



innovate BC

Standards of Conduct

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Roles	Owner	Executive (COO & CEO)	
	Recommends for Approval	Governance Committee	
	Approver	Innovate BC Board	
	Department Resp. for Deployment	Operations Department	
Related Policies, Procedures & Forms	Standards of Conduct Agreement		
	Conflict of Interest Policy		
	Conflict of Interest Guidelines		
	Conflict of Interest Disclosure Form		
	Whistleblower Policy		



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Innovate BC Standards of Conduct

Purpose and application

The Innovate BC Standards of Conduct (“**Standards of Conduct**”) serve as a guiding framework for ethical and professional behavior, providing clear expectations and principles to support decision-making in matters of conduct.

Application and Scope

This Standards of Conduct applies to:

- **“Employees”**: Includes all officers and employees of Innovate BC, whether full-time, part-time, permanent, contract-based, students, or secondees.
- **“Board Members”**: Encompasses all members of Innovate BC’s Board of Directors.
- **“Tenants”**: Covers individuals or organizations that rent or utilize co-working space at Innovate BC locations.
- **“Service Providers / Program Partners”**: Service providers or program partners receiving funding to re-deploy or provide a program related service on behalf of Innovate BC.

(hereinafter collectively referred to as **“Representatives”**)

Key Guiding Principles of Innovate BC’s ethical and professional behaviour

We expect all Representatives to adhere to the highest ethical standards by:

- **Acting with Integrity**: Demonstrating honesty, impartiality, and professionalism in all actions and decisions.
- **Ensuring Compliance**: Following all applicable laws, regulations, and internal policies to maintain accountability and public trust.
- **Promoting Inclusivity**: Fostering an equitable and respectful environment free from harassment, discrimination, or unsafe practices.
- **Demonstrating Financial Responsibility**: Using public funds and Innovate BC resources responsibly, ensuring transparency, accuracy, and diligence in all financial matters.
- **Managing Conflicts of Interest**: Proactively disclosing and addressing any real, perceived, or potential conflicts that could compromise impartiality or public trust.
- **Safeguarding Confidential Information**: Protecting sensitive data and trade secrets in accordance with Innovate BC’s confidentiality and privacy policies, including compliance with the Freedom of Information and Protection of Privacy Act (FOIPPA).

Commitment and Acknowledgment

All Representatives are required to adhere to our Standards of Conduct. For Employees, the Standards of Conduct are to be used in conjunction with the **Innovate BC Policy Manual**.



1.1 Public Service Values

As a Crown Agency, Innovate BC and its Representatives must uphold the public service values of British Columbia (“BC”). These values include ethical behavior, fairness, and the prudent and lawful use of public resources.

Innovate BC’s Standards of Conduct establish clear expectations for behavior and decision-making, ensuring that all Representatives act with integrity, professionalism, and accountability in every aspect of their work. Our commitment to these values and code of conduct and ethical principles is reflected in the following practices:

Ethical Behavior and Integrity

- **Act with integrity:** We demonstrate honesty, fairness, and accountability in all decisions and actions. We maintain the public’s trust by acting ethically and ensuring that Innovate BC operates in an impartial and transparent manner.
- **Prioritize professionalism:** We interact with colleagues, clients, stakeholders, and the public with respect, courtesy, and fairness. We foster a collaborative and inclusive workplace that reflects the highest standards of professional conduct.
- **Uphold compliance and adhere to the law:** We adhere to all applicable laws, regulations, and organizational policies. As an Innovate BC Representative, we avoid actions that could be perceived as improper or noncompliant with federal or provincial legislation or Innovate BC’s policies applicable to the performance of the Representative’s role.

Accountability and Public Trust

- **Stewards of public resources:** We ensure the prudent use of public resources, operating transparently and in alignment with legal and ethical standards.
- **Promote transparency:** We foster openness in decision-making and accountability for actions while safeguarding confidential information and respecting privacy laws.

Equity and Workplace Behavior

- **Diversity, equity, and inclusion:** We treat all individuals with dignity and respect, regardless of gender, race, ethnicity, religion, sexual orientation, disability, or other protected grounds.
- **Advance accessibility:** We remove barriers and create an inclusive environment where everyone can thrive.
- **Uphold equal opportunity:** We ensure all hiring, advancement, and workplace practices are fair, equitable, and based on merit.

Safeguarding Innovate BC Operations

We are committed to maintaining operational integrity and ensuring that all Representatives adhere to professional and ethical standards in their day-to-day activities. Our practices emphasize accountability, responsibility, and alignment with organizational values and legal obligations. These commitments support our mission to foster trust, transparency, and ethical conduct across all areas of operation, and align with expectations of a Crown Corporation.



- **Government Reporting:** We prepare accurate, clear, and timely reports for government bodies and public disclosures.
- **Resources and Property:** We use Innovate BC's assets responsibly for work purposes, safeguarding them against loss or misuse. This includes safeguarding technology, intellectual property, and physical resources, and using them solely for business-related activities.
- **Political Activity:** While we may engage in political activities, these remain separate from our work related to Innovate BC, ensuring impartiality.
- **Social Media:** We act professionally and avoid sharing confidential, defamatory, or offensive content online. We will immediately inform Innovate BC if we become aware of any social media posts that could impact Innovate BC, its clients, or other stakeholders.
- **Media engagement:** We ensure that only authorized Innovate BC Representatives engage with the media on behalf of the organization, directing inquiries to designated spokespeople like the Communications Director or Chief Executive Officer.
- **Ethical research standards.** We support ethical research by ensuring all projects funded by Innovate BC, particularly those involving human or animal subjects, biological or chemical hazards, or other ethical or safety considerations, comply with the ethical guidelines outlined in Appendix A.
- **Training:** We promote integrity, accountability, and compliance by providing annual training and awareness initiatives for relevant Representatives.
- **Annual Attestations:** We request all Representatives formally recognize their responsibilities under the Standards of Conduct and related policies either through contract or agreement, or other processes such as an annual attestation.

Financial Responsibilities

We are committed to transparent and ethical financial practices to uphold public trust and ensure Innovate BC's resources are used responsibly. Our approach to financial responsibility emphasizes compliance, accuracy, and integrity in all financial matters.

- **Legitimate Expenditures:** We ensure every expenditure serves a legitimate business purpose, aligning decisions with Innovate BC's financial policies and public accountability.
- **Accurate Records:** We maintain accurate and complete financial records, ensuring all Innovate BC-related transactions are documented transparently and comply with internal policies and external regulations.
- **Conflict-Free Decisions:** We avoid conflicts of interest in financial decisions by promptly disclosing personal interests that may affect impartiality and refraining from influencing decisions where conflicts exist.
- **Audit Cooperation:** We cooperate fully with audits, recognizing the importance of independent oversight in maintaining financial integrity and public trust.

In addition, Employees are required to follow additional guidelines outlined within the **Innovate BC Procedures Guide**.



1.2 Conflict of Interest

We appropriately manage activities or circumstances that create Conflicts of Interests between our personal or business interests and our responsibilities as a Representative of Innovate BC. “**Conflict of Interest**” is defined as a situation in which the personal or business interest of a Representative conflict with the interest of Innovate BC. Our primary business loyalty is to Innovate BC when functioning in the capacity of a Representative. We avoid having our decisions on behalf of Innovate BC influenced (or be seen to be influenced) by conflicting interests. For these reasons, we carefully and transparently manage actual, potential and perceived conflicts of interest (each a “Conflict” and collectively described as “Conflicts” in this section) by identifying and addressing Conflicts as follows:

- **Disclose conflicts proactively:** we promptly disclose the Conflict, including the nature and extent of the Conflict, to the Ethics Executive and in the case of Board Members, the Board Chair, at the earlier of: (i) the time it arises or (ii) the moment the Representative becomes aware of the Conflict.
- **Avoid preferential treatment:** We do not give special treatment or assist any individual or entity outside of ordinary professional responsibilities related to Innovate BC business, ensuring fairness in all decisions and actions.
- **Maintain impartiality in decision-making:** We do not participate in decisions where our or our associates could benefit unless the Conflict is disclosed and appropriately managed.
- **Manage financial interests responsibly:** We disclose financial interests that may create a Conflict, and we refrain from engaging with entities connected to Innovate BC’s work, including investments in applicants under review.
- **Protect confidential information:** We uphold strict confidentiality from materials arising with the relationship with Innovate BC, and will not disclose or misuse sensitive data, including trade secrets, Innovate BC client information, or other proprietary materials, during or after their time with Innovate BC.
- **Avoid personal gain:** We do not use our positions to benefit ourselves, our families, or our associates. Gifts, benefits, or favors are only accepted when they are modest, part of customary business hospitality, and do not influence decision-making or create obligations.
- **Respect post-engagement obligations:** We continue to respect confidentiality once the engagement with Innovate BC is completed, avoid Conflicts for a reasonable period of time, and do not leverage our past roles to seek preferential treatment.

In any situation where there is a Conflict or we suspect a Conflict may arise, as Representatives, we must bring the situation to the attention of our supervisor, senior leadership or Ethics Executive. In the case of Board Members, this must be discussed with the Board Chair.

In addition to the above, each Board Member who has, may have or may be perceived to have, a Conflict must:

- as part of the Board Member’s overarching fiduciary and confidentiality obligations, refrain from disclosing or making use of any confidential information received in their capacity as a Board Member of Innovate BC for the benefit or advantage of such Board Member or any person associated with the Director.



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- recuse themselves from the meeting of the Board or any Committee of the Board relating to such matter, unless otherwise directed by the Board Chair or the applicable committee of the Board.
- abstain from voting or taking other actions that affect the outcome of the activity or business transaction.
- make all disclosure and take all other actions as requested by the Board Chair or the Chair of the Governance Committee to satisfy all other legal requirements relating to the Conflict.

If the Board Member only realizes a conflict exists after receiving documents, the Board Member must immediately inform the Corporate Secretary and refrain from reviewing the documents related to the conflicted matter.

Where either the Board Chair or Governance Committee determines that a Conflict, a potential Conflict or a perceived Conflict of interest may interfere, potentially interfere with or be perceived to interfere with a Board Member's independent judgement, or where a Board Member is unable to disclose the nature and extent of the Conflict for confidentiality or other reasons, the Board Member must either eliminate the interest or duty giving rise to the conflict or resign as a Board Member of Innovate BC.

Conflicts related program guidelines will apply to Innovate BC's funding programs and will be a foundation for program specific guidelines for external reviewers, internal staff, and executives.

Each Board Member, and Employee must annually complete and return such forms, documents or electronic confirmations as may be approved by Innovate BC's Governance Committee, from time to time, for the purpose of identifying related parties of Innovate BC.

Declarations for Service Providers / Program Participants will be based on program and contractual requirements related to programs or services.

Innovate BC's Employees may be required to follow additional guidelines outlines within the Innovate BC Conflict of Interest Policy, detailed in the **Innovate BC Policy Manual**.

1.3 Confidentiality and Use of Information

At Innovate BC, we are committed to protecting the confidentiality, integrity, and responsible use of all sensitive information, systems, and data. All Innovate BC Representatives are expected to uphold these standards, ensuring that information is handled securely and ethically during and after their engagement with Innovate BC. This includes respecting confidentiality, safeguarding digital and intellectual assets, and complying with relevant privacy laws, including FOIPPA.

At Innovate BC, "Confidential Information" means any sensitive, proprietary, or non-public information obtained in connection with Innovate BC, including but not limited to:

- Financial records, funding decisions, business strategies, trade secrets, and proprietary research.
- Stakeholder, client, or employee personal or confidential information.
- Any third-party proprietary information disclosed to Innovate BC.



Confidential Information exclusions include information that:

- Is publicly available or becomes publicly available through no breach of this Agreement.
- Is independently developed by the Representative without reference to Innovate BC materials.
- Is lawfully obtained from a third party not under an obligation of confidentiality.

To maintain how we protect, safeguard, and manage sensitive information and ensure compliance with relevant regulations and policies, we committed to addressing confidentiality based on the following conduct:

- **Protecting confidential information:** We do not use confidential information for personal benefit or share with unauthorized individuals, and use Confidential Information solely for Innovate BC's legitimate business purposes Confidential information obtained during our engagement with Innovate BC is handled responsibly and remains protected even after our work with Innovate BC concludes and will not be disclosed unless expressly authorized by Innovate BC or required by law.
- **Safeguarding digital data:** We adhere to secure and authorized methods for storing and transmitting electronic information. We follow cybersecurity best practices, including encryption, secure passwords, and prompt reporting of breaches to Innovate BC's designated contact (e.g., the Ethics Executive or IT Administrator). We take all reasonable measures to protect Confidential Information, including secure storage of physical and electronic records.
- **Respecting Intellectual Property:** We protect Innovate BC's intellectual assets, such as trade secrets, patents, trademarks, copyrights, and proprietary data. These assets will not be used for personal benefit or disclosed to any unauthorized parties without prior approval by Innovate BC or unless expressly required by law.
- **Post-engagement confidentiality:** We continue to protect Innovate BC's sensitive information even after our work concludes. We return or securely destroy all confidential materials once it is no longer required for its intended purpose or when our engagement ends, unless expressly required by applicable contract, law, and regulations.
- **Reporting concerns:** We promptly report concerns to Innovate BC's designated contact (e.g., the program manager or designated executive) if a breach occurs. Innovate BC supports those who report concerns in good faith and ensures they are not penalized for doing so.
- **Breach responses:** We support Innovate BC breach responses to mitigate risks and will comply with Innovate BC confidentiality requirements and other relevant privacy regulations, including FOIPPA. Innovate BC treats breaches of confidentiality seriously and will take appropriate steps to mitigate harm to the organization and its stakeholders.
- **FOIPPA adherence:** We adhere to the Freedom of Information and Protection of Privacy Act (FOIPPA) by safeguarding confidential information, managing access requests responsibly through Innovate BC's CEO or designate, and maintaining ongoing confidentiality obligations even after employment or engagement ends.
- **Consequences for Breach:** Violation our Standards of Conduct related to Confidentiality and Use of Information may result in disciplinary action, including termination of employment, legal consequences, and financial penalties. Any breach of confidentiality, whether intentional or accidental, will be taken seriously, and Innovate BC will take appropriate steps to mitigate any harm to the organization or its clients.



1.4 Reporting Concerns

Violations of this Standards of Conduct, or other Innovate BC policies and standards, can subject you to disciplinary procedures, which may include termination of employment or contract/agreement for contractors. Board Members may be sanctioned for any violations.

If you become aware of or suspect any violation of the Standards of Conduct or related policies by any Representative, you have a responsibility to report it immediately. Violations must be reported to your supervisor, senior leadership or the Ethics Executive (Chief Operating Officer), and in the case of Board Members to the Board Chair. If you have a concern relating to the Chair, this may be reported to the Chair of the Governance Committee.

Innovate BC is committed to protecting any Representative from any form of retaliation or reprisal for reporting in good faith, a possible violation of the Standards of Conduct. Reports will be promptly and fairly investigated by the Ethics Executive, maintaining confidentiality throughout the process and ensuring information is only shared as necessary to meet legal obligations. We emphasize the importance of accuracy and good faith in reporting, with malicious or false allegations treated as serious violations. Violations of this Standards of Conduct must be documented and reviewed by the CEO and the Board of Directors.

Innovate BC's Employees are required to follow additional reporting guidelines outlined within the Innovate BC Policy #2.0 Public Interest Disclosure Act & Whistleblower Policy, detailed in the **Innovate BC Policy Manual**.

1.5 Compliance

All Board Members and Employees are required to complete a declaration on an annual basis stating that they have complied with the obligations set out in this Standards of Conduct. It is your responsibility to be familiar with and understand the provisions of this Standards of Conduct as well as other applicable Innovate BC policies and management standards, including those specifically identified in this Standards of Conduct.

Declarations for Service Providers / Program Participants will be based on program and contractual guidelines related to programs or services.

1.6 Exceptions

Any waiver of this Code will be granted only in very exceptional circumstances. Any waiver for Board Members or the Executive Leadership team must be approved in advance by the Board Chair and will be disclosed at the next Board meeting. Any waiver for Employees must be approved in advance by the Ethics Executive.

1.7 Amendment

The Board of Directors must authorize substantive amendments to this Standards of Conduct, including amendments to rules and procedures. The CEO may make administrative amendments to this Standards of Conduct, including amendments related to formatting, organization, spelling and similar matters.

Appendix A - Ethical Research Guidelines

All research projects being carried out with financial support from Innovate BC, and particularly those that include research involving human or animal subjects, biological or chemical hazards, or other ethical or safety considerations must comply with the following:

- All Innovate BC funded projects require a minimum of ethical conduct.
- The project leader, as identified in the individual Letter of Agreement between Innovate BC and the organization receiving funding, is responsible for ensuring that all research practices carried out in conjunction with the project comply with specific applicable ethical codes of conduct adopted by Innovate BC. Those codes include:
 - National Research Council Canada. 1996. NRC-CNRC Research Involving Human Subjects: Guidelines for IRAP, 42 p.
 - Tri-Council Working Group. 1997. Code of Ethical Conduct for Research Involving Humans. 98 p.
 - Kennedy, M.E. (ed.). (1996), Health Canada, Laboratory Biosafety Guidelines (2nd ed.). Minister of Supply and Services Canada. (Catalogue No. MR21-1/1996-E)
 - Canadian Council on Animal Care. Guide to the Care and Use of Experimental Animals. Vol 1 (1993) and Vol. 2 (1984). Ottawa, Ont.: CCAC.
- Failure to comply with the aforementioned codes constitutes grounds for the immediate termination of the identified research project, and the return of any previously advanced funds to Innovate BC.
- Projects dealing with complex ethical considerations may be required, at Innovate BC's request, to undergo a thorough external ethics review by an appropriate Ethics Review Committee. Any expense incurred as a result of such a review will be the responsibility of the awardee organization.

1.8 Ethics and AI research

Innovate BC is committed to the responsible development and use of AI technologies. As we explore AI initiatives, we will align these technologies with core ethical principles, including fairness, transparency, data privacy, and social responsibility. We will work to prioritize programs that demonstrate the avoidance of bias, comply with data protection laws such as **FOIPPA**, and integrate human oversight in decision-making processes when appropriate. While considering AI programming, we will work to regularly review projects to assess their impact and make adjustments as needed to align with evolving ethical guidelines, contributing positively to society.