



Grand Challenges Canada®  
Grands Défis Canada

## Code of Conduct and Anti-Harassment Policy

### Summary

Grand Challenges Canada's Code of Conduct and Anti-harassment Policy (collectively the "Code") defines the highest standards of behaviour expected of all Grand Challenges Canada (GCC) Representatives. All GCC Representatives are expected to follow [GCC's policies](#) and engage in ethical behaviour, anti-discrimination and respect, to ensure all interactions are done with fairness and dignity, and are free from real or perceived conflicts of interest. Grand Challenges Canada has a zero-tolerance policy for any abuse, bullying, harassment, sexual harassment, sexual exploitation, discrimination or other inappropriate conduct.

### Application

This Code applies to all GCC Representatives. For the purposes of the Code, GCC Representatives include without exception:

- all GCC employees (contract and permanent),
- students paid by GCC,
- GCC officers and directors,
- GCC committee and council members,
- any volunteers working with GCC,
- all innovators supported by GCC, and their sub-grantees or sub-contractors (whether funded by a grant, contract, sub-grant, loan or otherwise)
- consultants and service providers to GCC, and
- any other third parties who act as representatives of GCC.

It is expected that all GCC Representatives will comply with the Code and its principles, and perform their job, services, volunteer contributions, or project activities honestly and in a manner consistent with the values and policies of GCC, including those set out in this Code. GCC takes any form of abuse, bullying, sexual harassment, sexual exploitation, discrimination or other inappropriate or discriminatory conduct seriously and has procedures in place to take action should an issue ever arise.

For the purposes of the Code of Conduct, the following definitions apply:

**Sexual abuse:** Any sexual assault or threat of sexual assault committed with force, coercion, or in the course of an unequal relationship. Any sexual activity with a child is considered to be sexual abuse.

**Sexual exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially or politically.

**Protection from sexual exploitation and abuse (PSEA):** A term used by the United Nations and the non-governmental organization community that refers to action taken to protect vulnerable persons from sexual exploitation and abuse by their own employees and associated personnel.

### **Ethical Behaviour**

GCC Representatives act on behalf of the organization in various capacities. These interactions must therefore meet the highest standards of ethical and professional behaviour that uphold the reputation of GCC. Arrangements and relationships entered into, whether with or on behalf of GCC, must be free from bias, conflict of interest or the undue influence of others. Particular care must be taken by staff who are directly involved in the management of a program, procurement, contract or relationship with GCC, where key stages may be susceptible to undue influence.

Not every situation or circumstance can be addressed specifically in the Code. The principles and statement of values outlined in the Code are expected to be applied by GCC Representatives in exercising judgment and in conduct when facing questions, concerns or issues, whether or not they are expressly covered in the Code.

### **Reporting Breaches or Concerns of Any Form**

As a GCC Representative or someone interacting with GCC or its representatives, if you witness or become aware of actions or conduct that is not consistent with the Code or you have doubts about a course of action, you should seek advice and direction from:

- Your primary GCC contact, or (if not appropriate)
- One of the Co-Chief Executive Officers, or (if not appropriate)
- The Board of Directors ([BoardofDirectors@grandchallenges.ca](mailto:BoardofDirectors@grandchallenges.ca))
- At all times, you also have the option, when one of the parties is a GCC employee, of directing your questions and concerns to the University Health Network Human Resources Manager. As of January 2021, the representative is Sabrina Simone [Sabrina.Simone@uhn.ca](mailto:Sabrina.Simone@uhn.ca) and this policy will be updated if that representative changes.
- For confidential whistleblowing, please contact Grand Challenges Canada's General Counsel ([GeneralCounsel@grandchallenges.ca](mailto:GeneralCounsel@grandchallenges.ca)).
- If you wish to report an incident anonymously, you may use the Anonymous Reporting Form found on GCC's [website](#). Please note that GCC's ability to verify and address concerns that are reported anonymously may be limited.

If you are unsure of who to contact, please email: [info@grandchallenges.ca](mailto:info@grandchallenges.ca) for additional assistance.

GCC is committed to protecting those who report breaches and concerns; reports will be treated confidentially, unless required otherwise by law.

Those making reports in good faith will be protected from retaliation by GCC.

A person making a complaint in bad faith will not be tolerated. For example, GCC will not tolerate vexatious, fabricated or incongruous complaints that have no merit.

### **Accountability Procedures and Processes**

Grand Challenges Canada's management may initiate measures to address inappropriate behaviour, even in the absence of a formal complaint. GCC's management will also enable training for employees to help prevent misconduct.

Any incidents related to employees will be addressed through the University Health Network's complaint and conflict resolution process. Any ultimate decisions will be made by GCC management, with the involvement of the Board of Directors as necessary and appropriate.

Incidents that do not involve a GCC employee will be addressed and resolved by GCC's management, with involvement of the Board of Directors and other councils or committees as necessary and appropriate. GCC management will ensure its investigative procedures are fair, and when requested, confidential.

GCC's management is accountable for monitoring operational compliance with this Code, and to report any issues and their resolution to the Board of Directors, and where applicable GCC's funders.

All GCC Representatives must sign an attestation stating that they will follow this Code of Conduct, or that they will adopt their own policies and procedures in keeping with the principles set out in the Code.

A breach of the Code is serious and can result in action by GCC, up to and including immediate termination of employment, engagement and/or funding, and possibly the requirement to return any GCC project funds expensed.

### **Grand Challenges Canada Employee-Specific Policies**

GCC employees are also required to adhere to the [University Health Network policies](#), in addition to those listed here. The University Health Network policies include a complaint and conflict resolution process.

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