

## **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:** December 11, 2025

### **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 can 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 about 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 always, 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 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 interact 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 centers out someone
- inappropriate non-verbal communication (eye rolling, huffing, or sighing during conversations, smirking, 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 or 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 or 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.

**Next Scheduled Review Date: 2028**

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

**Policy Contact**

Director, People and Culture