

## **Toronto Seniors Housing Corporation**

### **Board of Directors Meeting Agenda**

**Date:** Thursday, December 11, 2025

**Time:** 3:00 pm to 5:30 pm

**Location:** WebEx and Livestream

<b>Item</b>	<b>Time</b>	<b>Description</b>	<b>Action</b>	<b>Type of Item</b>	<b>Presenter</b>
<b>1.</b>	3:00 pm 2min	Chair's Remarks	Information	N/A	Chair
<b>2.</b>	3:02 pm 2min	Land and African Ancestral Acknowledgements	N/A	N/A	Chair
<b>3.</b>	3:04 pm 1min	Approval of Public Meeting Agenda	Approval	Agenda	Chair
<b>4.</b>	3:05 pm 1min	Chair's Poll re: Conflict of Interest	Declaration	N/A	Chair
<b>5.</b>	3:06 pm 1min	Approval of Public Session Board Minutes October 30, 2025	Approval	Minutes	Chair
<b>6.</b>	3:07 pm 1min	Approval of Closed Session Board Minutes October 30, 2025	Approval	Minutes	Chair
<b>7.</b>	3:08 pm 2min	Action Items List	Information	Report	Chair
<b>8.</b>	3:10 pm 10 min	CEO's Report	Information	Verbal Report	Tom Hunter
<b>9.</b>	3:20 pm 20 min	2026 Proposed Budget	Approval	Report	Vince Truong

Item	Time	Description	Action	Type of Item	Presenter
<b>10.</b>	3:40 pm 2min	<b><i>Audit, Finance and Risk Committee Report</i></b>	Information	Verbal Report	Lawrence D'Souza
<b>10a</b>	3:42 pm 5 min	<ul style="list-style-type: none"> <li>Investment Policy</li> </ul>	Approval	Report	Vince Truong
<b>10b</b>	3:47 pm 5 min	<ul style="list-style-type: none"> <li>YTD October 2025 TSHC Financial Result</li> </ul>	Information	Report	Vince Truong
<b>11.</b>	3:52 pm 2 min	<b><i>Quality and Tenant Engagement Committee Report</i></b>	Information	Verbal Report	Linda Jackson
<b>12.</b>	3:54 pm 2 min	<b><i>Corporate Governance and Human Resources Committee Report</i></b>	Information	Report	Councillor Crisanti
<b>12a</b>	3:56 pm 5 min	People and Culture Policies: <ul style="list-style-type: none"> <li>Employee Code of Conduct</li> <li>Employee Conflict of Interest Policy</li> </ul>	Approval	Report	Carol Francis/ Dave Slater
<b>13.</b>	4:01 pm 1min	Motion to move into Closed Session	Approval	N/A	Chair
<b>14.</b>	4:02 pm 1 min	<b><i>Confidential report dealing with matters that are not required to be disclosed under the Municipal Freedom of Information and Protection of Privacy Act,</i></b>	Approval	N/A	Chair
<b>15.</b>	4:03 pm 20 min		Approval	Report	Tom Hunter / Grant Coffey
<b>16.</b>	4:23 pm 10 min		Information	Report	Grant Coffey

Item	Time	Description	Action	Type of Item	Presenter
17.	4:33 pm 5 min	<i>including but not limited to personal matters about identifiable individuals, a proposed or pending transaction with a third party, and recommendations of proposed policy or processes.</i>	Information	Report	Vince Truong
18.	4:38 pm 5 min		Approval	Report	Lesley Rountree
19.	4:43 pm 15 min		Approval	Report	Vince Truong
20.	4:48 pm 5 min		Information	Verbal	Tom Hunter
21.	5:03 pm 1 min		Approval	N/A	Chair
22.	5:04 pm 1 min	Motion to Approve Closed Session Items	Approval	N/A	Chair
23.	5:05 pm 1 min	Motion to Approve Adjournment of the Board Meeting	Approval	N/A	Chair
<b>Consent Agenda Items (items for Information only and will not be addressed during meeting, unless a Board/Committee member requests, or public deputation requested).</b>					
24	Business Continuity		Information	Report	Grant Coffey
25	Strategic Directions Q3 2025 Progress Report		Information	Report	Grant Coffey
26	Tenant Human Rights Complaints Report		Information	Report	Grant Coffey

# Toronto Seniors Housing Corporation

## Toronto Seniors Housing Corporation

### Board of Directors Action Items List December 2025

Open Action Items				
	Meeting Date	Description	Resp.	Status
1.	AFRC January 31, 2024	Staff to consult with TCHC on Environmental Renewal and Plan.	Grant Coffey	Pending
2.	AFRC January 31, 2024	Bring forward an overview of revitalization plans in the 2024 budget including net new potential housing for seniors.	Grant Coffey	In progress

Completed Action Items				
1.	December 16, 2024	Provide the TSHC-TCHC Legal Agreements Overview deck to Board	Grant Coffey	Complete
2.	October 24, 2024	Provide report of Rapid Re-housing bi-annually to Board and QTE Committee	Tom Hunter/ Brad Priggen	Complete

# Toronto Seniors Housing Corporation

Completed Action Items				
3.	October 24, 2024	Circulate to Board the presentation to Economic and Community Development Committee of October 23, 2024	Tom Hunter	Complete
4.	July 18, 2024	Cybersecurity Training Update	Carol Francis	Complete
5.	April 25, 2024	Issue ID Cards for ALL Board	Grant Coffey	Complete
6.	February 22, 2024	Ensure Operational Dashboard is visually easier to track	Brad Priggen	Complete
7.	February 22, 2024	Provide 2023 Town Hall Dates/Agenda to Board	Brad Priggen	Complete
8.	January 4, 2024	Determine if Budget discussions can be held in Public session	Grant Coffey	Complete

# Placeholder

Item 9: 2026 Proposed  
Budget

**Toronto Seniors Housing Corporation**  
Board of Directors Meeting

**Meeting Date:** December 11, 2025

**Item Number:** 10a

**Report Name:** Investment Policy

**To:** Board of Directors

**From:** Vince Truong, Finance Lead (I)

**Date of Report:** December 3, 2025

**Purpose:**

The purpose of this report is to provide a recommendation regarding the approval of the Investment Policy.

**Recommendation:**

It is recommended that the Board of Directors adopt the following resolution:

- Approve the Investment Policy, as set out in Attachment 1 to this report.

**Reason for Recommendation:**

The Investment Policy was in place at the start of Toronto Seniors Housing Corporation (TSHC) and it is up for review. The recommended

changes include updating the current position title, change the policy review process to every three years, change to the new policy format, and other minor edits.

The new investment policy also went through consultation with Toronto Community Housing Corporation (TCHC) for consistency and current practices.

After the Audit, Finance and Risk Committee (AFRC) meeting held on November 26, the Committee advised staff to review the Investment Policy with the City and consider pooling arrangements to maximize on investment returns. TSHC will advise of any proposed adjustments after the review of the requirements outlined by the AFRC, and will bring back in 2026 to the AFRC and Board.

Name: Vince Truong

Title: Finance Lead (I)

**List of Attachments:**

10a.1 - Investment Policy (Clean version)

10a.2 - Investment Policy (Tracked changes)

## **Toronto Seniors Housing Corporation (TSHC) Investment Policy**

**Policy Sponsor:** Finance Lead

**Approver:** Board of Directors

**Initial Approval Date:** May 18, 2022

**Date of Last Revision:**

**Effective Date:** June 1, 2022

### **Policy Statement**

The purpose of this Policy is to establish investment principles and guidelines that are appropriate for the purposes of meeting the various capital, financial and other obligations of Toronto Seniors Housing Corporation (TSHC).

### **Scope**

This Policy is applicable to TSHC personnel who have been vested with the power and responsibility to transact and invest funds on behalf of the organization. This Policy applies to all investments decisions and transactions.

### **Roles and Responsibilities**

The Chief Executive Officer (CEO) or designate and the Finance Lead have joint authority for transacting and investing funds on behalf of TSHC. The CEO designation of authority is to be in writing to the Finance Lead. The Finance Lead cannot designate their authority. If there are investment decisions and transactions, covered by this Policy, the Finance Lead shall prepare a schedule of investments for presentation quarterly to the Audit, Finance and Risk Committee.

### **Content**

Investment decisions will prudently balance liquidity, risk, growth, and yield and produce a total return that will preserve the real purchasing power of the principal invested.

Cash that is surplus to TSHC's current requirements may be invested in:

- Government of Ontario or Canada Treasury Bills
- Government of Ontario or Canada Bonds
- Guaranteed Investment Certificates (GIC) issued by a Canadian Chartered Bank

The maximum investment term for excess "in year" operating cash shall be for the period of up to one year.

All investment transactions require the joint written approval of the Chief Executive Officer and the Finance Lead.

**Amendments (Revision History):**

Initial policy approved by Board of Directors on May 18, 2022, effective June 1, 2022.

Policy reviewed on November 26, 2025, with the following revisions:

- Review schedule changed from every two years or earlier to every three years or earlier. Update position title and other minor edits.

**Next Scheduled Review Date: 2028**

The Policy shall be reviewed every three years or earlier if deemed necessary by the Finance Lead and amendments shall be presented to the Audit, Finance and Risk Committee for recommendation to the Board of Directors.

**Policy Contact**

Finance Lead

Toronto Seniors Housing Corporation (TSHC)  
Investment Policy

Policy Sponsor: Finance Lead

Approver: Board of Directors

Initial Approval Date: May 18, 2022

Date of Last Revision:

Effective Date: June 1, 2022

Policy Statement

The purpose of this Policy is to establish investment principles and guidelines that are appropriate for the purposes of meeting the various capital, financial and other obligations of Toronto Seniors Housing Corporation (TSHC).

Scope

This Policy is applicable to TSHC personnel who have been vested with the power and responsibility to transact and invest funds on behalf of the organization. This Policy applies to all investments decisions and transactions.

Roles and Responsibilities

The Chief Executive Officer (CEO) or designate and the ~~Director of Finance/~~ Finance Lead have joint authority for transacting and investing funds on behalf of TSHC. The CEO designation of authority is to be in writing to the ~~Director of Finance/~~ Finance Lead. The ~~Director of Finance/~~ Finance Lead cannot designate their authority. If there are investment decisions and transactions, covered by this Policy, the ~~Director of Finance/~~ Finance Lead shall prepare a schedule of investments for presentation quarterly to the Audit, Finance and Risk Committee.

Content

Investment decisions will prudently balance liquidity, risk, growth, and yield and produce a total return that will preserve the real purchasing power of the principal invested.

Cash that is surplus to TSHC’s current requirements may be invested in:

- Government of Ontario or Canada Treasury Bills
- Government of Ontario or Canada Bonds
- Guaranteed Investment Certificates (GIC) issued by a Canadian Chartered Bank

The maximum investment term for excess “in year” operating cash shall be for the period of up to one year.

All investment transactions require the joint written approval of the Chief Executive Officer and the ~~Director of Finance~~/Finance Lead.

**Amendments (Revision History):**

Initial policy approved by Board of Directors on May 18, 2022, effective June 1, 2022.

Policy reviewed on November 26, 2025, with the following revisions:

- Review schedule changed from every two years or earlier to every three years or earlier. Update position title and other minor edits.

**Next Scheduled Review Date:** 20278

The Policy shall be reviewed every three years or earlier if deemed necessary by the ~~Director of Finance~~/Finance Lead and amendments shall be presented to the Audit, Finance and Risk Committee for recommendation to the Board of Directors.

**Policy Contact**

Finance Lead

**Toronto Seniors Housing Corporation**  
Board of Directors Meeting

**Meeting Date:** December 11, 2025

**Topic:** October YTD 2025 TSHC Financial Result

**Item Number:** 10b

**To:** Board of Directors

**From:** Vince Truong, Finance Lead (I)

**Date of Report:** December 3, 2025

**Purpose:** The purpose of this report is to provide an update on financial matters.

**Recommendation:**

It is recommended that the Board of Directors receive this Report for information.

**Reason for Recommendation:**

October YTD 2025 TSHC Financial Result

Please see the Statement of Operations (Attachment 1).

Through October 31, 2025, TSHC incurred operating expenses of \$41,383,778 on a total revenue of \$45,770,624 for an excess of revenue over expenses of \$4,386,846 including amortization expense.

The excess of revenues over expenses included the below factors:

- October YTD surplus arising from the TCHC-TSHC reconciliation, which had a net positive effect of \$6,903,520,
- Salary and Benefit costs were higher than the budgeted expenditure by (\$502,783) with further details in the report,
  - Other savings in professional services, legal, and miscellaneous costs,
  - Service Delivery Agreement (SDA) - Shared Services with TCHC included HST recovery through the Canada Revenue Agency (CRA) had a net positive impact of \$325,381.

Revenue for the ten months was \$45,770,624 comprised of \$38,610,421 from TCHC for TSHC's rental units (revenue less expense estimate per the Transition Agreement) and \$6,903,520 from the surplus revenue from the nine months of the TCHC-TSHC reconciliation. Interest income earned on bank balances accounted for \$211,028, which included the interest payment from the CRA, and \$45,655 for other income including partnership agreement and miscellaneous income.

TSHC incurred operating expenses of \$41,383,778 including amortization expense. Expenses incurred were for staff compensation and benefits, legal and professional services, third-party vendors, insurance, other miscellaneous costs, and shared services paid to TCHC as per the SDA.

Salaries and benefits were higher due to several factors:

- Vacation accrual expense which is anticipated to be used in the latter part of the year,
- Parental leave, WSIB, long term disability, and staff benefits,
- Full complement of staff in Operations with low vacancy and staff turnover rates,

- Salary expenses are offset by a lower than expected Post-Retirement benefits accrual, resulting in higher expenses of (\$502,783) compared to budget.

Professional and legal services were lower than budget by \$91,130 mainly due to timing differences on the expenditure. Other miscellaneous costs were lower by \$193,092 as a result of decreased expenditures in staff training and development, communication services, tenant translations, office related expenses, and systems development maintenance costs. It is anticipated that these expenses will increase for the rest of the year; however, they will come within budget.

Insurance cost was higher due to additional coverage starting in April. This was not budgeted, and this cost will remain through the balance of the year.

Please refer to the Statement of Financial Position (Attachment 2):

1. Cash – \$8,483,465
2. Accounts Receivable - \$42,342
3. Due from TCHC (Short -Term) - \$2,884,695
4. Prepaid expenses - \$5,000
5. Due from TCHC (Long-Term) - \$4,015,051
6. Fixed Asset (Equipment), net - \$11,066
7. Accounts payable - \$3,756,686
8. Employee Benefits (Post-Retirement Benefits) - \$6,675,350

The cash balance represents the bank balance and petty cash as of October 31, 2025.

The Accounts Receivable balance consisted of interest receivable from the bank and from the CRA on the GST/HST sales tax.

Due from TCHC (Short-Term) included the 2025 TCHC-TSHC reconciliation surplus of \$6,903,520 less amount received for the Quarter 1 & 2 surplus of \$4,018,825.

Prepaid expense is the balance of the annual insurance paid in October 2024 with the monthly drawdown of expense to the end of October 2025 and the WSIB prepayment.

Due from TCHC is the long-term receivable for the Post-Retirement Obligations currently at \$4,015,051.

The Accounts Payable balance is of the end of October. The balance includes:

- Payroll - \$2,626,468
- Pension and Benefits - \$357,526
- Vendor Payables - \$772,692

Name: Vince Truong

Title: Finance Lead (I)

**List of Attachments:**

1. TSHC October YTD 2025 Financial Result - Statement of Operations
2. TSHC October YTD 2025 Financial Result - Statement of Financial Position

**Toronto Seniors Housing Corporation**  
**Statement of Operations (Draft - Unaudited)**  
**Ten Months to October 31, 2025**

STATEMENT OF OPERATIONS	Year to Date Result			Annual		
	Actual	Budget	Variance Actual Vs Budget	2025 Forecast	2025 Budget	Variance Forecast Vs Budget
<b>Revenue</b>						
Revenue from TCHC	38,610,421	38,610,421	-	46,332,505	46,332,505	-
TCHC-TSHC Reconciliation	6,903,520	-	6,903,520	8,473,155	-	8,473,155
Interest income	211,028	132,400	78,628	249,028	150,000	99,028
Other Income	45,655	-	45,655	45,655	-	45,655
<b>Total Revenue</b>	<b>45,770,624</b>	<b>38,742,821</b>	<b>7,027,803</b>	<b>55,100,343</b>	<b>46,482,505</b>	<b>8,617,838</b>
<b>Expenses</b>						
Salaries and Benefits	30,028,104	29,525,321	(502,783)	35,969,353	35,440,601	(528,752)
Legal and Professional Services	557,212	648,342	91,130	707,790	841,025	133,235
Insurance	678,626	637,250	(41,376)	816,931	764,699	(52,232)
Other Miscellaneous Costs	626,571	819,663	193,092	1,019,349	1,107,504	88,155
SDA - Shared Services with TCHC	9,487,903	9,813,284	325,381	11,450,560	11,775,941	325,381
<b>Total Expenses</b>	<b>41,378,416</b>	<b>41,443,860</b>	<b>65,444</b>	<b>49,963,983</b>	<b>49,929,770</b>	<b>(34,213)</b>
Amortization charge	5,362	5,340	(22)	6,432	36,432	30,000
<b>Excess of Revenue over Expenses</b>	<b>4,386,846</b>	<b>(2,706,379)</b>	<b>7,093,225</b>	<b>5,129,927</b>	<b>(3,483,697)</b>	<b>8,613,624</b>

**Toronto Seniors Housing Corporation**  
**Statement of Financial Position (Draft - Unaudited)**  
**As of Oct 31, 2025**

**Assets**

Current Assets:

Cash	8,483,465
Accounts receivable	42,342
Due from TCHC	2,884,695
Prepaid expenses	5,000
	<u>11,415,503</u>

Capital assets - Equipment	29,297
Less: Depreciation	<u>(18,231)</u>
Capital assets	<u>11,066</u>

Due from TCHC	4,015,051
---------------	-----------

<b>Total Assets</b>	<u><u>15,441,620</u></u>
---------------------	--------------------------

**Liabilities & Net Assets**

Current Liabilities:

Accounts payable and accrued liabilities	3,756,686
Due to TCHC	-
	<u>3,756,686</u>

Employee Benefits	6,675,350
-------------------	-----------

Net Assets

Unrestricted (Deficit)/Surplus	5,009,584
--------------------------------	-----------

<b>Total Liabilities &amp; Net Assets</b>	<u><u>15,441,620</u></u>
---	--------------------------

**Toronto Seniors Housing Corporation**  
Board of Directors Meeting

**Meeting Date:** December 11, 2025

**Topic:** Review of People and Culture Policies

**Item Number:** 12a

**Report Name:** Annual Review of People and Culture Policies

**To:** Board of Directors

**From:** Director, People and Culture

**Date of Report:** October 29, 2025

**Purpose:** For Approval

**Recommendation:**

It is recommended 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 November 6, 2025, and recommend that the Board of Directors approve at the December 11, 2025 meeting:

- 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:**

- 12a.1 – Employee Conflict of Interest Policy (Clean)
- 12a.2 – Employee Conflict of Interest Policy (Track Changes)
- 12a.3 – Employee Code of Conduct Policy (Clean)
- 12a.4 – Employee Code of Conduct Policy (Track Changes)

**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.

Policy reviewed on October 7, 2024, with minor revisions further clarifying the roles and responsibilities of employees, managers, and directors regarding the disclosure, review, and approval of conflicts of interest, with approval by the Board of Directors on October 17, 2024.

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 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**

**Employee A** works at Toronto Seniors Housing Corporation and has responsibilities for procurement activities. Employee A’s close relative (a family member) is a co-owner of XYZ Roofing Company Ltd. and sometimes does work repairing Toronto Seniors Housing Corporation roofs. Employee A oversaw the procurement process through which XYZ Roofing Company Ltd. was hired to complete a roofing contract.

This is a conflict of interest because Employee A’s close relative (a family member) stands to benefit personally from a decision of Toronto Seniors Housing Corporation that Employee A was able to influence.

**Example of a personal relationship conflict**

**Employee B** is a manager at Toronto Seniors Housing Corporation. Employee B is

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?**

If you already have another job, or an appointment to a board, you must still consider whether the second job places you in a conflict of interest with your job at Toronto Seniors Housing Corporation and submit a Declaration of Conflict of Interest form.

## **Example of a conflict of interest that could exist when you work at a second job:**

**Employee C** works at a second job outside of Toronto Seniors Housing Corporation. Their shift at Toronto Seniors Housing Corporation ends at 4 p.m., but their second job starts at 4:15 p.m. To make it to their second job on time, Employee C leaves their Toronto Seniors Housing Corporation job at 3:30 p.m.

This is a conflict of interest because the work demands of Employee C's second job conflict with their responsibilities at Toronto Seniors Housing Corporation.

## **What will happen when I declare a conflict of interest?**

Your situation will be reviewed to determine if there is a conflict of interest under the Policy. The purpose of the Employee Conflict of Interest Policy is not to punish employees for declaring a conflict of interest. The Policy is meant to help employees resolve conflicts of interest by encouraging them to declare any situation that may be an actual, potential, or apparent conflict of interest.

## **Can I declare a conflict of interest on behalf of someone else?**

No, but if you think there is wrongdoing that needs to be reported, we encourage you to make a report under the Whistleblower Protection Policy or our Fraud Prevention Policy.

## **Does the Employee Conflict of Interest Policy apply to how I use Toronto Seniors Housing Corporation property?**

The Employee Conflict of Interest Policy has some guidelines for the use of Toronto Seniors Housing Corporation property, but the Employee Code of Conduct covers the use of Toronto Seniors Housing Corporation property in more detail. If you use Toronto Seniors Housing Corporation property for anything other than its intended use as a Toronto Seniors Housing Corporation employee, or you use or try to access information that is unrelated to your duties and responsibilities, the Employee Conflict of Interest Policy may apply.

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.

**Example of a conflict of interest that could exist if you try to access information that is unrelated to your duties and responsibilities as an employee:**

**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.

## **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.

Policy reviewed on October 7, 2024, with minor revisions further clarifying the roles and responsibilities of employees, managers, and directors regarding the disclosure, review, and approval of conflicts of interest, with approval by the Board of Directors on October 17, 2024.

**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 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**

**Employee A** works at Toronto Seniors Housing Corporation and has responsibilities for procurement activities. Employee A’s close relative (a family member) is a co-owner of XYZ Roofing Company Ltd. and sometimes does work repairing Toronto Seniors Housing Corporation roofs. Employee A oversaw the procurement process through which XYZ Roofing Company Ltd. was hired to complete a roofing contract.

This is a conflict of interest because Employee A’s close relative (a family member) stands to benefit personally from a decision of Toronto Seniors Housing Corporation that Employee A was able to influence.

**Example of a personal relationship conflict**

**Employee B** is a manager at Toronto Seniors Housing Corporation. Employee B is

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?**

If you already have another job, or an appointment to a board, you must still consider whether the second job places you in a conflict of interest with your job at Toronto Seniors Housing Corporation and submit a Declaration of Conflict of Interest form.

## **Example of a conflict of interest that could exist when you work at a second job:**

**Employee C** works at a second job outside of Toronto Seniors Housing Corporation. Their shift at Toronto Seniors Housing Corporation ends at 4 p.m., but their second job starts at 4:15 p.m. To make it to their second job on time, Employee C leaves their Toronto Seniors Housing Corporation job at 3:30 p.m.

This is a conflict of interest because the work demands of Employee C's second job conflict with their responsibilities at Toronto Seniors Housing Corporation.

## **What will happen when I declare a conflict of interest?**

Your situation will be reviewed to determine if there is a conflict of interest under the Policy. The purpose of the Employee Conflict of Interest Policy is not to punish employees for declaring a conflict of interest. The Policy is meant to help employees resolve conflicts of interest by encouraging them to declare any situation that may be an actual, potential, or apparent conflict of interest.

## **Can I declare a conflict of interest on behalf of someone else?**

No, but if you think there is wrongdoing that needs to be reported, we encourage you to make a report under the Whistleblower Protection Policy or our Fraud Prevention Policy.

## **Does the Employee Conflict of Interest Policy apply to how I use Toronto Seniors Housing Corporation property?**

The Employee Conflict of Interest Policy has some guidelines for the use of Toronto Seniors Housing Corporation property, but the Employee Code of Conduct covers the use of Toronto Seniors Housing Corporation property in more detail. If you use Toronto Seniors Housing Corporation property for anything other than its intended use as a Toronto Seniors Housing Corporation employee, or you use or try to access information that is unrelated to your duties and responsibilities, the Employee Conflict of Interest Policy may apply.

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.

**Example of a conflict of interest that could exist if you try to access information that is unrelated to your duties and responsibilities as an employee:**

**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.

**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**

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.

## 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:

- Am I putting my own interests before those of Toronto Seniors Housing Corporation?
- Would I make the same decision if my supervisor, manager, the public or the media were watching me?
- Would I be embarrassed if my decision, comments, or actions were on the front page of a newspaper?
- Would I hesitate to take this action or allow my employees to take this action if this were my own company?
- Will I owe someone a favour if I do this?
- Would I be offered this if I were not an employee of Toronto Seniors Housing Corporation?
- Could my comments on social media or in a public forum be considered negative, derogatory, or taken as a criticism of Toronto Seniors Housing Corporation or a work colleague?

For advice or guidance related to this Policy, speak to your manager or department director.

### **Policy Content**

#### **Interactions with Tenants, Vendors, Community Partners, and the Public**

Tenants, and members of the public can form impressions of Toronto Seniors Housing Corporation based on their interactions with employees of the organization. An employee's individual actions reflect on Toronto Seniors Housing Corporation as an organization. Employees of Toronto Seniors Housing Corporation must work together to build and maintain relationships within the organization and in the community. Remember, when wearing TSHC uniform or workwear, you are representing Toronto Seniors Housing Corporation to tenants, vendors, community partners, and the public.

Tenants, and all others who contact Toronto Seniors Housing Corporation may

depend on us for information and the services we provide. Tenants, vendors, community partners and members of the public deserve to be treated with empathy, dignity, and respect. In all dealings with tenants, vendors, community partners or the public, employees are expected to be professional, helpful, and courteous at all times, especially when dealing with a difficult individual or situation. Staff should not engage in arguments with tenants, vendors, community partners or members of the public. They are expected to attempt to de-escalate situations in a calm, courteous manner, reaching out to their supervisor for support and guidance when needed. The issues being faced by tenants are important, and we must demonstrate through our words and actions that we take these issues seriously.

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.

Employees are also expected to avoid behaviors which a reasonable person would find inappropriate in a professional and productive workplace. This includes, but is not limited to the following:

- behaviour which is disruptive or intimidating
- inappropriate banter that isolates, excludes, or centres out someone
- inappropriate non-verbal communication (eye rolling, huffing, or sighing during conversations, smirking, or sneering, leering, shrugging shoulders etc.)
- insulting or derogatory comments, particularly as it relates to a protected

ground such as gender, gender orientation, sexual identity, race, religion, country of origin etc.

- jokes, gestures, or statements that could have an impact of being offensive
- making up or circulating rumours which could be harmful or hurtful to another person
- name calling, including in a joking manner
- profane or vulgar language
- sexual comments or innuendo
- 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 of promotion at work, or withholding something
- bragging about sexual ability
- bullying based on sex or gender
- calling people unkind names that relate to sex or gender
- demanding hugs
- 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
- spreading rumours of gossip of a sexual nature (including online)

For further information on sexual harassment please see the Workplace Harassment Policy.

Reasonable direction by supervisors and managers relating to the management

and direction of workers or the workplace or conducting performance reviews is not workplace harassment. If employees believe they are the victim of harassment, discrimination, or bullying under TSHC policy or the law they should seek assistance from their manager or department director.

### **Attendance at Meetings, Conferences, Workshops or Training**

This Code of Conduct applies when attending in-person, off-site or virtual meetings, conferences, workshops or training. As representatives of Toronto Seniors Housing Corporation, employees are expected to:

- 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.

## 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:

- Am I putting my own interests before those of Toronto Seniors Housing Corporation?
- Would I make the same decision if my supervisor, manager, the public or the media were watching me?
- Would I be embarrassed if my decision, comments, or actions were on the front page of a newspaper?
- Would I hesitate to take this action or allow my employees to take this action if this were my own company?
- Will I owe someone a favour if I do this?
- Would I be offered this if I were not an employee of Toronto Seniors Housing Corporation?
- Could my comments on social media or in a public forum be considered negative, derogatory, or taken as a criticism of Toronto Seniors Housing Corporation or a work colleague?

For advice or guidance related to this Policy, speak to your manager or department director.

### **Policy Content**

#### **Interactions with Tenants, Vendors, Community Partners, and the Public**

Tenants, and members of the public can form impressions of Toronto Seniors Housing Corporation based on their interactions with employees of the organization. An employee's individual actions reflect on Toronto Seniors Housing Corporation as an organization. Employees of Toronto Seniors Housing Corporation must work together to build and maintain relationships within the organization and in the community. Remember, when wearing TSHC uniform or workwear, you are representing Toronto Seniors Housing Corporation to tenants, vendors, community partners, and the public.

Tenants, and all others who contact Toronto Seniors Housing Corporation may

depend on us for information and the services we provide. Tenants, vendors, community partners and members of the public deserve to be treated with empathy, dignity, and respect. In all dealings with tenants, vendors, community partners or the public, employees are expected to be professional, helpful, and courteous at all times, especially when dealing with a difficult individual or situation. Staff should not engage in arguments with tenants, vendors, community partners or members of the public. They are expected to attempt to de-escalate situations in a calm, courteous manner, reaching out to their supervisor for support and guidance when needed. The issues being faced by tenants are important, and we must demonstrate through our words and actions that we take these issues seriously.

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.

Employees are also expected to avoid behaviors which a reasonable person would find inappropriate in a professional and productive workplace. This includes, but is not limited to the following:

- behaviour which is disruptive or intimidating
- inappropriate banter that isolates, excludes, or centres out someone
- inappropriate non-verbal communication (eye rolling, huffing, or sighing during conversations, smirking, or sneering, leering, shrugging shoulders etc.)
- insulting or derogatory comments, particularly as it relates to a protected

ground such as gender, gender orientation, sexual identity, race, religion, country of origin etc.

- jokes, gestures, or statements that could have an impact of being offensive
- making up or circulating rumours which could be harmful or hurtful to another person
- name calling, including in a joking manner
- profane or vulgar language
- sexual comments or innuendo
- 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 of promotion at work, or withholding something
- bragging about sexual ability
- bullying based on sex or gender
- calling people unkind names that relate to sex or gender
- demanding hugs
- 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
- spreading rumours of gossip of a sexual nature (including online)

For further information on sexual harassment please see the Workplace Harassment Policy.

Reasonable direction by supervisors and managers relating to the management

and direction of workers or the workplace or conducting performance reviews is not workplace harassment. If employees believe they are the victim of harassment, discrimination, or bullying under TSHC policy or the law they should seek assistance from their manager or department director.

### **Attendance at Meetings, Conferences, Workshops or Training**

This Code of Conduct applies when attending in-person, off-site or virtual meetings, conferences, workshops or training. As representatives of Toronto Seniors Housing Corporation, employees are expected to:

- 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, 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.

**Policy Contact**

Director, People and Culture

**Toronto Seniors Housing Corporation**  
**Board of Directors Meeting**

**Meeting Date:** December 11, 2025

**Topic:** TSHC Business Continuity Planning

**Item Number:** 24

**Report Name:** TSHC Business Continuity Planning

**To:** Board of Directors

**From:** Grant Coffey, Director Strategy and Business Management

**Date of Report:** November 10, 2025

**Purpose:** For information

**Recommendation:**

It is recommended that the TSHC Board of Directors receive this report for information.

**Reason for Recommendation:**

This report was presented at the Audit, Finance, and Risk Committee (AFRC) for information at its meeting on November 26, 2025.

TSHC is committed to maintain the resilience of its business operations during interruptions caused by natural, technological, or human-related events. To support this commitment, TSHC management initiated the development of a Business Continuity Plan (BCP) and Business Continuity Management Policy and had engaged MNP LLP to lead this process.

## **TSHC Business Continuity Plan**

TSHC's Business Continuity Plan (BCP) will help the organization stay resilient and keep critical services running during major disruptions. The main goal is to protect tenants, staff, and partners, while making sure essential operations continue.

The plan outlines the steps to take when a disruption is identified, including how staff escalate the issue, the evaluation process, and the appropriate response actions. It includes clear communication guidelines for staff, partners, and tenants, and ensures messages align with Toronto Community Housing Corporation (TCHC) when needed.

The plan also identifies time-sensitive processes across TSHC's departments. Each process includes a maximum tolerable downtime (MTD), resource requirements, technical and non-technical dependencies, and step-by-step recovery actions.

The BCP is reviewed annually or whenever significant operational changes occur. Updates will reflect changes in roles, processes, systems, and organizational structure.

## **Business Continuity Management Policy**

The Policy defines TSHC's approach to business continuity, outlines the responsibilities of key partners, and details the structure and processes that support continuity planning.

## **Next Steps**

TSHC management will explore and finalize training options to help staff understand the BCP, with plans to roll out the training program in Q1 2026.

TSHC is also working with TCHC on developing an updated Joint Emergency Response Plan that will include escalation processes, and roles and responsibilities between the two organizations.

Grant Coffey

Director, Strategy and Business Management

**Attachments:**

Attachment 1 – Business Continuity Presentation

# Business Continuity

## Overview of the Plan and Policy

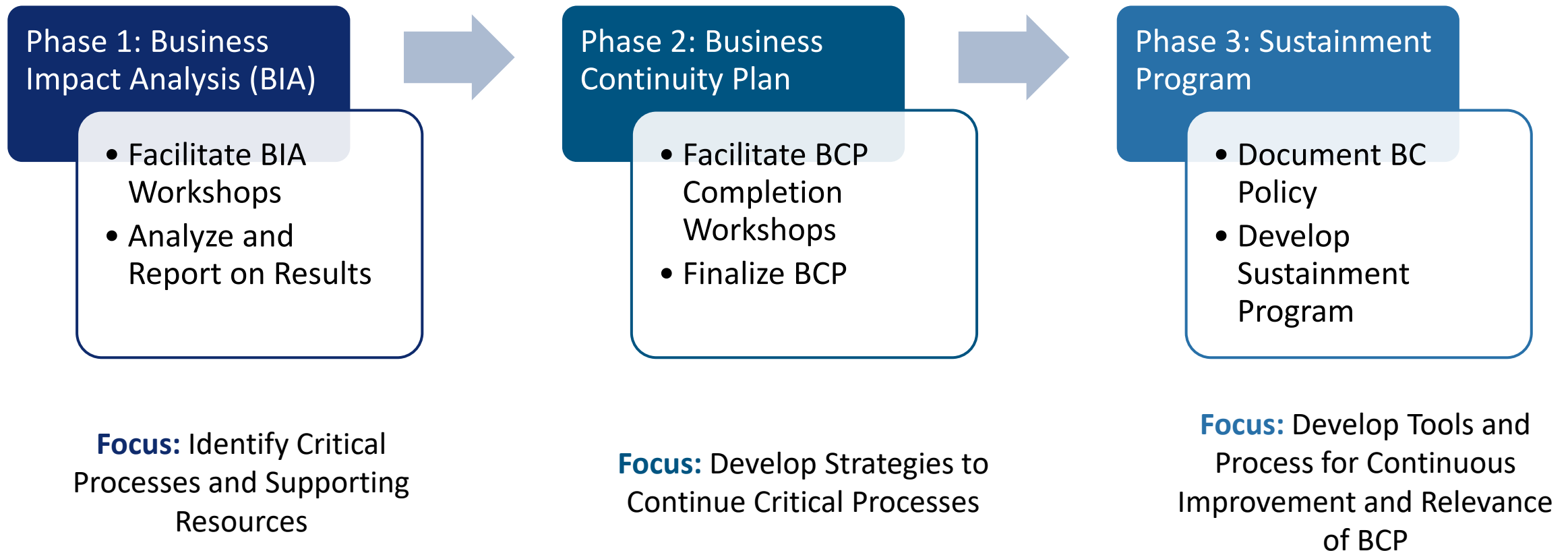
December 11, 2025

# Background

- Developing a Business Continuity Plan (BCP) was identified as a key priority by the Board
- Although TSHC is part of TCHC's BCP, TSHC wanted its own BCP that focuses on TSHC-owned processes
- TSHC added Business Continuity as a key action item under the Strategic Directions
- TSHC procured MNP LLP to collaborate on the development of a TSHC BCP

# Business Continuity Planning Project

**Objective:** Develop a TSHC BCP that focuses on TSHC-owned processes and integrates with TCHC's BCP.



# Overview of the BCP and BC Policy

## Business Continuity Plan Components

Plan Activation	<ul style="list-style-type: none"><li>• Including: Identification, Escalation, Evaluation, and Response</li></ul>
Communications and Information Management	<ul style="list-style-type: none"><li>• Response Cycle concept</li><li>• Internal and External comms</li></ul>
Strategies for Common Disruption Scenarios	<ul style="list-style-type: none"><li>• Loss of IT</li><li>• Loss of Facility</li><li>• Loss of Staff</li><li>• Loss of Critical Vendor</li></ul>
Critical Business Processes	<ul style="list-style-type: none"><li>• Workarounds and key actions to continue processes</li><li>• Primary and Alternate staff</li></ul>
Vital Records	<ul style="list-style-type: none"><li>• Procedures, Policies, etc.</li></ul>
Salvage List	<ul style="list-style-type: none"><li>• Items to salvage from impacted facility (hard to replace items)</li></ul>
Forms and Contact Information	<ul style="list-style-type: none"><li>• To guide the response</li></ul>

## Business Continuity Policy

Scope and Out of Scope

Roles and Responsibilities


# Business Disruption

A significant incident where the impact to operations/reputation is such that a response requires LT decisions and actions.

## Examples of a Business Disruption

- Flood or fire impact that renders a TSHC building as inhabitable
- Pandemic event
- Loss of IT or utilities for an extended period at a TSHC building

## What is not a Business Disruption

- Flood or fire impacting a minor portion of a TSHC building
- Health and safety incident resulting in non-serious injuries
- Loss of IT or utilities in building(s) for a short duration

# Critical Business Processes

Items that are covered under TSHC's BCP. The BCP has actions that need to be taken to recover these time-critical business processes from a disruption. TCHC Services are not included in this.

Operations	People & Culture	EPC	Finance	Strategy & Business Management
<ul style="list-style-type: none"><li>• Tenant Support</li><li>• Transfer Priority Requests</li><li>• Tenancy Services</li><li>• Maintenance Services (including cleaning services and AUI inspections)</li></ul>	<ul style="list-style-type: none"><li>• Employee Relations</li><li>• Labour Relations</li><li>• WSIB Management</li><li>• Disability Management</li><li>• Health and Safety</li></ul>	<ul style="list-style-type: none"><li>• External Communications</li></ul>	<ul style="list-style-type: none"><li>• Cash Flow Management</li><li>• Banking Services (including accounts payable, issuance of cheques, deposits)</li><li>• Month End Process and Reporting</li><li>• P-Card Administration</li></ul>	<ul style="list-style-type: none"><li>• Provide Strategic Advice to CEO and Leadership Team</li><li>• Relationship Management with TCHC</li><li>• Governance (Board)</li></ul>

# Linkage to TCHC

- Any services provided by TCHC would be captured in TCHC's Business Continuity Plan
- If the root cause of a TSHC business disruption is due to an issue that is primarily managed by TCHC (e.g., a cyber incident):
  - TSHC staff will connect with the Director, Strategic Communications at TCHC as they develop messaging to ensure, where appropriate, there is alignment with TCHC's communications.

# Business Continuity Management Policy

- TSHC engaged with MNP LLP to develop a Business Continuity Management Policy
- Key Policy Elements:
  - TSHC's approach to Business Continuity
  - Responsibilities of key partners
  - Structure and processes that support continuity planning

# Next Steps

- TSHC is exploring training options for staff on the new Business Continuity Plan for 2026
- TSHC is working with TCHC on an updated Joint Emergency Response Plan

**Toronto Seniors Housing Corporation**  
**Board of Directors Meeting**

**Meeting Date:** December 11, 2025

**Item Number:** 25

**Report Name:** Strategic Directions Progress Report – Q3 2025

**To:** Board of Directors

**From:** Grant Coffey, Director, Strategy and Business Management

**Date of Report:** December 2, 2025

**Purpose:** For Information

**Recommendation:**

It is recommended that the Board of Directors receive this report for information. This report was reviewed by the Quality and Tenant Engagement Committee (QTEC) on November 18, 2025.

**Reason for Recommendation:**

At the Board of Directors meeting on February 26, 2025, the Board of Directors approved the updated 2023-2025 Strategic Directions (SD) Roadmap, to reflect revised timelines and activities, resource capacity, and build on progress and experience gained in 2023 and 2024. The updated Strategic Directions Roadmap outlines the key initiatives and milestones that will guide our progress until the end of 2025. This

report provides highlights on the progress made on implementing the Strategic Directions in Q3 2025.

### **Key Performance Indicators Dashboard**

As indicated in the Dashboard, the third quarter of 2025 reflects strong operational performance, increased tenant engagement, enhanced staff development, and continued organizational excellence. For more comprehensive details, please refer to Attachment 1.

- **Housing Occupancy:** Housing occupancy rate maintained at 98.23%, exceeding the target of 98%. Average unit turnover time increased to 73 days, up from 64 days in Q2, but was well below the sector average of 78.85 days.
- **Arrears Management:** Rent collection rate sustained at 99.2%, with 89% households in good financial standing.
- **Pest Management:** The Operations and Environmental Health Unit teams continue to work actively with tenants to address pest issues, resulting in 787 units being declared pest free in the third quarter.
- **Community Safety:** In Q3, a total of 1,987 incidents were reported, a decrease from 2,218 in Q2, along with 418 proactive interventions, down from 516 in the previous quarter.
- **Tenant Engagement:** A total of 68 Community Activities Fund applications were approved, distributing \$94,804. Over 60 events were hosted, many of which celebrated the joys of summer and Canada Day. The Translation and Interpretation Policy was approved and launched in Q3.

- **Programs and Partnerships:** In Q3, 352 recurring programs were offered to tenants across the buildings, representing a 20% increase from 293 programs in Q2 and demonstrating a positive upward trend in program offerings. Four Regional Volunteer Meetings were held with 107 volunteers in attendance.
- **Employer of Choice:** On September 16, an all-staff event successfully brought employees together for a memorable day of reconnection, recognition, and celebration. The inaugural IDEA Committee meeting was held with new members on board. A range of training sessions covering key topics such as human rights, SharePoint, and practical job skills were organized.
- **Organizational Excellence:** The upgraded intranet was launched on September 23, followed by three Lunch and Learn sessions with over 100 staff in attendance. TSHC's financial standing stays robust as of September 30, 2025.

## **Strategic Directions Roadmap**

The SD Roadmap translates the Strategic Directions into a plan for delivery. The Q3 2025 Roadmap Tracker demonstrates progress across various strategic initiatives. In the third quarter of 2025, 10 projects/activities were planned, with 5 completed on time, and 5 with revised timelines. Project teams are committed to completing activities according to the updated timelines. Attachment 2 provides highlights of the completed projects and outlines the details of those with revised timelines.

## **Review and Planning Sessions for Strategic Directions**

As the current TSHC Strategic Directions (2023 – 2025) are approaching completion, a renewed set of Strategic Directions will be developed for the next three to five years. Planning sessions with the Leadership Team will be held later this year and into early next year to close out remaining initiatives under the existing Strategic Directions and plan for the transition to the new Strategic Directions.

Grant Coffey

Director, Strategy and Business Management

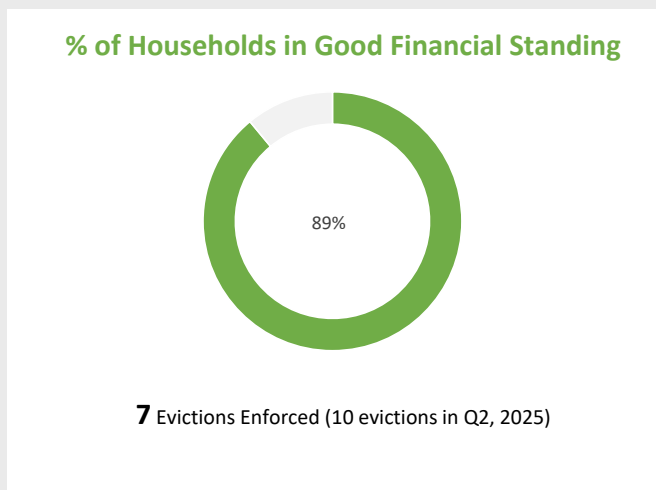
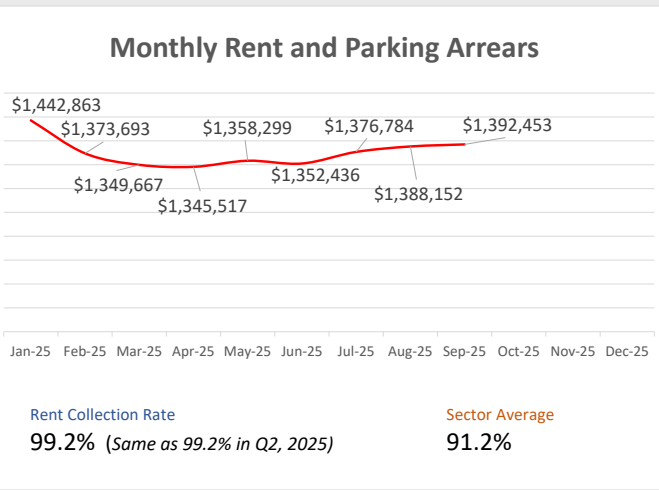
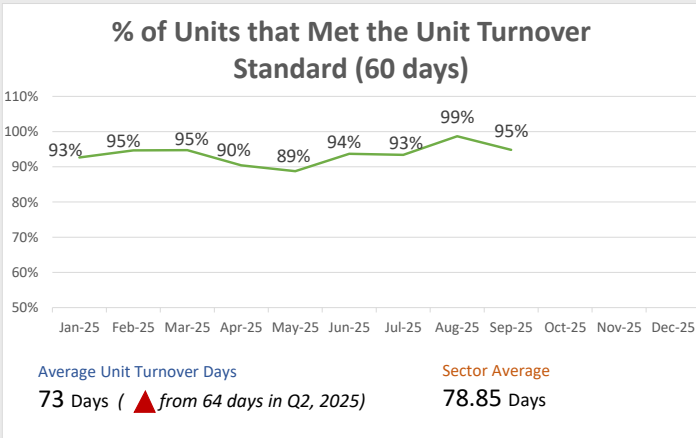
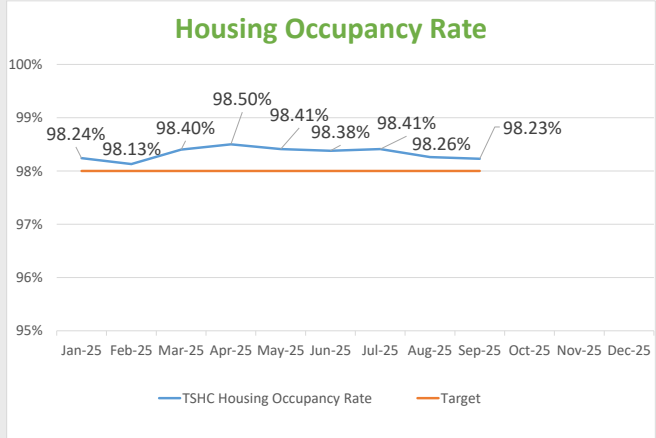
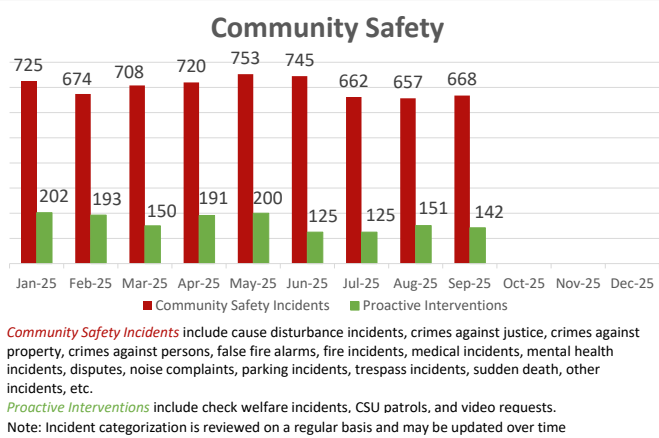
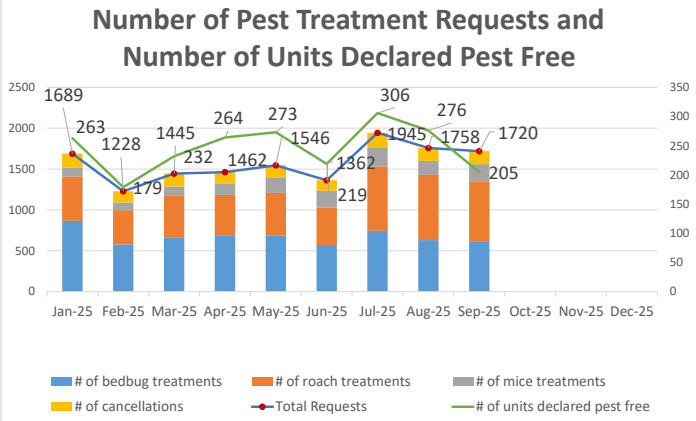
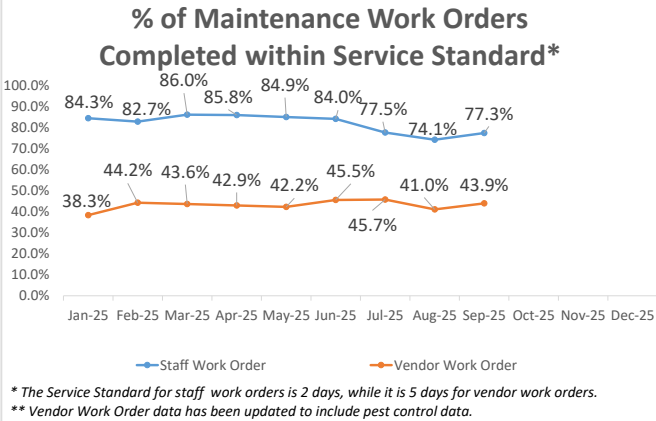
### **List of Attachments:**

1. Attachment 1 – SD Key Performance Indicator Dashboard – Q3 2025
2. Attachment 2 – SD Roadmap Update – Q3 2025

Strategic Objective 1: To provide safe, clean and well-maintained buildings and to support stable tenancies

Highlights:

- **Work Orders:** In September, 77.3% of staff work orders and 43.9% of vendor work orders were completed within the Service Standards.
- **Pest Management:** In Q3, a total of 787 units were declared pest free. Staff have assisted 20 tenants in preparation for treatment and coordinated the preparation of 23 units with Toronto Public Health.
- **The housing occupancy rate** at the end of September stood at 98.23%, exceeding the target of 98%. The average unit turnover days in Q3 was at 73 days, increasing from 64 days in Q2.
- **Arrears:** TSHC achieved 99.2% rent collection rate in Q3, same as in Q2. The arrears level has remained stable during Q3, with 89% of households maintaining good financial standing. A majority of households in arrears fell within the \$1 - \$2,000 range.



**Households in Arrears**

Rent and Parking Balance Range	No. of Tenant Accounts with Arrears
\$1-\$2,000	1299
\$2,001-\$4,000	81
\$4,001-\$6,000	36
\$6,001-\$8,000	27
\$8,001-\$10,000	9
\$10,001 and above	17
Grand Total	1469

**Strategic Objective 2: To enhance tenant engagement and inclusion in their communities and provide opportunities for tenants to have a voice**

**Highlights:**

- In Q3, 68 Community Activities Fund Applications were approved, distributing a total of \$94,804.
- Between July and September, over 60 events were hosted, many of which celebrated the joys of summer and Canada Day. Most events were fun-filled BBQs that brought the community together.
- Following a series of tenant consultations, the Translation and Interpretation Policy was approved and launched in Q3.
- Budget meetings were held to consult tenants, including the Senior Tenants Advisory Committee (STAC), on the 2026 City budget process which helps inform TSHC's submission.
- The Tenant Experience Survey questionnaire has been finalized and will reach tenants' mailboxes in mid-November. The timelines for completing the survey were adjusted because of the Canada Post strike.

**Community Activities Fund Distribution**

\$ Community Activities Fund Distributed in this quarter:

**\$94,803.65 in Q3 2025**

\$ Community Activities Fund Distributed in the same quarter last year:

**\$100,167 in Q3 2024**

Number of Community Activities Fund Applications Approved:

**68 in Q3 2025**

**Communications with Tenants:**

**1** issue of Seniors Speak and **1** Community Letter with Video

**24** new posters translated into top **8** languages and distributed

**Tenant Engagement Activities**

**6** CEO Tours

**1** Senior Tenants Advisory Committee Meeting

**4** Regional Tenant Meetings

**60** Tenant Summer Events

**280** tenants participated  
(including tenants attending CEO Tours)

**Online Engagement**

Website Users: **12,061**

Social Media Audience: **2,293**

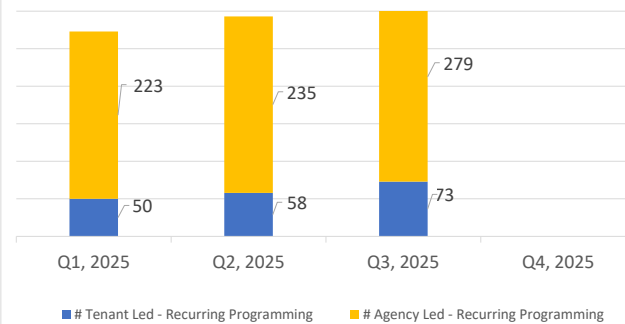
Social Media Audience Growth: **55**

**Strategic Objective 3: To facilitate access to services and programs that tenants need and want**

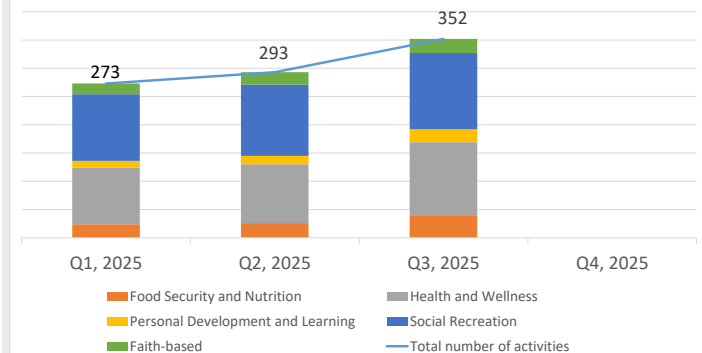
**Highlights:**

- In Q3, 352 recurring programs were offered to tenants across the buildings, representing a 20% increase from 293 programs in Q2 and demonstrating a positive upward trend in program offerings. Of these 352 programs, 279 (79%) were led by community partners, while 73 (21%) were tenant-led.
- Summer Regional Volunteer Meetings were held in July, with 136 volunteers attending across the four events. Alongside TSHC staff presentations on programs and partnerships, educational sessions were provided by the Toronto Policy Services (Fraud and Elder Abuse), as well as by TCHC Energy Conservation Team.
- The frequency of tenant volunteer updates has been increased to facilitate the timely sharing of monthly Seniors Strategy content.

**Recurring Programming**



**Building Programs**

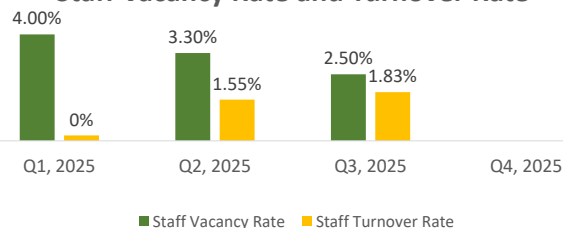


**Strategic Objective 4: To promote innovation**

No new innovations implemented across the organization in Q3.

**Enabler: Employer of Choice**

**Staff Vacancy Rate and Turnover Rate**



**Enabler: Employer of Choice**

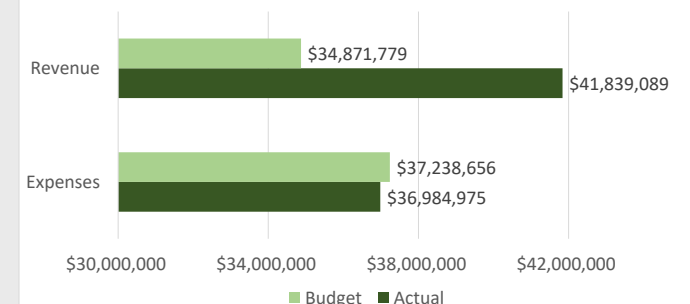
**Highlights:**

- The upgraded intranet was launched on September 23 which included a scavenger hunt and three Lunch and Learn sessions with over 100 staff in attendance.
- An all-staff event was successfully held on September 16, bringing staff together for a memorable day that included opportunities for reconnection, recognition, and celebration.
- Three Staff Bulletins were published.
- The first IDEA Committee meeting was held with new members.
- The second cohort of Enliven Leadership Training started with 21 people leaders participating in this cohort.
- A range of training sessions was delivered, including human rights training for 27 leaders, three SharePoint sessions for 105 staff, and various job skills-related trainings for over 230 staff members.

**Enabler: Organizational Excellence**

**Statement of Operations**

As of September 30, 2025



Objective/Enabler	Accountabilities	Initiatives	Actions	Time-limited Activities	Current Timeline	Status	Highlights/Comments
An excellent landlord To provide safe, clean and well-maintained buildings and units and to support stable tenancies	Director, Operations	Promote safety and security in our buildings and communities	Implement recommendations of safety and security Quality Improvement Project	Assess feasibility of doing a pilot project in highest call buildings	Q3 2025	Deferred	Project deferred pending on outcome of the CSU review and redeployment.
An excellent landlord To provide safe, clean and well-maintained buildings and units and to support stable tenancies	Director, Operations	Provide clean and well-maintained buildings and units	Work with TCHC to set priorities for capital investments and communicate with tenants about these plans	Establish an annual capital plan with TCHC	Q3 2025	Completed	A capital plan was established. A new system will be introduced in Q1 2026 to digitalize the capital project request process and facilitate easier approval and tracking monitoring.
Tenant engagement To enhance tenant engagement and inclusion in their communities and provide opportunities for tenants to have a voice	Director, Engagement, Partnerships and Communications	Communicate effectively with our tenants and other stakeholders	Develop communications strategy, including multiple channels and tools, translation, accessibility legislation (Accessibility for Ontarians with Disabilities Act) compliance and consistent messaging	Intranet upgrade	Q3 2025	Completed	The intranet went live on September 23, 2025. TSHC staff not only facilitated the go-live efforts behind the scene, but ran a number of promotional efforts to drive traffic including a scavenger hunt, and taking new headshots for staff who were interested at the all staff event in September.
Organizational excellence To strive for organizational excellence for effective and efficient delivery of our mandate	Director, Strategy and Business Management	Implement elements of good governance practices	Enhance governance practices in the areas of: governance foundations, principles and structures; board responsibilities and oversight; governance processes; and board effectiveness	Select governance best practices standard and governance review	<del>Q3 2025</del> Q1 2026	Revised Timeline	Best practices standard/governance research in progress with a revised timeline to Q1 2026. Board governance workshop also planned in Q1 2026.
Organizational excellence To strive for organizational excellence for effective and efficient delivery of our mandate	Director, Strategy and Business Management	Manage our financial resources responsibly	Work with TCHC and City on annual budget process	Budget planning – 2026	Q3 2025	Completed	2026 Budget drafted in collaboration with the City of Toronto and TCHC.
Organizational excellence To strive for organizational excellence for effective and efficient delivery of our mandate	Director, Strategy and Business Management	Be informed by data and driven by performance commitments	Improve access to quality data and apply data analytics	Review KPIs	<del>Q3 2025</del> Q4 2025	Revised Timeline	KPI review underway with planned completion for Q4 2025.
Organizational excellence To strive for organizational excellence for effective and efficient delivery of our mandate	Director, Engagement, Partnerships and Communications	Develop clear, plain language policies	Review priority policies to reflect TSHC values and principles	Review and update the Translation and Interpretation Policy	Q3 2025	Completed	The Translation and Interpretation Policy was approved at the Board on July 31. Procedures have been drafted for review by staff and vendor in Q4, followed by training.
Organizational excellence To strive for organizational excellence for effective and efficient delivery of our mandate	Director, Strategy and Business Management	Use technology effectively	Make best use of processes and data in HoMES system	Current SharePoint clean up/management	<del>Q3 2025</del> Q4 2025	Revised Timeline	SharePoint largely complete as of Q3 with 11 of 12 sites developed. Final migration and archive of content and sustainment activities planned for Q4 2025.
Organizational excellence To strive for organizational excellence for effective and efficient delivery of our mandate	Director, Strategy and Business Management	Use technology effectively	Make best use of processes and data in HoMES system	Participate in intranet solution refresh	Q3 2025	Completed	TSHC implemented new Intranet (Mango Apps) in September 2025.
Employer of choice To be an employer of choice by fostering a culture of innovation that engages, empowers, and supports staff	Director, People and Culture	Develop and implement a talent strategy	Identify, attract, recruit, and keep top talent	Review of JD's to ensure they include the key knowledge and skills required	<del>Q3 2025</del> Q4 2025	Revised Timeline	Language is being reviewed by legal. Target completion Q4 2025.

## **Toronto Seniors Housing Corporation**

### **Board of Directors Meeting**

**Meeting Date:** December 4, 2025

**Topic:** Tenant Human Rights Complaints Reporting Framework

**Item Number:** 26

**To:** Board of Directors

**From:** Director of Strategy and Business Management

**Date of Report:** December 2, 2025

**Purpose:** For information

**Recommendation:** Board receive this report for information.

**Reason for Recommendation:** The Corporate Governance and Human Resources Committee (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. 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. This procedure was part of the report and materials presented to CGHRC on November 6, 2025.

### **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 also received training in November and December on content that focused 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 supporting in 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 and the Board, TSHC has also developed a reporting framework that will be used for this purpose (Attachment 1). 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 2.

### **List of Attachments:**

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

## 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	<ul style="list-style-type: none"> <li>- Staff</li> <li>- Tenant</li> <li>- Vendor</li> <li>- Agency</li> <li>- Policy/Practice</li> </ul>
Type of complaint	<ul style="list-style-type: none"> <li>- Accommodation request</li> <li>- Harassment</li> <li>- Discrimination</li> <li>- Policy/Practice</li> <li>- Other</li> </ul>
Complaint by protected ground	<ul style="list-style-type: none"> <li>- 17 protected grounds</li> </ul>
Number of complaints that were investigated and addressed in the calendar year, breakdown by type of human rights complaint	<ul style="list-style-type: none"> <li>- Overall</li> <li>- Type of complaint</li> <li>- Respondent type</li> <li>- Protected ground type</li> </ul>
Regional breakdown of complaints	<ul style="list-style-type: none"> <li>- Overall</li> <li>- Type of complaint</li> <li>- Respondent type</li> <li>- Protected ground type</li> </ul>
% of complaints deemed non-human rights complaints during initial review	<ul style="list-style-type: none"> <li>- % human rights complaints</li> <li>- % other - % service request/ % fraud/ % other</li> </ul>
Number of human rights complaints handled by a third-party investigator	<ul style="list-style-type: none"> <li>- Overall</li> <li>- Type of complaint</li> <li>- Respondent type</li> <li>- Protected ground type</li> </ul>
% of complaints that were appealed/asked for procedural review	<ul style="list-style-type: none"> <li>- % Overall</li> <li>- % accommodation, harassment, discrimination, policy</li> </ul>

% of complaints that required translation supports	<ul style="list-style-type: none"> <li>- Overall</li> <li>- Preferred language</li> </ul>
Number of complaints that got taken to the HRT0 or LTB.	<ul style="list-style-type: none"> <li>- Overall</li> <li>- Type of complaint</li> <li>- Respondent type</li> <li>- Protected ground type</li> </ul>

<b>Future Reporting Considerations</b>	
Average time for complaints to be investigated/resolved	<ul style="list-style-type: none"> <li>- Overall</li> <li>- Accommodation request</li> <li>- Harassment</li> <li>- Discrimination</li> <li>- Policy/practice</li> </ul>

## 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