

# **DRIVERCHECK**

Fitness for Duty Experts

## **SUPPLIER CODE OF CONDUCT**

**VERSION 1.0**

## TABLE OF CONTENTS

About DriverCheck’s Supplier Code of Conduct.....	3
About DriverCheck.....	4
DriverCheck’s Values.....	5-7
Supplier’s Obligations.....	8
Ethical Considerations.....	9
Harassment & Violence in the Workplace.....	10-12
Human Rights.....	13
Confidentiality and Protection of PII.....	14
Corruption and Bribery.....	15-16
Insider Trading.....	17
Public Relations and Social Media.....	18-19
Health and Safety.....	20
Conflicts of Interest.....	21
Reporting Violations.....	22

## **ABOUT DRIVERCHECK'S SUPPLIER CODE OF CONDUCT**

Our Supplier Code of Conduct, which can be referred to simply as “the Code” highlights DriverCheck’s values and standards. Just as we expect all our employees to be honest, ethical, accountable, respectful, and trustworthy, DriverCheck also expects the same of its suppliers.

The Code is applicable to all DriverCheck suppliers, subcontractors, vendors, third parties and consultants we work with. For the sake of simplicity, all the businesses that perform work on the behalf of DriverCheck are referred to as “suppliers” throughout the Code.

## **ABOUT DRIVERCHECK**

As Canada's Fitness for Duty experts, our company wide goal is to build a healthier and safer world.

Founded in 1996, DriverCheck is the leading provider of workplace medical testing and assessments in the country serving thousands of employers in a variety of industries including transportation, oil & gas, aviation, rail, transit, mining, construction, healthcare, manufacturing and forestry.

DriverCheck conducts hundreds of thousands of medical tests annually, offering alcohol and drug testing, occupational health services, medical cannabis review services, medical staffing, and injury management programs. We are constantly striving to be viewed as the educational leader in the fitness for duty sector.

## **DRIVERCHECK'S VALUES**

DriverCheck is a family owned and operated business. Our organizational values are grounded in the Page family values. They honour our history and guide all our interactions with each other, our clients, and our community. We believe that these family values represent the very essence of who we are as individuals and as an organization.

### Our Why

To build a healthier and safer world.

### Our How

We empower our people to deliver mind-blowing service by providing them with the culture, opportunity, and innovative tools they need to thrive.

We empower our clients to build healthy and safe workplaces for their workers by providing a wide range of fitness-for-duty testing, assessment, and treatment services, along with program development, program management, and education.

## Our Family Values - F.A.M.I.L.Y.

### **FUN:**

We believe in taking time to have fun even though we do serious work. We laugh together and laugh at ourselves. We believe that people who have fun at work are less stressed, more productive, more innovative, and more collaborative.

### **AUTHENTICITY:**

We are real people. We are warm, vulnerable, humble, compassionate, approachable, and friendly. We will treat everyone with respect, fairness, and understanding. We will strive to earn the trust of our employees, our clients, and our communities.

### **MOXIE:**

DriverCheck is built on sheer grit and determination. We have passion for what we do. Together, we address challenges, navigate change, and offer positive solutions.

### **ICONIC SERVICE:**

People remain at the centre of all we do. We continually strive to provide mind-blowing service to our people, our clients, and their workers. This starts with empathy.

**LEARNING:**

We are committed to continuous learning and development, both personally and professionally. We embrace change, thrive on feedback, explore new approaches, seek out and apply best practices, and continuously adapt to address the emerging needs of everyone we serve.

**YES-MINDEDNESS:**

We remain open, flexible, and adaptable. We are committed to maintaining a solution-focused, positive outlook at all times. We envision possibilities and we navigate to overcome the challenges.

F.A.M.I.L.Y.

## **SUPPLIER'S OBLIGATIONS**

All DriverCheck suppliers are obligated to act in accordance with the Code while conducting business with or on behalf of DriverCheck, including with our customers and participants (individuals being assessed and tested).

Our suppliers are expected to comply with all applicable laws, rules, and regulations. The obligations set out in the Code are in addition to your own legal obligations and those found in your own code of conduct.

We expect all our suppliers to act in accordance with the expectations and obligations outlined in the Code. Failure to do so may result in suspension or termination of our business relationship.



## ETHICAL CONSIDERATIONS

Before taking action in a given situation, always ask yourself the following:

- Is the action honest or dishonest?
- Is the action ethical or unethical?
- Will someone be held accountable for the action?
- Is the action respectful or disrespectful?
- Will the action create trust or distrust?

If an action seems to be unethical or doesn't feel right, it probably shouldn't be done or acted on.

## **HARASSMENT & VIOLENCE IN THE WORKPLACE**

DriverCheck is committed to providing a work environment in which all individuals are free from workplace harassment and violence. We will take whatever steps that are reasonable to protect the workplace from harassment and violence from all internal and external sources.

DriverCheck has a zero-tolerance policy for workplace violence and harassment, and we strive to build an environment that is free from any forms of discrimination or harassment. Any act of violence and/or harassment committed by a DriverCheck employee, contractor, client, visitor, or member of the public is a violation of this policy and will be subject to disciplinary measures i.e., termination of contracts or agreements, termination of employment, removal from DriverCheck premises. It should also be noted that some cases may result in the involvement of local police and/or charges under the Criminal Code of Canada or other statutes.

What is workplace harassment?

Workplace harassment means engaging in a course of vexatious comment or conduct against a worker in a workplace that is known, or ought reasonably to be known, to be unwelcome (this includes Workplace Sexual Harassment). Some examples of comment, conduct, or communication that may constitute harassment are:

- offensive jokes or slurs;
- unwelcome physical contact;

- communications (written, oral, electronic) that threaten, intimidate or humiliate other individuals;
- public display of offensive pictures, cartoons, or other materials that others could find offensive.

### What is Workplace Sexual Harassment?

- (a) Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known, or ought reasonably to be known, to be unwelcome, or;
- (b) Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the worker, and the person knows, or ought reasonably to know, that the solicitation or advance is unwelcome.

### What is workplace violence?

Workplace violence is defined as:

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker,
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker,

- a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker,

Verbal threats, vandalism, pushing, hitting, acts of domestic violence in the workplace, sexual violence, arson, and murder are all examples of workplace violence.

*Note:* Domestic violence which includes spousal conflict between spouses who work at DC, or when a non-DC individual shows up onsite where their spouse works and that enters or affects the workplace is considered workplace violence.

Workplace harassment and violence will not be tolerated from any person in the workplace including members of the public, customers, employees, supervisors/managers, suppliers, and any other third party.

Any supplier of DriverCheck that is found to be involved in committing or encouraging harassment or violence in the workplace may be subject to suspension or termination of our business relationship. Where necessary, law enforcement will be called upon to further investigate.

## HUMAN RIGHTS

Recognition of human rights is fundamental to the viability of DriverCheck. We commit ourselves to the highest standards of respect for human rights and fully support their enforcement in all levels of our organization and in our interactions with our employees, clients, suppliers, and members of the public. We vow to integrate the principles of respect, dignity, and equal access and opportunity into all of our business practices to ensure that all individuals are able to feel a part of and contribute to the community in a meaningful way.

DriverCheck is committed to the United Nations Universal Declaration of Human Rights.

<https://www.un.org/en/about-us/universal-declaration-of-human-rights>

DriverCheck respects human rights, and we have processes in place to ensure that we are not complicit in human rights abuses.

We expect that our suppliers abide by all applicable human rights laws and regulations. Disregard for human rights may be grounds for suspension or termination of our business relationship.

## **CONFIDENTIALITY AND PROTECTION OF PII (PERSONAL IDENTIFIABLE INFORMATION)**

Confidentiality and data security is an incredibly important aspect of our work. A lack of confidentiality and security of information can seriously harm the viability of DriverCheck as an organization. Confidentiality is critical.

All reference to drug, alcohol, or medical information (written or verbal) must be work-related and appropriate. Furthermore, it is imperative that test-related and medical information is only released to designated individuals.

To the extent that suppliers have access to DriverCheck's confidential information and customer/client PII data, we expect our suppliers to always manage information responsibly and comply with the confidentiality provisions in our agreements, as well as comply with appropriate federal and/or provincial laws and regulations around the collection, use, storage, and disclosure of personal information.

We take our responsibility to protect the confidentiality of information very seriously and we expect our suppliers to do the same. Disregard for confidentiality may be grounds for suspension or termination of our business relationship.

## **CORRUPTION AND BRIBERY**

DriverCheck is committed to applying the highest standards of ethical conduct and integrity in its business activities in Canada and overseas. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

### **Responsibilities**

The prevention, detection and reporting of bribery and other forms of corruption is the responsibility of all those working for us, or supplying services to us, or under our control.

### **Improper Payments**

DriverCheck funds and facilities must not be used for any illegal or improper purpose. Bribery, kickbacks, or any payment to a person to commit an unlawful act, or to influence a person performing public duties, are prohibited, as is the diversion of assets for personal benefit. All DriverCheck suppliers are prohibited from committing or using corporate funds, facilities, or assets directly or indirectly for any illegal or improper purpose. Company assets are to be used to meet DriverCheck's business objectives and are not for personal use.

## Competition and Trade

Suppliers are required to be familiar with local laws regarding competition and trade practices. We must compete fairly and must not engage in prohibited or unlawful trade practices. We will only do business with suppliers who enhance our competitiveness and who have a consistent vision of sustainability and business ethics.

## Gifts and Hospitality

DriverCheck permits normal and appropriate corporate entertainment, gifts, hospitality, and promotional expenditure (given and received) to or from third parties that is undertaken for the purpose of creating and maintaining good business relationships or improving the image and reputation of DriverCheck. It must be given and/or received in good faith and not offered, promised, or accepted to secure an advantage, and must be of nominal value.

DriverCheck employees cannot accept gifts in the form of kickbacks, and will face disciplinary measures for doing so, up to and including termination. Kickback means a payment made to someone who has facilitated a transaction or appointment, especially illicitly.

Any supplier of DriverCheck that is found to be involved in committing or encouraging corruption or bribery may be subject to suspension or termination of our business relationship and where appropriate, law enforcement will be called upon to further investigate.



## **INSIDER TRADING**

While DriverCheck is not a publicly listed company and its corporate shares are not readily available for trading purposes, DriverCheck has several customers that are publicly listed companies.

Insider trading is the trading of a public company's shares or other financial securities based on material, non-public information about the company. Insider trading is illegal in Canada and in many parts of the world.

As a supplier you may become aware of non-public information (inside information) you acquire during our business relationship about DriverCheck's customers. Suppliers are required to keep confidential any inside information acquired during our business relationship and not trade the shares or other financial securities of DriverCheck's customers based on that knowledge.

Any supplier found to be involved in committing or encouraging insider trading may be subject to suspension or termination of our business relationship and where necessary, law enforcement will be called upon to further investigate.

## **PUBLIC RELATIONS AND SOCIAL MEDIA**

### Inquiries and Public Statements

DriverCheck suppliers are not to issue communications on behalf of or respond to questions about DriverCheck from the media or members of the public. Such inquiries should be forwarded to DriverCheck for follow up at [Marketing@DriverCheck.ca](mailto:Marketing@DriverCheck.ca).

### Social Media

As a supplier, you are not to post any of the following on social media:

- Information about DriverCheck and DriverCheck's clients, operations, especially operational incidents, and interruptions
- Pictures of DriverCheck equipment, facilities or other aspects of our operations and share them online
- Comments that imply you are speaking on DriverCheck's behalf
- Online profiles that indicate that you are a DriverCheck employee

As a supplier, you may:

- Follow DriverCheck social media channels
- Like, comment, and/or share DriverCheck social media content

## Endorsements

DriverCheck requires suppliers to obtain prior permission before using DriverCheck's name, logo, or other trademarks to promote their business. Any use of the DriverCheck logo, name or trademarks must adhere to DriverCheck's brand guidelines and approval process. To obtain these guidelines and the required approval please contact [Marketing@DriverCheck.ca](mailto:Marketing@DriverCheck.ca) prior to using DriverCheck's name, logo, or other trademarks.

## HEALTH AND SAFETY

DriverCheck is committed to providing and maintaining a healthy, safe, and productive work environment for all, while maintaining legislative compliance through the maintenance and continuous improvement of a corporate Health and Safety program.

To support this commitment, DriverCheck's suppliers shall share the responsibility to maintain a healthy and safe workplace and to protect all workers by reducing or eliminating hazards, injury, and illness.

All DriverCheck suppliers are responsible for ensuring that healthy and safe work conditions are maintained, that workers are advised of hazards, that safe work practices are adhered to, and that the work environment is secure. Suppliers will take all practical and reasonable measures to eliminate workplace fatalities, injuries, and disease.

DriverCheck suppliers will abide by all applicable occupational health and safety laws and regulations.

In summary, commitment to health and safety must form an integral part of our daily activities. It is in the best interest of all parties to consider health and safety in every activity. We sincerely appreciate your cooperation and commitment to keeping the workplace safe.

## CONFLICTS OF INTEREST

DriverCheck expects its suppliers to report any situation that may create an actual or perceived conflict of interest.

A conflict of interest is a situation in which an entity has competing responsibilities or interests. In business, a conflict of interest arises when a person's personal interests' conflict with their professional obligations. Here are some examples:

- Awarding work to a business that is owned or controlled by a friend or a family member.
- A relationship that makes it seem that your judgment has been compromised.

Suppliers should avoid any situation where they would improperly benefit, or appear to improperly benefit, from knowledge acquired from their business relationship with DriverCheck.

## REPORTING VIOLATIONS

To report a real or suspected violation of this Code, suppliers are asked to contact DriverCheck's Risk Management Department via one of the following ways:

Email: [bkearse@drivercheck.ca](mailto:bkearse@drivercheck.ca)

Telephone: 1-226-705-3383

Any real or suspected violations reported to DriverCheck will be treated seriously and in a confidential manner. Your cooperation in upholding this Code is appreciated.