Entertainment includes any event we host or attend for business related purposes – for example, meals, sporting events, theatrical performances, and educational events. Entertainment should always be in good taste and consistent with usual business practice. We must avoid entertainment that is too lavish or expensive as it may be seen to influence our judgment. The value of any entertainment events we attend may not exceed \$300. If you are offered entertainment of value that exceeds \$300, Leader approval must be obtained prior to acceptance.

STARS' Team Members must never provide gifts or contribute to any political party, organization, or any political candidate for or who holds public office on behalf of STARS.

Social Media and Communications

A Communications Policy is in place to provide guidance for public communications and outlines the officially designated spokesperson for the organization. Normally, all non-operational contact with the media is reviewed by the Communications Team, with vetting and possible handling through the Executive Team.

Email, texts, instant messages, and various social media options allow us to communicate quickly and from almost anywhere using any device. This ease of use and high accessibility make it even more important that our Team Members communicate respectfully and carefully in all electronic formats. Team Members need to be mindful that electronic communications are permanent and can easily and quickly be shared with a larger audience. STARS' Team Members should never send or post any restricted, confidential, internal, or otherwise non-public information or any messages or images that could tarnish STARS' reputation, the reputation of our stakeholders, or the reputations of our fellow Team Members. Online conduct is held to the same standard as in-person interactions and all Team Members are responsible to communicate appropriately and protect the reputation of STARS. While all Team Members are welcome to participate in online commentary, when it comes to representing our organization, it is important that Team Members participate in online social media in a meaningful, respectful, and relevant way that protects the reputation of STARS and adds value to our business and our culture.

Off Duty Conduct

STARS may be affected, reputationally and operationally, by Team Member behaviour that occurs outside of the workplace. Team Members are to be cognizant that their behaviours could impact STARS legitimate business interests. Team Members are expected to: remain respectful towards their colleagues and the public in all interactions, whether on or off duty and not to engage in behaviours that may lead other Team Members to refuse or be reluctant to work with them. ; If a Team Member engages in actions injurious to STARS reputation or creates difficulty in STARS ability to efficiently manage and/or direct our workforce; is charged with a criminal offence, or in the event actions that result in a Team Member's license suspension that results in a loss of privilege or restricted area identity card (RAIC), Team Members are to notify their leader or HR right away.

Compliance with Laws, Rules, and Regulations

Compliance with both the letter and the spirit of all laws, rules, and regulations applicable to our business is critical to our reputation and continued success. If a Team Member is charged with a criminal offence which may affect their ability to perform their job or may harm the interests or reputation of STARS, the Team Member must notify their Leader or Human Resources without delay.

All STARS' Team Members must respect and obey the laws of all jurisdictions in which we operate.

Compliance Procedures

This Code is not intended to address all of the situations that may be encountered. There will be occasions where you are confronted by circumstances not covered by policy or procedure and where you must make a judgment as to the appropriate course of action. In those circumstances you are encouraged to use your common sense and to contact your Leader or Human Resources for guidance. A STARS' Team Member who fails to comply with this Code, or its intent, or who knowingly permits or directs a Team Member, volunteer, consultant, or contractor under their leadership to not comply with this Code will be subject to disciplinary action up to and including termination of employment with cause.

- New STARS' Team Members will be required to certify their review, understanding of, and agreement to be bound by this Code as a condition of employment or contractual arrangement.
- All STARS' Team Members will be required to annually certify their review of, understanding of, and agreement to be bound by this Code.
- All policies referred to above are incorporated by reference and form part of this Code. You are responsible for knowing and abiding by their contents. The policies can be accessed through STARSgate, your Leader, or Human Resources.

- This Code will be reviewed by STARS as deemed necessary, at a minimum every three years and revised as determined appropriate by the Board and the Executive team. Reasonable efforts will be made to inform all STARS' Team Members of revisions to this Code.

OTHER:

This policy supersedes all previous policies with respect to the subject matter hereof.

RELATED POLICIES:

Respectful Workplace, Acceptable Use, Alcohol and Drug, Communications, Conflict of Interest, Ethics & Integrity, Fit to Work, Progressive Discipline, and Safety Policies

DEFINITIONS:

Team Member: Any individual that is part of STARS workforce, including contractors.

Leader: Any individual that has direct reports.

Contractor: Any individual, business, or entity that holds a signed contract with the organization.

The following is the required certification required under this Code:

I hereby acknowledge that I have read, understood, and agree to comply at all times with the Code of Conduct and all policies to, or informed by, reference therein. I am aware of where to access a copy of the Code and any document referred to or incorporated when reference to it is required. I understand that non-compliance with the Code, including any policy referred or incorporated therein, may result in disciplinary action up to and including termination of employment or termination of contractual arrangement with cause and without notice or payment in lieu of notice.

APPROVAL, REVIEW AND REVISION SUMMARY	
Policy name:	Code of Conduct
Approval authority:	Board of Directors, STARS
Effective date:	November 30, 2014
Last review and approval date:	September 2023
Next review and approval date:	September 2026
Owner:	Human Resources

