APTUS
TREATMENT CENTRE
FOR COMPLEX DISABILITIES
Embracing Potential since 1979

Business and Supply Chain Code of Conduct			
Section	**Finance**	Policy Owner(s):	Director, Finance
Authorized by	Board	Date	March 14, 2025
Applies To	Employees /Volunteers	Archive versions	Nov 15, 2023
Reference:			

Policy:

All employees/volunteers of Aptus involved in purchasing and business activities will abide by a code of conduct, integrity and professionalism which support Aptus's commitment to financial responsibility and accountability. Confidential information will be safeguarded. Individuals should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels and to share leading practices.

Personal Integrity and Professionalism:

All individuals involved in purchasing or other supply chain-related activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence must be integral to all supply chain activities within and between BPS organizations, suppliers and other stakeholders. Respect must be demonstrated for each other and for the environment. Confidential information must be safeguarded.

Accountability & Transparency:

Supply chain activities must be open and accountable. In particular, tendering, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All individuals must ensure that scarce public sector resources are used in a responsible, efficient and effective manner.

Conflict of Interest:

Employees/volunteers are expected to maintain "arm's length" relationships and conduct negotiations in an ethical and lawful manner. Conflicts of interest arise when:

- An employee/volunteer is in a situation where he/she has the opportunity to use the authority, knowledge or influence derived from his/her employment with Aptus in a way that benefits the employee/volunteer contrary to the interest of the employer.
- An employee/volunteer acts in a way that benefits him/her at the expense of Aptus.
- The personal and/or business activities and interests of an employee/volunteer conflict with the business interests of Aptus.

Employees/volunteers are not authorized to give to or receive personal gifts or services of greater than $50 on an annual basis from external stakeholders. If you do receive a gift, where possible, it should be given to the Finance Department to be recorded and distributed for companywide uses, such as social or meeting events. While it is recognized that business entertainment is intended to build relationships, employees/volunteers are not authorized to attend any event

which influences business decisions. If in doubt, please discuss with your Manager or Director of Finance.

Employee/volunteer participation in business related trips that are sponsored by an external organization must be pre-approved by their supervisor.

It is a conflict for an employee to own a substantial interest (other than as a shareholder of a publicly traded company) or participate in the business of an actual or potential supplier, customer, competitor, or any business or organization that conducts, or seeks to conduct, business with Aptus. The potential for a conflict of interest could also exist if an employee's close relative had a substantial interest in a supplier / competitor / customer of Aptus.

Employees/volunteers may work/volunteer for other organizations as long as doing so does not interfere with their ability to fulfill their responsibilities or is a conflict of interest with their position at Aptus.

An employee or volunteer who has reasonable grounds to believe that he or she has a conflict of interest shall exclude themselves from all aspects of the acquisition process and disclose the nature of the conflict of interest. This shall be in writing to a senior manager at Aptus and must disclose: all grants, research funding, free products, equipment on loan at Aptus or private practices, ownership of shares held in the competing companies, receipt of any gifts, educational funds etc. Companies or service providers must disclose same in writing to Aptus at the time they are presenting prices, quotations or tender responses.

Confidentiality of Information:

Employees/volunteers are expected to safeguard and keep strictly confidential all information pertaining to Aptus, its affiliated organizations, members and business partners gained as a result of their employment. An employee/volunteer who uses or discloses any of this information will be held liable for any damage or loss suffered by Aptus and those organizations and individuals to which the confidential information relates.

All employees/volunteers must rigorously protect the security and confidentiality of company, employee/volunteer, member and other information and transactions. You should use common sense, good judgment and take all reasonable steps to ensure that this information is kept confidential. Confidential documents that are being discarded must be shredded or discarded appropriately and not left in the garbage.

Employees/volunteers must not disclose confidential information to colleagues, family, friends or any other person within or outside of Aptus, who does not have a direct association with the transaction and the right to know.

Employees/volunteers will not use confidential, non-public information gained from the company for any personal or business benefit or transaction.

An employee/volunteer leaving Aptus must return all relevant information in any form and all copies that are in their possession immediately. This policy and its obligations continue to apply to individuals after their employment with Aptus ends.

Business Conduct:

No employee/volunteer shall falsify company records or make improper payments on behalf of Aptus. Any employee/volunteer with access to company funds must demonstrate the upmost care in handling these funds in accordance with the standards established to help the company protect and account for its finances.

It is essential that a professional image be maintained in all business transactions. Employees/volunteers should demonstrate a responsible attitude, professional demeanor and suitable attire at all times.

Compliance:

Employees/volunteers are asked to report any potential breaches of this policy that they may find themselves in or observe other employees/volunteers in potential conflict. Compliance with the Business Code of Conduct and its provisions are considered to be a condition of employment. Any breach of this policy is subject to appropriate disciplinary action up to and including termination.