



DESTINATION
BRITISH COLUMBIA™

STANDARDS OF CONDUCT

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PURPOSE AND APPLICATION OF OUR STANDARDS OF CONDUCT

At Destination British Columbia, the success of our business relies on the integrity of our systems and people involved in providing our products and services. We require every Destination BC employee to fulfill our promise to conduct our business with professionalism and honesty.

We recognize that business situations are, at times, complex and that the right decision or action may not always be clear. These **Standards of Conduct** are designed to be a framework to give employees guidelines and direction to help make the right decision. If you have questions or issues concerning any aspect of this policy, you are responsible to discuss the matter with your manager. Employees who fail to comply with these standards may be subject to disciplinary action up to and including dismissal.

These Standards apply to all full-time, part-time, regular and auxiliary employees, and the requirement to comply is a condition of employment.

All new employees must review and agree to the terms of the Standards of Conduct prior to commencing employment and are to be reviewed annually as part of the Performance and Professional Development Planning process.

These Standards, which have been adopted and approved by Destination BC's Board of Directors, are reviewed on a regular basis and revised as necessary.

As a Crown Corporation, we represent Government in our actions, and employees of Destination BC are also covered by the **Public Service Act**, and governed by the **BC Public Service Standards of Conduct**.

LOYALTY

Destination BC employees have a duty of loyalty to the government as their employer. You must act honestly and in good faith and place the interests of the employer ahead of your own private interests. The duty committed to in the Oath of Employment requires Destination BC employees to serve the government of the day to the best of their ability.

CONFIDENTIALITY

In the course of your duties you will have access to confidential information. Protecting confidential information is a crucial business practice.

If you are in doubt about whether information is confidential information, you should assume that it is unless otherwise advised by your Manager.

As a Destination BC employee, you should safeguard confidential information by keeping such information secure and limiting access to only those who 'need to know' in order to do their job. Do not discuss confidential information in public areas such as elevators, boarding lounges and aircraft or over mobile phones in public places where you could be overheard.

Do not give out information received through your position that is not available to the general public unless prior authorization is given for its release.

Access to Destination BC Computer Systems

Destination BC computer systems, data, programs and communication systems are the property of Destination BC. If you have access to Destination BC's computing and communication devices, you are expected to use them in a responsible manner for the benefit of Destination BC. Do not disclose your computer system passwords and/or user identification to anyone or allow anyone to access the Destination BC computer system via your access.

As a PSA Crown, Destination BC policies regarding appropriate use of government information and information technology resources are directed by the Office of the Chief Information Officer Policy Directive and further detail can be found in the policy: http://icw.cscd.gov.bc.ca/isb/security/docs/Acceptable_Use_policy.pdf.

Retention of Records

All records created or received by Destination BC are considered government records and must be managed in accordance with B.C.'s Document Disposal Act regardless of their form or medium. Destination BC retains and disposes of records in accordance with approved retention and disposition schedules. Any records created by you are under the custody and control of Destination BC and must be retained in accordance with the retention and disposition schedules.

Freedom of Information and Protection of Privacy Act (FOIPPA)

Destination BC is also required to comply with the information access and protection of privacy requirements established in B.C.'s Freedom of Information and Protection of Privacy Act. FOIPPA grants the Office of the Information and Privacy Commissioner the power to audit or investigate Destination BC's freedom of information and privacy protection practices and to order changes where there are findings of non-compliance.

Records created by you may be subject to an access to information request and if requested, you are required to provide them to Destination BC's Information and Privacy department, who will apply FOIPPA in Destination BC's response to the request.

Destination BC collects personal information from many individuals in the course of normal business activity. FOIPPA outlines the requirements that all B.C. public bodies, including Destination BC, must apply to protect personal information. Destination BC must comply with the provisions of FOIPPA when collecting, accessing, using, disclosing, storing and disposing of Personal Information.

Supplier, Competitor or Business Information

It is common within Destination BC to acquire information about other organizations, including Destination BC's competitors. In fact, Destination BC sometimes gathers a variety of information from legitimate sources to evaluate best business practices, and marketing methods. This is an ethical business activity.

It is not ethical to use illegal means to acquire a competitor's trade secrets or other confidential information. If information is obtained by mistake that may constitute a trade secret or confidential information of another person or business, or if you have questions about the legality of information gathering, you should immediately consult with your Manager.

You are expected to follow Destination BC's procedure for entering into non-disclosure agreements with Service Providers or others when appropriate and uphold Destination BC's obligations under such agreements.

Confidentiality of Information after Leaving Destination BC

After your employment with Destination BC ends, you must not disclose confidential information that you obtained through your employment with Destination BC.

PUBLIC COMMENTS

Destination BC employees may comment on public issues but must not engage in any activity or speak publicly where this could be perceived as an official act or representation (unless authorized to do so).

You must not jeopardize the perception of impartiality in the performance of your duties through making public comments or entering into public debate regarding corporate policies. You must not use your position in government to lend weight to the public expression of your personal opinions.

SOCIAL MEDIA

In online social networks, the lines between public and private, personal and professional are often blurred. Just by identifying yourself as a Destination BC employee you are creating perceptions about your expertise regarding Destination BC, our customers and the general public. You must ensure all content associated with you is consistent with your work and with Destination BC's mission and vision. You are expected to conduct yourself with the same level of respect, integrity and social responsibility in the online world as you would in the physical world.

Destination BC supports the use of social media and is creating a set of guidelines to help you make appropriate decisions and avoid risks when discussing, depicting or creating content about Destination BC or a related topic through social media. You are expected to understand and follow these guidelines, which are based on the following general principles:

- Pause Before Engaging
- Maintain a Good Reputation Online
- Protect Destination BC's Privacy and Resources
- Be Responsible for Your Actions Online

POLITICAL ACTIVITY

It is critical that we maintain impartiality in relation to our Destination BC duties and responsibilities when any of us engages in political activities. The resources of a Crown Corporation cannot be used in such a way as to create an impression that the corporation favours one political party over another.

Destination BC employees may participate in political activities including membership in a political party, supporting a candidate for elected office, or seeking elected office. Employees' political activities, however, must be clearly separated from activities related to their employment.

If engaging in political activities, you must remain impartial as well as conveying the perception of impartiality in relation to your duties and responsibilities. Employees must

not engage in political activities during working hours or use government facilities, equipment, or resources in support of these activities.

Partisan politics are not to be introduced into the workplace; however, informal private discussions among co-workers are acceptable.

WORKPLACE BEHAVIOUR

We share the responsibility of creating a safe and healthy work environment where everyone is treated with dignity and respect.

Destination BC is committed to providing a workplace that is free from harassment and at all times operates in accordance with the Human Rights Code and similar legislation. As such, you are expected to interact with colleagues, contractors, service providers, stakeholders and the public in a professional, respectful and courteous manner. Behaviour that will strain work relationships or contribute to a negative work environment is unacceptable and will not be tolerated.

Further, the conduct of Destination BC employees in the workplace must meet acceptable social standards and must contribute to a positive work environment. Bullying or any other inappropriate conduct compromising the integrity of Destination BC will not be tolerated.

All employees may expect and have the responsibility to contribute to a safe workplace. Violence in the workplace is unacceptable. Violence is any use of physical force on an individual that causes or could cause injury and includes an attempt or threatened use of force.

You must report any incident of violence. Any employee who becomes aware of a threat must report that threat if there is reasonable cause to believe that the threat poses a real or perceived risk of injury. Any incident or threat of violence in the workplace must be addressed immediately.

You must report a safety hazard or unsafe condition or act in accordance with the provisions of the WorkSafeBC Occupational Health and Safety Regulations. Information on Destination BC's OSH committees can be found on the corporate share drive.

CONFLICTS OF INTEREST

Our customers, stakeholders, and colleagues must be able to trust that we will exercise our discretion in a manner that is free from taint of personal interest.

In the workplace, conflicts of interest typically occur when the personal interests of employees, contractors, Board members, or members of their families and friends conflict with the business of the company, raising doubts about the impartiality of the business decisions made and the integrity of the person making those decisions, and the corporation which employs them.

In order to preserve a reputation for honest and fair dealing, you must avoid situations where someone could reasonably perceive that there is a conflict between your personal interests and your role as an employee, even if you have no intention of acting unfairly or dishonestly.

There may be circumstances in which your private interests may be incompatible with your role at Destination BC. These guidelines provide examples of the types of activities or interests that you are required to disclose. You should be cognizant that the potential for a conflict of interest may change upon accepting a new role or different position within Destination BC.

Guidelines and rules to avoid conflicts of interest are designed to protect the interests and reputation of Destination BC and each employee. The principles underlying conflict of interest rules are impartiality and integrity. As a Destination BC employee, you cannot be perceived by the public as being impartial and acting with integrity if you could derive a personal benefit from a decision.

Definition of Conflict:

- A real conflict of interest denotes a situation in which you have knowledge of a private economic interest that is sufficient to influence the exercise of your duties and responsibilities as an employee of Destination BC.
- An apparent conflict of interest exists when there is a reasonable apprehension, which reasonable well-informed persons could properly have, that a conflict of interest exists. This applies even when no conflict is found to actually exist.

Rules pertaining to Conflict:

- You must avoid any situation or decision-making in which there is a real or apparent conflict of interest or an apprehension of bias.
- You must not use your position at Destination BC to pursue or advance your personal interests, the interest of a family member or an associate, or the interest of a person to whom you owe an obligation.
- You must not directly or indirectly benefit from a transaction with Destination BC over which you can directly or indirectly influence a decision relating to the transaction. You must not take personal advantage of an opportunity available to Destination BC unless Destination BC has clearly and irrevocably decided against pursuing the opportunity and the opportunity is also available to other employees or the public.
- You must not use your position at Destination BC to solicit clients for a business or partnership you are personally involved with, or for a business operated by a family member, close friend, associate, a corporation in which you or a family member has a controlling interest, or for a person or a person's business to whom you owe an obligation.

Guidelines & Examples for Evaluation of Conflict

There are several situations that could give rise to a conflict of interest, or apparent conflict of interest or an apprehension of bias. The most common are accepting gifts, favours or financial benefits from suppliers, close or family relationships with suppliers, disclosing confidential information or using confidential information inappropriately. The following are examples of these types of situations:

- Participating in a decision to hire or promote a family member or friend.
- Influencing Destination BC to make its travel arrangements through a travel agency owned by a close friend, associate or family member.
- Acting as a service provider or retailer.
- Situations where you or someone you know would personally benefit from

- unauthorized disclosure or inappropriate use of information acquired through your employment with Destination BC.
- Situations in which you, a close friend or associate could personally benefit from your influence in Destination BC decisions, such as through investments, loans, purchases, sales, contracts, grants and regulatory or discretionary approvals and appointments.

You must disclose any circumstances that could be perceived as a real or an apparent conflict of interest.

Acceptance of Gifts

Giving or receiving gifts or entertainment can build understanding and expand relationships in everyday business life, but it can also cause a conflict of interest between personal interests and professional duty. Gifts and entertainment may erode the confidence and trust of others in the honesty and fairness of our business decisions, and undermine confidence and trust in the integrity of the management of the Corporation.

You must not accept gifts from suppliers, customers or anyone else connected to Destination BC in a business relationship. The only exceptions are modest promotional or expressions-of- gratitude items which are of limited value and which are available on a widespread basis (i.e. which are not specifically reserved for us) such as inexpensive pens, mugs, or calendars. Cash, as well as alcohol, regardless of the value, are never an acceptable form of gift giving or receiving and must be refused.

Gifts and prizes must be distinguished from events where we are building business relationships. If a supplier offers an employee free tickets to an event to use as they please, the tickets are gifts and must be refused. If, on the other hand, an employee is invited to attend the event with a supplier, this is acceptable. To avoid the perception of undue influence with a given supplier, the frequency of attendance at an event with a given supplier must be justifiable in the circumstances.

Entertainment may be offered or accepted in the ordinary course of business provided it is reasonable and modest and the frequency is justifiable in the circumstances. If you are in doubt whether the entertainment is reasonable and modest, you should obtain prior approval from your Manager.

You should always consider the following questions in relation to gifts or entertainment:

- Would the gift or entertainment be likely to or appear to influence my objectivity or the objectivity of the person to whom I am receiving or giving the gift or entertainment?
- Is the invitation from someone who is, or could be involved in a planned competitive process to provide services to Destination BC?
- Would my impartiality or the impartiality of the person to whom I am receiving or giving the gift or entertainment be compromised in any way or appear to others to be compromised?
- Is the entertainment for a private purpose as opposed to being for a business purpose?
- Is business going to be discussed as part of the event or only in a very limited way?

- Would the gift or entertainment or its frequency be considered unique or extraordinary?
- Would it be a problem or would you be embarrassed if you were to disclose the gift or entertainment to other employees or third parties?

If the answer to any of the above questions is “yes” or “perhaps” or could be perceived by third parties to be “yes” or “perhaps”, by accepting or offering such gifts or entertainment you are creating the appearance of a conflict of interest.

If you are not certain you should seek guidance from your manager.

Disclosure

In addition to applying the guidelines outlined above to determine if there is a real or apparent conflict of interest that you should declare, there are specific circumstances in which Destination BC requires you to disclose business interests, personal relationships and political activities. These specific circumstances are covered off in other areas, such as outside employment, working relationships etc.

To understand whether a given situation might create a conflict of interest, consider the following questions:

- Would other Destination BC employees or a member of the public think it might affect how I do my job for the corporation?
- Could someone perceive that I am using my work relationship with Destination BC to gain a personal benefit from any external party?
- Do I, my friends, or my family stand to gain anything by virtue of my employment with Destination BC or my Destination BC relationship with an external party doing business with Destination BC?
- Could it affect or be perceived to influence any decision which I might make at Destination BC?
- Do I feel under any obligation to an external party due to the relationship I have with that external party doing business with Destination BC?
- Would I be embarrassed if anyone inside Destination BC knew about the situation?
- Would someone outside Destination BC, such as a customer or stakeholder, question whether they had been treated fairly?

If the answer to any of the above questions is “yes” or “perhaps” or could be perceived by third parties to be “yes” or “perhaps,” you may be involved in a conflict of interest and should seek advice from your manager.

ALLEGATIONS OF WRONGDOING

Employees have a duty to report any situation relevant to Destination BC that they believe contravenes the law, misuses public funds or assets, or represents a danger to public health and safety. Employees can expect such matters to be treated in confidence, unless disclosure of information is authorized or required by law (for example, the Freedom of Information and Protection of Privacy Act). Employees will not be subject to discipline or reprisal for bringing forward in good faith, allegations of wrongdoing in accordance with this policy statement.

Employees must report their allegations or concerns consistent with the provisions of their Collective Agreement.

Other employees must report in writing to the Audit Committee Chair who will acknowledge receipt of the submission and have the matter reviewed and responded to in writing within 30 days of receiving the employee's submission.

These reporting requirements are in addition to an employee's obligation to report to the Comptroller General as outlined in Section 33.2 of the Financial Administration Act.

Where an employee believes that the matter requires a resolution and it has not been reasonably resolved by Destination BC, the employee may then refer the allegation to the appropriate authority.

If the employee decides to pursue the matter further then:

- Allegations of criminal activity are to be referred to the police;
- Allegations of a misuse of public funds are to be referred to the Auditor General;
- Allegations of a danger to public health must be brought to the attention of health authorities; and
- Allegations of a significant danger to the environment must be brought to the attention of the Deputy Minister, Ministry of Environment.

If you have questions or concerns about the conduct of any Destination BC employee, you are encouraged to discuss the matter with your Manager first and, if necessary, escalate it to senior levels of management in your division. For more serious matters, please see Destination BC's Whistleblower Policy.

WHISTLEBLOWER POLICY

Destination BC is dedicated to the highest possible standards of honesty, integrity and accountability. Destination BC's Whistleblower Policy is designed to protect the interests of Destination BC and its employees. It sets out a process to report concerns where:

- you believe something is seriously wrong at Destination BC, such as unethical or unlawful activities;
- you feel that a member of the Destination BC executive may be involved in unethical or fraudulent activity; or
- you have concerns you feel will not be kept in confidence.

This policy (Appendix 1) will provide you with direction on how and where to report such concerns with the confidence that your report will be acknowledged and taken seriously. Most importantly, this policy is designed to eliminate any fear you may have about voicing bona fide concerns. The policy also provides assurance that persons doing so will be protected from possible victimization.

LEGAL PROCEEDINGS

You must not sign affidavits relating to facts that have come to your knowledge in the course of your duties for use in court proceedings unless the affidavit has been prepared by a lawyer acting for Destination BC/government in that proceeding or unless it has been approved by a ministry solicitor in the Legal Services Branch, Ministry of Attorney General. In the case of affidavits required for use in arbitrations or other proceedings

related to employee relations, the Labour Relations Branch of the BC Public Service Agency will obtain any necessary approvals. Employees are obliged to cooperate with lawyers defending the Crown's interest during legal proceedings.

A written opinion prepared on behalf of government by any legal counsel is privileged and is, therefore, not to be released without prior approval of the Legal Services branch.

WORKING RELATIONSHIPS

Employees involved in a personal relationship outside work which compromises objectivity, or the perception of objectivity, should avoid being placed in a direct reporting relationship to one another. For example, employees who are direct relatives or who permanently reside together may not be employed in situations where:

- A reporting relationship exists where one employee has influence, input, or decision-making power over the other employee's performance evaluation, salary, premiums, special permissions, conditions of work, and similar matters; or;
- The working relationship affords an opportunity for collusion between the two employees that would have a detrimental effect on the Employer's interest.

The above restriction on working relationships may be waived provided that the President and CEO is satisfied that sufficient safeguards are in place to ensure that the Employer's interests are not compromised.

Conflicts of interest arising out of personal relationships in the workplace must be avoided. Employees must never have influence, input or decision-making over the hiring, evaluation, promotion or establishment of terms and conditions of employment of anyone with whom they have a close personal relationship. This includes influence over the hiring, evaluation or retention of contractors.

Employees and contractors in close personal relationships must not be employed or retained in positions where the company requires that the incumbents be unrelated for risk management or audit purposes (e.g. a close personal relationship between two employees who are jointly required to approve a type of financial transaction for risk management purposes).

Close personal relationships include, but may not be limited to:

- Spouses;
- Other intimate relationships;
- Parent/guardian/caregiver and child;
- Siblings;
- Mothers, fathers, brothers- and sisters-in-law;

Destination BC employees must not in any way participate in or influence the hiring of an external individual with whom they have a close personal relationship. Destination BC will endeavor wherever possible to avoid hiring individuals who have a close personal relationship into the same Division, and never within the same direct or indirect reporting line. In circumstances where a close personal relationship develops between two employees in a direct or indirect reporting line, or in other circumstances which may create a real or perceived conflict of interest, both employees must report the existence of the

relationship without delay to their manager(s). Failure to report such a relationship openly and promptly may result in disciplinary action, up to and including termination. Anyone in doubt as to whether a close personal relationship falls within this policy should err on the side of disclosure and seek advice.

You must disclose to your Manager any personal relationship with a person who is a Destination BC employee, or an employee of a service provider if it is, or could be perceived to be, a conflict of interest. Your Manager will identify if a conflict exists and, if so, immediately implement steps to resolve the conflict or remove the perception that it could exist.

If it is determined that your relationship is not a conflict of interest or is not likely to be perceived to be a conflict of interest and does not hinder your ability to act in Destination BC's best interests, your disclosure will be acknowledged and recorded in your personnel file.

POST EMPLOYMENT – SENIOR MANAGEMENT

Executive members of Destination BC must adhere Post Employment Restrictions outlined in Human Resources Policy 13 in the Public Service Act. This policy addresses confidentiality, offers of employment, lobbying, and providing council and is in place for a period of one year after employment with Destination BC ends. Full policy is provided in Appendix 2.

HUMAN RESOURCES DECISIONS

You must disqualify yourself as a participant in human resource decisions when your objectivity would be compromised for any reason or a benefit or perceived benefit could accrue to you.

For example, you are not to participate in staffing actions involving direct relatives or persons living in the same household.

OUTSIDE REMUNERTIVE AND VOLUNTEER WORK

You may hold a job outside Destination BC, carry on a business, receive remuneration from public funds for activities outside their position, or engage in volunteer activities provided it does not:

- interfere with the performance of your duties as a Destination BC employee;
- bring the Corporation into disrepute;
- represent a conflict of interest or create the reasonable perception of a conflict of interest;
- appear to be an official act or to represent government opinion or policy;
- involve the unauthorized use of work time or Destination BC premises, services, equipment or supplies; or;
- gain an advantage that is derived from their employment within Destination BC.

You may have alternate employment, participate in a business, or receive funds for personal activities outside your employment at Destination BC, provided it does not result in a conflict of interest or negatively impact your work performance at Destination BC.

However, you may not hold a significant financial interest, either directly or through a family member or associate, or hold or accept a position as an officer or director in an organization that has a relationship with Destination BC, unless that interest has been fully disclosed and addressed to Destination BC's satisfaction. A "significant financial interest" in this context is any interest substantial enough to be perceived to influence the decisions of Destination BC or be perceived to result in personal gain for you.

RESPONSIBILITIES

Senior executives, directors and managers play a leadership role in upholding these Standards at all times and must:

- ensure that all employees who report to them have received and reviewed these Standards;
- create and maintain a workplace where employees are able to comply with these Standards;
- take reasonable measures should any breach of these Standards come to his or her attention, including:
 - promptly following the appropriate escalation process;
 - implementing any correct actions if it is within his or her level of authority and responsibility to do so; and
 - taking the necessary steps to promote a safe environment for employees who report a violation of these Standards.

As a Destination BC employee, it is your responsibility to:

- understand and comply to these standards, and Destination BC policies, requirements and directives;
- successfully complete any and all mandatory training related to this material;
- avoid any situation where you would request or enable another Destination BC employee to violate these Standards or any Destination BC policy, requirement or directive, and
- cooperate truthfully and fully with any inquiry into a violation of these Standards or any Destination BC policy, standard, guideline, directive or other requirement.

Appendix 1

DESTINATION BRITISH COLUMBIA WHISTLEBLOWER POLICY

This policy applies to all full time and part time, regular and auxiliary employees of Destination British Columbia, and persons contracted for long-term engagements.

This Whistleblower policy and related procedures are intended to facilitate the confidential reporting and investigation of misconduct. Routine operational disputes or grievances should be addressed under processes addressed in existing internal policy.

Policy

Destination BC is dedicated to standards of honesty, integrity and accountability, and promotes a culture of openness in its interactions with employees.

Destination BC provides employees with a safe avenue to report any situation where misconduct by any Destination BC employee, manager, director, executive or a member of the Destination BC Board of Directors is known or believed to have occurred. (Examples of misconduct are set out in the definition section of this Policy)

Employees are encouraged to first discuss the matter with their manager or another member of the management team. Employees may bring their concern in confidence directly to the Finance & Audit Committee Chair in situations where:

- employees are not comfortable speaking with their manager or another member of the management team;
- there is a potential conflict of interest in reporting to management; or
- reporting to management has not resulted in the resolution of the concern.

This policy and associated procedures have been adopted to make clear that:

- Destination BC is committed to addressing reports of misconduct, including conducting an appropriate, objective and impartial investigation where warranted;
- Destination BC treats as confidential the identities of those involved in the disclosure and investigation process to the fullest extent possible;
- Destination BC does not support retaliation against employees who seek advice about a report, make a report, or participate in an investigation.
- Destination BC will address allegations of retaliation that appear to be connected to an employee's report of misconduct or participation in an investigation.
- Proper and complete records of disclosures will be created and maintained in a confidential and secure manner, and information will be provided to appropriate authorities as necessary or required;
- Appropriate corrective actions will be taken when a report of misconduct is substantiated.

Roles and Responsibilities

Destination BC Finance & Audit Committee

The Finance & Audit Committee is responsible for the overall maintenance and operation of this policy, and for ensuring procedures are established for receiving, investigating, tracking, and appropriately resolving all reports received under the Whistleblower Policy. The Finance & Audit Committee is responsible for ensuring that:

- Channels are established and maintained to facilitate the confidential reporting of concerns, suspicions or instances of misconduct under this policy.
- All reports and allegations of misconduct received the Whistleblower Policy are subject to an appropriate investigation.
- Appropriate outcomes and corrective actions are taken when a report of misconduct is found to have substance.

Finance & Audit Committee Chair is responsible for the following:

- Receiving, recording and reviewing reports concerning misconduct, including establishing if there are sufficient grounds for further action.
- Overseeing investigations, including initiating investigations when required, delegating responsibilities for investigations, reviewing and reporting the results and making recommendations for corrective action;
- Ensuring the identities of the employees making the report, the employees implicated or alleged to be responsible for the misconduct, and employees who participate in an investigation under this policy are kept confidential to the extent possible.
- Ensuring the confidential and secure retention of all documentation related to whistleblowing reports in accordance with Destination BC policies, the Document Disposal Act and FOIPPA.
- Maintaining information including the number of reports received, rejected, accepted; completed without investigation, of reports investigated; of reports still under consideration or investigation.
- Providing a list of all reports received to the Board of Directors on a quarterly basis.

Destination BC Managers

In addition to their responsibilities as employees, Destination BC managers, including senior executives, directors, and managers, are responsible for the following:

- Promoting a culture of openness in their interaction with employees.
- Informing employees of the principles, options, and protections offered by this policy, its intended use, and all related procedures.
- Promptly following the appropriate escalation process upon receiving a report of misconduct from an employee.
- Taking necessary steps to ensure that a safe environment exists for employees who make a report of misconduct.

Destination BC employees are responsible for the following:

- Being aware of their responsibilities under the Destination BC Standards of Conduct, Destination BC Policies, and applicable laws,
- Understanding the procedures to be followed when making a Whistleblower report.
- Cooperating in investigations of misconduct.

- Keeping details and results of investigations confidential when they have knowledge of are participants in an investigation under this policy.

Under this policy, employees will be subject to disciplinary action if they:

- Retaliate against another employee who has made a report of information that may evidence misconduct or who cooperates in an investigation of misconduct.
- Knowingly make a false or misleading statement in the course of seeking advice about making a report, in making a report, or during an investigation.
- Willfully obstruct an investigation being made under this policy.
- Knowingly conceal, destroy, mutilate or alter/falsify a document or evidence that is likely to be relevant to an investigation under this policy.
- Breach confidentiality related to a report or investigation under this policy.
- Direct, counsel or cause, in any manner, a person to do any of the above.

Definitions:

Misconduct: For the purpose of this policy, examples of misconduct include:

- a violation of law that is harmful to Destination BC
- serious violations of the Destination BC Standards Of Conduct and other Destination BC policies and procedures
- unauthorized or misuse of Destination BC funds or assets
- actions likely to cause serious harm to employee, contractor, or supplier health or safety.

Retaliation: Refers to adverse consequences, discrimination, or reprisal against an employee because that employee reported misconduct or participated in an investigation of misconduct and includes:

- dismissal or threaten to dismiss an employee
- discipline or suspend, or threatens to discipline or suspend an employee
- harass or otherwise disadvantage an employee
- intimidate or coerce the employee

Procedures

Reporting Known or Suspected Misconduct

Employees are expected to report any situation where misconduct by Destination BC employees, Destination BC management or members of the Destination BC Board of Directors, is known, or believed to have occurred. Examples of misconduct are set out in the definition section of this policy.

The Whistleblower Policy and related procedures are intended to facilitate the comprehensive reporting and investigation of misconduct.

Routine operational issues, disputes or grievances should be addressed through processes established under existing internal policies.

Employees are encouraged to first discuss the matter with their manager, or a senior member of the management team. Employees may bring their concern in confidence directly to the Finance & Audit Committee Chair in situations where:

- employees are not comfortable speaking with their manager or another member of the management team;

- there is a potential conflict of interest in reporting to management; or
- reporting to management has not resulted in the resolution of the concern.

Whistleblower Reports may be made on an anonymous basis. Employees are encouraged to provide their name in confidence to allow for follow-up and clarification, if necessary. Investigation may not be possible unless the source of the information is identifiable.

Reports made be made to management orally or in writing, and can be made in person, by telephone, or by mail/email. Whistleblower reports that are made to the Finance & Audit Committee Chair should be made in writing and delivered by mail to:

Finance & Audit Committee Chair
 c/o Destination British Columbia
 12th floor, 510 Burrard, Street
 Vancouver, BC V6C 3A8

The envelope should be marked “Private and Confidential”

Reports of misconduct should provide as much detail as is known, including the nature of the misconduct, the name of the person alleged to have committed the misconduct and other pertinent information. The information should be as precise as possible. Employees are encouraged to include contact information should further information be necessary to support the investigation, and in order to provide, when possible, updates and information related to the progress and outcome of the investigation.

Receipts of Whistleblower Reports

Where an employee reports misconduct to their manger verbally, the manager receiving the report will document the discussion and promptly and appropriately escalate the matter for further investigation. If the employee requests to report under the Whistleblower policy, the manager will forward the report in a confidential manner to the Finance & Audit Committee Chair.

The receiver of a Whistleblower report will explain to the employee making the report of misconduct:

- the stages laid out in the process
- confidentiality requirements and protections
- any additional requirement for reporting
- Destination BC’s commitment to protecting whistleblowers from reprisals

If the receiver is the employee’s manager, they will also explain the right of the person making the report to make the report directly to the Finance & Audit Committee chair.

The Chair of the Finance & Audit Committee will respond in writing to the employee making the report, acknowledging that the report has been received.

Review of Whistleblower Reports

All reports and allegations of misconduct received through the Whistleblower policy will be reviewed.

The Chair of the Finance & Audit Committee will determine whether the report is covered under any other policy or directive. Reports of misconduct made under this policy may be redirected where other more appropriate procedures are available, however the protection for reporting known or suspected misconduct applies regardless of the policy or process under which the report was made. The Finance & Audit Committee Chair will determine if there are sufficient grounds for further investigation. The Chair may decide not to investigate a report if in the chair's opinion the report is trivial, frivolous or vexatious, or if insufficient information is provided, for example in the case of anonymous submissions.

The Chair of the Finance & Audit Committee will respond in writing to the employee making the report of whether there will be further action on the matter. If the chair decides to proceed further, he/she will decide, from the nature and the particulars of the misconduct, what are the most appropriate next steps, which may include attempts at resolution and/or investigation.

Investigation of Whistleblower Reports

If the matter cannot be resolved, the Chair of the Finance & Audit Committee may initiate an investigation.

At the discretion of the Chair of the Finance & Audit Committee, an investigation may be carried out by the Finance & Audit Chair directly, by an internal investigation team, by an independent third-party, or be redirected to a more appropriate existing process.

Confidentiality

Maintaining confidentiality is crucial in ensuring that retaliation is not made against a Whistleblower. Investigations and the management and disclosure of information related to a report will be conducted in a manner that limits disclosure of the report and allegations and in accordance with the FOIPPA. Information about a report of misconduct will only be disclosed to those responsible for investigating and/or addressing the report.

Employees who have knowledge or are participants in an investigation under the Whistleblower policy are required to keep the details and results of the investigation confidential.

Actions on Completion of a Formal Investigation

At the conclusion of the investigation, the Finance & Audit Chair, or the lead investigator, will document the results in a confidential report. The distribution of this report will be based on the specific circumstances of the case.

A list of reports will be provided to the Board of Directors on a quarterly basis. Whenever possible, the Finance & Audit Chair will report the findings of the investigation to the person who made the report in a timely manner.

Where a report is found to have substance, Destination BC will take reasonable steps to address the conduct which is the subject of the report in accordance with Destination BC policies.

Further Escalation of Concerns

Employees who reported misconduct by means of this process and believe that their report was not adequately reviewed or investigated, may make a request to the Chair of Destination British Columbia's Board of Directors for review of the decision.

Employees should submit details of the misconduct, a description of the process followed, the reasons why it is believed that the report was not adequately reviewed and/or investigated, and contact information so that the chair of the Board of Directors can contact the employee for more information.

The Chair of the Board of Directors will review the information and promptly inform the employee in writing of whether they will proceed further.

Appendix 2

POST EMPLOYMENT RESTRICTIONS FOR SENIOR MANAGEMENT

This policy applies to all Destination BC employees who are appointed through an Order in Council. Typically this will include Vice Presidents and the Chief Executive Officer.

After Leaving Destination BC:

- a) You must not disclose confidential information that you obtained through your employment;
- b) If you had a substantial involvement in dealings with an outside entity at any time during the year immediately preceding the end of your employment then, for a year after the end of your employment, you must not:
 - accept an offer of employment, an appointment to the board of directors or a contract to provide services to that outside entity;
 - lobby or otherwise make representations for that outside entity to the government; or
 - give counsel to that outside entity, for its commercial purposes, concerning the programs or policies of Destination BC or any organization or ministry of the government in which you were employed at any time during the year immediately preceding the termination of your employment; and
- c) Until one year after your employment ends, you:
 - must not lobby or otherwise make representations for any outside entity to Destination BC or any ministry or organization of the government in which you were employed at any time during the year immediately preceding the termination of your employment; or
 - act for an outside entity in connection with any ongoing proceedings, transaction, negotiation or case in which the outside entity and Destination BC and/or the government are involvedif you, during your former employment with Destination BC, acted for or advised Destination BC or the government concerning the proceedings, transaction, negotiation or case; and acting for the outside entity in that connection would result in the receipt by the outside entity of a private or commercial benefit or of any benefit not for general application.

Reduction of One-Year Limitation

The Head of the BC Public Service Agency in consultation with the Deputy Minister to the Premier may reduce the one-year restriction, upon your application, after considering the following:

- a) the circumstances under which your employment ended;
- b) your general employment prospects;
- c) the significance to Destination BC and the government of information you possessed by virtue of your position with Destination BC;
- d) the desirability of a rapid transfer of your skills to an employer other than Destination BC;
- e) the degree to which the new employer might gain unfair commercial advantage by hiring you;
- f) the authority and influence you possessed while employed by Destination BC;
- g) the disposition of other cases.

Appendix 3

Supporting References

Public Service Act:

http://www.bclaws.ca/civix/document/id/complete/statreg/96385_01

BC Public Service Standards of Conduct

http://www2.gov.bc.ca/local/myhr/documents/jobs_hiring/standards_of_conduct_printable_version.pdf

Chief Information Officer Policy Directive

http://icw.cscd.gov.bc.ca/isb/security/docs/Acceptable_Use_policy.pdf

BC Document Disposal Act

http://www.bclaws.ca/Recon/document/ID/freeside/00_96099_01

Freedom of Information and Personal Privacy Act

http://www.bclaws.ca/Recon/document/ID/freeside/96165_00

Human Rights Code

http://www.bclaws.ca/Recon/document/ID/freeside/00_96210_01

WorkSafe BC Health and Safety Regulations

<http://www2.worksafebc.com/publications/OHSRegulation/Home.asp>