

Toronto Seniors Housing Corporation
Corporate Governance and
Human Resources Committee Meeting (CGHRC)

Date: Thursday, November 6, 2025

Time: 4:00 pm to 5:30 pm

Location: WebEx and Livestream

Item	Time	Description	Action	Type of Item	Presenter
1.	4:00 pm 2 min	Chair's Remarks	Information	N/A	Chair
2.	4:02 pm 2 min	Land and African Ancestral Acknowledgements	N/A	N/A	Chair
3.	4:04 pm 1 min	Approval of Public Meeting Agenda	Approval	Agenda	Chair
4.	4:05 pm 1 min	Chair's Poll re: Conflict of Interest	Declaration	N/A	Chair
5.	4:06 pm 1 min	Approval of Public Minutes of CGHR Committee Meeting of September 17, 2025	Approval	Minutes	Chair
6.	4:07 pm 1 min	Approval of Closed Minutes of CGHR Committee Meeting of September 17, 2025	Approval	Minutes	Chair
7.	4:08 pm 2 min	Action Items Review	Information	List	Chair
8.	4:10 pm 5 min	CEO Update	Information	Verbal	Tom Hunter
9.	4:15 pm 10 min	People and Culture Dashboard	Information	Report	Carol Francis

Item	Time	Description	Action	Type of Item	Presenter
10.	4:25 10 min	Tenant Human Rights Complaints Report	Information	Report	Grant Coffey
11.	4:35 10 min	People and Culture Policies:	Approval	Report	Carol Francis / Dave Slater
	11a	• Employee Code of Conduct			
	11b	• Employee Conflict of Interest Policy			
12.	4:45 10 min	TSHC Intranet Update	Information	Demo	Deanna Veltri / Matthew Kinch
13.	4:55 15 min	Inclusion, Diversity, Equity, Accessibility (IDEA) Strategy Update	Information	Report	Carol Francis / IDEA Co-Leads
14.	5:10 pm 1 min	Adjournment	Approval	N/A	Chair

Toronto Seniors Housing Corporation (TSHC)

Corporate Governance and Human Resources Committee Meeting (CGHRC)

[View Live Stream Video Part 1 here](#)

[View Live Stream Video Part 2 here](#)

Draft Minutes

The TSHC Corporate Governance and Human Resources Committee (CGHRC) held its meeting on Wednesday, September 17, 2025, at 4:00 pm via WebEx video conference. This meeting was livestreamed.

Members in attendance:

Brenda Parris, Chaired
Fareed Amin
Lawrence D'Souza
Warren Law

TSHC staff present:

Tom Hunter, Chief Executive Officer
Grant Coffey, Director, Strategy and
Business Management
Deanna Veltri, Director, Engagement,
Partnership and Communications (I)
Brad Priggen, Director, Operations
Carol Francis, Director, People & Culture
Vince Truong, Interim Finance Lead
Nina Phillips, Business Consultant
Karyn Bawden, EA and Board Secretary
Emma Francis and Fatima Mahmood, EAs

Item 1: Chair's remarks

Brenda Parris Chaired the meeting on behalf of Councillor Crisanti in his absence. She welcomed the Committee members, Board and staff and stated there were no deputations and the meeting was being livestreamed on YouTube.

The Chair acknowledged that September is World Alzheimer's Month and Prostate Cancer Awareness Month and Rosh Hashanah will begin on September 22nd.

The Chair noted it was a light agenda showcasing the People and Culture Dashboard then the meeting would move in-camera. She noted there were no closed decisions to be made at this time.

With that, the Chair continued to the next Agenda Item.

Item 2: Land and African ancestral acknowledgements

The Chair began with Land and African ancestral acknowledgements.

Item 3: Approval of Public meeting agenda

The Chair asked for a motion to approve the CGHRC Public meeting agenda of September 17, 2025 as presented.

Moved: Warren Law

Seconded: Lawrence D'Souza

With All in favour, it was resolved that the CGHRC Public Agenda of September 17, 2025, was approved as amended..... **Carried**

Item 4: Chair's poll re: conflict of interest

The Chair asked the members of the Committee whether there were any conflicts of interest. With no conflicts of interest being declared, the Chair continued to next Agenda Item.

Item 5: Approval of public minutes of CGHRC meeting of June 18, 2025

The Chair asked if there were any edits or changes to the CGHRC Public meeting Minutes of June 18, 2025, being none, the Chair asked for a motion to approve the CGHRC Public meeting Minutes of June 18, 2025, as presented.

Moved: Warren Law

Seconded: Lawrence D'Souza

With All in favour, it was resolved that the CGHRC Public meeting Minutes of June 18, 2025, were approved as presented**Carried**

Item 6: Approval of Closed Minutes of CGHRC meeting of June 18, 2025

The Chair asked if there were there any edits or changes to the CGHRC Closed session meeting Minutes of June 18, 2025, being none, the Chair asked for a motion to approve the CGHRC Closed session meeting Minutes of June 18, 2025, as presented.

Moved: Warren Law

Seconded: Lawrence D'Souza

It was resolved that the CGHRC Closed session meeting Minutes June 18, 2025, were approved as presented**Carried**

Item 7: Action item review

The committee reviewed the action items list and the status of the items. With no other action items discussed, and the Committee satisfied, the Chair proceeded to next Agenda Item.

Item 8: CEO Update

Through the Chair, Tom Hunter gave his CEO Update, highlighting:

- **People and Culture Update**
 - Noted that the IDEA Strategy would be brought forward later this year
- **Staff Event Recap**
 - All-staff carnival event was on September 16, 2025. The event was a tremendous success with a great turnout. Feedback has been overwhelmingly positive. Events like this are a critical part of our ongoing efforts to foster a positive and collaborative company culture
- **Governance Workshop**
 - The holds in November for the Workshop have been cancelled due to conflicts with key board members. A new date is being sourced.
- **New Board Composition**
 - New board composition will be confirmed at the Council meeting on October 10. A full update will be provided immediately following the Council's decision
- **Bargaining Update**
 - negotiations have officially begun with **Local 79**, and will continue to keep the committee informed as they progress.

The Chair asked for any comments or questions. Warren Law inquired about the Board Portal and what program we will be using. Grant Coffey noted it would be April. The Chair asked about historical documents and if they will be available on the portal. It was noted that they will be available and more information on the

Portal will be brought forward at the Governance Workshop.

With no further questions or comments, the Chair proceeded to the next agenda item.

Item 9: People and Culture Dashboard

Through the Chair, Carol Francis went through the People and Culture Dashboard.

The Chair asked what unpaid means and what is the follow-up. Ms. Francis noted that the People and Culture Team will work with People Leaders to reduce absenteeism.

With that, the Chair thanked the Committee and Ms. Francis for the presentation and proceeded to the next Agenda item.

Item 10: Approval to Move into Closed Session

The Chair asked for a motion to approve the meeting move into Closed Session under the TSHC By-law 1-2021 Section 4.19, Subsection 1L.

Moved: Warren Law

Seconded: Lawrence D'Souza

With all in favour, it was resolved that the TSHC CGHRC Public meeting be terminated and move into a Closed Session **Carried**

The meeting went into Closed Session.

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Upon return to the Public Session of the TSHC CGHRC September 17, 2025 meeting, the Chair thanked the online attendees for joining again and noted there

were no Closed Session Decisions to make and proceeded to the final Agenda Item, Adjournment.

Item 14: Adjournment

The Chair thanked the Board, Committee members, staff and online attendees who attended the TSHC CGHRC September 17, 2025, meeting and asked for a motion to adjourn the meeting.

Moved: Warren Law

Seconded: Lawrence D'Souza

With All in favour, it was resolved that the meeting terminate **Carried**

Brenda Parris, Board Director and Member
Corporate Governance and Human
Resources Committee Meeting

**TORONTO SENIOR HOUSING CORPORATION (TSHC)
Corporate Governance and Human Resources Committee**

Action Item List as of November 2025

Action items				
	Meeting Arising From	Description	Resp	Status
1.	Oct 7, 2024	Bring semi-annual report to Board/Committee on incidences/trends on tenant management process and efficacy on Tenant Human Rights Policy	Grant Coffey	Completed

Completed Action items				
	Meeting Arising From	Description	Resp	Status
1.	November 21, 2024	Staff to bring 2025 Review on Policies	Grant Coffey	Completed
2.	June 12, 2024	Whistleblower Protection policy to go to AFRC Committee for review	Carol Francis	Completed
3.	June 12, 2024	Bring Board, Governance and People and Culture Policies back to Board for review/editing and bring back to Board Committee for approval	Grant Coffey/ Carol Francis	Completed

Toronto Seniors Housing Corporation
Corporate Governance and Human Resources Committee
Meeting

Meeting Date: November 6, 2025

Topic: TSHC People and Culture Dashboard

Item Number: 09

To: Corporate Governance and Human Resources Committee (CGHRC)

From: Carol Francis, Director, People and Culture

Date of Report: October 29, 2025

Purpose: For information

Recommendation:

It is recommended that the Corporate Governance and Human Resources Committee receive the TSHC People and Culture Dashboard for information.

Carol Francis
Director, People and Culture

List of Attachments:

09.1 TSHC People and Culture Dashboard

Enabler 2: Employer of Choice

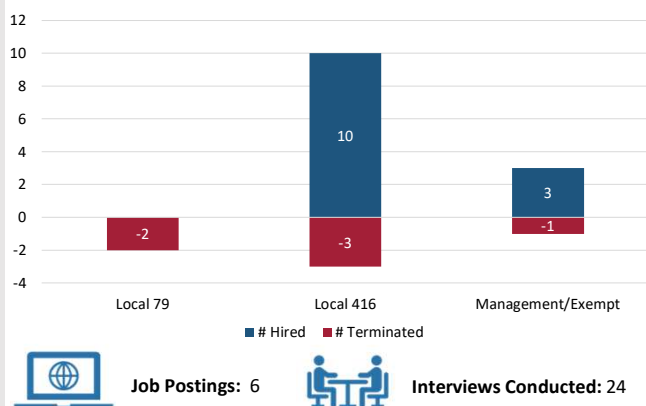
Highlights:

Recruitment & Workforce Stability: The organization maintained a low Turnover Rate and an associated low Vacancy Rate, confirming strong staff retention and stabilization of the average headcount. Recruitment efforts resulted in a net positive gain of new hires, effectively supporting necessary staffing levels.

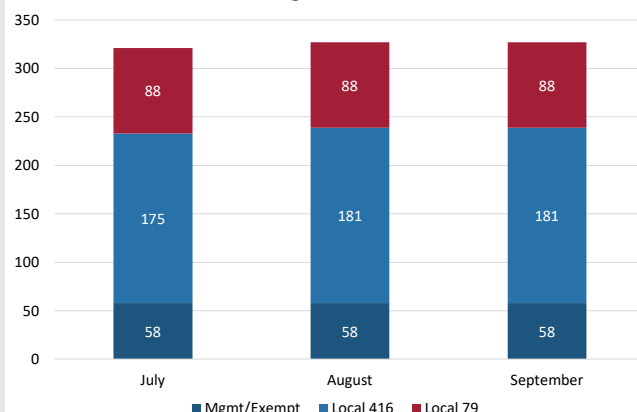
Health & Safety and WSIB: Lost-Time Claims remained low, demonstrating success in mitigating high-severity workplace injuries. The Joint Health and Safety Committee (JHSC) training and meeting compliance is on track, reinforcing a commitment to safety governance. WSIB Costs were effectively managed, showing either a decrease or stable performance against the target budget.

Training & Development: Compliance with mandatory training, such as the AODA/Workplace Violence/CCTV policy acknowledgements, is strong, reflecting high staff engagement with essential policy updates. Training opportunities offered and completed show positive momentum in employee development.

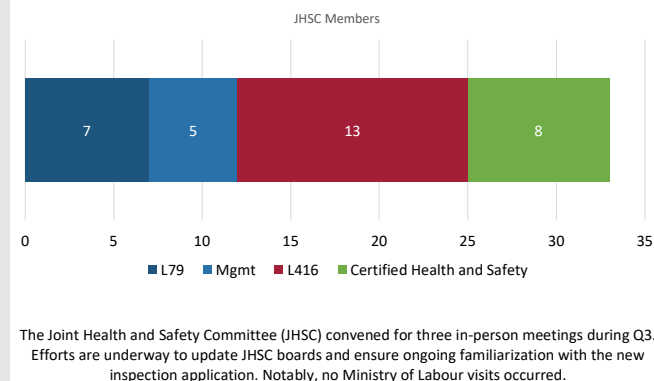
Recruitment



Average Head Count



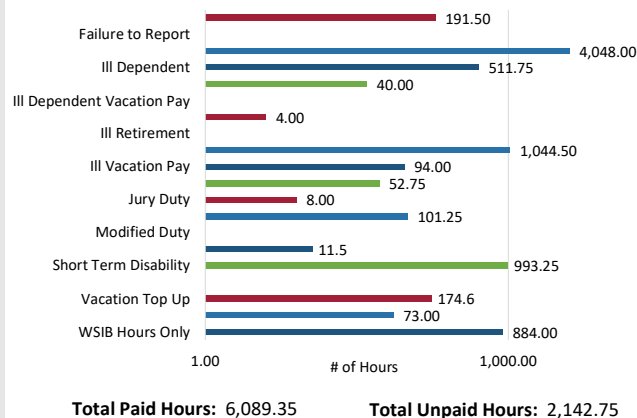
Joint Health and Safety Committee Updates



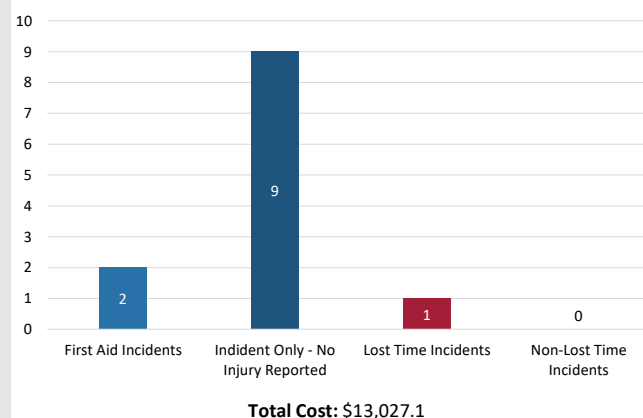
Turnover and Retention Rate

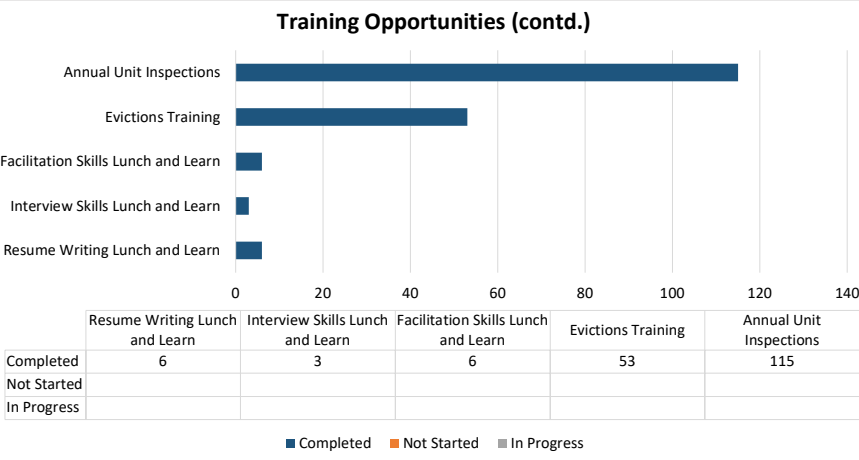
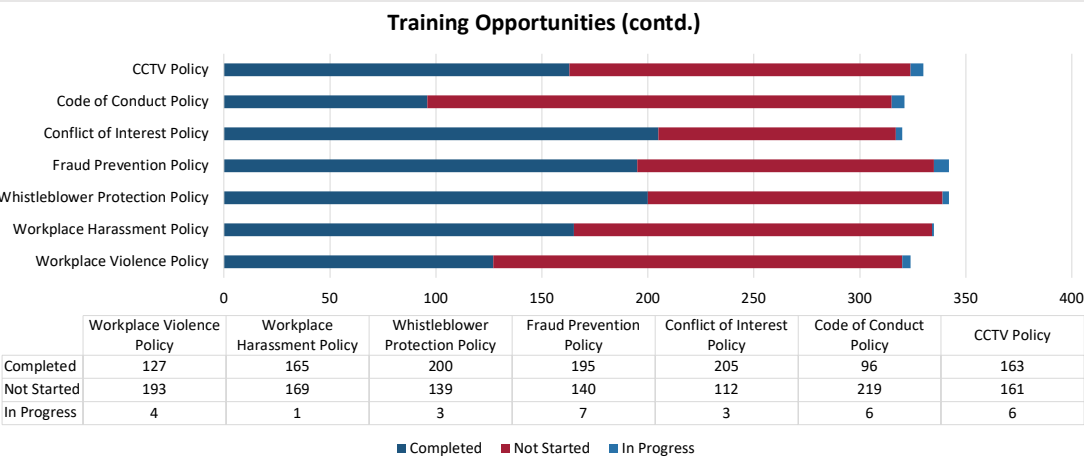
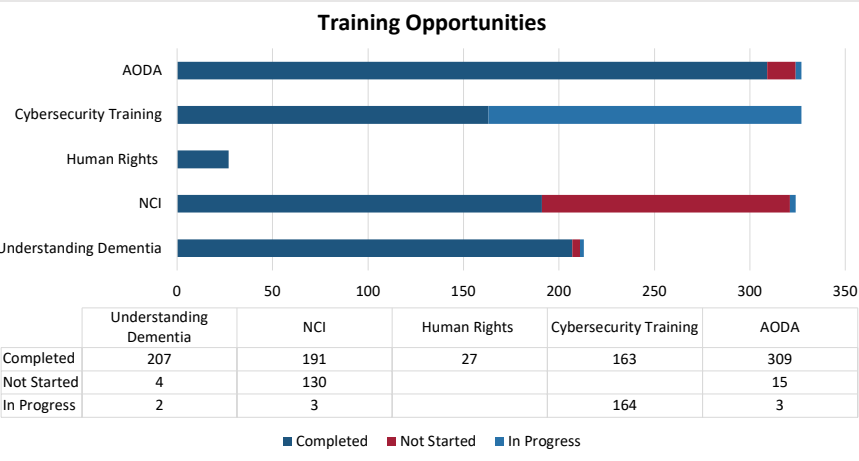


Absenteeism Rate



Lost-Time Claims Costs





Policies Training

Training Course: Code of Conduct
Target Audience: All Staff
Frequency: Annually
Description: The Code of Conduct Policy training aims to, provide guidelines on how our tenants, vendors, community partners and members of the public are treated, outline how employees are expected to conduct themselves in a professional, helpful, and courteous manner, bring an awareness how we represent and maintain the reputation of Toronto Seniors Housing Corporation.

Training Course: CCTV Camera Policy
Target Audience: All Staff
Frequency: One Time
Description: This policy review and acknowledgement details the new 2025 Closed-Circuit Television (CCTV) Policy governing security video surveillance and requires all personnel to confirm their understanding and compliance obligations in Talent Connect.

Training Course: Conflict of Interest
Target Audience: All Staff
Frequency: Annually
Description: The Conflict of Interest Policy aims to promote public confidence in Toronto Seniors Housing Corporation, which is the responsibility of every employee, by observing a high standard of honesty, integrity, accountability, and ethics, and by providing guidance on the Corporation's expectations related to conflicts of interest, including how to identify and resolve them.

Policies Training (contd)

Training Course: Fraud Prevention Policy
Target Audience: All Staff
Frequency: Every Three Years
Description: The Fraud Prevention Policy training aims to implement measures to prevent, detect and investigate fraudulent activities misconduct, provide an anonymous ethics hotline for reporting suspected fraud or corruption (available to staff, tenants and the public), outline guidelines and responsibilities for investigations, and manage claims diligently with respect and discretion.

Training Course: Whistleblower Protection Policy
Target Audience: All Staff
Frequency: Every Three Years
Description: The Whistleblower Protection Policy aims to provide guidelines for reporting wrongdoing in good faith, and offer reasonable protection from reprisal for those who report.

Training Course: Workplace Harassment Policy
Target Audience: All Staff
Frequency: Annually
Description: The Workplace Harassment Policy aims to provide a work environment free of harassment where all workers are treated with respect and dignity in accordance with the Occupational Health and Safety Act, and to ensure that harassment will not be tolerated from any person, including tenants, other workers, supervisors, and members of the public.

Policies Training (contd)

Training Course: Workplace Violence Policy
Target Audience: All Staff
Frequency: Annually
Description: The Workplace Violence Policy aims to provide information that violence in the workplace is unacceptable from anyone, include measures and procedures to protect workers from workplace violence, provide information on summoning immediate assistance and a process for reporting incidents or raising concerns, and address domestic violence while communicating risks of violence to workers.

Tenant Focused Training

Training Course: Annual Unit Inspections
Target Audience: SSCs, CMPs,
Frequency: Annually
Description: Provide training on documentation, how to manage tenants, pest control, and overall building concerns. Also, what to look for in terms of Unit inspections and how to document and the specific workflows required.

Training Course: Evictions for Cause
Target Audience: ROMs and Operational Staff
Frequency: Annually
Description: This training contains three modules focused on the paralegal team facilitating content based on document completion, LTB introduction, RTA appeals process, eviction policy, and tribunal dealings along with privacy surrounding picture taking/how to's and FAQs.

Training Course: New Hire Cleaner Specific Orientation
Target Audience: Cleaners Upon Hire
Frequency: One Time
Description: Focused on H&S, guidelines, maintenance schedules, roles and scenarios in dealing with required equipment handlings.

Training Course: New Hire Orientation
Target Audience: All Staff Upon Hire
Frequency: One Time
Description: Overview of the company, who we are, ITSM, what we do, tenants information, buildings, staff, management goals, performance, payroll, and key contacts, etc.

Training Course: Non-Violent Conflict Intervention (NCI)
Target Audience: Regional Operations Managers, Superintendents, SSCs and CSCs
Frequency: Every Two Years
Description: In this training participants will learn how to identify behaviours that could lead to a crisis, effectively respond to each bahaviour to prevent the situation from escalating, learn verbal and nonverbal techniques to defuse hostile behavior and resolve a crisis before it becomes violent, and learn to cope with their own fear and anxiety.

Training Course: SharePoint Superusers and all Staff use
Target Audience: All Staff
Frequency: One Time
Description: This training provides an overview of how to use Sharepoint, best practices, who has rights to update, edit and how to manage the content.

Tenant Focused Training (contd)

Training Course: Understanding Dementia
Target Audience: All Staff Upon Hire
Frequency: One Time
Description: In this training participants will learn to identify cognitive function and cognitive impairment, define dementia, identify the difference between regular aging and dementia, identify early signs/symptoms of dementia, define Alzheimer's disease (most common form of dementia), and apply communication strategies.

Training Course: WhatsApp to Teams Guidelines with SOP and without SOP
Target Audience: All Staff
Frequency: One Time
Description: Best practices on how to use Teams, transition from WhatsApp and compliance.

Staff Development Training

Training Course: Facilitation Skills
Target Audience: All
Frequency: Annually
Description: Training focused on how to engage audience, format your presentation, and deliver robust trainings.

Training Course: Leadership - Leading with Impact
Target Audience: P&C Business Partner, ROMs, CHSs, Business Consultant, Procurement and Tenant Supervisor
Frequency: One-time
Description: This training consists of seven modules; how to coach and use BRAVE communication tool; starting with setting the purpose fact finding and verification; asking open ended questions explore solutions and discuss barriers, develop your brand, how to lead for success, create high performance teams, develop talent, how to right, cultivate healthy and collaborative cultures.

Training Course: Lunch and Learns
Target Audience: All Staff
Frequency: One Time
Description: Facilitation Skills, Resume Writing Skills, Interview Skills

Compliance Training

Training Course: Cybersecurity
Target Audience: All Staff
Frequency: Annually
Description: This training equips staff with essential cybersecurity awareness skills to recognize and mitigate modern threats. Learners will explore real-world data breaches, common social engineering tactics (phishing, vishing, smishing), and various malware types, including ransomware and spyware. The course emphasizes proactive behaviours—like securing devices, using strong passwords, and safely navigating public Wi-Fi—to protect personal and organizational data. Interactive knowledge checks and practical examples reinforce every employee's critical role in maintaining a secure digital environment.

Training Course: AODA/Customer Service Standard
Target Audience: All Staff
Frequency: One Time
Description: This module provides an introduction to the accessibility requirements and the requirements that are applicable to all the standards.

Training Course: The Code and AODA
Target Audience: All Staff
Frequency: One-Time
Description: This module provides training on how the Ontario Human Rights Code and the AODA work together as it pertains to person with disabilities.

Training Course: Human Rights
Target Audience: SSCs
Frequency: One Time
Description: This training program is designed to equip legal and frontline staff with a strong understanding of human rights principles, relevant legislation, and case law. This will include the basic knowledge and skills needed to inquire into tenant-initiated human rights complaints, including conducting procedurally fair and legally defensible investigations as required.

Toronto Seniors Housing Corporation
Corporate Governance and Human Resources Committee
(CGHRC) Meeting

Meeting Date: November 6, 2025

Topic: Tenant Human Rights Complaints Reporting Framework

Item Number: 10

Report Name: Tenant Human Rights Complaints Reporting Framework

To: Corporate Governance and Human Resources Committee

From: Director of Strategy and Business Management

Date of Report: October 24, 2025

Purpose: For information

Recommendation: CGHRC receive this report for information.

Reason for Recommendation: CGHRC requested that TSHC periodically provide an update on the status of tenant human rights complaints following the approval of TSHC's Tenant Human Rights Policy.

Background

Policy and Procedure

In October, 2024, TSHC's Board of Directors approved the [Tenant Human Rights Policy](#). The policy provides an updated framework to ensure TSHC can comply with its obligations under the Ontario Human Rights Code, provide a viable mechanism for tenants to make human rights complaints to TSHC, and ensure TSHC premises are free from

harassment and discrimination by building tenant and staff awareness of their human rights obligations.

A procedure to handle human rights complaints made by tenants was finalized in July, 2025 (Attachment 1). The procedure was developed alongside the policy, in consultation with R-PATH, the Ombudsman, the City of Toronto's Human Rights Office and the Centre for Advancing the Interests of Black People. Elements of the procedure continue to be refined as it rolls out, such as alignment with TCHC on roles and responsibilities pertaining to scenarios where a TCHC vendor or staff member is the subject of a complaint made by a tenant living on TSHC premises.

Staff Training and Tenant Communications

Beginning in July, TSHC began training its staff on the Code, policy, procedure and related items in a staged manner. The leadership team and other staff members designated to handle investigations were provided an intensive one-day staff training on the Code, its application within the housing context, the specifics of the policy and procedure as well as a step-by-step training to run investigations transparently, fairly and effectively.

TSHC's Seniors Services Coordinators will also receive a training in November that focuses on proactively incorporating human rights principles into their day-to-day operations and being mindful of the policy and procedure in light of potential complaints that they may be responsible for escalating. The training will help ensure that a human rights lens is applied to tenancy management processes and informs considerations related to supports for tenants.

All staff are expected to receive general human rights training by the first quarter of 2026 after which communications will go out to tenants about the finalized complaints procedure.

Complaints Reporting

As part of its requirements to report updates on complaints to CGHRC, TSHC has also developed a reporting framework that will be used for this purpose (Attachment 2). It will also help TSHC refine its procedure over time.

Given the ongoing rollout of the complaints procedure at TSHC, no tenant complaints have been received directly by TSHC so far. However, six complaints have been filed at the Human Rights Tribunal of Ontario, the summary of which is provided in Attachment 3.

Grant Coffey

Director, Strategy and Business Management

List of Attachments:

1. Tenant Human Rights Complaints Procedure
2. Tenant Human Rights Complaints Reporting Framework
3. Tenant Human Rights Complaints Summary

Toronto Seniors Housing Corporation (TSHC) [Tenant Human Rights Complaints Procedure]

Procedure Owner: Grant Coffey, Director of Strategy and Business Management

Approver: Grant Coffey, Director of Strategy and Business Management

Initial Approval Date: July 3, 2025

Effective Date: July 3, 2025

Purpose

The Tenant Human Rights Complaints Procedure lays out the key steps for TSHC staff to respond to and investigate any potential human rights complaints made by tenants. The Procedure also describes the roles and responsibilities of TSHC staff to fairly and effectively complete each step of the complaints process.

Scope

Tenants who want to make a human rights complaint can do so under this Procedure. Tenants can make a human rights complaint if they believe they have been discriminated against or face related human rights issues as laid out in the Ontario Human Rights Code and [Tenant Human Rights Policy](#).

Under this Procedure, the complaint can only be made by a tenant or an agent representing the tenant, such as a social worker. The complaint can be against another tenant, TSHC staff member, or vendor or agency working in TSHC residential complexes. Tenants or their agent can also make a complaint about a particular TSHC policy, practice, decision or physical environment that they feel negatively

affects their human rights.

Out of Scope

This Procedure does not cover tenant complaints that are not related to human rights. Examples of complaints that are out of scope include complaints about unresolved service requests, fraud, or waste where there is no connection to a protected ground under the Human Rights Code (for complaints related to unresolved service requests, see [TSHC's Interim Procedure for Service Requests and Tenant Complaints](#)).

Human rights issues that occur outside of TSHC residential complexes are also not covered under this Procedure.

In addition, the Procedure does not apply to human rights complaints made by TSHC staff members (for human rights and employment, refer to TSHC's Staff Policy on Human Rights).

Definitions

Adverse Impact: If a behaviour or a practice, whether unintentional or not, has a negative effect on a group or a person, it is an adverse impact. This is a key condition to determine whether a person's human rights have been violated and if so, what actions need to be accordingly taken.

Complainant: The individual who makes a complaint to TSHC about a potential violation of their human rights at TSHC.

Complaint: An expression of grievance about a potential violation of an individual (or group's) human rights at TSHC.

Discrimination: Discrimination includes any distinction, including any

exclusion, restriction, or preference based on a prohibited *Code* ground, that impairs the recognition of human rights and fundamental freedoms.

The form of discrimination may be an action or decision that disadvantages a particular person or group, or it may be that a policy, procedure, or a practice is negatively impacting an individual or group indirectly.

A practice, behaviour, action, or decision which results in the distinction, exclusion, restriction, etc., of a person based on *Code* grounds, including but not limited to age, gender identity, disability, or race, may be discriminatory regardless of whether it is intentional or not.

The following must be established to constitute a complaint under the *Code*:

- They have a characteristic protected under the *Code*.
- They have experienced adverse impact/treatment under one of the three social areas detailed in this policy (Housing, Services, and Contracts).
- The protected characteristic was a factor in the adverse treatment.

Duty to Accommodate: TSHC has a duty to accommodate *Code*-related rights of tenants, to make sure that the housing they supply is designed to include people identified by *Code* grounds, and to take steps to remove any barriers that may exist, unless to do so would cause undue hardship.

The duty to accommodate may consist of adjustments to policies, the

physical environment, procedures, and practices that may otherwise be adversely impacting a particular individual or a group that is protected under the *Code*.

The tenant and TSHC are responsible for identifying accommodation needs and cooperating to identify, review, and implement suitable accommodation.

Grounds: The personal attributes that are protected under the Ontario Human Rights Code from discrimination and harassment and used as a basis to determine the nature of a discriminatory practice, action, or behaviour, and accordingly verify whether this was a violation of *Code* provisions.

Harassment: Engaging in a course of vexatious comment(s) or conduct that is known or ought reasonably to be known to be unwelcome amounts to harassment.

Comments or conduct that are generally known and/or reasonably ought to be known to be offensive, embarrassing, humiliating, demeaning, or generally unwelcome may amount to harassment. Comments or conduct that are specifically targeted against a group that is listed under protected grounds may amount to harassment under the *Code*. A single comment or action, if sufficiently serious, may amount to harassment.

Examples of harassment include epithets, remarks, jokes, or innuendos related to a person's gender, race, sexual orientation, or any other protected ground; posting or circulating offensive pictures, graffiti, or materials, either in print or virtually; singling out a person for humiliating or demeaning "teasing" or jokes because they are a

member of a *Code*-protected group; comments ridiculing a person because of characteristics that are related to a ground of discrimination.

Occupant: A person who is living with the tenant but is not listed as a tenant on the lease.

Poisoned Environment: This is created by conduct, comments, or practice that creates a discriminatory living environment. The comments or conduct need not be directed at a specific person, and may be from any person, regardless of position or status. A single comment or action, if sufficiently serious, may create a poisoned environment.

Respondent: The individual who is the subject of a complaint that has been made against them.

Social Areas: The parts of society under which the *Ontario Human Rights Code* applies, including employment, housing, services, unions and vocational associations and contracts.

Tenant: A person who has signed a lease with TSHC to reside in and is currently occupying a TSHC unit.

Approach to Resolving Human Rights Complaints

TSHC will ensure all human rights complaints are taken seriously, are addressed adequately and within a reasonable timeframe. To do so, TSHC will work with the complainant and the respondent to explore the best possible approach to finding a solution. This could mean anything from carrying out a formal investigation to facilitating a collaborative approach between the Complainant and Respondent for a quick

resolution.

For formal investigations, TSHC will determine on a case-by-case basis whether a complaint can be resolved with staff resources or whether additional third-party support, such as a human rights investigator or lawyer, is needed.

Summary of Key Steps of the Complaint Process

1. The tenant makes a complaint to TSHC.
2. TSHC's designated solutions clerk reviews the complaint to make an initial determination of whether it is an Ontario Human Rights Code (the *Code*) related complaint and to acknowledge that the complaint has been received and under review.
 - a. If it is not a Code-related complaint, TSHC will follow the relevant procedures, such as the Interim Procedure for Service Requests and Tenant Complaints, to resolve the complaint. The Complainant may disagree with the designated solutions clerk's assessment and ask that the complaint be reviewed again to check that it is a human rights issue (Step 3).
3. TSHC's Review Committee takes a closer look at the complaint to validate whether the initial assessment is related to a human rights issue and to determine whether additional resources such as a third-party investigator will be required to investigate the complaint. It may also work with the complainant at this time to explore ways to collaboratively resolve the issue with the respondent.
4. For formal investigations, TSHC will review the available evidence, related laws and other relevant documents, as applicable. A third-party investigator may lead the investigation at this time.
5. Based on the findings from the investigation, TSHC identifies steps to

resolve the complaint, if applicable.

6. TSHC communicates the findings and any applicable steps to resolve the complaint to the Complainant, Respondent(s) and other relevant parties.
7. If the complainant or respondent is dissatisfied with the outcome of the investigation, they may:
 - a. Ask TSHC for a reconsideration if there is evidence that shows that TSHC did not follow the procedure or if new relevant information emerges after the investigation concludes and may alter the outcome of the decision.
 - b. Take their case to the Ontario Human Rights Tribunal, The Landlord and Tenant Board, the City of Toronto's Ombudsman and/or their local councillor.

Roles and Responsibilities

1. Making a complaint

Tenants who believe that their human rights have been impacted within a TSHC residential complex will have to complete a complaints form and submit it to TSHC's Head Office. The complainant can get a copy of the form and submit it in one of the following ways:

- Phone at 416 945 0888
- Filling out the form online
- Emailing solutions@torontoseniorshousing.ca
- By mail to TSHC's head office at 423 Yonge Street.
- By contacting their Seniors Services Coordinator (SSC).

It is the responsibility of the Complainant to try to complete the complaints forms to the best of their ability. Alternatively, an agent acting on behalf of a Complainant may complete the form. The Complainant or agent should try to fill out the form in its entirety. This includes providing as many details of the incident(s), policy, practice or decision that they believe is a violation of their Code-related human rights.

For Complainants who request a copy of the form from their SSC's, the SSC can also assist Complainants to understand the instructions in the complaints form if the Complainant requires such help. However, SSC's cannot help tenants complete the forms. If tenants require further assistance with completing the form, they can consult external resources such as legal advisors at their own cost.

If a Complainant is making a complaint about their SSC and would still require assistance with accessing and understanding the form, they can contact their building's Regional Operations Manager (ROM).

Complainants who require assistance in another language can also request a copy of a translated form using the contact options provided above.

2. Complaint Intake and Processing

Acknowledgement

After a complaint is made, a designated solutions clerk under the TSHC Tenant Human Rights Complaints Procedure [updated July 2025]

Operations Department will review the details to make an initial determination of whether it is a human rights complaint or not. The broad conditions that need to be met for a complaint to constitute a Code-related human rights complaint are as follows:

- The complainant has one or more characteristic protected under the Human Rights Code;
- The complainant has experienced adverse impact/treatment within TSHC residential complexes; and
- The protected characteristic(s) was a factor in the adverse treatment.

The designated solutions clerk will make reasonable efforts to contact the Complainant within five business days following the complaint being filed. Their response will consist of one of three scenarios:

- If it is clearly determined that the complaint is not human rights related, the designated solutions clerk will notify the complainant of the decision and if applicable, advise them of any procedure and/or relevant steps that need to be taken by all relevant parties to address the complaint.
- If the information provided by the Complainant indicates the complaint is human rights related, the designated solutions clerk will notify the tenant that the claims will be further validated to determine the approach to investigate the claim. The designated solutions clerk will transfer the complaint to the Leadership Team to begin the Validation and Triaging process.
- If the information provided by the Complainant is unclear or incomplete, the designated solutions clerk will contact the Complainant for more details.

Response times may take longer than five business days in some cases and may take up to ten business days if the complaint is in a language other than English. If the designated solutions clerk under the Operations Department is not available to process the complaints, the Executive Assistant to the CEO's Office will serve as back up.

If the designated solutions clerk determines that the complaint is not human rights related, the Complainant may ask that the decision be reconsidered by the Review Committee, detailed in the next section. If the Review Committee confirms the solutions clerks' conclusion that the complaint is not human rights related, the Complainant can take up their issue to the Ombudsman, Ontario Human Rights Tribunal, the Landlord and Tenant Board, or to their local councillor.

Validation and Triaging:

Once an initial determination is made that the complaint is a Code-related human rights complaint, the designated solutions clerk's assessment will be reviewed and validated by a Review Committee. Members of the Review Committee will be appointed by TSHC's Leadership Team, represented by the Director of Strategy and Business Management. If the complaint is confirmed to be Code-related, the Committee will decide on how to proceed with the investigation including whether to recruit a third-party investigator.

The key contact designated to lead the investigation and outlined in the next section (3. Investigation), will make best efforts to notify the Complainant about the date that a formal investigation will be initiated

within ten business days of an investigation plan being prepared. The Complainant will also be notified if a third-party investigator will be involved. Depending on the nature of the case, the investigation lead may also work with the Complainant and Respondent at this time to explore a collaborative approach to resolving the complaint.

Alternatively, the designated solutions clerk may contact the Complainant if a determination is made by the Review Committee that the complaint is not going to be formally investigated. The clerk will provide an explanation for the decision and the Complainant may be given alternatives to internally address the complaint, if appropriate and available in the circumstances.

Anti-Black Racism

If the complaint is a case of potential Anti-Black Racism, the Review Committee will notify the Centre for Advancing the Interests of Black People at TCHC ('the Centre') that a complaint is currently under review. The key contact designated to lead the investigation will ask the Complainant whether they wish to have the Centre involved during the investigation stage. The Centre will support the Complainant and monitor the investigation if the Complainant consents.

3. Investigation

TSHC will make all reasonable efforts to carry out and conclude the investigation in an efficient and timely manner. The timeframe and nature of the investigation will be determined by the complexity of the case. The process may consist of gathering, reviewing and verifying

evidence through steps such as interviewing relevant parties and analysis of tenant records, and referencing applicable legislation and policies.

Procedural Fairness and Confidentiality

To ensure procedural fairness, TSHC will communicate all relevant steps that the Complainant, Respondent, and any other parties are required to follow during the complaints and/or investigation process. TSHC will provide reasonable arrangements to allow parties to fully participate in the process.

TSHC will not initiate reprisals against a Complainant, Respondent, and/or witness who has made a complaint under this policy in good faith or is participating in an investigation under the Policy in good faith. A reprisal is an action, or threat, that is intended as retaliation for claiming or enforcing a right. Examples of Reprisals include harassment, discrimination, intimidation or imposition of another penalty, or any other action which harms their living conditions. It also includes a threat to take actions or knowingly advising another person to engage in reprisal.

If the Complainant prefers to take a mediated approach to resolving the complaint during this time, TSHC will make the necessary arrangements if the Respondent also wishes to participate. If they wish, tenants can also seek out external supports such as legal advice and/or trusted support persons at their own cost.

If tenants want to know the status of the investigation, they may

TSHC Tenant Human Rights Complaints Procedure [updated July 2025]

contact the key contact outlined in the four scenarios below, for updates.

The investigation process covers four scenarios within which a complaint can occur on TSHC residential complexes, or any combination of these:

- A tenant makes a complaint against a TSHC staff member.
- A tenant makes a complaint against another tenant, occupant or guest.
- A tenant makes a complaint against a TSHC policy, practice, physical environment or decision.
- A tenant makes a complaint against a vendor or agency that is engaged by TSHC.

Complaints made against TSHC staff

For complaints made against a TSHC staff member, TSHC's People and Culture Department will work with the supervisor and/or manager of the staff member who is the subject of the complaint (Respondent) to manage the investigation. For complaints involving unionized staff, a union representative will also be present throughout the investigation.

The People and Culture Department will advise the staff supervisor/manager on the key steps and considerations to ensure the investigation is conducted fairly and in line with other applicable policies and procedures that govern staff conduct and performance. The staff supervisor/manager will lead the interviews and will review and assess the evidence with support from the People and Culture

Department as necessary. The staff supervisor/manager will be the key contact with the Respondent and the Complainant and will be responsible for gathering evidence and arranging interviews wherever necessary and appropriate.

If it is determined during the validation and triaging stage that a third-party investigator is required to investigate the complaint, this investigator will review relevant documents and conduct interviews with the involved parties as required. They will be the main contact with the Respondent and Complainant throughout the course of the investigation. The supervisor/manager of the Respondent and the People and Culture Department will support the third-party investigator throughout the process as required, for example, through providing access to relevant documents and participating in interviews.

Complaints made against other tenants/occupants/guests

As part of its obligation as a landlord to ensure the reasonable enjoyment of all tenants, TSHC's Operations Department will follow the tenancy management process to review and resolve disputes wherever applicable, including incidents that are Code-related human rights violations such as harassment and discrimination. The Regional Operations Manager (ROM) of the building where the incident occurred will be responsible for gathering and reviewing the evidence and conducting interviews where required. The ROM will be the main contact with the Complainant and Respondent throughout the investigation.

If it is determined during the validation and triaging stage that a third-

TSHC Tenant Human Rights Complaints Procedure [updated July 2025]

party investigator is required to investigate the complaint, they will lead the investigation, reviewing relevant documents and conducting interviews with the relevant parties as required. They will be the main contact with the Respondent and Complainant throughout the course of the investigation. The ROM will support the third-party investigator wherever required, for example, through providing access to relevant documents and participating in interviews.

Complaints made against vendors or agencies operating within TSHC residential complexes.

TSHC works with several agencies and vendors which are managed by different TSHC departments. If a complaint is made against a staff member employed by an agency or vendor operating in TSHC residential complexes, the department responsible for managing the relationship with the agency or vendor will lead the investigation.

Depending on the nature of the complaint, and the contractual relationship with the vendor or agency, TSHC may compel the Respondent to participate in the investigation or request the relevant agency or vendor that employs the Respondent to review the complaint. In instances where vendors operating within TSHC premises have contractual arrangements with Toronto Community Housing (TCHC), TSHC may contact TCHC to review the complaint.

It may also be determined that a third-party investigator is needed. In such cases, the third-party investigator will lead the investigation, reviewing evidence and conducting interviews as required with support from the TSHC department responsible for managing the relationship

with the vendor or agency.

Complaints made against a TSHC policy, practice, physical environment or decision.

For complaints regarding a particular policy, practice or decision being non-compliant with the Code, the department that owns the policy or is responsible for the decision will be tasked with reviewing it in consultation with the Strategy and Business Management Department. The Policy Owner will determine whether getting further legal advice is required.

For complaints against particular decisions, TSHC's physical environment or ongoing practices that a Complainant believes violates their Code-related rights, the department responsible for the decision, practice or management of the premises will review the complaint and determine how to proceed, including whether to consult with other TSHC staff and/or procure external support.

4. Recommendations

Once the investigation has been concluded, the investigation lead will review the findings to determine the appropriate steps that need to be taken to address the complaint. The Leadership Team may also be consulted during this time. When investigations are led by a third party, the TSHC department responsible for the complaint will retain discretion over the recommendations made by the third-party investigator.

5. Communications and Implementation

Within ten business days of the decision being made, the key contact/department responsible for leading the investigation will send a decision letter to the Complainant, Respondent(s) and other relevant parties detailing the outcome of the investigation and any relevant steps that TSHC and others will be taking to address the complaint.

The parties will also be provided with a list of options that they can consider if they remain dissatisfied with the outcome of the investigation.

6. Reconsideration

If the Complainant and/or Respondent is not satisfied with the outcome of the investigation, they can get in touch with the key contact who earlier liaised with them during the investigation for a reconsideration of the decision within 30 business days of the decision being communicated to them. The Complainant or Respondent must demonstrate either:

- The complaint was not handled in accordance with the Procedure or;
- New relevant information has emerged that may alter the outcome of the investigation.

The Review Committee will then review whether the investigation was conducted in accordance with the procedure. A member of the Review Committee will communicate the findings to the Complainant or Respondent.

Alternatively, the Complainant may contact the Ontario Human Rights Tribunal, the Ontario Landlord and Tenant Board, the City of Toronto's Ombudsman or their local councillor for further consideration. Making an internal human rights complaint doesn't prevent a tenant from making a complaint to another person or administrative body. The Complainant may directly contact one of these parties before or without requesting an internal reconsideration.

Confidentiality

To maintain the integrity of the complaints process, TSHC will safeguard and keep confidential, all information received in the complaints and investigation process, unless required to disclose information to relevant parties, as laid out in the Procedure, or as required by law.

All parties involved in the complaints and investigation process are required to treat the matter as confidential and not disclose or release to anyone any information about the incident, complaint, and /or investigation. This extends to details of a complaint (including its existence), meetings about a complaint, identifying information about a person including names of witnesses, contact made with an investigator etc.

Conflict of Interest

In the event that a complaint is made against an individual responsible for managing the investigation or handling some other part of the complaints process, an alternative will be delegated these

TSHC Tenant Human Rights Complaints Procedure [updated July 2025]

responsibilities. The table below lays out the different scenarios:

Complaint Type	Lead	Alternative
Against Staff	People and Culture Business Partner	Manager, People and Culture
	Manager, People and Culture	People and Culture Director
	Regional Operations Manager	Director of Operations
	Other Staff Supervisor	Regional Operations Manager
Against Tenant/Occupant	Director of Operations	Manager, People and Culture
	Regional Operations Manager	Director of Operations
Against Vendor/Agency	Director of Partnerships	Manager, People and Culture
	Director of Operations	Manager, People and Culture
Against Intake	Solutions Team	Director of Operations
Against Tenant Support	Seniors Services Coordinator	Regional Operations Manager

Monitoring and Reporting

The designated solutions clerk will be responsible for documenting all completed investigations in accordance with the Reporting Framework

(see attachment). These details will be reported to TSHC's Committee on Corporate Governance and Human Resources (CGHRC) every six months.

Related Legislation, Regulations, and TSHC Policies:

- Ontario Human Rights Code (OHRC)
- Accessibility for Ontarians with Disabilities Act (AODA)
- Residential Tenancies Act, 2006, SO 2006, c 17.
- City of Toronto Housing Charter

Tenant Human Rights Complaints Reporting Framework

The following indicators will be used to track complaints and for reporting purposes as well as to refine TSHC's complaints procedure over time. One additional indicator is listed for future consideration.

Measure	Category
Type of respondent the complaint is made against	- Staff - Tenant - Vendor - Agency - Policy/Practice
Type of complaint	- Accommodation request - Harassment - Discrimination - Policy/Practice - Other
Complaint by protected ground	- 17 protected grounds
Number of complaints that were investigated and addressed in the calendar year, breakdown by type of human rights complaint	- Overall - Type of complaint - Respondent type - Protected ground type
Regional breakdown of complaints	- Overall - Type of complaint - Respondent type - Protected ground type
% of complaints deemed non-human rights complaints during initial review	- % human rights complaints - % other - % service request/ % fraud/ % other
Number of human rights complaints handled by a third-party investigator	- Overall - Type of complaint - Respondent type - Protected ground type
% of complaints that were appealed/asked for procedural review	- % Overall - % accommodation, harassment, discrimination, policy

% of complaints that required translation supports	- Overall - Preferred language
Number of complaints that got taken to the HRTO or LTB.	- Overall - Type of complaint - Respondent type - Protected ground type

Future Reporting Considerations	
Average time for complaints to be investigated/resolved	- Overall - Accommodation request - Harassment - Discrimination - Policy/practice

Tenant Human Rights Complaints Summary

Given the ongoing rollout of the Tenant Complaints procedure at TSHC, no tenant human rights complaints have been made directly to TSHC.

The following information summarizes the types of human rights complaints that TSHC tenants have filed at the Human Rights Tribunal of Ontario. Note that the total types of respondents, type of complaints and claimed protected grounds listed in the table below may be more than the total number of reported complaints. This is because multiple respondents may be the subject of a complaint; there also may be multiple types of complaints and protected grounds claimed as part of a single complaint.

For example, a complainant may make one complaint against a staff member and a tenant (two respondents) and cite their age and disability status as two protected grounds that played a role in the adverse treatment.

ITEM		Total
Total Number of Complaints		6
Type of Respondent the complaint is made against	Tenant	2
	Staff	3
	Vendor	0
	Corporation	4
Type of Complaint	Accommodation Request	3
	Discrimination	3
	Harassment	2
Complaint by Protected ground	Age	3
	Disability	4
	Race	1
	Receipt of Public Assistance	3
	Place of Origin	1
Status	Dismissed	1
	Ongoing	5

Toronto Seniors Housing Corporation
Corporate Governance and Human Resources Committee
(CGHRC) Meeting

Meeting Date: November 6, 2025

Topic: Review of People and Culture Policies

Item Number: 11

Report Name: Annual Review of People and Culture Policies

To: Corporate Governance and Human Resources Committee

From: Director, People and Culture

Date of Report: October 29, 2025

Purpose: For Approval

Recommendation:

It is recommended that CGHRC approve and recommend that the Board of Directors approve the following policies listed and appended to this Report:

- Employee Code of Conduct
- Employee Conflict of Interest Policy

This approval will also include a change in the review cycle from one (1) year to three (3) years.

Reason for Recommendation:

The Toronto Seniors Housing Corporation (TSHC) Policy Management Framework was approved on January 12, 2024. This framework includes an on-going policy

review and clean-up initiative which will result in a comprehensive policy inventory that will be accessible to all staff on the TSHC internal web site and to the public on the TSHC external website.

As part of this initiative, each policy undergoes assessment to determine policy owner, appropriate approval level, current state and approval status, and policy review cycle.

The following policies were reviewed by CGHRC on June 12, 2024, and approved by the Board of Directors on October 17, 2024.

- Employee Code of Conduct
- Employee Conflict of Interest

The following is a high-level summary of each:

Employee Code of Conduct

The objective of the Code of Conduct is to identify the standards Toronto Seniors Housing Corporation expects from employees in all dealings with tenants, work colleagues, visitors, contractors, suppliers, vendors, and members of the public. It applies to all employees of TSHC and students on academic placements. This code was initially adopted from TCHC and approved by the TSHC Board of Directors on April 28, 2022.

This policy underwent a comprehensive review in 2024. Revisions included:

- Conversion to standard TSHC format.
- Change title from “Code of Conduct” to “Employee Code of Conduct.”
- Addition of TSHC commitment and shared values.
- Incorporation of examples relating to inappropriate behaviour (respectful workplace and sexual harassment).
- Further elaboration on the Gifts and Gratuities section, including the establishment of a threshold value for disclosing receipt of gifts.
- Incorporate behavioral expectations for employees attending virtual or on-site meetings, workshops, conferences, or training events.
- Assignment of Next Review Date.

This policy was reviewed in October 2025 in accordance with the established one

(1) year review schedule. Current revisions included minor edits and a recommendation to change the formal review cycle to 3 years.

Employee Conflict of Interest Policy

The objective of the Conflict-of-Interest Policy to define expectations to promote Toronto Seniors Housing Corporation's shared values and to observe a high standard of honesty, integrity, accountability, and ethics. This policy also provides guidance on expectations of Toronto Seniors Housing Corporation related to conflicts of interest, including how to identify and resolve a conflict of interest. It applies to all employees of TSHC and students on academic placements. This policy was initially adopted from TCHC and approved by the TSHC Board of Directors on April 28, 2022.

This policy underwent a comprehensive review in 2024. Revisions included:

- Conversion to standard TSHC format.
- Change title from "Conflict of Interest" to "Employee Conflict of Interest."
- Addition of TSHC commitment and shared values.
- Minor revisions to clarify roles and responsibilities employees and managers.
- Incorporation of Questions and Answers into policy.
- Review to ensure consistent identification of specific positions of accountability e.g. CEO or Department Director.
- Assignment of Next Review Date

This policy was reviewed in October 2025 in accordance with the established review schedule. Current revisions included minor edits and a recommendation to change the formal review cycle to 3 years.

Carol Francis
Director, People and Culture

List of Attachments:

- 11.1 – Employee Conflict of Interest Policy (Track Changes Version)
- 11.2 – Employee Conflict of Interest Policy (Clean Copy Version)
- 11.3 – Employee Code of Conduct Policy (Track Changes Version)
- 11.4 – Employee Code of Conduct Policy Track Changes Version)

**Toronto Seniors Housing Corporation (TSHC)
Employee Conflict of Interest Policy**

Policy Sponsor: Director, People and Culture

Approver: Board of Directors

Initial Approval Date: April 28, 2022

Date of Last Revision: October 20, 2025

Effective Date: October 17, 2024

Policy Statement

Toronto Seniors Housing Corporation (TSHC) is committed to enhancing public confidence in what we do. In performing their duties and responsibilities, employees are expected to promote shared values and observe the highest possible standards of professionalism and service.

Our Commitment

With a focus on the unique needs of seniors, we are committed to being a leader in the delivery of quality, affordable housing for seniors. Our commitment includes engaging and collaborating with our tenants, our staff, and our partners towards providing excellent service for the well-being of our tenants.

Our Shared Values

Toronto Seniors Housing Corporation policies, procedures, and directives, including the Employee Code of Conduct, are based on our shared values. These values inform our decision-making and guide our behaviour in all activities related to our work.

Respect – Our culture is built on respect, trust and open and honest communication among tenants, staff, and service providers. We respect each tenant’s independence and privacy. We will assist tenants to find the services they prefer.

Inclusion – Quality of life for seniors is enhanced by living in vibrant and diverse communities. We strive for inclusion and equity.

Accountability – We are accountable to our tenants, our shareholder (the City of Toronto), and the public. We are committed to transparency. We are clear on our goals. We set targets and report our results. We demonstrate integrity and responsible stewardship of our resources.

Innovation – We are creative, innovative, adaptive, and flexible to meet the needs of our current and future tenants. We are a catalyst for positive change, energizing communities, and partners to join us to achieve our mandate.

Toronto Seniors Housing Corporation (TSHC) employees are expected to conduct themselves with personal integrity, honesty, and diligence in performing their duties. TSHC employees are required to support and advance the interests of the Corporation and avoid placing themselves in situations where their personal or private interests may conflict with or are perceived to conflict with the interests of TSHC.

We take pride in conducting ourselves with personal integrity, ethics, honesty, and diligence in performing our duties and ensuring we are protecting the public trust and confidence in TSHC.

Policy Objective

Promoting public confidence in Toronto Seniors Housing Corporation is the responsibility of every employee. Therefore, in performing their job duties, employees are expected to promote Toronto Seniors Housing Corporation’s shared values and to observe a high standard of honesty, integrity, accountability, and ethics. This Policy provides guidance on expectations of Toronto Seniors Housing Corporation related to conflicts of interest, including how to identify and resolve a conflict of interest.

Scope

This Policy applies to every employee of Toronto Seniors Housing Corporation and students on academic placements.

The standards outlined in this Policy are of particular importance to employees who can make or influence decisions of the organization (managers and senior leaders).

Out of Scope

Third parties who have business dealings with Toronto Seniors Housing Corporation, including contractors and vendors of Toronto Seniors Housing Corporation, are expected to comply with provisions of their contracts related to conflicts of interest. The Board of Directors Conflict of Interest Policy governs Members of the Board of Directors. Tenant volunteers must follow the Tenant Volunteer Code of Conduct.

Definitions

Conflict of interest: Any situation in which an employee’s personal or business interests may compete or appear to compete with their duties as an employee of Toronto Seniors Housing Corporation or may cause the employee to act contrary or appear to act contrary to the best interests of Toronto Seniors Housing Corporation.

A conflict of interest can also be a situation where an employee can use their
TSHC Employee Conflict of Interest Policy [updated October 20, 2025]

position for private or personal gain or expectation of private or personal gain, non-monetary or otherwise. A conflict may also occur when the private or personal interest benefits an employee's family, friends, or organizations in which the employee's family or friends have a financial interest.

A conflict of interest can be one or more of the following types:

Actual conflict: a conflict of interest that the employee has, or may have, at the present time.

Potential conflict: any situation which may lead or have the potential to lead to a conflict of interest in the future.

Apparent conflict: any situation which could be perceived as a conflict of interest by others, regardless as to whether there is an actual conflict of interest.

An apparent conflict of interest may arise where the employee (or the employee's family, friends, or business associates) stands to benefit personally from their own actions, or from a decision of Toronto Seniors Housing Corporation that they are able to influence.

Personal or Business Interest: Includes any personal gain, benefit, privilege, or advancement the employee, and/or the employee's family, friends, or business associates (past and present) may receive or expect to receive, whether monetary or non-monetary. Examples of conflicts of interest include, but are not limited to:

- using information learned during an employee's employment for personal benefit
- making a decision that may result in a benefit for a personal business partner
- being on the hiring panel for a close friend or family member
- being the employee, owner, or shareholder of, or having a financial interest in a company submitting a 'bid' application to Toronto Seniors Housing Corporation
- accessing the information of a friend or family member who is a tenant of Toronto Seniors Housing Corporation
- an employee 'exchanging hospitality' with a contractor or supplier, in which the employee uses their position to benefit the contractor or supplier in exchange for something that may personally benefit the employee or the employee's family, friends or business associates (past or present)
- entering a business or legal relationship with a tenant, such as agreeing to be the executor of a tenant's will

Roles and Responsibilities

It is the responsibility of all Toronto Seniors Housing Corporation employees to be familiar with and understand the provisions of the Employee Conflict of Interest Policy and avoid placing themselves in situations where their private or personal

interests may conflict with or perceived to conflict with the interests of TSHC.

All employees must disclose any actual or perceived conflicts of interest to their manager or department director.

It is the responsibility of managers and department directors to engage with People and Culture to determine how employees can continue to perform their duties in a way that does not contravene this Policy. Recommendations will be reviewed and approved by department directors.

Compliance with this Policy

The rules which follow do not cover all situations of a conflict of interest. Employees should always use proper judgment and act in the spirit of this Policy. If employees have any questions about this Policy or need any clarification about what is expected of them, they are expected to consult with their manager or department director for guidance.

Contravention of this Policy is a serious matter. Non-compliance with this Policy may lead to discipline, up to and including dismissal for cause. Non-compliance includes failing to declare a conflict of interest in accordance with this Policy. In some cases, non-compliance can also lead to legal action by Toronto Seniors Housing Corporation.

Policy Details

Avoiding a Conflict of Interest

- Employees must not enter any situation, arrangement or agreement that results or could result in a conflict of interest (actual, potential, or apparent) and should arrange their personal affairs to ensure that any conflicts of interest are avoided.
- Employees should consider any advantage their position at Toronto Seniors Housing Corporation may give them, whether it be the power to influence decisions, their ability to use company resources, or their access to information about others.
- In deciding whether their actions could result in a conflict of interest, employees are expected to consider how their actions will be seen by their colleagues or the public.
- Should an employee have any questions or need any clarification about this Policy, they are expected to consult with their manager or department director.

Gifts or donations

Employees may not solicit or accept any fees, advances, gifts, money, personal discounts, donations, personal benefits, meals, tickets, personal loans or the like from a tenant or any other person or entity that has, or might have, business dealings with Toronto Seniors Housing Corporation where it could result in a conflict of interest.

The exceptions are gifts of a nominal value of less than five dollars such as a greeting card, hat, token, memento, fridge magnet, or occasional coffee, which do not influence or would not be perceived as influencing the performance of the employee's duties. Other exceptions are accepting money where doing so is required as part of the employee's job (e.g., collecting rent or a fee established by Toronto Seniors Housing Corporation).

For example (but not intended to be a complete list), this means that an employee should never accept:

- a cash tip or in-kind gifts
- a gift that could be viewed as an exchange for a favour
- any meals unless the employee pays their own expenses
- offers to donate to a charitable cause on the employee's behalf
- an invitation to an event at the expense of the other person
- tickets to a sporting event or concert from a vendor or supplier

If you are unsure, decline the gift and consult with your manager.

An employee should never solicit donations for a charitable cause on behalf of a contractor or supplier, unless it is for a program/initiative established by Toronto Seniors Housing Corporation.

Outside Activities and 'Moonlighting'

Employees are not permitted to engage in outside work (which includes being self-employed) or other similar activities outside of working hours unless the outside work or activity is not in conflict with their work for Toronto Seniors Housing Corporation. This includes having another job if the work demands will conflict with the employee's position at Toronto Seniors Housing Corporation or if the employee could use information they learn while working at Toronto Seniors Housing Corporation for the benefit of the other company or themselves.

If an employee:

- wishes to engage in outside work, or
- be a director for any board or committee which may deal with issues affecting Toronto Seniors Housing Corporation, the employee must first declare a potential conflict to their manager or department director in writing and receive authorization for the engagement or appointment

It is the responsibility of managers and department directors to engage with
TSHC Employee Conflict of Interest Policy [updated October 20, 2025]

People and Culture to ensure that the outside work or activity is not in conflict with their responsibilities with Toronto Seniors Housing Corporation. Recommendations will be reviewed and approved by department directors.

Business Interests (Examples)

If the employee is, or seeks to be, an employee, director, or officer of a company (or the employee has a financial interest in the company) that has business dealings with Toronto Seniors Housing Corporation, this is a conflict of interest.

If an employee (or a family member, friend, or business associate of the employee) has a financial interest in a company that has business dealings with Toronto Seniors Housing Corporation, and the employee engages in any process related to a business transaction involving the company, this will be a conflict of interest.

The employee must declare the conflict or potential conflict of interest to their manager or department director in writing and seek advice on their role in such circumstances. The manager or department director, in consultation with People and Culture, will review the circumstances to determine what other actions, if any, should be taken to resolve the conflict.

Personal Relationships

Employees should always maintain a professional relationship with other employees and all persons with whom Toronto Seniors Housing Corporation has dealings. This includes tenants, commercial tenants (tenants), contractors, suppliers, and vendors.

However, Toronto Seniors Housing Corporation acknowledges that some employees will develop or have existing relationships with such individuals.

Employees must take all reasonable steps to manage these relationships, so the employee is not placed in a conflict-of-interest position (actual, potential, or apparent).

An example is if an employee works at, or has access to, a Toronto Seniors Housing Corporation owned or operated building and has direct contact with a friend or family member who is a tenant at that building (or access to the information of friends or family because of their job at Toronto Seniors Housing Corporation) as this will usually result in a conflict of interest. A friend includes someone the employee is dating or has a relationship with.

If an employee participates in the hiring process for, or will supervise, family, friends, or business associates (past/current) this will also be a conflict of interest.

Employees must declare any conflicts or potential conflicts of interest to their manager or department director. The manager or department director, in

consultation with People and Culture, will review the circumstances to determine what actions, if any, should be taken to resolve the conflict, such as making changes to a reporting relationship or work location. Recommendations will be reviewed and approved by department directors.

Confidentiality of Information

In performing their duties and responsibilities for the organization, employees will learn information about Toronto Seniors Housing Corporation and its operations which is not known to the public. Employees are prohibited from trying to access such information if it is not associated with their work. Employees are also expected not to use or disclose such information for any purpose that is not associated with their work (unless authorized by their divisional head or when required by law).

For more information regarding the responsibilities that employees must protect the property and information of Toronto Seniors Housing Corporation, please see the Employee Code of Conduct.

Reporting and Resolving a Conflict of Interest

All employees shall receive a copy of this Policy. Employees are required to declare any conflict of interest (real, potential, or apparent) they may have under this Policy upon hire. If, during their employment, an employee is in or will be in a conflict-of-interest situation, the employee must immediately report/declare the conflict of interest in writing to their manager or department director.

Employees are expected to fully cooperate in any discussion or investigation related to the resolution of a conflict of interest. The manager or department director, in consultation with People and Culture, will review the circumstances to determine what actions, if any, should be taken to resolve the conflict. Recommendations will be reviewed and approved by department directors.

Annual Review of Obligations

Toronto Seniors Housing Corporation employees and managers and executives shall review their obligations under this Policy on an annual basis, including the requirement to declare a conflict of interest.

Related Legislation, Regulations, and TSHC Policies:

- *Employment Standards Act, 2000*
- *Municipal Freedom of Information and Protection of Privacy Act, 1990*
- *Ontario Human Rights Code, 1990*
- Acceptable Use of Information Technology Policy (TCHC)
- TSHC Elections Policy
- TSHC Employee Code of Conduct Policy

- TSHC Fraud Prevention Policy
- TSHC Media and Issues Protocol

Amendments (Revision History):

Initial policy approved by Board of Directors on April 28, 2022.

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Next Scheduled Review Date: 2028

This Policy will be reviewed once every three years.

Policy Contact

Director, People and Culture

Appendices

- Appendix – Conflict of Interest Policy Questions and Answers
- Declaration of Conflict of Interest Form

Appendix - Conflict of Interest Policy Questions and Answers

Why do we have a Conflict-of-Interest Policy?

The Employee Conflict of Interest Policy is important to us as a public sector organization. Promoting public confidence in Toronto Seniors Housing Corporation (TSHC) is the responsibility of every employee. We are all expected to promote Toronto Seniors Housing Corporation's shared values and to follow a high standard of honesty, integrity, accountability, and ethics. The Employee Conflict of Interest Policy makes these expectations clear and consistent across the organization.

This Policy is also intended to protect you by setting out steps that you can take to protect yourself against allegations of a conflict of interest. Most conflicts can be resolved to the satisfaction of both the employee and Toronto Seniors Housing Corporation.

What is a conflict of interest?

A conflict of interest is any situation where an employee's personal or business interests compete or appear to compete against their duties as an employee and against the best interests of Toronto Seniors Housing Corporation. A conflict of interest can be one or more of the following types:

Actual conflict: a conflict of interest that the employee has, or may have, at the present time.

Potential conflict: any situation which may lead to or have the potential to lead to a conflict of interest in the future.

Apparent conflict: any situation which could be perceived as a conflict of interest by others, regardless as to whether there is an actual conflict of interest.

Example of a business interest conflict

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hiring a new team member and recommends that their niece apply. Employee B interviews their niece in the hiring process.

This is a conflict of interest because Employee B participates in the hiring process for their niece.

How do I declare a conflict of interest?

You must complete the Declaration of Conflict of Interest Form and send it to your manager or department director. Instructions on how to submit the form confidentially are set out on the form.

When should I report that I have a conflict of interest?

You must declare all conflicts of interest when you become aware of them. If you have any doubt about whether you have a conflict of interest, you should declare the conflict immediately. Each year, Toronto Seniors Housing Corporation will review obligations with employees and managers under the Policy, including requirements to declare any conflicts of interest and to complete the Declaration of Conflict of Interest Form.

Do I have to tell my manager?

If you are not comfortable declaring your conflict of interest to your manager, you may declare it to your department director.

To whom does this Policy apply?

The Employee Conflict of Interest Policy applies to every employee of Toronto Seniors Housing Corporation, and students on academic placements. The Policy is especially important to employees who can make or influence decisions of the organization.

Who is not covered by this Policy?

Third party contractors and vendors, Tenant Volunteers and TSHC Board members are not covered by this Policy. Contractors and vendors must follow any conflict-of-interest guidelines in their contracts. TSHC Board members must follow the Board of Directors Conflict of Interest Policy. Tenant Volunteers must follow the Tenant Volunteer Code of Conduct.

Can I work at another job outside of Toronto Seniors Housing Corporation?

Employees may engage in outside work or be appointed to a board (paid or volunteer) if the work is not in conflict with their duties at Toronto Seniors Housing Corporation. If you plan to work a second job or join a board of directors, you must first complete the Declaration of Conflict of Interest Form and receive approval before you accept the position.

What if I already have another job outside of Toronto Seniors Housing Corporation?

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If you are unsure if you have a conflict of interest, please reach out to your manager or department director for guidance. Employees must always follow the [Acceptable Use of Information Technology Policy](#) when using Toronto Seniors Housing Corporation cell phones, computers, email, Internet, and other information technology.

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Employee D knows someone who lives in a Toronto Seniors Housing Corporation owned or operated building. Employee D uses their position at Toronto Seniors Housing Corporation to access the information of tenants in the company database and uses this information for personal reasons. Employee D does not need to access this information for a purpose associated with their duties and responsibilities while at work.

This is a conflict of interest because Employee D has accessed or used information that they learned while working at Toronto Seniors Housing Corporation for their own personal benefit and not their job.

As an employee and a tenant of TSHC who is living in a rent-geared-to-income unit, do I have to declare my TSHC income and report any changes to my salary, and am I required to report if someone else is living in my unit?

Yes. Under the Rent-Geared-to-Income (RGI) program, you are required to report who is living in your unit and you must also always report your income. This includes your salary as TSHC employee and any changes to your salary during the year (i.e. if you are promoted or receive a pay increase). This information is used to determine if you are eligible to be an RGI tenant and in the calculation of your rent. There could be an impact on your tenancy if you do not accurately report this information, and you may be required to repay amounts if your rent is recalculated. As a TSHC employee, you would be in violation of both the Employee Code of Conduct and Employee Conflict of Interest Policy if you do not accurately report your income and who is living in your RGI unit. TSHC will the income being reported by TSHC employees who are also tenants under the RGI program.

CONFLICT OF INTEREST DECLARATION FORM

This form applies to all employees of Toronto Seniors Housing Corporation

If you have a conflict of interest, you must immediately inform your direct supervisor/manager.

Before completing this form, please take the opportunity to review the Conflict of Interest Policy and ask any questions you may have about what is expected of you. The Conflict of Interest Policy is attached to this form. You may choose to discuss any questions you have about the policy or this form with your direct supervisor/manager divisional director.

Definition of a conflict of interest

A conflict of interest is an actual, potential, or apparent conflict. This includes, but is not limited to, any situation that could reasonably be perceived as a conflict of interest by others, regardless of whether there is an actual conflict of interest.

How to declare a conflict of interest

Complete and give your completed form to your direct supervisor/manager by email or by regular mail in a sealed envelope marked private and confidential. If you are not comfortable declaring your conflict of interest to your direct supervisor/manager, you must declare to your divisional director.

You may also declare a conflict of interest to your divisional head by email or by regular mail in a sealed envelope marked “confidential.”

Conflict of interest declaration

Please describe the conflict of interest.

By signing below, I confirm the information I have provided on this form is correct to the best of my knowledge. I also confirm that I have no other conflicts of interest to declare. I will submit a revised form if the information on this form is no longer accurate.

Name

Date

Signature

Toronto Seniors Housing Corporation (TSHC)

Employee Conflict of Interest Policy

Policy Sponsor: Director, People and Culture

Approver: Board of Directors

Initial Approval Date: April 28, 2022

Date of Last Revision: October 17, 2024

Effective Date:

Policy Statement

Toronto Seniors Housing Corporation (TSHC) is committed to enhancing public confidence in what we do. In performing their duties and responsibilities, employees are expected to promote shared values and observe the highest possible standards of professionalism and service.

Our Commitment

With a focus on the unique needs of seniors, we are committed to being a leader in the delivery of quality, affordable housing for seniors. Our commitment includes engaging and collaborating with our tenants, our staff, and our partners towards providing excellent service for the well-being of our tenants.

Our Shared Values

Toronto Seniors Housing Corporation policies, procedures, and directives, including the Employee Code of Conduct, are based on our shared values. These values inform our decision-making and guide our behaviour in all activities related to our work.

Respect – Our culture is built on respect, trust and open and honest communication among tenants, staff, and service providers. We respect each tenant’s independence and privacy. We will assist tenants to find the services they prefer.

Inclusion – Quality of life for seniors is enhanced by living in vibrant and diverse communities. We strive for inclusion and equity.

Accountability – We are accountable to our tenants, our shareholder (the City of Toronto), and the public. We are committed to transparency. We are clear on our goals. We set targets and report our results. We demonstrate integrity and responsible stewardship of our resources.

Innovation – We are creative, innovative, adaptive, and flexible to meet the needs of our current and future tenants. We are a catalyst for positive change, energizing communities, and partners to join us to achieve our mandate.

Toronto Seniors Housing Corporation (TSHC) employees are expected to conduct themselves with personal integrity, honesty, and diligence in performing their duties. TSHC employees are required to support and advance the interests of the Corporation and avoid placing themselves in situations where their personal or private interests may conflict with or are perceived to conflict with the interests of TSHC.

We take pride in conducting ourselves with personal integrity, ethics, honesty, and diligence in performing our duties and ensuring we are protecting the public trust and confidence in TSHC.

Policy Objective

Promoting public confidence in Toronto Seniors Housing Corporation is the responsibility of every employee. Therefore, in performing their job duties, employees are expected to promote Toronto Seniors Housing Corporation’s shared values and to observe a high standard of honesty, integrity, accountability, and ethics. This Policy provides guidance on expectations of Toronto Seniors Housing Corporation related to conflicts of interest, including how to identify and resolve a conflict of interest.

Scope

This Policy applies to every employee of Toronto Seniors Housing Corporation and students on academic placements.

The standards outlined in this Policy are of particular importance to employees who can make or influence decisions of the organization (managers and senior leaders).

Out of Scope

Third parties who have business dealings with Toronto Seniors Housing Corporation, including contractors and vendors of Toronto Seniors Housing Corporation, are expected to comply with provisions of their contracts related to conflicts of interest. The Board of Directors Conflict of Interest Policy governs Members of the Board of Directors. Tenant volunteers must follow the Tenant Volunteer Code of Conduct.

Definitions

Conflict of interest: Any situation in which an employee’s personal or business interests may compete or appear to compete with their duties as an employee of Toronto Seniors Housing Corporation or may cause the employee to act contrary or appear to act contrary to the best interests of Toronto Seniors Housing Corporation.

A conflict of interest can also be a situation where an employee can use their
TSHC Employee Conflict of Interest Policy [updated October 20, 2025]

position for private or personal gain or expectation of private or personal gain, non-monetary or otherwise. A conflict may also occur when the private or personal interest benefits an employee's family, friends, or organizations in which the employee's family or friends have a financial interest.

A conflict of interest can be one or more of the following types:

Actual conflict: a conflict of interest that the employee has, or may have, at the present time.

Potential conflict: any situation which may lead or have the potential to lead to a conflict of interest in the future.

Apparent conflict: any situation which could be perceived as a conflict of interest by others, regardless as to whether there is an actual conflict of interest.

An apparent conflict of interest may arise where the employee (or the employee's family, friends, or business associates) stands to benefit personally from their own actions, or from a decision of Toronto Seniors Housing Corporation that they are able to influence.

Personal or Business Interest: Includes any personal gain, benefit, privilege, or advancement the employee, and/or the employee's family, friends, or business associates (past and present) may receive or expect to receive, whether monetary or non-monetary. Examples of conflicts of interest include, but are not limited to:

- using information learned during an employee's employment for personal benefit
- making a decision that may result in a benefit for a personal business partner
- being on the hiring panel for a close friend or family member
- being the employee, owner, or shareholder of, or having a financial interest in a company submitting a 'bid' application to Toronto Seniors Housing Corporation
- accessing the information of a friend or family member who is a tenant of Toronto Seniors Housing Corporation
- an employee 'exchanging hospitality' with a contractor or supplier, in which the employee uses their position to benefit the contractor or supplier in exchange for something that may personally benefit the employee or the employee's family, friends or business associates (past or present)
- entering a business or legal relationship with a tenant, such as agreeing to be the executor of a tenant's will

Roles and Responsibilities

It is the responsibility of all Toronto Seniors Housing Corporation employees to be familiar with and understand the provisions of the Employee Conflict of Interest Policy and avoid placing themselves in situations where their private or personal

interests may conflict with or perceived to conflict with the interests of TSHC.

All employees must disclose any actual or perceived conflicts of interest to their manager or department director.

It is the responsibility of managers and department directors to engage with People and Culture to determine how employees can continue to perform their duties in a way that does not contravene this Policy. Recommendations will be reviewed and approved by department directors.

Compliance with this Policy

The rules which follow do not cover all situations of a conflict of interest. Employees should always use proper judgment and act in the spirit of this Policy. If employees have any questions about this Policy or need any clarification about what is expected of them, they are expected to consult with their manager or department director for guidance.

Contravention of this Policy is a serious matter. Non-compliance with this Policy may lead to discipline, up to and including dismissal for cause. Non-compliance includes failing to declare a conflict of interest in accordance with this Policy. In some cases, non-compliance can also lead to legal action by Toronto Seniors Housing Corporation.

Policy Details

Avoiding a Conflict of Interest

- Employees must not enter any situation, arrangement or agreement that results or could result in a conflict of interest (actual, potential, or apparent) and should arrange their personal affairs to ensure that any conflicts of interest are avoided.
- Employees should consider any advantage their position at Toronto Seniors Housing Corporation may give them, whether it be the power to influence decisions, their ability to use company resources, or their access to information about others.
- In deciding whether their actions could result in a conflict of interest, employees are expected to consider how their actions will be seen by their colleagues or the public.
- Should an employee have any questions or need any clarification about this Policy, they are expected to consult with their manager or department director.

Gifts or donations

Employees may not solicit or accept any fees, advances, gifts, money, personal discounts, donations, personal benefits, meals, tickets, personal loans or the like from a tenant or any other person or entity that has, or might have, business dealings with Toronto Seniors Housing Corporation where it could result in a conflict of interest.

The exceptions are gifts of a nominal value of less than five dollars such as a greeting card, hat, token, memento, fridge magnet, or occasional coffee, which do not influence or would not be perceived as influencing the performance of the employee's duties. Other exceptions are accepting money where doing so is required as part of the employee's job (e.g., collecting rent or a fee established by Toronto Seniors Housing Corporation).

For example (but not intended to be a complete list), this means that an employee should never accept:

- a cash tip or in-kind gifts
- a gift that could be viewed as an exchange for a favour
- any meals unless the employee pays their own expenses
- offers to donate to a charitable cause on the employee's behalf
- an invitation to an event at the expense of the other person
- tickets to a sporting event or concert from a vendor or supplier

If you are unsure, decline the gift and consult with your manager.

An employee should never solicit donations for a charitable cause on behalf of a contractor or supplier, unless it is for a program/initiative established by Toronto Seniors Housing Corporation.

Outside Activities and 'Moonlighting'

Employees are not permitted to engage in outside work (which includes being self-employed) or other similar activities outside of working hours unless the outside work or activity is not in conflict with their work for Toronto Seniors Housing Corporation. This includes having another job if the work demands will conflict with the employee's position at Toronto Seniors Housing Corporation or if the employee could use information they learn while working at Toronto Seniors Housing Corporation for the benefit of the other company or themselves.

If an employee:

- wishes to engage in outside work, or
- be a director for any board or committee which may deal with issues affecting Toronto Seniors Housing Corporation, the employee must first declare a potential conflict to their manager or department director in writing and receive authorization for the engagement or appointment

It is the responsibility of managers and department directors to engage with
TSHC Employee Conflict of Interest Policy [updated October 20, 2025]

People and Culture to ensure that the outside work or activity is not in conflict with their responsibilities with Toronto Seniors Housing Corporation. Recommendations will be reviewed and approved by department directors.

Business Interests (Examples)

If the employee is, or seeks to be, an employee, director, or officer of a company (or the employee has a financial interest in the company) that has business dealings with Toronto Seniors Housing Corporation, this is a conflict of interest.

If an employee (or a family member, friend, or business associate of the employee) has a financial interest in a company that has business dealings with Toronto Seniors Housing Corporation, and the employee engages in any process related to a business transaction involving the company, this will be a conflict of interest.

The employee must declare the conflict or potential conflict of interest to their manager or department director in writing and seek advice on their role in such circumstances. The manager or department director, in consultation with People and Culture, will review the circumstances to determine what other actions, if any, should be taken to resolve the conflict.

Personal Relationships

Employees should always maintain a professional relationship with other employees and all persons with whom Toronto Seniors Housing Corporation has dealings. This includes tenants, commercial tenants (tenants), contractors, suppliers, and vendors.

However, Toronto Seniors Housing Corporation acknowledges that some employees will develop or have existing relationships with such individuals.

Employees must take all reasonable steps to manage these relationships, so the employee is not placed in a conflict-of-interest position (actual, potential, or apparent).

An example is if an employee works at, or has access to, a Toronto Seniors Housing Corporation owned or operated building and has direct contact with a friend or family member who is a tenant at that building (or access to the information of friends or family because of their job at Toronto Seniors Housing Corporation) as this will usually result in a conflict of interest. A friend includes someone the employee is dating or has a relationship with.

If an employee participates in the hiring process for, or will supervise, family, friends, or business associates (past/current) this will also be a conflict of interest.

Employees must declare any conflicts or potential conflicts of interest to their manager or department director. The manager or department director, in

consultation with People and Culture, will review the circumstances to determine what actions, if any, should be taken to resolve the conflict, such as making changes to a reporting relationship or work location. Recommendations will be reviewed and approved by department directors.

Confidentiality of Information

In performing their duties and responsibilities for the organization, employees will learn information about Toronto Seniors Housing Corporation and its operations which is not known to the public. Employees are prohibited from trying to access such information if it is not associated with their work. Employees are also expected not to use or disclose such information for any purpose that is not associated with their work (unless authorized by their divisional head or when required by law).

For more information regarding the responsibilities that employees must protect the property and information of Toronto Seniors Housing Corporation, please see the Employee Code of Conduct.

Reporting and Resolving a Conflict of Interest

All employees shall receive a copy of this Policy. Employees are required to declare any conflict of interest (real, potential, or apparent) they may have under this Policy upon hire. If, during their employment, an employee is in or will be in a conflict-of-interest situation, the employee must immediately report/declare the conflict of interest in writing to their manager or department director.

Employees are expected to fully cooperate in any discussion or investigation related to the resolution of a conflict of interest. The manager or department director, in consultation with People and Culture, will review the circumstances to determine what actions, if any, should be taken to resolve the conflict. Recommendations will be reviewed and approved by department directors.

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**Toronto Seniors Housing Corporation (TSHC)
Employee Code of Conduct**

Policy Sponsor: Director, People and Culture

Approver: Board of Directors

Initial Approval Date: April 28, 2022

Date of Last Revision: October 17, 2025

Effective Date:

Policy Statement

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Innovation – We are creative, innovative, adaptive, and flexible to meet the needs of our current and future tenants. We are a catalyst for positive change, energizing communities, and partners to join us to achieve our mandate.

Policy Objective

The purpose of this code is to identify the standards Toronto Seniors Housing Corporation expects from employees in all dealings with tenants, work colleagues, visitors, contractors, suppliers, vendors, and members of the public.

Scope

This Code applies to every employee of Toronto Seniors Housing Corporation and students on academic placements.

Any employee who is in a position to make or influence decisions of the organization, such as a management or senior leadership role, will be held to a higher standard under this code.

This code shall be interpreted in a manner that is consistent with governing legislation, including but not limited to the *Ontario Human Rights Code*, 1990.

This Code is intended to provide general guidelines and is a companion to other Toronto Seniors Housing Corporation policies, procedures, or directives. It is not intended to conflict with Toronto Seniors Housing Corporation's obligations to its employees under collective agreements or employment contracts. It does not replace any policy, procedure or directive unless specifically identified by the employer.

Employees with professional designations may also have obligations and may be subject to more than one code of conduct. If a situation arises that may cause conflict or confusion between the applicable codes, seek clarification from your manager and your professional organization.

Roles and Responsibilities

While performing job duties, employees of Toronto Seniors Housing Corporation are expected to:

- promote the best interests of Toronto Seniors Housing Corporation
- become familiar with and abide by all policies, procedures, and directives
- follow any legislation that applies to your work
- be accountable: if an issue comes your way, take ownership of the problem, try to deal with it as best as you can, and ask for help when needed
- follow lawful directions of management
- refrain from condoning acts which are against the law or contrary to company policies, procedures, or directives
- be at work (unless on vacation or an authorized leave)
- strive for customer service excellence
- act in a professional manner when interacting with others
- show care, diligence, and attention to detail in all aspects of your work

- treat everyone with whom they have dealings with respect
- be helpful, professional, and courteous at all times

This list is not exhaustive of the standards expected by Toronto Seniors Housing Corporation. Employees should also be mindful that Toronto Seniors Housing Corporation is a public sector employer and your actions, both during working hours and in your off-duty time, can impact the reputation of Toronto Seniors Housing Corporation within the community.

The Code of Conduct does not specifically address every situation or question that may arise. It is intended to promote ethical decision-making and behaviour, to make us think how ethics and integrity guide us in doing our jobs. Ethical behaviour is not about finding the right answers – it is about asking all the right questions, like:

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- Would I make the same decision if my supervisor, manager, the public or the media were watching me?
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Tenants, and all others who contact Toronto Seniors Housing Corporation may

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Toronto Seniors Housing Corporation is committed to providing a safe work environment for employees and will not tolerate violence or harassment in accordance with the *Occupational Health and Safety Act, 1990* and TSHC Workplace Violence Policy and TSHC Workplace Harassment Policy. This includes when employees are interacting with tenants, vendors, community partners and the public on behalf of the company during their working hours.

Respectful Workplace

Toronto Seniors Housing Corporation is committed to fostering a respectful workplace, one that is free of inappropriate behaviour, where employees are entitled to be free of discrimination, harassment, and violence. All employees are to be treated fairly, differences are acknowledged and valued, communication is open and civil, conflict is addressed early and there is a culture of empowerment and cooperation. Employees will treat each other with courtesy, respect, and dignity. At Toronto Seniors Housing Corporation we must maintain professionalism in the workplace and try to be as helpful as possible in all dealings with each other.

Civility is expected by all employees, who should work collegially and resolve conflicts with each other in a constructive and professional manner during their working hours. Harassment, discrimination, or bullying under the *Ontario Human Rights Code 1990*, *Occupational Health and Safety Act 1990*, or Toronto Seniors Housing Corporation policy, are prohibited and will not be tolerated.

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- inappropriate non-verbal communication (eye rolling, huffing, or sighing during conversations, smirking, or sneering, leering, shrugging shoulders etc.)
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- jokes, gestures, or statements that could have an impact of being offensive
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- statements or other actions designed to be harmful, hurtful, or demeaning to another person
- threats, or veiled threats, included those made in a joking manner
- withdrawal of work, favouritism, or the unnecessary exclusion of others for an improper reason (i.e., a non-work-related reason or a reason that is not justified by law)

For further information on Workplace Violence please see the Workplace Violence Policy.

A respectful workplace is one that is free from sexual harassment. Sexual harassment defined under the *Ontario Human Rights Act, 1990* is “engaging in a course of vexatious comment or conduct that is known or ought to be known to be unwelcome.” In some cases, one incident can be serious enough to meet the threshold for sexual harassment. Sexual harassment can include, but is not limited to:

- asking for dates and not taking “no” for an answer
- asking for sex in exchange for something, like offering to improve a test score, offering to a raise or promotion at work, or withholding something
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- bullying based on sex or gender
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- making comments about a person’s physical appearance (for example whether or not they are attractive)
- making sexual jokes
- making unnecessary physical contact, including unwanted touching
- posting or sharing pornography, sexual pictures, cartoons, graffiti, or images of a sexual nature (including online)
- saying or doing something because you think a person does not fit sex-role stereotypes
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- behave in a courteous and professional manner at all times
- treat all participants with respect, dignity and consideration, in the spirit of recognizing and valuing a diversity of opinions and views
- be considerate, respectful and collaborative in your communications and actions
- discuss differences of opinion in a non-confrontational manner with due regard for the viewpoint of others
- refrain from engaging in demeaning, discriminatory, or harassing behaviour, speech or actions

Toronto Seniors Housing Corporation Property

Toronto Seniors Housing Corporation owns, controls, leases, or operates facilities, materials, resources, and assets, which includes (but is not limited to) buildings, land, money, vehicles, phones, phone system, records, files, documentation, office equipment, cell phones, pass cards, computers, computer tools and network, supplies, cheques, and equipment. (TSHC Property).

Employees are expected to use Toronto Seniors Housing Corporation Property reasonably and responsibly and take all possible steps to protect such property from misuse, loss, or damage. This includes safeguarding property that has been entrusted to their care, such as cell phones, money, or company files. Deliberately causing damage to such property (or deliberately allowing someone else to cause damage) is prohibited.

Employees are also expected to use Toronto Seniors Housing Corporation Property lawfully, and only for a purpose directly associated with their job at Toronto Seniors Housing Corporation. For example, employees should not access, communicate, distribute, or display racial or ethnic slurs, threats, insults, obscenities, abuse, defamation or lewd or sexually explicit material on Toronto Seniors Housing Corporation computers, cell phones or other assets. Staff should also not use an electronic key/pass card to access areas for personal reasons which are not related to their work.

The exception to personal use is limited and occasional use of company computers, networks, internet, e-mail, and phones, as permitted by the

Acceptable Use of Information Technology Policy (Note: communications over Toronto Seniors Housing Corporation Property are not private and may be monitored by the company). For further information, please see the Acceptable Use of Information Technology Policy.

Fraud and Theft

Employees are prohibited from engaging in any type of fraud as defined in the Fraud Prevention Policy, or any action by an employee intended to conceal or avoid detection of activity prohibited by this Policy. Employees are expected to immediately report, in writing and in accordance with company policy, instances of suspected fraud and any knowledge of activity which is prohibited by this clause. All confirmed incidents may be viewed as acts of a criminal nature and may be treated accordingly.

Property of Others

Employees are expected to respect and treat with care the property of other employees, tenants, former tenants, co-workers, guests, visitors, vendors, volunteers, contractors, and suppliers, which are brought onto the premises of Toronto Seniors Housing Corporation owned, controlled, leased, or operated buildings.

Employees cannot ask to borrow or use the property of a tenant. Employees cannot borrow, use, or take the property of a tenant after they move out or the tenant disposes of the property, unless the employee is authorized as part of their job to do so. If the property of a visitor to a Toronto Seniors Housing Corporation building is left behind, the employee must tell their supervisor or manager and return the property.

Gifts and Gratuities

Employees may not accept any gift, benefit, or favour in exchange for special consideration, or where it may be perceived to be an exchange for special treatment. This includes (but is not limited to) cash tips, loans, gifts that could be perceived as an exchange for a favour, gifts from current or potential vendors or interested parties in anticipation of a procurement or tendering process. If you are offered a gift, politely explain that you appreciate the gesture, but you are already compensated by TSHC. All gifts, benefits or favour offered or received shall be immediately reported to your manager or departmental director.

TSHC employees may accept:

Small holiday gifts showing appreciation such as cards, cookies, candy, or chocolates with a nominal value of less than Five Dollars.

Advertising promotional materials such as calendars, scratch pads, pens are also acceptable.

If in doubt about a specific situation, discuss it with your supervisor or manager.

Licenses and Professional Designations

When an employee is required to have a license or professional designation for their job, the employee must immediately report any loss or potential loss of that license or professional designation to their supervisor or manager. For example, employees who drive company vehicles as part of their job must immediately report any suspensions of their driver's license to their supervisor or manager.

Alcohol and Drugs

It is prohibited for an employee to be under the influence of alcohol or drugs during working hours. The phrase "under the influence" refers to impairment, to any degree, of an individual's ability to safely perform the activity in question as a result of the use of alcohol, drugs, or a combination of both. The exception is over the counter or physician-prescribed medication and drugs unless the use results in impairment that will risk the health and safety of the employee or any other person. Impairment is a state of reduced physical or mental ability.

An employee must disclose to their supervisor or a manager if they are under the influence of any alcohol or drugs during working hours (or expect to be under the influence during working hours in the case of over the counter or physician-prescribed medication and drugs) where there could be any risk to the health and safety of the employee or any other person.

If a situation covered by this clause is brought to the attention of an employee's direct supervisor or manager, the employee's direct supervisor or manager (or other management) will review the circumstances and take appropriate action after consultation with People and Culture. The appropriate action shall include reasonable accommodation as required by the Ontario *Human Rights Code*. Toronto Seniors Housing Corporation has the right to request reasonable information or documentation to support accommodation under this clause.

Confidentiality

In performing their duties and responsibilities for the organization, employees will learn information about Toronto Seniors Housing Corporation and its operations. This includes information in verbal conversations and information in writing, formal documents, files, e-mails, computers, data records, etc. In most cases, this information is not known to the public. Examples include, but not limited to, information related to our financial affairs, marketing plans, tenants, resources, contractors, proposed initiatives, strategy, members of the public, employees, etc.

This information is confidential and is Toronto Seniors Housing Corporation's property. Employees must take all reasonable steps to ensure this information is not used or disclosed without proper authorization, and in accordance with

company policy and the *Municipal Freedom of Information and Protection of Privacy Act*, 1990.

This includes securing and safeguarding information which has been entrusted to the employee’s care, such as locking cabinets and securing documents when not in use. Employees must also be mindful of what information can be overheard in conversations or seen on their phone, both during working hours and when they are in public during their private time. Employees must not deliberately try to access such information when the information is not associated with their work. Employees are also expected not to use or disclose such information for their own personal gain or for any purpose that is not associated with their work (unless authorized by their division head or when required by law). For more information, please see the Acceptable Use of Information Technology Policy, Records Management Policy, and Employee Conflict of Interest Policy.

These rules concerning using or disclosing information do not apply where the employee is reporting wrongdoing under company policy or participating in an internal investigation. Employees should use proper internal channels, rather than a public setting, to address any concerns they have about Toronto Seniors Housing Corporation.

For more information about how to report wrongdoing and the protections available to employees who report wrongdoing, please see the Whistleblower Prevention Policy.

Media Inquiries

Communications with the media must be conducted so that all information originates from a qualified, informed, and **approved** spokesperson of Toronto Seniors Housing Corporation. All media requests for interviews or information must be referred to the Communications team. For more information, please see the Social Media Policy and the Media and Issues Protocol.

Relationships with Tenants

Employees may not enter the home of tenant, unless authorized by law and/or without authorization from Toronto Seniors Housing Corporation, unless they are invited by the tenant, the visit takes place outside of the employee’s working hours, and the visit does not otherwise violate this code. Employees must also comply with the Toronto Seniors Housing Corporation Employee Conflict of Interest Policy.

Annual Review of Obligations

Toronto Seniors Housing Corporation employees and managers shall review their obligations under this Policy on an annual basis.

Related Legislation, Regulations, and TSHC Policies:

- *Employment Standards Act, 2000*
- *Municipal Freedom of Information and Protection of Privacy Act, 1990*
- *Ontario Human Rights Code, 1990*
- *Occupational Health and Safety Act, 1990*
- Acceptable Use of Information Technology Policy (TCHC)
- TSHC Employee Conflict of Interest Policy
- TSHC Fraud Prevention Policy
- TSHC Media and Issues Protocol
- TSHC Records Management Policy
- TSHC Social Media Policy
- TSHC Workplace Harassment Policy
- TSHC Workplace Violence Policy

Amendments (Revision History):

Initial policy approved by Toronto Seniors Housing Corporation Board of Directors on April 28, 2022.

Policy reviewed with the following revisions, approved by the Board of Directors on October 17, 2024.

- Commitment and Shared Value sections added
- incorporation of examples illustrating inappropriate behavior
- further elaboration on the Gifts and Gratuities section including nominal value threshold
- further elaboration of behavioral expectations for employees attending virtual or on-site meetings, workshops, conferences or training events.

Policy reviewed in October 2025, with minor edits and a change to the review schedule from annual to every 3 years, to be approved by the Board of Directors on December 4, 2025.

Next Scheduled Review Date: 2028

This Policy will be reviewed once every three (3) years.

Corporate Governance and Human Resources Committee on

Policy Contact

Director, People and Culture

**Toronto Seniors Housing Corporation (TSHC)
Employee Code of Conduct**

Policy Sponsor: Director, People and Culture

Approver: Board of Directors

Initial Approval Date: April 28, 2022

Date of Last Revision: October 17, 2024

Effective Date:

Policy Statement

Toronto Seniors Housing Corporation (TSHC) is committed to enhancing public confidence in what we do. In performing their duties and responsibilities, employees are expected to promote shared values and observe the highest possible standards of professionalism and service.

Our Commitment

With a focus on the unique needs of seniors, we are committed to being a leader in the delivery of quality, affordable housing for seniors. Our commitment includes engaging and collaborating with our tenants, our staff, and our partners towards providing excellent service for the well-being of our tenants.

Our Shared Values

Toronto Seniors Housing Corporation policies, procedures, and directives, including the Employee Code of Conduct, are based on our shared values. These values inform our decision-making and guide our behaviour in all activities related to our work.

Respect – Our culture is built on respect, trust and open and honest communication among tenants, staff, and service providers. We respect each tenant’s independence and privacy. We will assist tenants to find the services they prefer.

Inclusion – Quality of life for seniors is enhanced by living in vibrant and diverse communities. We strive for inclusion and equity.

Accountability – We are accountable to our tenants, our shareholder (the City of Toronto), and the public. We are committed to transparency. We are clear on our goals. We set targets and report our results. We demonstrate integrity and responsible stewardship of our resources.

Innovation – We are creative, innovative, adaptive, and flexible to meet the needs of our current and future tenants. We are a catalyst for positive change, energizing communities, and partners to join us to achieve our mandate.

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An employee must disclose to their supervisor or a manager if they are under the influence of any alcohol or drugs during working hours (or expect to be under the influence during working hours in the case of over the counter or physician-prescribed medication and drugs) where there could be any risk to the health and safety of the employee or any other person.

If a situation covered by this clause is brought to the attention of an employee's direct supervisor or manager, the employee's direct supervisor or manager (or other management) will review the circumstances and take appropriate action after consultation with People and Culture. The appropriate action shall include reasonable accommodation as required by the Ontario *Human Rights Code*. Toronto Seniors Housing Corporation has the right to request reasonable information or documentation to support accommodation under this clause.

Confidentiality

In performing their duties and responsibilities for the organization, employees will learn information about Toronto Seniors Housing Corporation and its operations. This includes information in verbal conversations and information in writing, formal documents, files, e-mails, computers, data records, etc. In most cases, this information is not known to the public. Examples include, but not limited to, information related to our financial affairs, marketing plans, tenants, resources, contractors, proposed initiatives, strategy, members of the public, employees, etc.

This information is confidential and is Toronto Seniors Housing Corporation's property. Employees must take all reasonable steps to ensure this information is not used or disclosed without proper authorization, and in accordance with

company policy and the *Municipal Freedom of Information and Protection of Privacy Act*, 1990.

This includes securing and safeguarding information which has been entrusted to the employee's care, such as locking cabinets and securing documents when not in use. Employees must also be mindful of what information can be overheard in conversations or seen on their phone, both during working hours and when they are in public during their private time. Employees must not deliberately try to access such information when the information is not associated with their work. Employees are also expected not to use or disclose such information for their own personal gain or for any purpose that is not associated with their work (unless authorized by their division head or when required by law). For more information, please see the Acceptable Use of Information Technology Policy, Records Management Policy, and Employee Conflict of Interest Policy.

These rules concerning using or disclosing information do not apply where the employee is reporting wrongdoing under company policy or participating in an internal investigation. Employees should use proper internal channels, rather than a public setting, to address any concerns they have about Toronto Seniors Housing Corporation.

For more information about how to report wrongdoing and the protections available to employees who report wrongdoing, please see the Whistleblower Prevention Policy.

Media Inquiries

Communications with the media must be conducted so that all information originates from a qualified, informed, and **approved** spokesperson of Toronto Seniors Housing Corporation. All media requests for interviews or information must be referred to the Communications team. For more information, please see the Social Media Policy and the Media and Issues Protocol.

Relationships with Tenants

Employees may not enter the home of tenant, unless authorized by law and/or without authorization from Toronto Seniors Housing Corporation, unless they are invited by the tenant, the visit takes place outside of the employee's working hours, and the visit does not otherwise violate this code. Employees must also comply with the Toronto Seniors Housing Corporation Employee Conflict of Interest Policy.

Annual Review of Obligations

Toronto Seniors Housing Corporation employees and managers shall review their obligations under this Policy on an annual basis.

Related Legislation, Regulations, and TSHC Policies:

- *Employment Standards Act, 2000*
- *Municipal Freedom of Information and Protection of Privacy Act, 1990*
- *Ontario Human Rights Code, 1990*
- *Occupational Health and Safety Act, 1990*
- Acceptable Use of Information Technology Policy (TCHC)
- TSHC Employee Conflict of Interest Policy
- TSHC Fraud Prevention Policy
- TSHC Media and Issues Protocol
- TSHC Records Management Policy
- TSHC Social Media Policy
- TSHC Workplace Harassment Policy
- TSHC Workplace Violence Policy

Amendments (Revision History):

Initial policy approved by Toronto Seniors Housing Corporation Board of Directors on April 28, 2022.

Policy reviewed with the following revisions, approved by the Board of Directors on October 17, 2024.

- Commitment and Shared Value sections added
- incorporation of examples illustrating inappropriate behavior
- further elaboration on the Gifts and Gratuities section including nominal value threshold
- further elaboration of behavioral expectations for employees attending virtual or on-site meetings, workshops, conferences or training events.

Policy reviewed in October 2025, with minor edits and a change to the review schedule from annual to every 3 years, to be approved by the Board of Directors on December 4, 2025.

Next Scheduled Review Date: 2028

This Policy will be reviewed once every three (3) years.

Policy Contact

Director, People and Culture

Toronto Seniors Housing Corporation
Corporate Governance and Human Resources Committee
(CGHRC) Meeting

Meeting Date: November 6, 2025

Topic: Inclusion, Diversity, Equity and Accessibility (IDEA) Strategy 2025
Q4 Update

Item Number: 13

To: Corporate Governance and Human Resources Committee

From: Carol Francis, Director, People and Culture

Date of Report: October 29, 2025

Purpose: For Information

Recommendation:

It is recommended that the Corporate Governance and Human Resources Committee (CGHRC) receive this report for information.

Reason for Recommendation:

In 2023, Toronto Seniors Housing Corporation began a planned effort to foster an environment of Inclusion, Diversity, Equity, and Accessibility (IDEA). The journey began with a comprehensive Employee Engagement and Demographic Survey conducted in partnership with Flex Survey, providing valuable insights into the organization's current state. Based on these findings, TSHC collaborated with McLeans and Company to develop a robust IDEA Framework, forming the foundation for a comprehensive IDEA Strategy.

This strategy is structured in three phases, each with four defined pillars, key objectives, and actionable steps to drive meaningful progress:

Phase I: Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

Phase II: Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

Phase III: Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

This three-phase roadmap, will continue to be the foundation of TSHC's IDEA Strategy and Diversity Lens.

Carol Francis
Director, People and Culture

List of Attachments:

13.1 – IDEA Strategy Update Presentation

13.2 – IDEA Strategy Update

Toronto Seniors Housing Corporation

Inclusion, Diversity, Equity and Accessibility (IDEA) Strategy 2025 Q4 Update

Corporate Governance and Human Resources Committee

November 6, 2026



TSHC's IDEA Strategy: Three Phases

Phase I: Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

- **Focus:** Establishing core IDEA infrastructure, foundational knowledge, and the initial application of the Diversity Lens.
 - IDEA Committee formation
 - IDEA Committee Co-Leads
 - Training and resources for staff
 - Development of IDEA Structure

Phase II: Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

- **Focus:** Building on the foundation by enhancing engagement, support, communication, and deepening the application of the Diversity Lens.
 - Diversity Lens – high level application
 - Employee Engagement Survey – Demographic results review
 - Policy review application
 - Budget considerations including staffing of an IDEA, Policy and Programs Advisor

TSHC's IDEA Strategy: Three Phases (cont'd)

Phase III: Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

- **Focus:** Fully integrating IDEA into all aspects of TSHC's operations, ensuring long-term sustainability, and continuously evaluating the effectiveness of the Diversity Lens.
 - IDEA, Policy and Programs Advisor – update of the IDEA Strategy, further implementation

This three-phase roadmap, will continue to be the foundation of TSHC's IDEA Strategy and Diversity Lens.

IDEA Pillars and Objectives and Key Actions



IDEA Pillar 1

Embrace and Cultivate Workforce Diversity

Objectives

1. Establish inclusive recruitment process practices.
2. Embed IDEA into performance and talent management programs.
3. Promote the IDEA Committee (Appendix 2) and opportunities to be involved in IDEA focused groups.



IDEA Pillar 3

Foster an Engaging Culture and Environment for All

Objectives

- Create a safe environment for and within diverse communities.
1. Review current policies and establish new policies for alignment with the IDEA Framework.
 2. Explore opportunities for expanded partnerships on wellness resources and benefits for staff beyond the workplace.
 3. Identify opportunities for staff engagement and dialogue beyond day-to-day work.



IDEA Pillar 2

Embed Education and Training

Objectives

1. Deliver foundational training on IDEA for all current staff and future staff as a part of onboarding practices.
2. Further embed IDEA in operations, outline IDEA accountabilities and expectations for specific roles with the organization.
3. Uncover and identify training delivery methods to overcome barriers to acquiring training for staff across the corporation.



IDEA Pillar 4

Serve TSHC's Diverse Communities

Objectives

1. Explore the opportunity to curate IDEA resources and support through existing partnerships.
2. Explore and expand partnerships to better support the needs of staff and tenants.



Pillar 1 - Embrace and Cultivate Workforce Diversity

Actions Taken

Phase I - Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

- Recruitment Process reviewed – utilization of diverse job posting portals
- Initial review of recruitment related policies
- Diversity Lens utilized for policy review – formalized process in development phase
- Current alignment with Human Rights legislation
- Review of staff demographics to address underrepresentation
- IDEA Committee – staff volunteers selected/Co-Leads



Pillar 1 - Embrace and Cultivate Workforce Diversity

Actions Taken

Phase II - Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

- Mentorship Program under consideration and will be reviewed in 2026
- Identify IDEA related training for all staff joining TSHC
- Working with the Communication Team on any IDEA related communication
- TSHC IDEA communication guideline TBD
- IDEA space on inHouse (intranet)



Pillar 1 - Embrace and Cultivate Workforce Diversity

Actions Taken

Phase III - Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

- Alignment with the Policy Management framework
- Job description reviews



Pillar 2 - Embed Education and Training

Actions Taken

Phase I - Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

- Multi-mode training and experiential opportunities for all Staff
- DEI training provided to IDEA Committee
- Unconscious Bias training – All Staff
- Truth and Reconciliation – recognition activity in September
- Plan to address number 57 under review
- Working with The Centre to deliver CABR training and alignment with future strategic initiatives
- Leadership Team completing IDI (Intercultural Development Inventory) Assessment/ Feedback sessions (Needs Analysis)
- AODA training rolled out to all staff
- 2026 staff training plan to include IDEA related training for all staff



Pillar 2 - Embed Education and Training Actions Taken

Phase II - Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

- Sourcing of IDEA training – In progress
- IDEA training - various topics to be sourced
- IDEA training identified for variety of staff

Phase III - Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

- None to date



Pillar 3 - Foster an Engaging Culture and Environment for All - Actions Taken

Phase I - Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

- Policy Management Framework identifies policies for review and approval – apply the Diversity Lens
- IDEA Committee/ Co-Leads recruited – 2 year term
- IDEA Committee – participated in DEI training
- IDEA Committee/ Co-Leads to identify required training



Pillar 3 - Foster an Engaging Culture and Environment for All - Actions Taken

Phase II - Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

- IDEA Committee sub-groups to be established
- Quiet spaces exist within some TSHC buildings
- Wellness initiatives to be enmeshed with TSHC programs
- Partnership building in progress
- inHouse IDEA enhancements for communication

Phase III - Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

- Establish and train Employee Resource Groups
- Employee Engagement Survey – IDEA section



Pillar 4 - Serve TSHC's Diverse Communities

Actions Taken

Phase I - Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

- Have identified IDEA partners – for strategic input and training (The Centre/TCHC, DiversiPro/ TELUS Health etc.)

Phase II - Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

- Work with EFAP to offer wellness support
- Update the Employee Engagement Survey with IDEA section

Phase III - Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

- Continue to work with Partners

2025 IDEA Accomplishments

IDEA Committee:

- Board approval of IDEA Strategy, Diversity Lens and Committee Terms of Reference.
- IDEA Committee volunteers and Co-Leads selected
- Application of IDEA Committee Terms of Reference

Training and Workshops:

- Diversity, Equity and Inclusion Training – IDEA Committee
- Mitigating Unconscious Bias in the Workplace – All Staff
- HRP Ignite: IDEA Conference – People and Culture

Cultural Events:

- The Centre – The CABR Strategy – Assessing Our Impact – Shaquille Morgan
- The Story of Lucy and Blackburn Thornton – Suzette Daley
- IDEA from History to Action – Hamlin Grange
- Pride Events

2025 IDEA Accomplishments (cont'd)

Cultural Events (cont'd):

- Filipino Heritage Month
- Indigenous Heritage Month
- Indigenous Heritage Month – Presentation Jim Meeks
- Truth and Reconciliation/Orange Shirt Day
- Islamic Heritage Month

Diversity Lens:

- Application of various Diversity Lens have begun with the Policy Management Framework and Recruitment
- Focus will be applied within 2026
- Review of demographic information contained within the Employee Engagement Survey
- IDEA Committee support will be focused on the application of various diversity lens.

Leadership Engagement:

- Intercultural Development Inventory Assessments - Leadership
- 360 Evaluations - Leadership



IDEA

Strategic Plan

Continuing TSHC's Journey of Inclusion,
Diversity, Equity, Accessibility

2025 – Q4 Update

A Message from the Director, People and Culture

Over the past nine months, Toronto Seniors Housing Corporation (TSHC) has continued to make meaningful progress in advancing its Inclusion, Diversity, Equity and Accessibility (IDEA) priorities. Since inception, TSHC employees have expressed strong interest in seeing IDEA values embedded in the organization's culture and operations. This commitment continues to grow and is reflected in increased engagement and participation across the organization.

In 2025, the IDEA Committee supported the successful delivery of several educational and cultural initiatives in partnership with community organizations and vendors. These included Black History Month, Filipino Heritage Month, Pride, and Indigenous History Month. Each initiative provided opportunities for learning, reflection, and celebration, further reinforcing TSHC's commitment to fostering a respectful and inclusive workplace.

To strengthen the Committee's capacity and sustainability, new members and three Co-Leads were selected this year. Within weeks of forming, the refreshed Committee successfully launched new internal communications, including a communication and video recognizing Islamic Heritage Month.

Staff participation in IDEA activities — whether through volunteering, leadership, or attendance — has increased from the previous year, signaling positive momentum and growing organizational alignment with TSHC's IDEA objectives.

Next Steps

Looking ahead, the IDEA Committee and Co-Leads are focusing on the following priorities:

- Further application of the IDEA strategy and action plan to formalize TSHC's strategic approach and guide activities across all divisions.
- Expansion of Partnerships and Programming to include additional days and months of significance, with an emphasis on intersectionality and representation.

- Integration of the Diversity Lens into organizational policies, practices, and learning initiatives to support equitable and inclusive outcomes for staff and tenants.

The Committee and leadership team are already beginning preparations for 2026 programming and will continue to strengthen TSHC's culture of inclusion, diversity, equity and accessibility.

A handwritten signature in black ink, reading "C. Francis", on a light gray background.

Carol Francis
Director, People and Culture

TSHC's IDEA Strategy: Three Phases

The IDEA Committee, Leadership Team and Director, People and Culture have continued to work towards developing the IDEA Roadmap. The three-phase implementation plan has been initiated in several ways. There has been phase execution across each phase as TSHC continues to deliver on the IDEA Strategy. Each phase builds upon the previous one, ensuring sustainable and impactful change, all while consistently applying the Diversity Lens. This three-phase roadmap, will continue to be the foundation of TSHC's IDEA Strategy and Diversity Lens.

Phase I: Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

- **Focus:** Establishing core IDEA infrastructure, foundational knowledge, and the initial application of the Diversity Lens.
 - IDEA Committee formation
 - IDEA Committee Co-Leads
 - Training and resources for staff
 - Development of IDEA Structure

Phase II: Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

- **Focus:** Building on the foundation by enhancing engagement, support, communication, and deepening the application of the Diversity Lens.
 - Diversity Lens – high level application
 - Employee Engagement Survey – Demographic results review
 - Policy review application
 - Budget considerations including staffing of an IDEA, Policy and Programs Advisor

Phase III: Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

- **Focus:** Fully integrating IDEA into all aspects of TSHC's operations, ensuring long-term sustainability, and continuously evaluating the effectiveness of the Diversity Lens.
 - IDEA, Policy and Programs Advisor – update of the IDEA Strategy, further implementation

TSHC's IDEA Pillars, Objectives and Key Actions

TSHC's three-phase IDEA Strategic Plan remains TSHC's core IDEA Pillars, objectives, and initiatives, complete with measurable targets to gauge TSHC's success. This report is consistent with maintaining accountability and transparency, as the CEO and/or Director of People and Culture will provide bi-annual reports to the Corporate Governance and Human Resources Committee (CGHRC) and the Board detailing TSHC's progress toward these strategic goals. For each objective, TSHC has identified key priorities which guide TSHC's daily operations, continuing to ensure TSHC working towards the IDEA Strategy targets.

IDEA Pillars and Objectives



IDEA Pillar 1

Embrace and Cultivate Workforce Diversity

Objectives

1. Establish inclusive recruitment process practices.
2. Embed IDEA into performance and talent management programs.
3. Promote the IDEA Committee (Appendix 2) and opportunities to be involved in IDEA focused groups.



IDEA Pillar 2

Embed Education and Training

Objectives

1. Deliver foundational training on IDEA for all current staff and future staff as a part of onboarding practices.
2. Further embed IDEA in operations, outline IDEA accountabilities and expectations for specific roles with the organization.
3. Uncover and identify training delivery methods to overcome barriers to acquiring training for staff across the corporation.



IDEA Pillar 3

Foster an Engaging Culture and Environment for All

Objectives

1. Create a safe environment for and within diverse communities.
2. Review current policies and establish new policies for alignment with the IDEA Framework.
3. Explore opportunities for expanded partnerships on wellness resources and benefits for staff beyond the workplace.
4. Identify opportunities for staff engagement and dialogue beyond day-to-day work.



IDEA Pillar 4

Serve TSHC's Diverse Communities

Objectives

1. Explore the opportunity to curate IDEA resources and support through existing partnerships.
2. Explore and expand partnerships to better support the needs of staff and tenants.

Phase I

Immediate Actions (Into 2026) - Foundation Building & Diversity Lens Integration

Focus: Establishing core IDEA infrastructure, foundational knowledge, and the initial application of the Diversity Lens.

Pillar	Actions	Actions Taken
 Pillar 1: Embrace and Cultivate Workforce Diversity	• Perform a thorough review, applying the Diversity Lens, to create short-term, medium-term, and long-term strategies for all recruitment and retention policies, procedures, and practices. • Update policies identified for revisions to ensure they align with IDEA principles and Human Rights legislation. • Collect and analyze current workforce demographic data, including race, ethnicity, gender, disability status, and other relevant categories. • Identify areas of underrepresentation compared to relevant labour market data and community demographics. • Create specific strategies to address and identify gaps and barriers in workforce diversity. • Implementing the Diversity Lens checklist into new initiatives.	• Recruitment Process reviewed – utilization of diverse job posting portals • Initial review of recruitment related policies • Diversity Lens utilized for policy review – formalized process in development phase • Current alignment with Human Rights legislation • Review of staff demographics to address underrepresentation • IDEA Committee – staff volunteers selected/Co-Leads

Pillar	Actions	Actions Taken
 Pillar 2: Embed Education and Training	• Source or develop IDEA training for new hires. • Source or develop IDEA training for current staff. • Develop an action plan to address number 57 in the Truth and Reconciliation Commissions “94 Calls to Action”, focusing on professional development and training. • Continued mandatory CABR training. • Source or design a targeted training program for the Leadership and Extended Leadership Team, focusing on their responsibilities in championing IDEA. Training modules will include, but not be limited to, Indigenous Cultural Competency for People Leaders and Managers, AODA training, and microaggressions. • Uncover and identify training delivery methods to overcome barriers and gaps to acquiring training for staff across the corporation.	• Multi-mode training and experiential opportunities for all Staff • DEI training provided to IDEA Committee • Unconscious Bias training – All Staff • Truth and Reconciliation – recognition activity in September • Plan to address number 57 under review • Working with The Centre to deliver CABR training and alignment with future strategic initiatives • Leadership Team completing IDI (Intercultural Development Inventory) Assessment/ Feedback sessions (Needs Analysis) • AODA training rolled out to all staff • 2026 staff training plan to include IDEA related training for all staff

Pillar	Actions	Actions Taken
 Pillar 3: Foster an Engaging Culture and Environment for All	• Develop and implement comprehensive Terms of Reference for the IDEA Committee, outlining its purpose, responsibilities, and operational procedures. • Implement a strategic volunteer recruitment plan to attract diverse members to the IDEA Committee. • Develop and deliver regular IDEA-related training for committee members, ensuring they have the knowledge and skills to effectively contribute.	• Policy Management Framework identifies policies for review and approval – apply the Diversity Lens • IDEA Committee/ Co-Leads recruited – 2 year term • IDEA Committee – participated in DEI training • IDEA Committee/ Co-Leads to identify required training
 Pillar 4: Serve TSHC's Diverse Communities	• Source IDEA resources through existing and potential partners. • Develop partnerships to support IDEA training needs of staff and tenants.	• Have identified IDEA partners – for strategic input and training (The Centre/TCHC, DiversiPro/ TELUS Health etc.)

Phase II

Expanding and Deepening (2026-2027) - Enhancement, Engagement, and Diversity Lens Application

Focus: Building on the foundation by enhancing engagement, support, communication, and deepening the application of the Diversity Lens.

Pillar	Actions	Actions Taken
 Pillar 1: Embrace and Cultivate Workforce Diversity	• Develop and implement a mentorship program and a buddy program designed to support the advancement of all employees. • Ensure buddies are trained in IDEA principles and their role in creating an inclusive environment. • Create a transparent communication strategy to inform staff about policy changes and IDEA initiatives. • Create various channels for staff to provide feedback. • Ensure feedback mechanisms are accessible and widely promoted.	• Mentorship Program under consideration and will be reviewed in 2026 • Identify IDEA related training for all staff joining TSHC • Working with the Communication Team on any IDEA related communication • TSHC IDEA communication guideline TBD • IDEA space on inHouse (intranet)

Pillar	Actions	Actions Taken
 Pillar 2: Embed Education and Training	• Develop partnerships and source potential IDEA training for onboarding new hires. • Implement targeted training for the Operations department, covering basic IDEA training, microaggressions, and trauma-informed practices, among other relevant topics. • Implement IDEA training for new hires, current staff, Leadership and Extended Leadership	• Sourcing of IDEA training – In progress • IDEA training - various topics to be sourced • IDEA training identified for variety of staff
 Pillar 3: Foster an Engaging Culture and Environment for All	• Promote IDEA Committee and opportunities to be in IDEA Employee Resource Groups. • Create quiet spaces for people with neurodiverse and mental health conditions, and for prayers. • Research and establish partnerships with organizations that offer wellness resources and benefits for staff beyond the workplace. • Work with employees to promote an inclusive workspace by allowing them to share their lived experiences. • Hold open and honest discussions about sensitive issues such as misogyny, racism, and ableism to better understand employees lived experiences inside and outside the workplace.	• IDEA Committee sub-groups to be established • Quiet spaces exist within some TSHC buildings • Wellness initiatives to be enmeshed with TSHC programs • Partnership building in progress • inHouse IDEA enhancements for communication

Pillar	Actions	Actions Taken
 Pillar 4: Serve TSHC's Diverse Communities	• Establish crisis and support resources for staff wellness. • Identify wellbeing needs that are not adequately addressed by the Employee and Family Assistance Program (EFAP) and develop programs to address specific needs	• Work with EFAP to offer wellness support • Update the Employee Engagement Survey with IDEA section

Phase III

Embedding and Sustaining (2027-2028) - Integration, Accountability, and Continuous Diversity Lens Review

Focus: Fully integrating IDEA into all aspects of TSHC's operations, ensuring long-term sustainability, and continuously evaluating the effectiveness of the Diversity Lens.

Pillar	Actions	Actions Taken
 Pillar 1: Embrace and Cultivate Workforce Diversity	• Conduct ongoing reviews of current policies and establish new policies for alignment with the Diversity Lens and IDEA Strategy. • Create a detailed framework outlining IDEA competencies and expectations for each role, including observable behaviours and measurable outcomes. • Analyze various roles within the organization to identify specific IDEA competencies and expectations relevant to each position. • Review guides, and checklists, to assist employees in making sure that IDEA is being used in all operational processes.	• Alignment with the Policy Management framework • Job description reviews
 Pillar 2: Embed Education and Training	• Further embed IDEA in Operations, outline IDEA accountabilities and expectations for specific roles within the organization (e.g. tenancy management, RGI).	

Pillar	Actions	Actions Taken
 Pillar 3: Foster an Engaging Culture and Environment for All	• Implement Employment Resource Groups (ERGs) as safe support spaces. • Develop a dedicated budget to support the IDEA Committee, and potential ERGs. • Conduct a needs assessment and create a detailed action plan to identify specific barriers to accessibility and inclusion for staff with neurodiverse, mental health, and sensory conditions.	• Establish and train Employee Resource Groups • Employee Engagement Survey – IDEA section
 Pillar 4: Serve TSHC's Diverse Communities	• Continue to address barriers and gaps to accessibility, equity, and inclusion. • Work with partners to create resources addressing barriers and gaps to accessibility, equity, and inclusion.	• Continue to work with Partners

2025 IDEA Accomplishments

IDEA Committee:

- Board approval of IDEA Strategy, Diversity Lens and Committee Terms of Reference.
- IDEA Committee volunteers and Co-Leads selected
- Application of IDEA Committee Terms of Reference

Training and Workshops:

- Diversity, Equity and Inclusion Training – IDEA Committee
- Mitigating Unconscious Bias in the Workplace – All Staff
- HRPA Ignite: IDEA Conference – People and Culture

Cultural Events:

- The Centre – The CABR Strategy – Assessing Our Impact – Shaquille Morgan
- The Story of Lucy and Blackburn Thornton – Suzette Daley
- IDEA from History to Action – Hamlin Grange
- Pride Events
- Filipino Heritage Month
- Indigenous Heritage Month
- Indigenous Heritage Month – Presentation Jim Meeks
- Truth and Reconciliation/Orange Shirt Day
- Islamic Heritage Month

Diversity Lens:

- Application of various Diversity Lens have begun with the Policy Management Framework and Recruitment
- Focus will be applied within 2026
- Review of demographic information contained within the Employee Engagement Survey
- IDEA Committee support will be focused on the application of various diversity lens.

Leadership Engagement:

- Intercultural Development Inventory Assessments - Leadership
- 360 Evaluations - Leadership

