

HRPA EMPLOYEE CODE OF CONDUCT

Principles and expectations that guide ethical behaviour at
the Human Resources Professionals Association (HRPA)

Updated September 2008



HRPA Employee Code of Conduct

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1. Introduction

The Code of Conduct is a statement of our principles and expectations that guide ethical behaviour at the Human Resources Professionals Association (HRPA). This code has been approved by HRPA's Board of Directors and applies to everyone who acts on behalf of the association including board members, employees, volunteers, agents, consultants, and contingent workers. In addition to governing conduct among employees, this code governs conduct between all who interact with HRPA.

All employees of HRPA are required to abide by this Code of Conduct and acceptance of the terms of this Code of Conduct is a condition of employment. Employees are required to sign off on the code annually, which will normally occur as part of the employee's performance review. New employees will be required to sign off on the Code of Conduct as a condition of employment.

Failure to comply with any provision of this code or Association policy is a serious violation, and may result in disciplinary action, up to and including termination. These consequences may apply not only to employees who violate the code, but also to those who condone misconduct, fail to either report or take reasonable measures to prevent, detect, and address this misconduct, or seek to retaliate against those who report potential misconduct in good faith.

1.1. HRPA Values

- Leadership:** Evidenced by clear articulation of a compelling vision for the future of the HR profession coupled with the courage to make decisions and take appropriate actions in a timely manner in support of the vision
- Innovation:** Evidenced by fostering collaboration and creative thinking, the sharing of knowledge and continuous improvement that sustains excellence
- Integrity:** Evidenced by uncompromised dedication to professionalism, responsiveness to our member's needs and interests, and accountability for effective stewardship of members' investment of time, money and engagement

1.2. HRPA Stakeholders Defined

HRPA's stakeholders include:

- Directors of the Board
- Chapter Executive members
- Committee members
- Employees
- Volunteers
- Members
- Contractors
- CCHRA
- Government
- Public
- Other professional associations with which we do business

Directors of the Board of HRPA, chapter executives, committee members, employees, volunteers and contractors all represent the HRPA brand in one situation of another. Some

are in a position to influence HRPAs policy and direction while others can make binding financial commitments. The purpose of this Code of Conduct is to manage the association's reputational and financial risks.

Those who represent HRPAs, make decisions on behalf of HRPAs, and/or make financial commitments on behalf of HRPAs do so with the best interests of the association.

1.3. Reporting Code of Conduct Violations

It is recognized that reporting possible violations of the Code of Conduct can be a difficult matter. Yet, in order for a Code of Conduct to be effective, all individuals who deal with HRPAs must participate in its implementation. All employees and volunteers are expected to report suspected and actual violations of this code. Employees should report suspected and actual violations to their manager. Financial issues should be brought to the attention of the Director, Finance and IT. Human Resources issues should be brought to the attention of the Director, HR Excellence and issues dealing with Directors of the HRPAs Board and HRPAs chapter Executives must be brought to the attention of the Chair of the HRPAs Governance and Nominating and Governance Committee and/or the Chair of HRPAs Board of Directors. Ultimately, HRPAs Board Chair and its Chief Executive Officer are responsible for the implementation of this Code of Conduct.

All reported instances of questionable or unethical behaviour will be investigated.

1.4. Confidential Reporting

Reports and complaints will be kept confidential to the extent permitted by law and by the Association's need to properly investigate the situation. Given the sensitive nature of allegations, it is expected that those who report instances of potentially questionable or unethical behaviour need to keep the matter confidential. In addition, you may never disclose or discuss an investigation with unauthorized persons.

1.5. Retaliation

The HRPAs Code of Conduct prohibits retaliation against employees who, in good faith, submit or participate in the investigation of any complaint. If you believe you or others are the subject of retaliation as a result of having reported suspected misconduct or for participating in an investigation, you must report the matter to Chair of HRPAs Board of Directors and the Chief Executive Officer.

1.6. Co-operation with Investigations

The HRPAs Code of Conduct requires that all co-operate completely with any investigation relating to potentially questionable or unethical behaviour.

Nothing in this code should be understood as limiting other similar codes of conduct. Specifically, HRPAs does not limit the applicability of the HRPAs Code of Conduct agreed to by all HRPAs members and the present code is intended to complement, not contradict the Code of Conduct for HRPAs Board of Directors and Directors of HRPAs Chapters..

2. Handling Information

2.1. Privacy Policy

In conducting its business, HRP A collects and maintains information on individuals:

- Members
- Volunteers
- Employees
- Prospects

In each case, HRP A is committed to maintaining the privacy of personal information and the proper handling of all such personal information. In doing so, HRP A is guided by the principles outlined in *Personal Information and Electronic Documents Act* (PIPEDA) and other similar legislation. These principles, which are based on the Canadian Standards Association's Model Code for the Protection of Personal Information, are included as part of the act.

Ensuring the privacy of personal information requires that all those who use personal information or who have access to personal information are aware of the sensitive nature of this information and act accordingly.

Those who have the responsibility for policies and processes have added responsibility to ensuring that the policies and processes are in line with the principles summarized below.

Principle 1 – Accountability

Organizations must appoint one person to oversee and to be accountable for the organization's compliance with the privacy principles. This responsibility also extends to any person or organization that has access to personal information for processing, such as payroll. Organizations must also implement policies and procedures to give effect to the principles, and to provide adequate training and communication to ensure they are followed.

Principle 2 – Identifying Purposes

Organizations must identify the purpose for which they are collecting the personal information at or before the time of collection. Any other use of the information, unless required by law, must have the consent of the individual. Persons who are collecting the information should be able to explain the purpose of the collection.

Principle 3 – Consent

An individual's knowledge and consent is necessary for the collection, use, and disclosure of personal information, except where required by law, or where it is impossible or impractical for legal, medical or security reasons.

Principle 4 – Limiting Collection

Organizations may only collect the information that is necessary for the defined purposes and only by fair and lawful means.

Principle 5 – Limiting Use, Disclosure and Retention

Information cannot be used for any purpose other than the purpose for which it was collected, unless documented. It may not be disclosed, except in accordance with its original purpose. Employers should be sure to obtain written consent to disclose personal information of

employees to third parties. Information should only be retained as long as necessary to fulfill its purpose or as required by law. Written policies should provide minimum and maximum retention periods and methods for secure destruction of information once it is no longer required to be retained.

Notwithstanding any retention period the employer may establish, an organization that has personal information that is the subject of a request by an individual or the Privacy Commission must retain the information for as long as is necessary to allow the individuals to exhaust any recourse they may have under PIPEDA..

Principle 6 – Accuracy

Personal information should be accurate, up-to-date and complete for the purposes set out. Policies and practices should also give individuals an opportunity to correct any errors in information that is used on an on-going basis.

Principle 7 – Safeguards

Personal information must be protected against loss, theft or unauthorized access and the method of security will depend on the sensitivity of information collected. Security measures should include physical (where and how the information is physically kept), organizational (who has access, why and how) and technological.

Principle 8 – Openness

An organization's policies and practices of managing personal information should made available and should include the name of the privacy manager. The information made available should also include the means of gaining access to personal information held by the organization and a description of the type of personal information held by the organization, including a general account of its use.

Principle 9 – Individual Access

Organizations must provide individuals with details about what personal information they have, how to access it and amend it, upon request.

Principle 10 – Challenging Compliance

A procedure must be in place to deal with complaints and challenges to an organization's compliance with the principles above.

All employees, volunteers, board members, agents of HRPAs are expected to behave in ways ensuring protection of the personal information collected, stored, and used by HRPAs.

2.2. Use of Member Information

HRPA staff shall not divulge information regarding members to any outside party.

Membership status, including CHRP status, is not considered personal information. Any member of the public has the right to know if an individual is a member in good standing of HRPAs or is entitled to use the CHRP designation.

Membership lists are only to be used for purposes approved by HRPAs.

2.3. Handling Inquiries Regarding Membership (Registration) Status

There are two kinds of inquiries regarding membership status: informal and formal.

Informal requests are inquiries made by members for purposes of confirming their payment arrangements. These requests are of an informal nature. Informal requests of this kind can be handled by members of the Membership Department.

Formal requests are not to be handled by the Membership Department. Formal requests include:

- Request from members for written confirmation of their membership status (e.g. tax purposes or employment purposes, immigration status purposes)
- All requests from third parties (e.g. WSIB, adjudication bodies, members of the public considering launching a complaint, employers verifying staffing information)
- All requests from HRPAs committees (e.g. Complaints, Investigations and Discipline Committee or the Appeals Committee)

All formal requests as defined above must be handled by the Registrar.

2.4. Confidential and Sensitive Information

Confidential information obtained as a result of employment with HRPAs shall not to be used by an employee for the purpose of furthering any private interest, or as a means of personal gain. Use or disclosure of such information could result in civil or criminal penalties, both for the individuals involved and for HRPAs.

In the course of any job, an employee may become aware of personal and confidential information. HRPAs depends on the maturity and loyalty of each employee to keep such information private. Employees may also depend on their manager/director to keep personal matters confidential.

Confidential information pertaining to private business activities, plans and finances of HRPAs is HRPAs's property. Use of such information for personal advantage or private speculation is strictly forbidden.

Employees understand that in the course of their employment with the association, they will receive confidential information with respect to the business or activity of the association and its affairs, including information on processes, products, clients and pricing, the disclosure of which would be highly detrimental to the best interests of the association.

All confidential information of the association, its subsidiaries and/or their respective customers and clients, is the exclusive property of the association, its subsidiaries and/or their respective customers or clients, and must be regarded, treated and protected at all times...

Employees shall not disclose any confidential information of the association, its subsidiaries, and/or their respective customers or clients, other than as necessary in carrying out their duties on behalf of the association during or subsequent to the period of employment without first obtaining the association's consent. Employees must also take all reasonable precautions to prevent inadvertent disclosure of any confidential information.

Employees shall not use, copy, transfer or destroy any confidential information of the association, its subsidiaries, and/or their respective customers or clients, other than as necessary in carrying out their duties on behalf of the association, at any time during or subsequent to the period of employment, without first obtaining the association's consent. Employees must take all reasonable precautions to prevent inadvertent use, copying, transfer or destruction of any confidential information. This prohibition includes, but is not limited to, licensing or otherwise exploiting, directly or indirectly, any products or services that embody or are derived from confidential information. This includes judgment or analysis based upon knowledge of such confidential information.

Association employees hereby promise not to disclose at any time, either during or after their termination of employment, such confidential information, and make improper use, either

directly or indirectly, of such confidential information or to use such confidential information for the benefit of themselves or others.

Without limiting the generality of the foregoing, employees will not use any confidential information of the association or its subsidiaries for the purpose of assisting any entity that competes with the association or its subsidiaries.

Employees acknowledge and agree that the obligations under this section are to remain in effect in perpetuity.

Confidential information about HRPAs, its members, non-members, suppliers, or employees shall not be divulged to anyone other than persons who are authorized to receive such information. When an employee is in doubt as to whether certain information is confidential, no disclosure shall be made without first obtaining appropriate management approval. The basic policy of caution and discretion in handling confidential information extends to both external and internal disclosure.

All formal inquiries about membership status shall be redirected to the Registrar. The *Human Resources Professionals Association of Ontario Act, 1990*, clearly puts the Registrar in charge of maintaining the membership register. Although this responsibility can be delegated, at the end of the day, the Registrar is responsible for the register.

3. Avoiding Conflicts of Interest

All those who operate within the sphere of HRPAs must not place themselves in a position where there is the possibility of conflict between their personal or business interests, the interests of any associated person, or their duties to any other organization and the interests of HRPAs. You must make sound, impartial, and objective decisions on behalf of the Association. To ensure that your actions are in the best interests of the Association, you should disclose any potential or actual conflict to your manager.

3.1. Employment Outside HRPAs

Full-time employees of HRPAs are expected to devote the whole of their time, attention and ability to the performance of their duties and responsibilities and shall use their best efforts to promote the interests of the association. Employees agree to not take any other employment during the period of employment unless approved in writing by the association, in advance. Use of the association's time for personal matters and conflicts of interest are prohibited. Employees warrant that there is no legal obligation restricting their ability to carry out their duties to the association.

For part-time employees and volunteers, it is important that employment relationships do not cause conflicts of interest.

Depending on the commitment to HRPAs, other employers should be aware of employees' employment with HRPAs.

3.2. Activities Outside of HRPAs

Employees can participate in outside organizations (e.g. local school board or homeowners' association) if membership in these associations do not cause conflicts if and when decisions regarding the association or its products are made. If an employee is a member of an outside organization, they must remove themselves from discussing or voting on any matter that involves the interests of the association or its competitors. In addition, employees must disclose this conflict to the outside organization without disclosing nonpublic company information and disclose any potential conflict to the HRPAs Ethics Committee and obtain

approval from both their director-level supervisor and the business unit's most senior officer prior to serving on a board or committee of a public company, or acting as a representative of the association on a board or committee of any outside organization.

3.3. Personal Political Interests

Your personal political contributions and activities must be kept separate from the Association. If you make political contributions, you may not refer in any way to your employment or use the Association's assets, including its name, in connection with your contributions, unless required to do so by law. If you are appearing before a government body or engaging in contact with a public official outside of your ordinary work duties regarding a business in which the association is engaged or a business issue in which the association has an interest, you should make it clear that you are not representing the association, and you should advise your supervisor in advance.

3.4. Insider Trading and Financial Interests

As an employee, you may become aware of "material inside information"—information that is not publicly available and could reasonably lead a person to buy or sell the association's or another company's securities. Employees must never use material inside information (even if you acquired it as a tip) to trade—or advise or assist another person in trading—in the associations or any other company's stock or securities. This also prohibits employees from trading in derivatives of these securities. Insider trading is a serious violation of the law and can result in severe civil or criminal penalties, including imprisonment. Employees should never trade or help others trade on information that may be viewed as material inside information. If you are at all unsure whether information is material inside information, consult the Legal department before making any decision to buy or sell a security, or disclose such information. As a general rule, nonpublic information concerning a company's business, financial prospects, regulatory or legal matters, or management issues is often considered material.

There are extensive and complex rules relating to insider trading. If an employee—or any family or household member, or person with whom the employee has a close personal relationship—has inside information about the association or another company that they have learned about through their employment at the association (regardless of whether the information is material), the employee should check with the Legal department prior to trading its securities or stock.

3.5. Significant Financial Interests in Companies

You may not take a significant financial interest in a company that is a competing business provider of the association. A significant financial interest is any financial interest that:

- (a) Is more than 1/10 of one per cent of a company's publicly traded securities or other financial instruments, and
- (b) Exceeds 25 per cent of an employee's annual base salary and last annual bonus.

4. Creating a Positive Work Environment

4.1. Harassment and Discrimination

Individuals have the right to be treated with respect in the workplace. HRPA will endeavor at all times to provide a work environment, which is supportive of productivity and the personal goals, dignity and self-esteem of every person. The HRPA is fully committed to upholding the Ontario Human Rights Code. Under the code; "Every person has a right to equal treatment with respect to employment without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, gender, sexual orientation, and age, record of offences, marital status, family status, or handicap."

HRPA upholds the Ontario Human Rights Code in regard to harassment in employment; "Every person who is an employee has a right to freedom from harassment in the workplace by the employer or agent of the employer or by another employee because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, age, gender, record of offences, marital status, family status or handicap."

HRPA's senior management is dedicated to providing a workplace free from discrimination and harassment. Discrimination or harassment on any of the above-prohibited grounds is illegal and will not be tolerated. HRPA will take appropriate disciplinary measures against any person under its direction who subjects any employee to harassment or discrimination.

If an individual believes they have been harassed or discriminated in any way, they should immediately discuss the situation with the responsible Director or the Director of HR Excellence.

4.2. Workplace Violence

Workplace violence is more than just physical violence; it consists of all forms of psychological violence including intimidation and bullying. This kind of behaviour will not be tolerated by anyone involved with HRPA.

4.3. Environmental Health and Safety

HRPA is committed to providing a safe work environment for employees, volunteers and visitors. This cannot be done through corporate policies alone. Everyone has a responsibility in reporting unsafe working conditions, and making sure their behaviour does not create unsafe working conditions for others.

4.4. Misconduct Off the Job

All individuals representing HRPA, whether employees or volunteers, need to be mindful that participating in any misconduct off the job that damages the reputation of the association is grounds for action.

4.5. Relationships with Departing and Former Employees

An employee's obligation to abide by certain Association standards exists even after their employment with HRPA ends (e.g. employees can't accept a job with another company, if their new duties would cause them to:

- Breach any employment condition or agreement with the association
- Use or disclose nonpublic information about the association in the new position

In addition, employees who are leaving or retiring from the Association must ensure they return all association property, including all records and equipment. They may also not provide any association nonpublic information to former employees and if a former employee solicits this information, employees must notify their manager.

Former employees may not be rehired or engage as independent contractors or as agency employees unless that person has been separated from the Association for a minimum time period established by Human Resources.

Employees may not purchase products or services on the association's behalf from former employees unless they have been separated from the Association for more than a year. Even if this is the case, they must obtain appropriate authorization from their manager and follow the association's procurement policies.

If an employee suspects a former employee is unfairly benefitting from association information after the year period is over, they should consult with General Counsel for appropriate action. Exceptions may be made only with approval from a Director.

4.6. Sustainability

HRPA has made a commitment to sustainability. For this commitment to be effective, all employees, volunteers, and agents of HRPA must also be committed to sustainability. It is therefore expected that all will support HRPA's commitment to sustainability.

4.7. *Human Resources Professionals Act of Ontario, 1990*

HRPA has agreed to protect the public by ensuring that its members behave competently and ethically. It is the responsibility of everyone to ensure that this commitment is met by reporting instances of incompetent and/or unethical behaviour.

5. Protecting HRPA's Assets

5.1. Preparing, Disclosing and Maintaining Accurate Records

HRPA employees, volunteers and agents are expected to prepare and maintain accurate records.

5.2. Retaining Association Records

Employees and volunteers are expected to show judgment with respect to the destruction of Association records. The retention period will vary depending on the document or record in question. At the very least no document should be destroyed without consulting the individual responsible for the document. With respect to the destruction of document, if in doubt, discuss with your manager before destroying the document.

5.3. Safeguarding Association Information

All those who deal with association information are expected to demonstrate appropriate care in dealing with Association information. Precautions should be commensurate with the sensitivity of the information. Confidential documents should be stored in secure cabinets. Electronic documents should also be password protected.

5.4. Protecting Intellectual Property

All those who are involved with HRPAs have a duty to protect the intellectual property of HRPAs.

5.5. Copyright

HRPA is committed to respecting the intellectual property of others, specifically, copyrights in all its materials.

6. Maintaining Integrity and Fairness in Business Dealings

6.1. Fair, Honest and Respectful Service

All HRPAs stakeholders expect and deserve fair, honest, and respectful service. All employees are accountable in the delivery of that standard of service.

6.2. Business Providers Privacy

All those who engage in business dealings on behalf of the HRPAs must appropriately balance the requirement for transparency with the appropriate expectations of privacy on the part of vendors.

6.3. Selecting and Maintaining Relationships with Business Providers

You must use care and good judgment in selecting and maintaining relationships with all of HRPAs's business providers. Employees who participate in the selection of any business provider must:

- Use a selection process that is fair, does not improperly discriminate, and complies with all Association policies and procedures
- Ensure business providers are apprised of their obligation to abide by the association's standards of business conduct
- Put all agreements in writing and consult with our General Counsel if warranted, before executing them
- Consult General Counsel when the business provider or project is located outside the Canada

6.4. Gifts and Entertainment

The association competes on the merit of its products and services, not through gifts, entertainment, or other business courtesies. Although the exchange of gifts and entertainment can promote successful working relationships and good will, failure to follow the provisions can harm the association's reputation.

Gift: Anything of value—including promotional trinkets, food, beverages, tickets to cultural or sporting events—that an employee, a family or household member, or a person with whom they have a close personal relationship—either gives or receives.

Entertainment: Includes meals and events—cultural and sporting—attended with a customer or business provider. If an employer does not attend the event with the customer or business provider, the tickets are not considered entertainment, but rather, gifts and are subject to the gift restrictions in this code.

To be appropriate, a gift (whether it is given or received) must be:

- Unsolicited
- Cash or anything usable as cash (e.g., a gift certificate), with the exception of certain association marketing promotions that are consistent with the association policies and have been approved in advance
- Of moderate value (that is, no more than \$100 in face value in a calendar year from the same organization) unless approved in advance

To be appropriate, entertainment must be:

- Unsolicited
- Offered or accepted in the normal course of business
- Attended by both an association employee and an employee of a business provider and it must be an occasion where business is discussed
- Not unduly lavish (e.g. charging more than would be reasonable or customary for a business dinner or lunch)
- At a venue and conducted in a manner that does not violate other provisions of this code or harm the Association's reputation (e.g. an event at an adult entertainment venue is not acceptable).

Regardless of value, the appearance of influence must always be considered when accepting any business courtesy, such as a gift or entertainment. For any type of business courtesy, you may never use your own money or resources to do something that is among those prohibited by the association. In addition, when you offer gifts or provide entertainment to others consistent with this code, you must also ensure that these courtesies are properly reflected on the association's books and records.

Even if the gift or entertainment meets the above standards, you must not exchange it if:

- (a) It is intended to influence another person's business judgment;
- (b) It might create the appearance of undue influence, unfairness or impropriety; or
- (c) You are participating in, conducting, or directly supervising a formal procurement process (such as a request for bids) on the association's behalf.

6.5. Maintaining Integrity of the Certification Process

The *Human Resources Professionals Association of Ontario Act, 1990* provides that one of the objects of HRPA is to hold examinations and prescribe tests of competency deemed appropriate to qualify membership in and certification by the association. HRPA shall grant membership to persons who have passed such examinations as its Board may prescribe by by-law. HRPA is responsible for the integrity of the assessment processes involved in certification.

HRPA commits itself to the highest standards in regards to assessment. Specifically, HRPA adopts the Standards for Educational and Psychological Testing, 1999 as the professional and technical standards for its certification process.

6.6. Purchase Orders/Cheque Requisitions/Contracts

To ensure appropriate control over commitments made on behalf of HRPA.

- A purchase order is required for all expenditures more than \$700.

- Managers are authorized to make commitments on behalf of the association of approved budget items up to the amount of \$2,500; over this amount it must be co-signed by a staff Director.
- Staff Directors are authorized to make commitments on behalf of the association of approved budget items up to the amount of \$25,000.
- The Chief Executive Officer must authorize commitments made on behalf of the association of approved budget items more than \$25,000.
- The Chief Executive Officer must authorize any commitment made on behalf of the association for non-approved budget items. Any single commitments for non-budgeted items that exceed the amount of \$25,000 must be co-signed by the Chair or Vice-chair, Audit & Finance Committee. In the event that non-budgeted items, either individually or cumulatively, exceed \$100,000 then approval for the non-budgeted items must be obtained from the Board of Directors prior to commitment. In addition, commitments made for unbudgeted items will be included in the Financial Statements commentary.
- These commitments must be in writing (through a contract, proposal, purchase order, etc.), must include full and detailed costing, and must be authorized according to the limits specified within the policy. A copy of the final, approved contract or purchase order should also be given to the Finance Department.