



# Code of Business Conduct

## # BRP-POL-2016-003001



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## **BRP Code of Conduct**

BRP and its employees must, at all times, comply with all applicable laws and regulations. BRP will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. BRP does not permit any activity that fails to stand the closest possible public scrutiny.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing BRP's operations.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, who, if necessary, should seek appropriate legal advice.

## **General Employee Conduct**

BRP expects its employees to conduct themselves in a businesslike manner. Drinking, gambling, fighting, swearing, and similar unprofessional activities are strictly prohibited while on the job.

Employees must not engage in sexual harassment, or conduct themselves in a way that could be construed as such, for example, by using inappropriate language, keeping or posting inappropriate materials in their work area, or accessing inappropriate materials on their computer.

## **Conflicts of Interest**

BRP expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Organization. Employees must not use their positions or the knowledge gained as a result of their positions for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they have pursued, or are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with their employer, they should immediately communicate all the facts to their supervisor.

## **Outside Activities, Employment, and Directorships**

All employees share a serious responsibility for BRP's good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to BRP and is encouraged. Employees must, however, avoid acquiring any business interest or participating in any other activity outside BRP that would, or would appear to:

- Create an excessive demand upon their time and attention, thus depriving BRP of their best efforts on the job.



- Create a conflict of interest - an obligation, interest, or distraction - that may interfere with the independent exercise of judgment in BRP's best interest.

## **Relationships with Clients and Suppliers**

Employees should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with BRP, or that provides goods or services, or both, to BRP if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of BRP.

## **Gifts, Entertainment, and Favors**

Employees must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or organization with whom or with which BRP has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their positions with BRP might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

## **Kickbacks and Secret Commissions**

Regarding BRP's business activities, employees may not receive payment or compensation of any kind, except as authorized under BRP's business and payroll policies. In particular, BRP strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

## **Organization Funds and Other Assets**

Employees who have access to BRP funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in BRP's policies and procedures or other explanatory materials, or both. BRP imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor or seek appropriate legal guidance so that BRP can promptly investigate further.

When an employee's position requires spending BRP funds or incurring any reimbursable personal expenses, that individual must use good judgment on BRP's behalf to ensure that good value is received for every expenditure.

BRP funds and all other assets are purposed for the organization only and not for personal benefit. This includes the personal use of organizational assets, such as computers.



## **Organization Records and Communications**

Accurate and reliable records of many kinds are necessary to meet BRP's legal and financial obligations and to manage the affairs of the Organization. The Organization's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

## **Dealing With Outside People and Organizations**

Employees must take care to separate their personal roles from their BRP positions when communicating on matters not involving BRP business. Employees must not use organization identification, stationery, supplies, and equipment for personal or political matters.

When communicating publicly on matters that involve BRP business, employees must not presume to speak for BRP on any topic, unless they are certain that the views they express are those of BRP, and it is BRP's desire that such views be publicly disseminated.

When dealing with anyone outside BRP, including public officials, employees must take care not to compromise the integrity or damage the reputation of either BRP, or any outside individual, business, or government body.

## **Prompt Communications**

In all matters relevant to customers, suppliers, government authorities, the public and others in BRP, all employees must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

## **Privacy and Confidentiality**

When handling financial and personal information about customers or others with whom the Organization has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for the Organization's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.



- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

Adopted on:..... March 25<sup>th</sup>, 2016

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