

5.1 Code of Conduct and Business Ethics Policy

Intent

The intent of this policy is to communicate the employer's commitment to conducting business in an open and ethical manner and to dictate workplace expectations and outline what the employer has determined to be unethical behaviours.

This document clarifies the responsibilities that the employer and its employees have to each other, to our partners and to our guests. It helps us understand the responsibilities we share, and alerts us to important conduct issues that may arise. You will not find every policy or standard here; however, the basic values and principles by which the hotel is guided are included in this document.

Scope

This policy applies to all employees at all times and without exception.

Bargaining members are requested to refer to their current Collective Agreement for procedures and guidelines pertaining to this policy. Where the Collective Agreement is silent, bargaining members shall refer to the contents of this policy. In situations where the directions of this policy cover issues also in the Collective Agreement, the Collective Agreement will be the final authority.

Compliance with local laws and the hotel's policies, procedures and values are not optional. All employees must follow them.

Every employee must report any violations of the Code of Conduct. All personnel are prohibited from taking any action against an employee who reports a concern.

Disciplinary action, including termination of employment, may be taken against any employee who does not adhere to the hotel's Code of Conduct and/or who knowingly makes a false report.

Guidelines

The employer has created a workplace built on ethical business practices, trust, accountability, and integrity. It is the responsibility of every employee to maintain this code of ethics by supporting and actively participating in ethical operations in their day to day business.

The employer relies on its employees to always do the right thing to maintain our good name. The vision of the hotel and every employee is to be the best in everything we do, individually and collectively. All employees are to act professionally and with integrity.

The employer will maintain a strict zero tolerance policy against any wrongdoing or impropriety, and will immediately take the appropriate disciplinary action necessary to correct any identified problems.

If a violation of this policy occurs, the employer will use disciplinary measures that reflect the severity of the offence up to and including termination of employment. Punitive measures including legal action may also be pursued.

Each employee should ask questions, raise concerns and report dishonest or improper conduct by employees, representatives, guests or suppliers.



Corporate Values

Integrity

We are open and trustworthy in dealing with our guests, suppliers, and co-workers.

Health & Safety

We work safely in a manner that protects and promotes the health and well-being of the individual and the environment.

<u>Teamwork</u>

We work together in a coordinated effort to achieve our goals.

Individual Worth

We recognize and respect our individual team members and their contributions.

<u>Guests</u>

We are committed to providing our guests with exceptional service and will treat them with respect and dignity. We consistently meet the needs of each individual guest with a professional, friendly, prompt, courteous and enthusiastic attitude.

Excellence

We constantly pursue excellence in everything we do.

<u>People</u>

We work in an inclusive environment that embraces change, new ideas, and respect for the individual.

Profitability

We earn sustainable financial results that enable profitable growth.

Accountability

We are accountable – individually and collectively – for our behaviour, actions and results.

Guide to Business Conduct

Management Responsibility

All members of management must demonstrate a commitment to the hotel's values through their actions. They must also promote an environment where compliance is expected and valued.

Respect and Fair Treatment

Every employee must respect the people and cultures with whom or which they work. Relationships among employees in the workplace must be business-like and free of any bias, prejudice or harassment.

The hotel gives equal opportunity for employment to all individuals, regardless of their race, religion, colour, national origin, age, sex, sexual orientation or disability. This fair treatment applies to all phases of the employment relationship.

Protection and Proper Use of the Hotel's Assets



All employees should protect the hotel's assets and ensure their efficient use. All hotel assets are to be used only for legitimate business purposes.

Harassment

The hotel does not tolerate any form of harassment. It may take many forms, all of which are unacceptable. Examples of harassment are:

- Jokes, insults, threats and other unwelcome actions about a person's race, colour, gender, age, religion, national origin, disability, sexual orientation, social and economic status or educational background.
- Sexual advances, requests for sexual favours, or other unwelcome verbal or physical conduct of a sexual nature.
- Verbal or physical conduct that upsets another employee's work performance or creates a fearful or hostile work environment.

For additional information on harassment, please see the Workplace Harassment and Discrimination Policy.

A violation of this Code of Conduct may result in disciplinary action including possible immediate termination, without additional warning. Every employee must sign an agreement, promising to comply with all the policies listed in the Code.

Reporting Possible Violations of the Code of Conduct

If you have questions about this code of conduct or concern about a co-worker's conduct, first contact your manager. If you do not feel comfortable doing that, contact one of the following:

- General Manager
- Head Office