



Code of Conduct

June 2019

Table of Contents

1. Introduction	3
2. Core Values	4
3. General Rules of Professional Conduct.....	4
OPERATING PRINCIPLES	4
4. Duties	5
BOARD MEETINGS.....	6
5. Conflict of Interest	7
6. Entertainment, Gifts and Favours.....	8
8. Use of Corporate Property.....	9
9. Outside Activities	9
10. Working Relationships	10
11. Allegations of Wrongdoing	10
12. Intellectual Property and Copyright.....	11
13. Business Expenses and Financial Accountability	11
14. Violence, Harassment and Discrimination	11
SEXUAL HARASSMENT	12
GENERAL HARASSMENT.....	12
DIVERSITY AND ANTI-DISCRIMINATION.....	12
REPORTING	13
15. Media Relations	13
16. Post-Service Restrictions.....	13
Appendix A - CODE OF CONDUCT ACKNOWLEDGEMENT AND AGREEMENT.....	14
Appendix B - CONFLICT OF INTEREST GUIDELINES	15
Appendix C – CONFLICT OF INTEREST ANNUAL DISCLOSURE STATEMENT	16
Appendix D - BC Milk Marketing Board Privacy Policy	18
Appendix E – BC Milk Marketing Board Anti-Harassment Policy	21

1. Introduction

The British Columbia Milk Marketing Board has the authority to promote, control and regulate the production, transportation, packing, storing and marketing of milk, fluid milk and manufactured milk products within British Columbia. The Board exercises its powers under federal and provincial enactments.

Some of the duties and responsibilities of the BC Milk Marketing Board are to:

- maintain a register of licensed producers
- license all producers, vendors, producer vendors and milk transporters
- allot milk quota to licensed producers
- serve as the registrar of milk quota and administer the transfer of milk quota among licensed producers
- administer the timely changes to authorized, published milk prices
- administer the monthly producer equalization pool, including the reconciliation of milk production with reported processed industrial milk product production and fluid sales
- coordinate daily on-farm milk pick-up and delivery to processors
- administer milk marketing regulations for industry compliance purposes, including, when warranted, making use of inspection authority
- prepare and disseminate accurate and timely industry information through established communication devices including newsletters, brochures, web sites and broadcast e-Mail

BC Milk Marketing Board (BC Milk) is committed to achieving its mission: “To enhance the vitality of the whole BC dairy industry through a culture of sound governance.” This Code of Conduct document outlines the standards of professional behaviour that BC Milk expects from its Board Members and employees. It does not outline every imaginable situation, but rather, provides guidelines and standards to help guide daily decision making. These guidelines, in addition to the application of common sense, judgment and good management practices will help to guide the day to day performance of duties on behalf of BC Milk.

If you encounter a situation where you are unclear as to the proper course of action, we encourage you to bring the matter to the attention of the Chair of the Board for Board Members, or your manager for employees.

All Board Members and employees are asked to review this document and complete the Code of Conduct Acknowledgement and Agreement form found in Appendix A. This will certify that you have read, understood and agree to abide by the policies and guidelines laid out in this document.

2. Core Values

All Board Members and employees will exercise honesty and integrity in the execution of their daily responsibilities, in service to dairy producers, processors, consumers and other stakeholders, and will reflect BC Milk's core values:

- Leadership - To lead by committing to continuous personal and organizational development.
- Trust - To create, build and maintain trust by being honest, open and transparent.
- Respect - To listen, accept differences and work together.
- Integrity - To be consistent in our actions and values.
- Teamwork - To help each other succeed through collaboration.
- Fairness - To ensure equitable application of rules and benefits.
- Accountability - To hold ourselves and each other responsible for delivering results.

Therefore, during their term of office or employment, Board Members and employees will conduct themselves accordingly.

3. General Rules of Professional Conduct

OPERATING PRINCIPLES

In order to achieve its mission and vision, BC Milk is deeply committed, both provincially and nationally, to the following operating principles:

- An orderly milk marketing system based on effective border controls, production discipline and the ability to negotiate prices;
- Responsible use of the powers delegated to it under the various federal and provincial acts;
- The provision of the opportunity for efficient farmers to earn a reasonable return for their labour, management and investment; Never losing sight of the reality that we work for all stakeholders;
- Proactively dealing with societal issues such as environment, food safety and animal care;
- The production and marketing of high-quality milk and dairy products;
- A clearly defined process governing policy development and implementation;
- Working cooperatively with other provincial milk marketing organizations to advance the Canadian dairy industry;
- Putting the collective good of the industry ahead of individual needs of any stakeholder;
- Fair and equitable application of policies;
- Open communication and consultation;
- Efficient and cost-effective administrative operations;
- Highly motivated, passionate staff possessing a wide range of essential skills.

BC Milk's operating principles provide the basis of our corporate culture. We are committed to conducting our business in an open, transparent manner. We will ensure the fair and equitable application of policies and will communicate and consult with each other and our stakeholders.

Through our actions and our achievements, we will breathe life into our operating principles, so that they continue to be part of BC Milk's normal procedures and practices.

Some examples of the behaviours that support our operating principles include:

- We will operate with loyalty to BC Milk.
- We will advocate equally for all stakeholders, in the best interests of the industry.
- We will use our delegated powers responsibly and for the good of all dairy producers, processors, consumers, other stakeholders and the national supply management system.
- We will work in close consultation with producers to continually improve the production and marketing capabilities of BC Milk and all producers.
- We will continually strive to streamline and improve our operations to ensure the effective and efficient use of resources.
- We will ensure that our employees are offered continual learning opportunities, including formal training opportunities and on-the-job training and coaching.

Board Members' knowledge of the applicable legislation, laws, and rulings should be sufficient to the extent necessary to fulfill their responsibilities. All Board Members are expected to be knowledgeable of, and comply with, all applicable legislation, laws, and rulings, including the *Natural Products Marketing (BC) Act*, the *Milk Industry Act*, and related regulations and by-laws, and the direction of the BC Farm Industry Review Board, and the BC Ministry of Agriculture. In addition, Board Members, who are milk producers, have a duty to comply in all respects with licensing and quota requirements. Board Members have a duty to solicit additional support or advice in instances where they feel they need additional knowledge or a deeper understanding of the relevant legislation, laws, and rulings to fulfil their duties.

Board Members and employees are also expected to adhere to BC Milk policies and procedures, such as Human Resources and Financial policies, and including the policies laid out in this Code of Conduct document.

If you are unsure of the appropriate action in any given situation, please refer the matter to your manager or the General Manager in the case of employees, or the Chair of the Board, in the case of Board Members. In keeping with our culture of openness and transparency, we encourage any questions you may have.

4. Duties

All Board Members, members of the senior management team and other employees are engaged in helping BC Milk achieve its mission and vision. Each group has an important role to play to ensure the organization's success.

Board Members and employees alike are expected to commit their best efforts, knowledge and skills to achieve the mandate and goals of BC Milk. Board Members and employees must act honestly and in good faith in their dealings with each other, producers, processors, and other stakeholders.

Board Members and employees are expected to conduct themselves in a professional manner when representing BC Milk in business matters. Professional attire, consistent with the event or business engagement is assumed.

The Board is a regulatory body. Under the leadership of the Chair of the Board, Board Members are accountable for policy decisions regarding BC Milk, establishing and assigning production quotas, establishing pricing and marketing policies with processors, and interacting with British Columbia and federal governments and other industry associations.

As the Board is a regulatory body, the determinations of the Board have the force of law. These decisions may be subject to appeal or legal challenge. Board Members therefore have an important duty to make and apply decisions in a responsible manner and to be prepared to defend or reconsider decisions through the hearing process.

In addition to regular board meetings, Board Members sit on various internal and industry committees. Board Members also participate in many agricultural and dairy industry events and must keep in close contact with individual associations and stakeholders.

Under the leadership of the General Manager, the Senior Management Team and Employees are accountable for implementing and administering BC Milk policies, as dictated by the Board. Staff operations are organized into four divisions:

- Finance and Administration
- Policy and Quota Administration
- Transportation and Milk Quality
- Communications and Programs Management

BC Milk conducts a strategic plan review session each year and the BC Milk strategic plan is aligned with the policies and priorities established by the Board.

BOARD MEETINGS

It is expected that Board Members will attend all regularly scheduled Board meetings and any special meetings, as called. In the event that they are physically unable to attend, Board Members may alert the Board Chair prior to the meeting to arrange for virtual attendance via teleconference.

Board meetings are closed to non-Board Members, except to others that may be required by the Board such as the General Manager and recording secretary. Members of the senior management team or other employees may be invited to present at, or attend, selected portions of Board Meetings to provide information based on their area of expertise. Due to confidentiality considerations, employees, including the senior management team, will attend Board meetings only as requested by the General Manager or as otherwise advised by the Board.

To preserve confidentiality, there may be some segments of Board meetings that will be held in camera. In camera sessions are closed to all except Board Members and others as may be invited by the Board. Minutes of the discussion will only be taken if there are outcomes which require a decision of the Board.

It is expected that Board Members will be united in their presentation and execution of Board decisions, regardless of individual opinions and positions that may have emerged during the decision-making process.

5. Conflict of Interest

At BC Milk, Board Members are appointed by Government or the Milk Industry Advisory Committee (MIAC), or elected by their peers, to provide hands-on industry expertise, which is critical to guide the development of policy. Since some Board Members are active in the industry, it is expected that real or perceived conflicts of interest will occasionally arise.

A conflict of interest occurs when a Board Member, an employee and/or their family has an interest, financial or otherwise, or engages in a business or activity that may be seen to conflict with the proper execution of their duties, or where they may be seen to potentially gain an unfair advantage through the decisions of the Board or BC Milk. A conflict of interest may also occur when a Board Member or employee could potentially gain an advantage through the use of confidential, or not-yet released information generated by Board decisions.

In keeping with our core values of transparency and open communication, Board Members and employees are asked to disclose any real or perceived conflict of interest. This includes any scenario when they, a related person, close friend or member of their immediate family may be seen to benefit directly or indirectly from a policy decision, established quota, or other transaction. For example, it is expected that Board Members and employees will declare any interest they may hold in a dairy processing operation or dairy cooperative.

The *Declaration of Conflict of Interest* form can be found in Appendix B and is executed annually by Board Members. In addition to the annual declaration, employees should report any real or perceived conflicts of interest to the General Manager through their manager. Board Members should report any real or perceived conflicts of interest to the Chair.

If a Board Member has declared a conflict of interest, they may be asked to abstain from the deliberations and any voting that may occur where a decision is being considered that is related to the declared conflict. All Board Members will be expected to observe confidentiality protocols and will not release or act on corporate information regarding policies or quotas prior to the scheduled publication date. If a Board Member has not declared a conflict of interest and/or has acted on confidential information prior to its release, and has benefited financially, the Board may seek remedy through the existing regulatory provisions.

In the event that an employee has not declared a conflict of interest, and/or has acted on confidential information prior to its release, the General Manager will determine the extent of the conflict and any remedy required, such as a reassignment of duties or required disciplinary action, up to and including termination.

6. Entertainment, Gifts and Favours

In the normal course of business interactions, small gifts, tokens of appreciation, and offers of entertainment, such as complimentary tickets to a sporting event, are common. Board Members and employees may accept such tokens provided that the value is nominal and of a nature that could easily be reciprocated by the Board Member or employee.

Board Members and employees may not accept gifts, entertainment, services, or other benefits that are offered to secure preferential treatment, or that may be perceived by others to potentially influence a Board Member or employee's normal decision-making outcomes or performance of duties.

Gifts valued under \$100.00 are acceptable. If a gift over \$ 100 is accepted, the Board Member or employee must declare the receipt of such a gift to the Board Chair, or your manager, and complete the gift declaration form for submission to the next Board meeting.

If you are in doubt, you are encouraged to seek the advice of your manager or the General Manager. Board Members may seek the advice of the Chair.

7. Confidentiality and Privacy

Producers, processors, consumers and other stakeholders trust BC Milk to preserve their confidentiality. BC Milk has a longstanding policy on the confidentiality of personal information and is committed to protecting the personal or corporate privacy of everyone with whom it engages.

BC Milk is subject to *the Freedom of Information and Protection of Privacy Act (FIPPA)*. Board Members and employees are expected to familiarize themselves with BC Milk's Privacy Policy which ensures that the organization is meeting the requirements of the Act, and to carefully follow this policy, to ensure that all information regarding individuals dealing with BC Milk is held in strict confidence.

A copy of BC Milk's Privacy Policy can be found in Appendix C.

In addition to the personal information privacy requirements, Board Members and employees are expected to keep confidential all corporate information until such time as the information is released to the broader public. This includes the physical protection of producer and employee based confidential information, such as locking filing cabinets, securing personal computers and databases, using passwords for PC's and other electronic devices, including smart phones, and shredding appropriate documents.

Board Members and employees may not use confidential information to gain personal advantage and may not release confidential information to others (see above re: Conflict of Interest). It is expected that Board Members and employees will not act on any information that they have access to prior to the publication date.

The Board will refer the matter and seek remedy through the existing regulatory provisions in cases where Board Members use confidential information to gain personal advantage.

For employees, the situation shall be reviewed by the General Manager to determine appropriate actions to be taken.

BC Milk continually monitors its compliance with BC Milk's Privacy Policy. If you believe that a breach of privacy or confidentiality has occurred, you are encouraged to highlight this to your manager or the General Manager. Board Members should raise potential breaches in privacy or confidentiality to the Chair. The General Manager and the Chair will involve the Privacy Officer in the resolution of privacy issues.

8. Use of Corporate Property

Corporate property represents an investment made by BC Milk to provide service to producers, processors, consumers and other stakeholders and to conduct our business more effectively. Corporate property includes physical property (office furniture, office equipment and supplies) and electronic property (PC's, mobile devices, etc.). These tools are provided for business use and should be used only for business activities, unless otherwise authorized, and returned in good condition.

Electronic equipment, such as personal computers, laptops, tablets, cell phones, or other wireless devices may be used for personal activities, in accordance with usage policies as may be determined from time-to-time by the General Manager.

Board Members and employees must not use corporate tools at any time to:

- Engage in any activity that violates any law
- Transmit confidential BC Milk information to parties who should not receive it
- Download, disseminate or post copyrighted material
- Download software, unless authorized to do so, as it may contain viruses or be subject to copyright protection or licensing fees
- Further individual political or lobbying efforts
- View or transmit obscene, racist, or objectionable material
- Engage in commercial activities unrelated to BC Milk
- Access or attempt to access another's information without authorization
- Copy, reproduce or distribute unauthorized computer software

9. Outside Activities

Board Members are required to disclose any outside employment, business interests, board memberships, or political activities that may conflict with the execution of their duties on behalf of BC Milk.

Employees are required to disclose any outside employment, business interests, or board memberships, to their manager or General Manager to ensure that there is no conflict with the execution of their duties on behalf of BC Milk.

Due to the nature of our business, Board Members and members of the senior management team must exercise care when engaging in political activities. As representatives of BC Milk, Board Members and senior managers may not publicly support one political party and should take care to ensure that their

political activities don't misrepresent the Board. Any involvement in other political activity not mentioned here, should be disclosed to the Chair to ensure that no conflict exists.

Employees are encouraged to participate in the political process but should take care to ensure that their activities are undertaken as private citizens and not viewed as representing BC Milk.

Board Members and employees may offer fundraising items (i.e., raffle tickets, chocolate bars) for schools, charities and other personal interests or clubs to other Board Members or employees by leaving the offer in a common area, such as the lunch room or other staff areas. Direct solicitation of other Board Members or employees is not permitted.

BC Milk supports participation in service or volunteer organizations in the community. It is incumbent on the Board Member or employee to ensure that such involvement does not conflict with the performance of their regular duties.

10. Working Relationships

BC Milk is committed to attracting and retaining qualified individuals who can help the organization realize its mission and vision. Board Members and employees are encouraged to refer qualified individuals to the General Manager. Relatives of Board Members or employees will not be considered for employment with BC Milk.

11. Allegations of Wrongdoing

We all have a duty to protect the integrity of the organization. As such, Board Members and employees have a duty to report any breaches of confidentiality, privacy, conflict of interest or other perceived wrongdoing.

Examples of activities that must be reported include:

- Activities which contravene the law;
- Real or perceived conflicts of interest, breach of standards or breach of BC Milk's Code of Conduct;
- Misuse of corporate funds or assets; and
- Activities which present a danger to public health, safety or the environment.

Incidents involving employees should be reported to their manager, or General Manager. Incidents involving a Board Member, or the General Manager should be reported to the Chair. Incidents involving the Chair should be reported to the Vice Chair.

A Board Member or employee who is found to have engaged in any wrongdoing will be subject to disciplinary action, up to and including referral to the appropriate authorities for remedy and resolution.

Board Members or employees who report any wrong doing will be safe from reprisals, unless the report is found to be malicious.

12. Intellectual Property and Copyright

Any intellectual property that is developed by Board Members and employees on behalf of BC Milk shall remain the property of BC Milk. Copyrights secured on behalf of BC Milk shall remain the property of BC Milk.

Board Members and employees must take care not to inappropriately use material that is copyrighted by others.

13. Business Expenses and Financial Accountability

Board Members and employees have a responsibility to use the financial resources of the organization in a responsible manner. As a not-for-profit organization, extravagant spending on business items or expenses is not permitted. If you would be uncomfortable disclosing or publishing the nature and value of the expense, it would be advisable not to submit it for reimbursement.

Purchase of corporate items must be done in accordance with the purchasing policy, including securing the appropriate level of sign off.

BC Milk will reimburse Board Members and employees for out-of-pocket expenses incurred during the performance of business duties. BC Milk has developed expense policies that are applicable for Board Members and employees. In all cases, the receipts or other appropriate documentation must be submitted to ensure payment of expenses. Expenses should be submitted in the subsequent month that they occur, using an authorized BC Milk expense report.

For full details on allowable expenses, please contact the Controller.

14. Violence, Harassment and Discrimination

BC Milk believes that all Board Members and employees have the right to work in an environment free of violence, harassment, and discrimination and, as such, has a zero-tolerance policy with respect to these behaviours. The official BC Milk Marketing Board Anti-Harassment Policy is defined in Appendix E.

Violence, harassment, and discrimination are forms of misconduct that undermine the integrity of the organization and the employment relationship. It is our intent to take every reasonable measure to ensure that no one is subjected to violence, harassment, or discrimination for any reason including: race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offences, religion, marital status, family status or disability.

Complaints will be thoroughly investigated, and BC Milk will take appropriate measures against anyone who is found to have engaged in such conduct.

The Board will refer any Board Member engaging in violent behaviour, harassment or discrimination toward another Board Member, employee, or stakeholder to the Executive Committee for review. A recommendation will be developed for approval by the Board which may include seeking remedy through the existing regulatory provisions.

Any employee engaging in violent behaviour, harassment or discrimination toward a Board Member, employee, or stakeholder, will be subject to disciplinary action, up to and including immediate termination for cause.

SEXUAL HARASSMENT

Sexual Harassment is:

- Any conduct, comment, gesture or contact of a sexual nature that is likely to cause offense or humiliation to any employee, prospective employee, or volunteer, or that might, on reasonable grounds, be perceived by an employee or prospective employee, as placing a condition of a sexual nature on employment or on any opportunity for professional development, training or promotion.
- A sexual solicitation or advance made by a person who is in a position to confer any benefit on, or deny any benefit to, the recipient of the solicitation or advance, if the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome.
- A reprisal or threat of reprisal for rejecting a sexual solicitation or advance.

GENERAL HARASSMENT

Harassment is defined as any unwelcome behaviour, conduct or communication that is likely to cause offence or embarrassment to any individual. It is conduct that interferes with a climate of understanding and mutual respect for the dignity and worth of each person.

The following, while not exhaustive, are some examples:

- Verbal abuse or threats;
- Unwelcome remarks, jokes, innuendo or taunting;
- Displaying of pornographic, racist, or other offensive or derogatory pictures;
- Practical jokes which cause awkwardness or embarrassment;
- Unwelcome invitations or requests or other gestures;
- Unnecessary physical contact; and
- Racial slurs or jokes.

DIVERSITY AND ANTI-DISCRIMINATION

BC Milk is committed to diversity and recognizes that diverse backgrounds and experiences add value and breadth to the organization. All individuals will be treated with the respect and dignity that we all deserve. Discrimination will have no place in considerations of employment, assignment, training opportunities, or promotion. No Board Member, employee, or potential Board Member or employee will be discriminated against on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offences, religion, marital status, family status or disability.

REPORTING

Any Board Member wishing to lodge a complaint of violence, harassment, or discrimination may do so by contacting the Chair. Employees may contact their manager or the General Manager. Any such complaint will be handled on a confidential basis. While disclosure of the name of the complainant is required for the purpose of investigating the complaint, the matter will be pursued only with the Board Member or employee's knowledge and consent.

15. Media Relations

All Board Members should receive media training in order to allow them to more effectively represent BC Milk. When representing BC Milk to the media, Board Members should utilize any policy and/or position statements, key messages and/or scripts that have been prepared.

Board Members should exercise caution when offering an opinion which could be taken to represent an official BC Milk position.

To ensure that messages released to the media are consistent, and that BC Milk's reputation is maintained, employees must refer all complex media inquiries to the General Manager, so that media relations staff can answer the inquiry on behalf of BC Milk.

16. Post-Service Restrictions

It is expected that Board Members and employees will continue to abide by BC Milk's confidentiality and privacy rules after their service to BC Milk is completed. Board Members and employees may not solicit other Board Members or employees to leave the organization within a 24-month period following the termination of service.

Appendix A - CODE OF CONDUCT ACKNOWLEDGEMENT AND AGREEMENT

I, _____, **acknowledge** that I have read and understood BC Milk Marketing Board Code of Conduct for Board Members and employees.

I **agree** to conduct myself, at all times, in accordance with the Code of Conduct and guidelines provided.

I undertake to confirm in writing, that I have read, understood and complied with the Code of Conduct.

Signature

Print Name _____ Date _____

Appendix B - CONFLICT OF INTEREST GUIDELINES

By my signature, attached hereto I, _____, signify that I have received a copy of the **Conflict of Interest** guidelines subscribed to by the British Columbia Milk Marketing Board 1996 - 1997 and to which amendments may be made from time to time, and

Further, I have read and understand the provisions and the intent of the guidelines governing Conflict of Interest, and

Furthermore, I agree to be bound by the provisions in the Conflict of Interest guidelines.

Dated this _____, day of _____, 20_____.

Signature: _____.

Appendix C – CONFLICT OF INTEREST ANNUAL DISCLOSURE STATEMENT

PROCEDURES FOR BOARD MEMBERS AND EMPLOYEES

ANNUAL DISCLOSURE OF DIRECTORSHIPS AND TRUSTEE POSITIONS AND PRIVATE ECONOMIC INTERESTS

TO: The Chair, The GM, Members of the British Columbia Milk Marketing Board.

1. Name of Board Member or Employee_____.
2. This statement discloses information as of (Date):_____.
3. A direct or indirect conflict with my duty as a member or employee of the Board and the following offices or interest may arise because:
 - a. I, or the following related person(s), hold the following offices (appointed or elected):

 - b. I, or the following related person(s), or trustee(s) or nominee(s) on my behalf, own or possess, directly or indirectly, the following interests:

whereby, directly or indirectly, a duty or interest might be created in conflict with my duty or interest as a member or employee of the Board.

4. The nature and extent of the conflicting office, duty or interest referred to in paragraph 3 is:

5. In addition to the offices listed in paragraph 3, the following is a list of every business entity (companies, partnership, joint ventures, or proprietorship) in which I, or any trustee or nominee on my behalf, or the following related person, hold ten percent or more interest:

NAME OF COMPANY	TYPE OF BUSINESS
_____	_____
_____	_____
_____	_____

6. The following is a list of every business enterprise or organization related to agriculture in respect of which I, or the following related person receive financial remuneration for services performed or from which I, or a related person receive any amount required to be included as income under the Income Tax Act (Canada):

7. The following is a list of each subsidiary or affiliate of a company listed in paragraph 3(b) or paragraph 5 of this Statement:

Company listed in Paragraph 3 (b) or 5	Name of Subsidiary or Affiliate	Type of Business
_____	_____	_____
_____	_____	_____
_____	_____	_____

8. In addition to the offices listed in paragraph 3 (a), the following is a list of every company of which I am a director or officer:

Company	Position
_____	_____
_____	_____
_____	_____

I HEREBY DECLARE that the foregoing constitutes a complete and accurate disclosure by me pursuant to the governing policy of the British Columbia Milk Marketing Board.

I FURTHER DECLARE AND CERTIFY that I have complied with the stipulated conditions in the policy statement governing conflict of interest since:

_____, _____, or since the date of my appointment as a member or employee of the British Columbia Milk Marketing Board, whichever is the later. (Please note any exceptions.)

DATED this _____ day of _____, 20____ .

Signature of Member or Employee: _____

Appendix D - BC Milk Marketing Board Privacy Policy

The purpose of privacy legislation is to establish rules governing the collection, use and/or disclosure of personal information in a way that recognizes individuals' rights of privacy with respect to their personal information in an age in which technology increasingly facilitates the collection and free flow of information.

BC Milk Marketing Board (BC Milk) is subject to the *Freedom of Information and Protection of Privacy Act (FIPPA)*. BC Milk has a longstanding policy on the confidentiality of personal information and is committed to protecting the personal privacy of all those with whom it has dealings. BC Milk keeps all information respecting individuals dealing with BC Milk in strict confidence. No individual personal information is sold by BC Milk. BC Milk has procedures to control how it obtains, uses and gives out personal information. BC Milk will correct any errors that are brought to its attention.

BC Milk's procedures and systems are designed to protect such information from error, loss and unauthorized access. BC Milk keeps such information only as long as it is needed. BC Milk continually monitors its compliance with applicable privacy legislation. BC Milk respects people's privacy when it carries out its roles and responsibilities. These obligations apply to all Board members, staff, consultants and agents and contractors who provide services to or on behalf of BC Milk.

Regulatory Duties

As a marketing board constituted under the Natural Products Marketing Act (BC) and with specific authorities provided by the Milk Industry Act, BC Milk, through regulation, has information filing requirements. BC Milk collects, uses, discloses and retains this information in order to regulate the production and marketing of milk in accordance with its regulations, policies, orders, directions and decisions. BC Milk may collect such information directly from producers and processors or from others involved in the production and marketing of milk.

Consent Requirement

BC Milk obtains the parties' express or implied consent before obtaining or using personal information about that person or disclosing that information to anyone in the course of commercial activities. Regulatory requirements are excepted from the consent requirement. Participation in certain Board programs will constitute consent to the obtaining, use and disclosure of personal information. Details will be set out in program information packages.

Persons not wishing to provide their consent may decline to participate or may notify BC Milk and their wishes will be respected. In some cases, participation may not be possible where the necessary personal information is not made available.

Limited Disclosure

There are circumstances where use and disclosure of personal information may be justified or permitted under a legal duty or right and BC Milk may use and disclose such information without the party's consent. In such cases where BC Milk is of the opinion that it is appropriate or necessary to use or disclose such information, the use and disclosure will be limited so that only that information which is required is used or disclosed.

Producer Information

As a general rule, all producer information is held in strict confidence and, except in very limited circumstances, is not revealed to anyone unless expressly or implicitly authorized by the producer. BC Milk guards its producer mailing list from unauthorized use and disclosure. Where disclosure is deemed by BC Milk to be of benefit to producers, it is tightly controlled with strict safeguards put on its use and disclosure by any third parties.

Privacy Officer

BC Milk has appointed a Privacy Officer charged with the responsibility for developing, implementing and administering BC Milk's privacy policy. As part of this mandate, the Privacy Officer will ensure that all of the necessary internal controls and procedures are in place, including appropriate training and supervising of BC Milk staff in achieving full compliance with all privacy obligations.

The Privacy Officer will receive and ensure appropriate follow-up on all inquiries. This includes such things as withdrawal of consent, request for disclosure of information on file, corrections to information and termination of consent previously given. All such requests must be in writing and may result in an administrative charge to cover BC Milk's costs in dealing with same.

Web Site Statement

A visitor to the BC Milk Web site is not required to reveal any individually identifiable information such as name, address or telephone number. Nor is such information collected passively by electronic means.

Information is collected when an individual voluntarily completes an online survey. This information is collected, used or disclosed in a manner consistent with this policy statement.

BC Milk's Web server does not collect visitor information in the form of the visitor's domain or internet protocol (IP) address but does collect information regarding which pages are accessed. This information is used internally, only in aggregate form, to help serve Web site users better. None of this information is retained after it has been used and is discarded.

Any inaccuracies that are brought to BC Milk's attention will be corrected.

Compliance Concerns

Any complaints concerning the access to, accuracy, management or use of personal information should be addressed in writing to the Privacy Officer. All such inquiries will be responded to with 30 days of receipt at the BC Milk office. Any unresolved matters may be referred by the Privacy Officer to the BC Milk Board. If a party is still not satisfied, contact should be made with the office of the Privacy Commissioner in Victoria.

Policy Review

This privacy policy is in effect as of July 1, 2019. The BC Milk Board will from time to time review and revise its privacy practices and this privacy policy. In the event of any amendments to this privacy policy, a notice will be posted on BC Milk's Web site or communicated to producers through BC Milk publications.

BC Milk is committed to meeting all of its privacy obligations. Any questions or suggestions are welcome and should be addressed to the Privacy Officer.

Appendix E – BC Milk Marketing Board Anti-Harassment Policy

I. Policy Scope

This “Anti-Harassment Policy” applies to all employees and contractors of the British Columbia Milk Marketing Board (the “Board”). The BCGEU and BCMMB Collective Agreement shall take precedence over this policy.

II. Policy Purpose

The purpose of this policy is to assist all employees in identifying and preventing discriminatory and personal harassment in the workplace, and to provide procedures for handling and resolving complaints. It is intended to promote the well-being of everyone in the workplace and to foster the values of integrity and trust that are essential for a sound organization.

III. Definitions

Complainant: An employee who has brought forward or filed a complaint pursuant to the terms of this policy, alleging that discriminatory or personal harassment has occurred.

Respondent: An employee who is alleged to have discriminated against or personally harassed a complainant.

Investigator: An individual designated by the General Manager of the Board to investigate, through fact finding, formal complaints of discriminatory or personal harassment.

Discriminatory harassment: Conduct that is related to employment at the Board that may occur at or away from the workplace, and:

- is based on or related to a prohibited ground of discrimination set out in the *Human Rights Code* of British Columbia, namely: race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, age, or conviction for a criminal or summary conviction offence that is unrelated to employment; and
- is unwelcome or is of such a nature that it would be reasonable to assume that it is unwelcome; and
- detrimentally affects the work environment or leads to adverse job-related consequences for the complainant.

Examples of discriminatory harassment may include, but are not limited to:

- displays of offensive, derogatory, or sexually explicit pictures, photographs, cartoons, drawings, symbols, and other material;
- unwanted and unnecessary touching, patting, pinching, or other suggestive physical contact;
- offensive remarks about sexual orientation;
- racist language, slurs, derogatory comments, stereotypes;
- telling racist or ethnic jokes that are by their nature embarrassing or offensive;
- threats or abuse based on colour, language, or ethnic background; or
- displaying or distributing racist cartoons, posters, graffiti, books, or pamphlets.

Personal harassment:

Behaviours, words, or actions, whether consisting of a single incident or several incidents over a period of time, that meets the following three criteria:

- may or may not be intended to cause harm to the recipient(s); and
- has a clear and demonstrably negative effect on the complainant; and
- would reasonably be known or expected to be offensive or humiliating.

Day-to-day managerial functions and activities such as work assignment, performance management, and progressive discipline are not considered personal harassment under this policy. However, managerial functions and activities that meet the above criteria are not exempted from this policy.

Personal harassment does not include every workplace conflict or interaction that an employee may find unpleasant. The harassment process should not be used to vent feelings of minor discontent or generalized dissatisfaction with life in the workplace.

Personal harassment may include bullying, ostracism, or hazing. Examples of specific behaviours that may constitute personal harassment include, but are not limited to:

- verbal harassment: epithets, derogatory comments, slurs, jokes, gossip, innuendo, abusive comments, ridicule, or yelling;
- visual harassment: posters, cartoons, drawings, gestures, or displays;
- physical harassment: touching, patting, blocking movement, or gestures;
- threats or demands: suggestions or statements that certain unreasonable conduct needs to be accepted or that an employee needs to engage in unreasonable conduct in order to protect employment or benefits of a position; or
- retaliation: any suggestion of retaliation in respect of a complaint made under this policy.

Retaliation:

Any action with a negative impact taken, threatened, or suggested against a person in whole or in part because that person:

- files a complaint pursuant to this policy; or
- associates with the person who filed a complaint pursuant to this policy; or
- participates in any way in an investigation of a complaint pursuant to this policy; or
- reports any failure to follow through with a decision flowing from an investigation pursuant to this policy.

Examples of retaliation may include, but are not limited to:

- threats of or actual demotion or involuntary transfer;
- negative changes in terms or conditions of employment;
- denial of opportunities including training opportunities; or

- personal harassment, including ostracism or exclusion from normal social and professional interactions.

Regardless of the outcome, when a harassment complaint is made in good faith, the complainant and anyone providing information will be protected from all forms of retaliation by co-workers and superiors.

IV. Confidentiality

A governing principle in respect of any matter that is brought forward pursuant to this policy is confidentiality.

Every effort will be made to keep these matters confidential. Ultimate responsibility for determining the resolution of a complaint lies with the General Manager of the Board.

Information will be disclosed during the complaint process only to the extent necessary to:

- protect the safety or security of any individual involved in a complaint, or any other Board employee; or
- protect people not related to the Board if any reasonable concerns for their safety are identified; or
- conduct a proper and fair investigation; or
- comply with the law or litigation.

To the extent that incidents take place in the workplace, other employees may be aware of or have some knowledge of the situation. Steps will be taken to protect incidents of unacceptable behaviour or individuals involved in a complaint from being publicized in the workplace, if possible, without compromising an investigation.

Any party to an investigation or any employee involved in an alleged incident must not disclose the names of any other party or any circumstances related to the complaint except as necessary to report an incident, investigate a complaint, take action flowing from an investigation, or as required by law, including the *Freedom of Information and Protection of Privacy Act*.

Materials or written or electronic information related to a complaint or produced in an investigation will be maintained in secure, locked cabinets and offices, or in password-protected electronic files by those people entitled to handle that information.

Disclosure of information contrary to the requirements set out above is a breach of this policy and may be subject to disciplinary action.

V. Six-Month Limitation

The General Manager will not normally pursue a complaint that is reported more than six months after the date of the incident(s) on which the complaint is based. The limitation period may be extended if the delay was incurred in good faith or if the delay does not result in prejudice against any of the individuals involved.

VI. Frivolous or Vexatious Complaints

An investigation may determine that a complaint is not supported or that there is no breach of this policy. Such a finding does not automatically mean that the complaint was frivolous or vexatious.

Frivolous or vexatious complaints are those where the complainant or others know there is no foundation in fact that would suggest a breach of this policy and where the complaint is filed for the purpose of bringing an adverse consequence to the respondent or another employee of the Board. Such complaints are, in and of themselves, a breach of this policy and any employee engaged in the presentation or filing of such a complaint may be subject to discipline up to and including dismissal.

VII. Procedures

1. *Complaint is filed* – An employee may file a complaint with his or her immediate supervisor. Only complaints from individuals who believe they have personally experienced discriminatory or personal harassment will be accepted for investigation. Third parties may not submit a formal complaint on behalf of another person.
2. *Investigators are assigned* – The General Manager will assign investigators to the case. The investigators will act as fact-finders. They will not be responsible for determining if there is a breach of the policy or any outcomes from the investigation.
3. *Investigation is conducted* – An investigation will be undertaken as quickly as possible. In all cases, the complainant will be contacted by the investigators within two working days of a complaint being accepted for investigation. In order to conduct a thorough investigation, the respondent will be provided with the complainant's name and information on the particulars of the complaint, and offered an opportunity to respond.
4. *Interviews are held* – The complainant and the respondent, as well as any individuals who may be able to provide relevant information, will be interviewed individually. At all stages, each party has the right to be accompanied by or represented by a person of choice.
5. *Investigators' report is filed* – When the investigation is complete, the investigators will file a report with the General Manager that will set out the allegations, the responses, and the findings of fact made by the investigators. The report will not contain a recommendation on findings of culpability or discipline.
6. *The final outcome* – The General Manager may find either or both or neither of the complainant and respondent in contravention of this policy. Determining culpability and discipline will be the sole responsibility of the General Manager. The General Manager will inform the complainant and respondent, in writing, of the final outcome of the investigation as soon as possible.