



Code of Conduct

This Code of Conduct (Code) provides expected standards of behaviour for GCC representatives towards those who come into contact with GCC through its work, such that any contact is ethical, positive, and appropriate.

1. PURPOSE

Grand Challenges Canada's Code of Conduct (the "**Code**") sets the highest standards of behaviour expected of all Grand Challenges Canada (GCC) representatives. All GCC representatives are expected to engage in ethical behaviour and in respectful conduct free from discrimination, ensure all interactions are done with fairness and dignity, and follow all related GCC policies, including, but not limited to the [Safeguarding Policy](#) and [Conflict of Interest Policy](#).

2. SCOPE

This Code applies to all GCC representatives, which include without exception:

- all GCC employees (contract and permanent);
- students paid by GCC;
- GCC officers and directors;
- advisors to GCC, including committee and council members;
- any volunteers working with GCC;
- all innovators supported by GCC, and their sub-grantees or sub-contractors;
- implementing partners;
- consultants; 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 act honestly and in a manner consistent with the values and policies of GCC, including those set out in this Code.

This Code applies at all times, where a GCC representative's conduct has a connection to, or could reasonably be expected to affect, the business, reputation, or interests of GCC. Conduct that occurs outside of the workplace — including criminal or unethical acts — may give rise to disciplinary action where such conduct harms or has the potential to harm GCC's legitimate business interests, the employment relationship, or the trust and confidence that GCC places in its representatives.

3. PRINCIPLES

GCC has a zero-tolerance policy for any violence, incivility, bullying / cyberbullying, harassment, sexual harassment, discrimination or other inappropriate conduct.

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.

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. All personal and professional interactions within GCC, irrespective of hierarchical or other power relationships, shall be based on integrity and mutual respect.

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.

Romantic or sexual relationships between coworkers are generally discouraged and can create real or perceived conflicts of interest, favoritism, discomfort among colleagues, and disruption to the workplace. Romantic or sexual relationships between a supervisor and an employee are prohibited because of the influence, authority, or power imbalance in the relationship. Individuals in this situation should immediately disclose the relationship to their manager or Human Resources so that appropriate measures can be taken. Measures will include reassigning reporting responsibilities to others where appropriate. Failure to disclose the relationship may be subject to disciplinary action.

Respectful and Inclusive Environment

GCC is committed to treating every individual with dignity and respect. All persons are entitled to a work environment of mutual trust and respect that is free from aggression, improper pressure, intimidation, discrimination and harassment. Harassment in all its forms, including sexual harassment, is prohibited to maintain a workplace that is safe, secure, respectful, and inclusive for everyone.

Our team works best when we consider how we treat each other and engage in ethical behaviour. GCC representatives should avoid actions or behaviours that may constitute poor practice or is potentially offensive or harmful. GCC encourages a workplace culture where representatives are empowered to stop rumors directly and to apply the "Is it True? Is it Kind? Is it Necessary?" standard before engaging in conversations about colleagues or others connected to GCC's work. The question should always be asked, "Is it my story to tell?"

This doesn't mean that managers cannot hold employees accountable for their work, but it does mean that we will not harass or bully each other. A reasonable action taken by a manager relating to the management and direction of workers or the workplace is not workplace incivility,

discrimination, bullying, or harassment when conducted professionally, respectfully, and in good faith.

Integrity and Honesty

GCC representatives must be open and transparent such that actual or potential breaches of the Code may be challenged.

GCC representatives commit to:

- Acting honestly, truthfully and with integrity in all our transactions and dealings;
- Treating the innovators we work with fairly;
- Acting responsibly toward the communities in which we work and for the benefit of the communities that we serve;
- Being responsible, transparent and accountable for all of our actions.

4. RESPONSIBILITIES

All GCC representatives have a personal responsibility to:

- Ensure that their behaviour and conduct complies with this Code;
- Establish and maintain a respectful work environment which is free of violence, incivility, bullying / cyberbullying, discrimination, and harassment;
- Actively working to eliminate any violence, incivility, bullying / cyberbullying, discrimination, or harassment; and
- Reporting any matter that breaches this Code.

Human Resources and Legal have a joint responsibility to:

- Provide information, education, and consultation to all GCC representatives on the interpretation and application of this Code;
- Review incidents and complaints under this Code;
- Lead investigations under this Code; and
- Identify any preventative and/or disciplinary measures.

5. CONFLICT RESOLUTION AND COMPLAINT PROCESS

The conflict resolution and complaint process may be initiated by any GCC representative. All persons have a right to safely engage in GCC's resolution processes under this Code without reprisal, reprimand or retaliation, or threat thereof. Disciplinary action may result where participants in resolution processes experience any form of retaliation.

All persons involved in the processes defined in this Code are expected to maintain confidentiality. Information that is collected about an incident or complaint, including identifying information about any person involved, will be disclosed for the purposes of investigating or taking corrective action, or as required by law or applicable regulatory body.

If you have doubts about a course of action or are uncertain whether something is within the scope of this Code, you can seek advice and direction from your primary GCC contact, Human Resources, or the Whistleblowing Officer, as appropriate. For the purposes of this Code, the Whistleblowing Officer will be the General Counsel.

A. Reporting Conduct in Violation of this Code

The **Conflict Resolution and Complaint Process (informal process)** follows 4 steps:

1. Discuss the concern directly with the GCC representative believed to be acting inappropriately.
2. If the behaviour continues after having discussed the concerns with the GCC representative, or if unsure about how to proceed, ask Human Resources for advice.
3. If the behaviour continues, ask the Senior Director, People & Culture or the Whistleblower Officer to facilitate or mediate a resolution with the person. Depending on the nature of the matter, a third party mediator may also be brought in.
4. If the behaviour continues, or is of a serious nature, submit a complaint under the Formal Resolution Process (see below).

In the event that an incident of violence, incivility, bullying / cyberbullying, discrimination or harassment occurs, GCC representatives are encouraged to first address the issue at an early stage and in a collaborative manner through the conflict resolution and complaint process laid out above, before escalating.

However, direct engagement (Step 1) with the person exhibiting the behaviour is not required and or appropriate, particularly in cases involving sexual harassment, discrimination, or violence. In such cases, GCC representatives may proceed directly to Step 2, Step 3, or the Formal Resolution Process (as established below) at any time.

Similarly, if this informal process does not resolve the issue, individuals may engage the Formal Resolution Process.

Any ultimate decisions will be made by GCC senior leadership, with the involvement of the Board of Directors as necessary and appropriate. GCC will ensure its investigative procedures are fair and confidential, to the best of its abilities.

If there is evidence that a complaint is made in bad faith or found to be vexatious, the person who submitted the complaint may face disciplinary measures.

B. Formal Resolution Process

a) Initiating the Formal Resolution Process

A complainant can engage in a Formal Resolution Process for an issue that has not been resolved or is not appropriate for the Conflict Resolution and Complaint Process noted above. The complainant does not need to be the target of the alleged behaviour. The complainant should escalate to the Senior Director, People & Culture or the Whistleblower Officer that they would like to proceed with the Formal Resolution Process.

The complainant must submit the formal complaint in writing (to the Senior Director, People & Culture and/or the Whistleblower Officer). The complaint must provide a description of the behaviour experienced, as well as all relevant dates, times, places, and persons involved. If the complainant prepares a paper copy in their own format, they must ensure that it is signed and

dated. Separate from the complaint, the complainant must provide a list of all witnesses who are believed to have some knowledge of the complaint and provide any relevant evidence and context they may have.

In order for a complaint to be properly addressed on a timely basis, complaints should be submitted as soon as possible after the alleged behaviour has occurred.

Within 10 working days of receipt of the complaint, the Senior Director, People & Culture and/or the Whistleblower Officer will meet with the complainant to determine the merit and scope of the complaint and provide the complainant with the necessary supports and advice.

The complainant must be prepared to be identified by name to the person alleged to be in contravention of this Code (the respondent). The respondent will be notified and given a reasonable amount of time to respond in writing to the allegations.

The Senior Director, People & Culture and/or the Whistleblower Officer will then meet with the respondent to hear their side of events and to ensure they too have the necessary supports and advice and are informed of the process.

After the respondent has provided their version of events (in writing), the Senior Director, People & Culture and/or the Whistleblower Officer would conduct a preliminary assessment, and a determination will be made as to whether an investigation is appropriate or required. If appropriate, mediation or other dispute resolution measures may be offered to resolve the complaint if that hasn't already been attempted. The complainant may be required to attend additional meetings in order to provide further information.

GCC senior leadership can initiate measures to address any conduct in violation of this Code, without a formal complaint from a GCC representative or an external third party.

Two or more complaints alleging similar violations of this Code by the same person, or having facts in common, may be dealt with under the same proceeding.

A complainant may, at their discretion, decide to withdraw a complaint at any point in the process under this Code. However, GCC may choose to continue to pursue the complaint despite the withdrawal.

b) Conducting an Investigation

Where an investigation is warranted, the Senior Director, People & Culture and the Whistleblower Officer will together review the case to determine how to proceed with an investigation. For clarity, the investigation commences after the respondent has provided their version of events and a decision has been made to investigate. In the absence of a response from the respondent, the investigator may use their discretion to proceed with the investigation where an investigation is warranted, based on available information.

In some cases, GCC may appoint an external investigator or team of investigators, with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable GCC to minimise the risk of future wrongdoing.

All reasonable efforts will be made to complete the investigation within 60 working days after the response from the respondent is received.

GCC will aim to keep both the complainant and respondent informed of the progress of the investigation. At the end of an investigation, the complainant(s) and respondent(s) will be advised of the findings in writing, as confidentiality allows. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. Any information about the investigation should be treated as confidential.

All GCC representatives are required to cooperate fully with investigations. Investigations will follow the principles of procedural fairness to allow those suspected of wrongdoing to explain or defend actions, and will be conducted in a trauma informed way. During investigations, the complainant and respondent may be physically separated to allow for a safe working environment. Supports are available through the process to all parties, as needed.

Investigation reports will be filed with Human Resources and Legal and kept for at least two years following the date of the last incident. Investigation reports will also be shared with GCC's Board of Directors. The investigation report and statements of the parties are confidential and will not be distributed to any party, unless required by law or applicable regulatory body.

c) Imposing Disciplinary Measures

If there is evidence that this Code has been breached or violated, GCC may take appropriate disciplinary action upon any respondent, including, but not limited to, one or more of the following remedies and sanctions:

- an apology (verbal or written)
- counselling
- education or training
- written reprimand or warning
- job or program transfer
- change of work assignment or appointment
- termination of appointment, employment, volunteer position, contract
- agreement or any other privileges
- support/counsel persons affected by discrimination and/or harassment
- monitoring and follow-up to ensure that any violence, incivility, bullying / cyberbullying, discrimination, and/or harassment has stopped and no incidents of reprisal have occurred
- suspension of the respondent without pay
- reporting to appropriate licensing body, as required

If a complaint under this Code is made in good faith and there is no evidence of violence, incivility, bullying / cyberbullying, discrimination, or harassment, no adverse consequences and no documentation of the complaint will appear on the respondent's record, or any person involved in the complaint.

d) Appeal

If the complainant or respondent is unsatisfied with the outcome of a complaint under this process, either party may submit a written appeal to the Chief Executive Officer (CEO), or designate, for

review. For the appeal process to proceed, the person making the appeal must provide evidence that the investigation was improperly conducted, or that there have since arisen significant new facts that could change the outcome of the original investigation.

e) Recusal and Independent Handling

Where a complaint or concern under this Code involves, or is directed at, a member of Human Resources, Legal, the Whistleblowing Officer, or the Chief Executive Officer, the individual(s) who would ordinarily oversee the process shall be recused from any role in receiving, assessing, investigating, or deciding on the complaint. In such cases, the following applies:

- If the complaint involves a member of Human Resources or Legal (other than the General Counsel), the matter shall be referred to the Whistleblowing Officer (General Counsel) and an independent external investigator for handling.
- If the complaint involves the Senior Director, People & Culture, and/or the Whistleblowing Officer (General Counsel), the matter shall be referred to the Chief Executive Officer, who shall appoint an independent external investigator.
- If the complaint involves the Chief Executive Officer, the matter shall be referred directly to the Board of Directors, who shall appoint an independent external investigator and oversee the process.

In all cases under this subsection, the recused individual shall have no access to complaint materials, investigation files, or related communications until the matter is resolved. The independent external investigator shall report findings to the non-conflicted decision-maker identified above.

6. WHISTLEBLOWING

Whistleblowing is the disclosure by a GCC representative or any third party (the whistleblower) of information that relates to suspected wrongdoing or dangers at or related to work. This may include but is not limited to:

- criminal activity
- failure to comply with any legal or professional obligation or regulatory requirements
- miscarriages of justice
- danger to health and safety
- damage to the environment
- bribery
- facilitating tax evasion
- financial fraud or mismanagement
- conduct likely to damage our reputation or financial wellbeing
- unauthorised disclosure of confidential information
- negligence
- the deliberate concealment of any of the above matters

If you have any genuine concerns related to suspected wrongdoing or danger affecting any GCC funded activities (a whistleblowing concern), you should report it under this Code.

GCC is committed to protecting those who report whistleblowing concerns; reports will be treated confidentially, unless required otherwise by law. While GCC will do everything in its power to

protect confidentiality, legal proceedings or obligations may require the whistleblower's identity to be revealed, or the investigation process may result in their identity becoming known or inferred. Whistleblowers making reports in good faith will be protected from reprisal by GCC.

The protections under this Code **do not** apply to individuals making false, exaggerated, malicious, or misleading reports. For example, GCC will not tolerate vexatious, fabricated or incongruous complaints that have no merit. If GCC concludes that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Reporting Whistleblowing Concerns

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, concerns should be reported as soon as possible after you become aware of them.

Those who wish to report whistleblowing concerns under this Code can do so verbally (by phone or in person) or in writing (by mail or email) by contacting:

- Your primary GCC contact, or (if not appropriate)
- The Chief Executive Officer (CEO), or (if not appropriate)
- The Board of Directors (BoardofDirectors@grandchallenges.ca)

For confidential whistleblowing, please contact GCC's General Counsel (GeneralCounsel@grandchallenges.ca).

The whistleblower making a report should include as much information as possible to permit evaluation of the concern. Ideally, a report should include:

- a description of the alleged wrongdoing
- name(s) of the person or persons involved
- name(s) of any witnesses
- date of the alleged wrongdoing
- whether the wrongdoing has already been reported and a response received

All whistleblowing concerns will be addressed, regardless of the source of the allegation. Following a preliminary assessment, a determination will be made as to whether an investigation is appropriate or required. Where an investigation is warranted, it will be conducted in a timely and comprehensive manner.

Whistleblowers themselves should not attempt to investigate, only to provide information. Whistleblowers will only be informed of the progress and final outcome of the investigation if appropriate.

Whistleblowers who chose to remain anonymous acknowledge that it may hinder the investigation, should an investigation be determined to be the appropriate action, as there are no means to follow up with the whistleblower.

Anonymous Reporting

If you wish to report a whistleblowing concern 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.

7. ACCOUNTABILITY

GCC 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. GCC will also enable training for employees to help prevent misconduct.

All GCC representatives are required to sign an attestation stating that they will follow this Code, 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.

Policy Type	Board Policy (external)
Policy Owner	Legal (General Counsel) & Human Resources (Senior Director, People & Culture)
Approved By	Akin Alaga (CIOO) & Karlee Silver (CEO)
Last Updated	June 19, 2026

Annex A – Definitions

For the purpose of this Code, the following definitions apply:

Bullying/cyberbullying: A range of behaviours in which targeted individuals are repeatedly, and over time, treated in a mean, insulting, or abusive way. Bullying can be initiated deliberately or unconsciously, and includes conduct which is virtual through the use of information and communications technology (cyberbullying). The affected person may feel upset, afraid, isolated, or humiliated. The bully sometimes acts alone and sometimes as part of a group of people.

Examples include:

- insulting a person's skills, looks, habits or beliefs
- spreading false or malicious rumours, gossip, or innuendo
- berating/belittling an individual
- unwarranted criticizing or ridiculing, especially in the presence of others
- giving insulting nicknames
- engaging in practical jokes that humiliate
- undermining or deliberately impeding a person's work
- physical gesturing that intimidates, offends, degrades, or humiliates
- refusing to work or converse with a person or group of persons
- mocking a person's accent, abilities, or mannerisms
- yelling or shouting which intimidates, coerces, or belittles

Discrimination: Differential treatment based on a personal characteristic which has an adverse impact on an individual or group. Adverse impact is the denial of employment-related benefits and/or injury to dignity, feelings, and respect arising from an offensive comment, question, or request that is linked to a *Ontario Human Rights Code* ground. Examples of personal characteristics include: race; ancestry; place of origin; colour; ethnic origin; citizenship; creed; sex; sexual orientation; age; marital status; family status; disability; gender identity; gender expression.

Harassment: Any objectionable course of behaviour, comment, display, or communication, including conduct which is virtual through the use of information and communications technology that is known, or ought reasonably to be known, to be unwelcome, intimidating, or offensive. Harassment may also include discrimination as set out in the *Ontario Human Rights Code* and prohibited grounds.

Examples include:

- yelling or shouting which intimidates, coerces, or belittles another person
- unwanted actions based on a person's characteristics, such as race, ethnicity, sexual orientation, disability, gender, or religion
- unwelcome remarks, jokes, innuendoes, or taunting
- unwelcome initiations, requests, or remarks
- stalking

Incivility: Behaviours that are rude, disrespectful, inconsiderate, or insensitive. There may not be an intention to harm, but the end result of such behaviour makes for an unpleasant work

environment, decreased performance, and commitment to the organization, co-workers, learners, and patients.

Examples include:

- skipping basic courtesies such as hello, thank you, and please (in person, in email, or virtually)
- sarcasm
- cliques, gossip, and social exclusion
- intruding on personal or physical boundaries
- arriving late when relied on by others for coming on time
- body language that conveys dismissiveness or negative judgment
- use of profanity
- loud, boisterous behaviour that disturbs others

Intimidation:

Behaviour that causes fear, including:

- making statements that instill fear or alarm
- slandering someone publicly
- sharing someone's personal photos or other material about them without consent
- diminishing someone's value, making insults or betraying trust
- invading a person's personal space
- stalking

Sexual harassment:

Engaging by a GCC representative in a course of vexatious comment or conduct against any person, through the use of information and communications technology, because of sex, sexual orientation, identity, or gender expression, where the course of comment or conduct is known, or ought reasonably to be known, to be unwelcome.

Examples include:

- unwelcome sexual advances (oral, written or physical)
- requests for sexual favours
- sexual and sexist jokes
- racial, homophobic, sexist, or ethnic slurs
- written or verbal abuse or threats
- leering
- unwelcome remarks, jokes, taunts, or suggestions about a person's body, a person's physical or mental disabilities, attire, or on other prohibited grounds of discrimination
- unnecessary physical contact such as patting, touching, massaging, pinching, or hitting
- patronizing or condescending behaviour
- displays of pornographic, degrading, offensive, or derogatory material such as graffiti or pictures
- physical or sexual assault
- 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.

Threatening Behaviour:

The following are examples of threatening behaviour:

- making statements that elicit alarm or threaten a person's welfare
- making public personal or defamatory material online to undermine someone's confidence, credibility and professional behaviour
- betraying someone's trust, creating disquiet and uneasiness in others
- threatening damage to property
- making threats to another person, including death threats

Violence: The use, threat, or attempt of physical force against another person that causes, or could cause, physical injury.

Examples include:

- pushing or shoving
- hitting, or trying to hit, a worker
- jabs or punches
- throwing objects
- verbal threats of physical harm
- gestures that simulate or threaten physical harm, such as waving fist or punching an open palm
- blocking an exit or path in order to keep someone from leaving the area
- wielding a weapon
- sexual violence

Annex B – Conflict Resolution & Complaint Process Flowchart



