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Contents

Policy	1
Code of Business Conduct	2
Audience.....	2
General Information.....	2
Accountability.....	2
Implementation and Review of Code	2
Enforcement of and Questions Concerning the Code	2
Key Areas of Conduct.....	3
Service and Profit.....	3
Respectful Workplace	3
Respect SaskTel's Time and Resources.....	3
Shift Work and Overtime	3
Personal Appearance in the Workplace	3
Alcohol and Drug Use	4
Driver's Licence Requirements	4
E-mail, Internet and Social Media Use	5
Political Activities.....	6
Prizes.....	6
Social Media	7
Application of Social Media Principles and SaskTel Expectations	7
Guiding Principles	7
SaskTel Expectations for Employees' Authorized Business Use of Social Media.....	9
SaskTel Expectations for Employees' Personal Conduct in Social Media.....	10
Conflict of Interest.....	12
Definition	12
Conflict of Interest Committee	12
Employee Responsibilities	12
Family Members.....	13
Use of the SaskTel Name	13
Supplementary Employment, Volunteering, and Other Activities Outside of Work.....	13
Volunteering Specifically for Emergency First Responder/Fire Fighter Response During Scheduled Work Time	14
Accepting Gifts.....	155
Providing Service to Customers.....	155
Insider Trading.....	166
Involvement in Business Concerns that Deal With SaskTel.....	166
Purchasing and Contracting on Behalf of SaskTel	166
Investments in Companies That Are SaskTel's Competitors.....	177
Subscribing to SaskTel's Products and Services	177
Process for Reporting Conflict of Interest.....	188
Handling Company Information.....	188
Privacy	188
Records and Proprietary Information	199
National Security.....	199
Confidentiality of Communications.....	199
Maintaining Confidentiality after Leaving SaskTel.....	20
Unauthorized Audio and Video Recordings in the Work Place.....	20
Handling Company Assets	20
Transactions and Assets.....	20
Corporate Property.....	20
Corporate Funds	211

Copyrights.....	222
Inventions.....	222
Conduct With Customers.....	222
Upholding Ethical Standards.....	222
Respecting Customer Property.....	222
Conduct With Other External Clients.....	233
Conduct With Suppliers.....	233
Conduct With Competitors.....	233
Conduct While on Assignment in Foreign Countries.....	233
Whistle Blowing.....	244
Definition.....	244
Purpose.....	244
What is Wrongdoing?.....	244
Wrongdoing is Not.....	255
Reporting Wrongdoing Through Clearview Connects.....	255
Confidentiality.....	266
Protection From Reprisal.....	266
False Accusations of Wrongdoing are Punishable.....	277
Conclusion.....	277

Policy

SaskTel's activities are guided by a set of values and principles designed to help employees make ethical decisions in the conduct of the corporation's business. This set of values, principles, and the guidelines based on these are SaskTel's Code of Business Conduct.

SaskTel expects all employees to uphold the corporate values in their work activities.

The Code of Business Conduct is not, nor can it be, a detailed list of guidelines to cover every conceivable ethical, moral or legal circumstance that may confront SaskTel employees. You must use common sense and sound judgment in many situations. If you are unsure of what decision to make or action to take, or not certain whether a situation is covered by the Code, talk to your manager or contact SaskTel Performance Management at 306 777-5712.

It is your responsibility to familiarize yourself with the Code.

Important: SaskTel will discipline employees who violate the rules of conduct described in this document up to and including termination of employment.

Code of Business Conduct

Audience

- All employees of SaskTel Holdco
- All contractors working on behalf of SaskTel

General Information

Accountability

SaskTel employees are accountable to:

- SaskTel's customers
- Communities in which SaskTel operates
- SaskTel's shareholders – i.e. the people of Saskatchewan

SaskTel must provide them with adequate information about its activities, and will record all its transactions in sufficient detail to identify their true purpose, extent, and source.

Implementation and Review of Code

SaskTel's Executive Committee is responsible for reviewing the Code of Business Conduct annually, and ensuring that it is revised and communicated throughout the Company, as required.

SaskTel's Executive and managers must ensure that:

1. All new SaskTel employees are provided with access to the Code of Business Conduct, an explanation of its scope and its applicability;
2. SaskTel employees review the applicability and importance of the Code of Business Conduct, as well as the consequences of violating it, during their annual review process – Partnership for Excellence (PFE).

Enforcement of and Questions Concerning the Code

Refer any information concerning actual or potential breaches of, and questions concerning the application or interpretation of, the Code of Business Conduct to:

- Your immediate manager or Performance Management at 306 777-5712;
- The Vice President responsible for Human Resources at 306 777-2010.

Important: SaskTel will discipline employees who violate the rules of conduct described in this document up to and including termination of employment.

[\(Home\)](#)

Key Areas of Conduct

Service and Profit

As a Crown corporation, SaskTel must operate to create a healthy balance between service and profit. Profitability is necessary for SaskTel to remain viable as a service provider in a competitive communications industry. However, SaskTel must complement the principle of profitability by providing the people of Saskatchewan with affordable, accessible, and exceptional quality communications service.

Respectful Workplace

Aligning with our Corporate values of Honesty, Integrity and Respect, SaskTel promotes a culture that treats everyone with civility and respect and a working environment in which employees feel valued and respected. SaskTel is committed to maintaining an environment that focuses on healthy and positive working relationships, and will continue to establish and maintain a work environment that is free from discrimination, harassment, and violence. SaskTel employees are expected to conduct themselves in accordance with Human Rights and Occupational Health and Safety legislation.

More information on SaskTel's Respectful Workplace program and related information and resources are discussed on SaskTel's intranet, *The Source*, under "Respectful Workplace."

Respect SaskTel's Time and Resources

SaskTel's corporate values of honesty, integrity and respect, are the foundation for the expectations of its employees. Expectations for personal conduct include, but are not limited to, doing a fair day's work for a fair day's pay, being punctual, keeping absences to a minimum, avoiding frequent or lengthy personal telephone calls, e-mail, web browsing or social media activity and performing our jobs to the best of our abilities. Although incidental personal use of SaskTel devices is acceptable (within reason), any excessive charges that SaskTel incurs (e.g. roaming or long distance charges) should be charged to your personal account or reimbursed, unless otherwise authorized by your manager.

Shift Work and Overtime

If your job position entails doing shift work or working overtime, SaskTel expects you to uphold this commitment, as SaskTel must provide uninterrupted communications services to its customers.

Note 1: For in-scope employees, overtime and shift work are discussed in the Collective Agreement Between SaskTel and Unifor.

Personal Appearance in the Workplace

In the workplace, you should always appear clean and well-groomed and present a professional image in your personal appearance.

SaskTel does not have a specific "dress code", but relies on the good judgment of employees, in conjunction with management expectations, to dress in a manner that is appropriate for their particular work environments while respecting individual expression, comfort and creativity.

[\(Home\)](#)

Alcohol and Drug Use

SaskTel is committed to minimizing the safety risks involved with our operations by providing a workplace that is free of the negative effects of alcohol and drug use.

SaskTel prohibits employees from:

- Consuming, distributing, selling or possessing alcohol, recreational marijuana or illegal drugs on company property or while engaged in work for SaskTel. However, responsible possession, sale, purchase, delivery, storage or use of alcoholic beverages is permitted at SaskTel-sponsored social functions (such as a retirement party, or where an employee receives a bottle of wine as a gift or a promotional item, or for recognition) or when representing SaskTel at social/business functions.
- Reporting to work under the influence of alcohol, recreational marijuana or illegal drugs.
- Operating SaskTel vehicles or equipment after consumption of illegal drugs, alcohol, marijuana or medications at levels that cause impairment.

Employees are expected to report fit for duty and remain fit throughout their workday or shift. Employees have the requirement to disclose the use of any lawful substance that could result, or is likely to result, in impairment of an individual's physical or mental capacity and create a threat to the health or safety of the employee or others. Noticeable effects of alcohol consumption, recreational marijuana or illegal drug use on employees – ranging from the smell of alcohol on an employee's breath to obvious signs of impairment – could make a negative impression on customers, adversely affect job performance, or impact job safety.

Important: SaskTel will take appropriate disciplinary action up to and including termination of employment when an employee's alcohol, recreational marijuana, illegal drug consumption or non-disclosed medication usage adversely affects SaskTel's operations, image, or safety and well-being of its employees, customers or the public.

Driver's Licence Requirements

If you operate vehicles that are owned or leased by SaskTel, or operate your personal vehicle while on corporate business, you must have a valid driver's licence, and of the proper class for the type of vehicles being driven.

Loss or Suspension

Employees whose driver's licences are revoked or suspended must inform their immediate managers.

If you lose your driving privileges, and require a valid driver's licence to perform your work duties in an acceptable manner, SaskTel will suspend you without pay for the duration of the loss of your driving privileges, or until SaskTel can reassign you to other work duties at the discretion of the company.

Important: SaskTel may terminate the employment of employees who repeatedly lose their driver's licences, or lose their licences for an extended duration.

[\(Home\)](#)

E-mail, Internet and Social Media Use

All business-related electronic mail, up to and including text and instant messages, sent by or to employees using corporate resources are the property of SaskTel. Examples of corporate resources include hardware, application or network connections provided by SaskTel for business purposes.

SaskTel's computers and your work time are resources to be used for SaskTel related business. As such, electronic mail and the internet generally must be used only for SaskTel business activities. Blogging and other social networking activities are personal and should be done on your own time, using your own resources, unless such activity is part of your job or business related. Incidental personal use is permissible as long as it does not:

- Consume more than a minimal amount of resources or time;
- Interfere with your productivity, or;
- Pre-empt any business activity.

SaskTel prohibits employees from accessing subject matter that is "inappropriate" or illegal wherever such content is found. If SaskTel discovers content on SaskTel systems or assets that it considers to be unlawful or that may be unlawful, the company will report such instances to the police.

Employees must not download, install or use computer games, including games or applications on social networking sites, on SaskTel devices (e.g. computer, iPads, and phones).

SaskTel does not routinely intercept, read or review the content of permissible personal communication created or sent by employees as described above. However, SaskTel reserves the right to access, monitor, intercept, review, search, track, store or otherwise use such content for SaskTel operational, maintenance, audit, security or investigative purposes. Such purposes include, without limitation, enforcing SaskTel policies and procedures, maintaining data integrity, ensuring the efficient and proper operation of SaskTel systems and assets and ensuring SaskTel complies with applicable laws. Employees should be aware that their expectation of personal privacy in these circumstances is subject to the considerations described above.

Employees should use good judgment and discretion when using SaskTel systems or assets for allowable personal use. Specifically, employees are encouraged to set up a personal folder on any SaskTel-owned computer and other communication devices to store the content related to such personal use.

Note 2: More information concerning permissible electronic resource use is discussed in SaskTel's Corporate Procedure 023.06, Security (Information) – Correct and Legal Use of Systems.

[\(Home\)](#)

Political Activities

While you have the right to be politically active, you must demonstrate discretion. Political activity must not interfere with work requirements.

You may not display any visible indications of political affiliation in the workplace – e.g. wearing campaign buttons where you are in contact with and serving customers or the public.

You must not contribute or recommend the contribution of SaskTel funds, property, or services to any candidate for or holder of a government office. Also, you should not make such contributions with personal funds in the name of SaskTel.

Note 3: SaskTel may grant leave for employees wanting to acquire public office, as described in SaskTel's Corporate Procedure 133.20/933.20, Leave - Seeking Nomination and Election.

Prizes

The following rules apply to employees who win prizes at events hosted by organizations other than SaskTel where SaskTel has sponsored the employees' attendance:

- You may keep any prizes that are valued at not more than \$300.
- For prizes valued at more than \$300, you must return the prizes to the organizing committee of the event.
- If you purchase tickets offered at the event, for the purpose of further fundraising, you may keep the prizes you win from the purchase of the tickets.

At events organized by SaskTel (other than wholly internal functions, like employee Christmas parties), you are not eligible to win prizes.

[\(Home\)](#)

Social Media

Social media is an umbrella term that encompasses many forms of technology, social interaction and content creation. At its most basic, online social media includes interacting with people in public via online tools, regardless of whether the online tool is controlled by SaskTel. These guidelines have been established to ensure that employees who use social media either as part of their job, or in a personal capacity, have guidance as to the company's expectations where the social media engagement is about SaskTel, its products and services, its people, its competitors and/or other business related individuals or organizations.

Application of Social Media Principles and SaskTel Expectations

What Is Covered?

- Guiding Principles – how we will use online social media
- SaskTel expectations for employees' use of online social media in a business context ("as part of your job")
- SaskTel expectations for employees' use of online social media in a personal capacity ("outside of work")

What Is Not Covered

These principles and expectations do **not** apply to an employees' personal use of social media platforms where there is no reference to SaskTel, its products and services, its people, its competitors and/or other business related individuals or organizations.

Guiding Principles

The following guiding principles outline how our corporate values should be reflected in your online social media space and to guide your participation, both when you are acting on behalf of SaskTel, as well as when you are participating in a personal capacity. These principles extend to all SaskTel employees and our agencies, partners, contractors and suppliers in their online social media interactions with or in respect of SaskTel.

- **Demonstrate SaskTel's core values.** If you are in a discussion that relates to SaskTel or its products or services, speak the truth and ensure the information you share about SaskTel is accurate and public information. Do not make unsubstantiated claims or manipulate conversations by creating posts designed to mislead followers or control the conversation. Express ideas and opinions respectfully. Do not make disparaging or insulting comments about others, including competitors. Observations about competitor's products and services must be factually accurate, public information.
- **Respect SaskTel time and resources.** Whether social media activity is personal or part of your job, it can be very time consuming. Where such activity has a business purpose or is part of your job, it is still important to ensure there is value in the time invested in social media activity and that it does not interfere with your other job duties. Personal social networking at work should be as brief and infrequent as personal telephone conversations. For the most part, both should be done on your own time, using your own resources.

[\(Home\)](#)

- **Adhere to the Code of Business Conduct, and other applicable corporate policies and the law.** Policies that apply to SaskTel employees, such as those protecting the privacy of employees, customers and suppliers and SaskTel proprietary information, apply in every public setting, including online social media conversations and other forms of participation. Examples of SaskTel proprietary information include SaskTel trade secrets, customer identities, company financial results not otherwise publicly available, business performance, planned acquisitions or divestitures or future product launches.
- **Respect copyrights, trademarks and other third party rights.** When posting, be mindful of the intellectual property rights of others, including copyright rights. Get permission before you use third party materials and provide appropriate attribution to content created by others, including a direct link to its source, if possible. Do not cite, reference or post information identifying third parties—customers, suppliers, co-workers, managers, friends—, including photographs, without permission. You are responsible for the content of your online posts and could be held personally liable.
- **Ensure** you do not post material that is false, misleading, inflammatory, obscene, threatening, harassing, discriminatory, defamatory, disrespectful or damaging to the interests of another person, including SaskTel, its employees, contractors, partners, suppliers, competitors or other business related individuals or organizations. Do not post material that is likely to tarnish the image of SaskTel or its brand.
- **Be transparent in every social media engagement.** Transparency is about your identity and your relationship to SaskTel. Honesty—or deceit—is quickly noted in the social media environment. If you discuss SaskTel, your work or other topics related to SaskTel online, disclose your affiliation with SaskTel. If you blog or discuss SaskTel or topics related to SaskTel and you have a vested interest in something you are discussing be the first to point it out.
- **Be respectful** of all individuals and communities with whom or in which you interact online, including fellow employees. Discussions or disagreements between employees should not occur in a public domain.
- **Be aware when mixing your business and personal lives.** The line between public and private, and between personal and professional can blur in online social media discussions. Assume that everything you post is public, or could be made public by others. By disclosing your relationship with SaskTel, your online actions are connected to your colleagues, managers and SaskTel. Personal attacks, insults, slurs and obscenities, or derogatory comments toward SaskTel or our people, products or services, or the products or services of our competitors or any other business or organization are prohibited if using SaskTel equipment or you are identified as a SaskTel employee. Assume that your posts will be read by your colleagues and manager.
- **Adhere to the Terms of Use** of the social media platform being used and seek to conform to its cultural and behavioural norms.

[\(Home\)](#)

SaskTel Expectations for Employees' Authorized Business Use of Social Media

Just as with traditional media, SaskTel has an opportunity, and a responsibility, to effectively manage our reputation online. The following principles illustrate how employees should represent SaskTel in an online, official capacity, when speaking on behalf the company.

- **Adhere to the Guiding Principles outlined above.**
- **Fully disclose your affiliation with SaskTel.** Anyone who is representing SaskTel online, including employees, agents, suppliers and other third parties communicating on behalf of SaskTel must always disclose their employment by, or affiliation with, SaskTel using their real name or a name that reflects their SaskTel relationship, e.g., first.last@sasktel.com.
- **Be an ambassador.** Be mindful that you are representing SaskTel. How you conduct yourself in the online social media space not only reflects on you, it is a direct reflection of SaskTel.
- **Listen before you post.** Getting a feel for the tone of the conversations and opinions people are sharing will help you strike the right note when it comes time to join in. Listening demonstrates that you value the information and opinions being shared and you're not just there to do a drive-by sales pitch.

That said, if people are talking directly about a SaskTel product or service, it's acceptable to acknowledge a compliment with a quick thank you. If their comments are negative, a public dispute will reflect poorly on yourself and SaskTel. Respond politely and briefly to let them know that you want to provide them with a positive SaskTel experience.

- **Use a human voice.** Speak in the first person and avoid corporate speak. Avoid technical jargon unless you are in a technical forum.
- **Stick to your area of expertise.** Determine whether the information you are sharing would fall within your area of responsibility and expertise or if there is a subject matter expert who is better able to respond. When in doubt, do not post your advice, support or comments. Instead, acknowledge the issue, question or concern and offer to have an appropriate SaskTel subject matter expert respond.
- **Don't pick fights.** Focus on interactions where you can help customers or engage in open and honest knowledge sharing. Avoid reacting to people's comments; respond respectfully to the ideas of others.
- **Commit to conversations.** If you respond to a problem, you own it. When engaging online, be prepared for a two way conversation that might extend over a period of time. If you become the point of contact for a customer complaint, for example, stay with it until it is resolved. If the issue has been passed on to a subject matter expert, follow up and/or check back for additional comments and questions.
- **Admit your mistakes.** Be the first to respond if you make an error and correct it quickly. If you modify an earlier post, make it clear that you have done so.

[\(Home\)](#)

- **Know that the Internet is permanent.** Everything you say can (and likely will) be used in the court of public opinion, so assume everything you say is ‘on the record’—forever. Never say anything you would not want to see published on the front page of the newspaper.

Examples where these expectations apply:

- *A customer support employee responding to questions on Twitter.*
- *An engineer or programmer participating in an online technical forum.*
- *An employee on the Max team commenting on a Digital Lifestyle discussion forum.*
- *A Corporate Communications manager commenting to a blog post about SaskTel.*
- *An employee writing a SaskTel sanctioned public blog.*
- *An official SaskTel Facebook Fan Page about Max new releases.*

SaskTel Expectations for Employees' Personal Conduct in Social Media

Online social media tools are an excellent form of self-expression and it's natural for highly engaged employees to include their SaskTel experiences in this arena. It's important to understand the implications of engaging in online conversations that reference SaskTel and/or your relationship with SaskTel and its services. These expectations have been developed for employees who choose to make references to SaskTel, its people, products or services in their personal social media interactions. It is important in these circumstances that readers of your posts do not misconstrue your personal comments as representing an official SaskTel position.

- **Adhere to the Guiding Principles outlined above.**
- **Be who you are.** SaskTel discourages the use of pseudonyms or anonymous posting in situations where online participation relates to SaskTel or our business. We expect you to identify yourself and disclose your relationship with SaskTel when discussing the Company online.
- **Let subject matter experts respond to negative posts.** If you come across posts or comments that are negative toward SaskTel or our services, whether from customers or third parties, rely on internal experts to respond. Pass the post along to Corporate Communications at media.reporting@sasktel.com where official spokespeople can determine an appropriate response.
- **Be on the lookout for compliments and criticism.** Even if you are not an official online spokesperson for SaskTel you are one of our most vital assets for monitoring the social media landscape. If you come across positive or negative remarks about SaskTel online that you believe are important, consider sharing them by forwarding them to Corporate Communications at media.reporting@sasktel.com.
- **Use a disclaimer.** Ensure that you do not imply in any way that you are authorized to speak on behalf of SaskTel. When posting on your personal blog or commenting on other social media, be clear that you are sharing your personal views and opinions and not the view of SaskTel. Even with a disclaimer, remember that your posts and opinions not only reflect on you personally, but also reflect on SaskTel. If you are not an authorized SaskTel spokesperson, add a disclaimer to this effect *“The opinions and positions expressed are my own, and do not necessarily reflect those of SaskTel”*. You are personally responsible for the content of your online posts, and you are also responsible for ensuring that any information about SaskTel products and services that you provide is informed and factually accurate.

[\(Home\)](#)

- **Be aware** of the importance of not damaging the company's reputation, commercial interests and/or bringing SaskTel into disrepute during your social media engagements. Personal attacks, insults, slurs and obscenities, or derogatory comments toward SaskTel or our people, products or services, our customers, or the products or services of our competitors or any other business or organization are prohibited.
- **Disclose only publicly available information. Adhere to corporate policies pertaining to confidentiality, proprietary information and privacy/safeguarding personal information.**

Note 4: Information concerning the sharing of company information is discussed in greater depth in SaskTel's Corporate Procedure 020.20, Security (Information) – Safeguarding Company Information and Corporate Policy 024, Privacy.

- **Think before posting.** Use sound judgment and common sense before you post. Remember that online communication is permanent and public, even if you delete the original post. Avoid posting in the heat of the moment and consider the reaction of readers in the short and long term. When in doubt, do not post.
- **Respect SaskTel time and property.** SaskTel devices and your work time are resources to be used for SaskTel related business. Blogging and social networking activities are personal and should be done on your own time unless such activities are part of your job.

Examples: These expectations would apply when an employee:

- *Uses a personal Twitter account to express excitement about the announcement of a SaskTel service launch, or a new movie feature on Max.*
- *Shares ideas and insights via comments on an industry analyst blog or user forum.*
- *Shares stories of SaskTel sponsorship or volunteer activities on their personal blog, Twitter feed or Facebook status.*
- *Accesses Facebook at work to see what their friends are doing and/or posting pictures of their latest vacation on the site.*
- *Searches YouTube at work for videos and information on their personal interests and hobbies.*

[\(Home\)](#)

Conflict of Interest

SaskTel employees must avoid being in conflict of interest situations by being mindful to not use their positions to influence Company processes for personal benefit or to benefit family members, friends, or others. Employees are obligated to report any actual, potential, or perceived conflict of interest situation in which they may be involved to the Conflict of Interest Committee.

Definition

Conflict of interest is the illegal or unethical mingling of personal interest with company duties or responsibilities. It includes any situation in which your personal activities, interests or relationships result in, or may appear to result in:

- The inability to objectively fulfill your work duties at SaskTel;
- A personal gain or advantage by virtue of your job position, or;
- Creating a negative image of SaskTel in the community.

As a SaskTel employee, you owe your first business allegiance to SaskTel; you must not use your position or knowledge of SaskTel's affairs to obtain personal benefits for yourself or other people, including family members.

Note 5: Family members include an employee's near relatives, such as a spouse or common-law spouse, persons in a significant personal relationship, child, or parent. As family ties vary from family to family, a family member may include other relatives of the employee or the employee's spouse.

Conflict of Interest Committee

SaskTel has created the Conflict of Interest Committee for the purpose of reviewing each potential conflict of interest situation and ensuring consistent remedial action for any incident of conflict of interest.

The Conflict of Interest Committee is composed of the Vice President responsible for Human Resources and the Vice President, Corporate Counsel and Regulatory Affairs.

Conflict of interest, either actual or perceived, is not always easy to determine. When in doubt, refer the matter to the Conflict of Interest Committee at 306 777-2010/2223.

Employee Responsibilities

As an employee, you hold a position of trust and responsibility at SaskTel. As such, you must avoid actual or potential conflict of interest situations by being mindful to not use your position to influence Company processes for personal benefit or to benefit family members, friends, or others. To determine if you may potentially be in a conflict of interest position, ask yourself:

- Am I following Company procedures correctly?
- Could my actions potentially result in financial or other advantage for myself, my family members, or friends?
- Am I uncomfortable discussing this with my immediate manager or coworkers?
- Would I act differently if family members or friends were not involved?

Conflict of interest, either actual or perceived, is not always easy to determine. When in doubt, refer the matter to SaskTel's Conflict of Interest Committee at 306 777-2010/2223.

[\(Home\)](#)

Family Members

All employees are responsible to disclose to their managers the existence (actual or potential) of a direct reporting relationship between themselves and a family member.

Employees should not participate in decisions of a significant nature involving a family member (i.e. hire, transfer, promotion, etc.).

Employees are responsible to consider whether such relationships fall within this policy and to report any such relationships to their managers. Employees' managers must then determine appropriate action; in doing this, they must consult with Human Resources (306 777-5712) or the Conflict of Interest Committee (306 777-2010/2223).

Use of the SaskTel Name

When you purchase goods or services that are not for corporate use you must not use SaskTel's name if doing so will, or will appear to, provide you with benefits that you would otherwise not have.

Example: Using SaskTel's name when checking into a hotel in order to get a cheaper corporate rate when the purpose of your stay at the hotel is not related to business is a conflict of interest.

Supplementary Employment, Volunteering, and Other Activities Outside of Work

You have the right to work at other paying jobs, do volunteer work, and to engage in other activities of personal interest, including operating a personal business, outside of the hours that you work at SaskTel provided that these activities do not:

- Conflict or interfere with the attention and energies that you normally devote to your duties at SaskTel;
- Put SaskTel in a potentially embarrassing or ethically questionable situation;
- Use SaskTel's time and resources for personal business purposes, or;
- Cause other conflicts of interest with SaskTel.

You should discuss any such plans or activities with your immediate manager or the Conflict of Interest Committee.

Examples:

- *Working in the evenings or weekends for a cellular phone service retailer who is a competitor of SaskTel is a conflict of interest.*
- *Being involved in a hobby or an outside-of-work activity so that it interferes with punctuality or quality of your job performance at SaskTel is a conflict of interest.*
- *Monitoring an e-mail account attached to your personal business during work hours is a conflict of interest.*

[\(Home\)](#)

Volunteering Specifically for Emergency First Responder/Fire Fighter Response During Scheduled Work Time

In emergency situations where an employee is acting in the capacity of a certified First Responder or Volunteer Fire Fighter, management may approve the request to volunteer during work hours if the following criteria are met:

- Must be an emergency call-out event within the district/area of the employee's volunteer responsibility.
- Prior to leaving their SaskTel workplace and/or duties, the employee must ensure the following actions are completed:
 - Employee **must** report the event to his/her immediate manager/director associated with his/her work assignment and get immediate manager/director approval to be absent;
 - Employee must ensure his/her SaskTel work site is left in a secure and safe state, and;
 - Employee must ensure external customers are not left without service or that the continuity of repair efforts is coordinated with another SaskTel representative prior to leaving the worksite.
- The emergency event will subsequently be validated/confirmed in writing (via hard-copy letter, email and/or scanned documentation) which provides, but is not limited to, the following:
 - Date and time of emergency
 - File number of emergency
 - Location and description of the type of emergency
 - Employee's name
 - Confirmation that the employee is a certified First Responder/Volunteer Fire-Fighter
 - Confirmation of the date and time the employee attended/responded to the emergency event referenced and that his/her attendance was required
 - The signature endorsement of Group Coordinator or Fire Chief

Note 6: Employees may be denied the ability to respond to the call-out event if management deems there are critical business circumstances that coincides with the volunteer call-out or other business factors that must be considered.

Employees will use personal time to cover any time away from the workplace for the volunteer response activity. Employees recognize that SaskTel doesn't supervise or sanction the volunteer activities. Any injury or other matter arising as a result of the volunteer emergency event will not be considered a SaskTel workplace accident and will not qualify for Workers Compensation. The employee understands that they are undertaking any volunteer activity at their own risk. SaskTel will not be responsible or liable for any loss, damage, or injury suffered by any employee's volunteer activity. If other time away from work as a result of the emergency event is required, employees must use personal time.

[\(Home\)](#)

Accepting Gifts

Gifts are items of value or services intended for the benefit of the employee. You must not accept gifts or favours where these would, or would appear to, improperly influence you in the performance of your duties at SaskTel. Employees should never solicit personal gifts or favours.

1. You may accept meals, refreshments or promotional items as long as these are modest in nature and provided in the regular course of business.
2. You may accept personal gifts, entertainment, or benefits from individuals or organizations doing business with SaskTel only when they are:
 - Part of the normal exchange of hospitality between persons doing business together;
 - Tokens exchanged as part of protocol, or;
 - The normal presentations of gifts to persons participating in public functions.
3. You must never accept gifts valued at more than \$300. If you receive tangible items as gifts valued at more than \$300, they will have to be given over to Corporate Communications. The Conflict of Interest Committee may approve gifts valued at more than \$300 in some circumstances.

Examples:

- *Receiving a DVD player as a gift from a supplier is outside of the normal presentation of gifts and is therefore a conflict of interest.*
 - *A supplier offers to bring you to a business conference and to pay for your flight, hotel accommodation, and meals. As these costs will be more than \$300 and are in any case beyond the normal exchange of hospitality, accepting such an offer would be a conflict of interest.*
 - *Receiving a commemorative plaque, picture, pen, or other article as a token of appreciation from a supplier is not a conflict of interest.*
 - *Receiving a device, such as an iPad, as part of a training course or conference registration fee - although provided as part of the registration fee - is considered receiving a gift.*
4. If you receive a gift or tickets and you are acting in an official capacity, you must report this if the value exceeds \$200. (Report this by using the 'Reporting Complimentary Tickets and Gifts' Form - see the form under "Related Information" in this policy).

If you accept tickets to an event in your personal (i.e. not professional) capacity, you must reimburse the provider of the tickets the cost of the tickets. However, you do not have to report the tickets.

Providing Service to Customers

You must provide customers with services in an objective, fair and equitable way. Therefore, you must not give preferential treatment to friends, family members, or organizations in which you, your friends, or family members have a business interest.

If you, as part of your job duties, make decisions concerning customer accounts you must not handle your own account or the accounts of family members or friends.

Examples:

- *Giving preferential attention to the service needs of friends or family members instead of applying equitable treatment to all SaskTel customers is a conflict of interest.*
- *Using your position in Credit Services to cancel debt on the account of a friend or relative is a conflict of interest.*

[\(Home\)](#)

Insider Trading

Through your job position, you may sometimes have knowledge of changes in the business or operations of organizations that have not been publicly disclosed and that could affect market prices or the value of securities in those organizations. This knowledge is known as “insider information” and may include, but is not limited to, dividend changes, earnings estimates, significant business developments, expansion or curtailment of operations, sale or purchase of substantial assets or other activities of significance.

- You must not use insider information for personal profit, either for yourself or for friends or family members.
- You must not use insider information to trade securities of any organizations with which SaskTel has business dealings, except when done in compliance with laws governing insider trading.

Example: Learning that SaskTel is planning to enter a business relationship with a company, and that this will likely increase that company’s share price, and subsequently buying shares in that company or providing this information to friends or family members so that they can buy shares in the company is a conflict of interest.

Involvement in Business Concerns that Deal With SaskTel

You must avoid potential conflict of interest connected with the sale of goods or services to SaskTel by:

- Family members;
- A private company in which you or family members are shareholders or directors;
- A public company in which you are a controlling shareholder or director, or;
- Personal involvement through a partnership or proprietorship.

If you intend, directly, indirectly, or through family members, to enter into a contract to provide SaskTel with materials or labour you must:

1. Submit in writing your intention to enter a contract, including a full disclosure of your or your family members’ financial interest in the contract, to the Conflict of Interest Committee.
2. Receive written approval to engage in the contract from the Conflict of Interest Committee before entering the contract.

Example: If you build small equipment enclosures to house switching network equipment and want to sell these to SaskTel, you must follow the process described above to avoid being in a conflict of interest situation.

Purchasing and Contracting on Behalf of SaskTel

If you are a “purchaser” – i.e. you have the authority to purchase goods and services for SaskTel or to tender, negotiate, or award contracts on behalf of SaskTel, or to influence or potentially influence these processes – you must be able to act independently and objectively. As a purchaser, you must avoid direct or indirect interests in relationships with potential suppliers or contractors to SaskTel where personal benefit or gain may be implied or construed to result to you or a family member.

If you learn that you must make business decisions that may involve a direct or indirect interest as described above, other than a shareholding of less than 10 percent in a publicly-traded company, you must inform the Conflict of Interest Committee. The Conflict of Interest Committee shall review the situation and inform you of how to resolve the matter.

In the event that you are a purchaser, and you or a family member own less than 10 percent in a publicly-traded company that may be entering into a business relationship with SaskTel, you must disclose your shareholdings to the Conflict of Interest Committee in advance of finalizing a contract award.

[\(Home\)](#)

Investments in Companies That Are SaskTel's Competitors

You must avoid potential conflict of interest by being an investor in businesses that are competitors of SaskTel to the extent that you are:

- A shareholder or director of a private company;
- A controlling shareholder or director of a public company, or;
- Personally involved through a partnership or proprietorship.

If you are not sure if you are in a conflict of interest situation you must refer the matter to the Conflict of Interest Committee.

Example: If you are an owner or shareholder in a private home security company that competes with SecurTek, you are in a conflict of interest situation.

Subscribing to SaskTel's Products and Services

SaskTel employees serve as ambassadors of SaskTel and as such, are expected to use SaskTel products and services where it is reasonable to do so.

Commencing 01 Jan 2015, all employees hired or promoted into a management position are required to subscribe to SaskTel products and services (telephone, internet, mobile, TV and security), where available. If an employee is currently contractually obligated to subscribe to the product or service of a different provider (e.g. mobile phone contract) he/she must switch to SaskTel when their existing contract expires. All managers who were in their job positions prior to 01 Jan 2015 are expected to use SaskTel products and services, where available.

SaskTel reserves the right to access, monitor and track manager usage of SaskTel products and services to verify compliance with the above. Failure to comply with these requirements may be grounds for termination.

[\(Home\)](#)

Process for Reporting Conflict of Interest

Table 1

If you know of an actual or perceived conflict of interest situation you must report the incident using the steps in Table 1.

Step	Person	Action
1	Employee	Refers conflict of interest situation to immediate manager or Vice President responsible for Human Resources.
2	Immediate Manager	Collects details of the potential conflict of interest situation in a confidential manner and discloses details to Vice President responsible for Human Resources.
3	Vice President responsible for Human Resources	Ensures that the matter is brought to the Conflict of Interest Committee.
4	Conflict of Interest Committee	Investigates and reviews each disclosure. Subject to the terms of the <i>Collective Agreement Between SaskTel and Unifor</i> , affected employees are entitled to make verbal or written presentations to the Committee.
5	Conflict of Interest Committee	Determines if a conflict of interest exists and recommends any required action to the Vice President of the department concerned or alternatively responds directly to the employee with the Committee's decision.
6	Vice President responsible for Human Resources	Reviews action necessary to resolve the issue and consults with manager(s) concerned, then reports back to the Committee.

Handling Company Information

Privacy

Maintaining privacy means safeguarding personal information.

Personal information is defined in the Freedom of Information and Protection of Privacy Act [Saskatchewan] as any information regarding an identifiable individual, whether an employee or customer, such as product and service subscriptions, billing data, credit history, or complaints.

Publicly available information, such as a public directory listing of a name, address, and telephone number, is not considered to be personal information.

In the interests of protecting corporate and personal information, SaskTel employees, dealers, and agents must refer to and uphold all standards of privacy that are discussed in the following SaskTel documents:

- *Corporate Procedure 024.01, Privacy - Treatment of Personal Information*
- *Corporate Procedure 024.03, Privacy - Accessing and Disclosing Customers' Personal Information*
- *Corporate Procedure 024.04, Managing Employee Privacy*

SaskTel's privacy standards are based on those described in:

- *Canadian Standards Association (CSA) Model Code for the Protection of Personal Information*
- *Freedom of Information and Protection of Privacy Act [Saskatchewan]*

[\(Home\)](#)

Records and Proprietary Information

Corporate records and proprietary information are exclusively the property of SaskTel. Examples of sensitive corporate information are:

- Agreements or arrangements between SaskTel and its customers and suppliers.
- Current or intended products and services and corporate strategies.

These kinds of information are corporate property and may be used only in the conduct of business by authorized employees.

Note 7: Records and proprietary information are discussed in greater detail in SaskTel's Corporate Procedure 020.20, Security (Information) - Safeguarding Company Information.

National Security

You must be very vigilant about safeguarding corporate records or documents that have been assigned a government security classification. Canada's communications network is vital to national security, and disclosures of this kind of information could be very damaging for SaskTel and the public.

Such information includes:

- Security procedures
- Location of facilities
- Circuit layouts
- Re-routing and service restoration procedures
- Classified National Security Information.

SaskTel employees must:

- Never talk about government security information in circumstances where someone may overhear you.
- Report any attempt by unauthorized people to obtain such information, or to gain access to restricted areas, to Corporate Security at 306 777-2733 in Regina or 306 931-5679 in Saskatoon.

Confidentiality of Communications

SaskTel employees must:

- Access confidential information (e.g. listening to telephone conversations while testing a circuit) only when it is an unavoidable part of a work function.
- Not disclose any information they may become privy to while working with any of SaskTel's communications and information systems.
- Never use this information for personal benefit.
- Guard against any tampering or intrusion of SaskTel communications systems, except as authorized by law.

Information about such matters as billing records, equipment or circuits must not be disclosed to anyone outside the corporation, except as authorized by law and as described in SaskTel's official corporate administrative and technical documentation and other corporate guidelines. Refer anyone requesting such information (e.g. law enforcement agencies or government officials) to Corporate Security at 306 777-2733 in Regina or 306 931-5679 in Saskatoon.

[\(Home\)](#)

Note 8: Confidentiality of communication is discussed in greater detail within the following SaskTel documents:

- Corporate Procedure 020.20, Security (Information) - Safeguarding Company Information
- Corporate Procedure 024.01, Privacy - Treatment of Personal Information
- Corporate Procedure 024.03, Privacy - Accessing and Disclosing Customers' Personal Information

Maintaining Confidentiality after Leaving SaskTel

If you end your employment with SaskTel for any reason, you may not disclose, show, demonstrate, reproduce, copy or use in any way, SaskTel confidential and/or proprietary information, or communicate it or any part of it to any third party, except as required by law.

Unauthorized Audio and Video Recording in the Work Place

The multitude of personal mobile devices in the workplace make it easy for employees to make audio and video recordings of discussions and presentations that involve confidential and proprietary information.

Employees must never make audio or video recordings in the workplace without first receiving the consent of any and all parties who may be included in the recording. As business meetings provide a platform for managers and employees to share proprietary and confidential information, conversations which take place in those contexts should not be available for dissemination outside that particular forum.

It is important for the operation and success of our business that all employees feel comfortable to express their views in a spirit of open, spontaneous and honest dialogue – especially when sensitive or confidential matters are being discussed.

Important: Exceptions include normal surveillance using authorized SaskTel building security systems and formal SaskTel investigations.

Handling Company Assets

Transactions and Assets

You must maintain records of financial transactions, corporate assets, and compliance with all statutory and company requirements concerning the disposition and acquisition of:

- Corporate property
- Corporate funds
- Copyrights
- Inventions

Corporate Property

You must protect the corporation's physical property and revenues. These include:

- Telephones and other equipment
- Computer software and hardware
- Details of business applications whether these exist in print, electronic, or other form
- Vehicles
- Tools
- Materials and supplies
- Keys
- Magnetic cards
- Reproduction facilities
- Cash, securities and accounts

You may not for personal reasons use, borrow, take, sell, lend, give away or intentionally damage any property, equipment, tools, materials and supplies, regardless of their condition, without specific authorization.

Corporate Funds

You are accountable for any corporate funds over which you have control. You must ensure that SaskTel receives good value when you spend corporate funds or personal money for which you expect to be reimbursed by SaskTel.

Claims for reimbursement must be for actual expenditures – unless a different payment scheme is authorized. Employees responsible for handling SaskTel's funds and associated records and materials are responsible for properly managing them.

[\(Home\)](#)

Copyrights

When using information, data, and computer software programs you must comply with all applicable copyright laws; you must not use software programs for which SaskTel has not obtained a software licence or other approval.

Note 9: Copyrights are discussed in greater detail in SaskTel's Corporate Policy 151, Legal - Copyright.

Inventions

All inventions made, conceived, written and/or designed by SaskTel employees during or after working hours and which fall within the scope of SaskTel's business operations, belong to the corporation. You are expected to fully disclose such inventions and to assign all rights to SaskTel without charge.

SaskTel expects complete cooperation from you when the Company decides to develop or pursue the invention and/or apply for a patent, or other intellectual property rights protection.

Note 10: Intellectual property rights are discussed in greater detail in SaskTel's Corporate Procedure 020.10, Security (Information) - Fraud, Theft or Misuse of Corporate Assets and Revenues.

Conduct With Customers

Upholding Ethical Standards

You must treat customers with fairness and respect at all times. You must do this directly or by supporting the work of other individuals or departments. When dealing with customers you must:

- Not make promises that SaskTel cannot keep.
- Limit customer entertainment to what is reasonable to facilitate business discussions.
- Not refuse to sell service or maintain SaskTel equipment simply because the customer is also buying from another supplier.
- Not directly or indirectly offer benefits or rewards to customers in violation of laws, regulations, SaskTel's corporate policies and other corporate guidelines, or business ethics standards and practices.

In addition to customers, you must exercise ethical standards when dealing with people and agencies involved in all levels of government, and with competitors and SaskTel agents and contractors.

Respecting Customer Property

While working on customer premises, your conduct must be beyond reproach. You must have permission to enter customers' premises and must rigorously respect their property and privacy. You must:

- Never take or borrow anything without customers' permission.
- Treat any information about the customers' affairs as confidential.
- Report to SaskTel any violation by customers of corporate regulations or standards.

[\(Home\)](#)

Conduct With Other External Clients

Conduct With Suppliers

All dealings with suppliers are to be governed by economic factors while keeping in mind the best interests of the corporation.

Whenever possible, employees who buy, lease, or rent on behalf of the corporation must request and receive from suppliers written estimates quoting the costs for material, equipment and work. All suppliers must receive equal consideration, as SaskTel's choice must be based upon the quality of the product or service and the price charged – unless otherwise indicated in SaskTel's corporate administrative documents.

SaskTel employees must never accept gratuities such as gifts, entertainment, money, loans, vacations or hotel accommodations from suppliers – with the exception of promotional items of nominal value or moderately scaled entertainment within the limits of prudence.

You must not:

- Demand that suppliers stop trading with the corporation's competitors.
- Ask suppliers to buy SaskTel's products simply to gain our business.

Complimentary Tickets and Gifts

SaskTel employees may be offered complimentary tickets to events outside of a SaskTel sponsorship package. You may accept complimentary tickets in situations where there is a business purpose such as corporate hosting, business development or partner appreciation. You may also accept complimentary tickets in instances where you will attend an event in an official capacity for SaskTel (e.g. receiving or giving an award, recognition in an official program).

- If you receive a gift or tickets and you are acting in an official capacity, you must report this if the value exceeds \$200. (Report this by using the 'Reporting Complimentary Tickets and Gifts' Form - see the form under "Related Information" in this policy).
- If you accept tickets to an event in your personal (i.e. not professional) capacity, you must reimburse the provider of the tickets the cost of the tickets. However, you do not have to report the tickets.

Conduct With Competitors

SaskTel must avoid all actions that could be seen as unfair or contrary to any laws governing the marketplace. You must:

- Never participate in price fixing, bid rigging and reselling price maintenance schemes.
- Not refuse to deal with SaskTel's competitors.
- Not be involved in or associated with any exclusive dealings.
- Never disparage competitors and their products, or improperly obtain our competitors' trade secrets or confidential information.

SaskTel operates in a competitive communications industry, and must be always mindful about ensuring that any of the corporation's marketing programs or sales practices do not conflict with the *Competition Act* [Canada] or the *Telecommunications Act* [Canada].

Conduct While on Assignment in Foreign Countries

As SaskTel conducts business in foreign countries, SaskTel employees must be mindful and respectful of the customs and practices of local cultures, and their social aims and economic priorities.

SaskTel employees who travel to, or are posted in, a foreign country must obey all laws of the host country and Canadian laws (except where they contradict those of the host country).

[\(Home\)](#)

While posted in a foreign country, you must not:

- Directly or indirectly pay or accept bribes or other improper benefits;
- Make contributions to political parties or candidates;
- Be involved in any political activity, except as permitted by law;
- Use the corporation's position to influence public issues;
- Withhold or distort financial information to evade taxes, or;
- Act contrary to the general conduct principles described in this policy.

Whistle Blowing

There are two ways to report wrongdoing in the company. One option is to use the processes described in *The Public Interest Disclosure Act* - see the link to this provincial legislation under "Related Information" in this policy. The other option is to use the anonymous reporting process provided by the third party vendor, **Clearview Connects™** Ethics Reporting Program.

Each reporting method has pros and cons. It is up to the person reporting a wrongdoing to decide which process to use. You may also use the grievance process or other internal investigative processes including telling your immediate manager about an incident of wrongdoing.

Important: The following information in the "Whistle Blowing" part of this policy is designed for those opting to use Clearview Connects to report an incident of wrongdoing.

Definition

Whistle blowing is the reporting by employees of incidents of wrongdoing – illegal, unethical, immoral or illegitimate practices – that are under the control of their employer, to persons or organizations that may be able take action to address the wrongdoing.

Purpose

SaskTel is committed to the highest possible standards of integrity, openness and accountability. As such, SaskTel must provide employees with:

- A secure, confidential disclosure process that encourages employees to raise serious concerns about actual or potential wrongdoing, and;
- Protection from reprisal for having made or proposing to make, in good faith and on the basis of reasonable belief, allegations of actual or potential wrongdoing in the workplace.

What is Wrongdoing?

Wrongdoing is an act or an omission that has serious negative implications for the public interest and the integrity of the organization. These include, but are not necessarily limited to:

- A violation of the *Criminal Code* [Canada] and other federal or provincial laws, where the act or omission relates to the employee's official activities or the misuse of corporate funds or assets;
- Financial wrongdoing or gross mismanagement of corporate assets;
- Acts that endanger the health or safety of persons or the environment;
- Serious or flagrant breaches of SaskTel's *Code of Business Conduct*;
- Information suggesting that a matter(s) falling within any one of the preceding points has been, or is likely to be deliberately concealed, or;
- Reprisals resulting from good faith disclosures of wrongdoing, or assisting or participating in the internal disclosure process.

[\(Home\)](#)

Examples

- *Someone has purposefully altered numbers on an income statement to show something other than an accurate account of the company's business.*
- *Several employees collude to process payment of false invoices in exchange for kickbacks.*

Wrongdoing is Not...

Other matters of concern that do not constitute “wrongdoing” – e.g. personal issues, employment-related disputes, and other workplace problems affecting employees – can be dealt with through alternate reporting methods such as communication with management, applicable corporate policies, and the grievance process.

Reporting Wrongdoing Through Clearview Connects

SaskTel uses **ClearView Connects™** Ethics Reporting Program to handle reports of wrongdoing in the company. ClearView is a communications consulting firm that specializes in improving organizational communication and hosting confidential reporting systems.

ClearView is completely independent from SaskTel. Their encryption and security technology ensures the anonymity of anyone reporting an incident of wrongdoing.

Any SaskTel employee, who believes that he/she is being asked to commit a wrongdoing, or believes that a wrongdoing has been committed by someone else, should report the incident to ClearView in one of the following ways:

1. Go online at **www.clearviewconnects.com** from a computer with Internet access and complete a report of the incident.
2. Phone toll-free at **1 866 686-9871**. Give your report to a ClearView hotline agent, or; leave a detailed voicemail message in ClearView's interactive voicemail system.
3. Mail your report to:

ClearView Connects™
P.O. Box 11017
Toronto, ON
M1E 1N0

After you have made a report of wrongdoing, ClearView will relay your report to:

- Vice President, Corporate Counsel and Regulatory Affairs
- Director of Internal Audit

Note 11: If your report indicates that one of the above persons is involved in wrongdoing, ClearView will relay the report to SaskTel's Chief Financial Officer and the Chairperson of the Governance Committee of SaskTel's Board of Directors.

The Governance Committee reviews all "whistleblower" reports at its regular meetings. However, you can request to have your report sent to the Chief Financial Officer and the Governance Committee for any instance of wrongdoing.

[\(Home\)](#)

The senior company managers listed above receiving reports of wrongdoing will:

1. Receive, record and review disclosures of information concerning wrongdoing and establish if there are sufficient grounds for further action or whether the matter is more appropriately referred to another body;
2. Ensure that procedures are in place to manage instances of wrongdoing that require immediate or urgent action;
3. Initiate investigations when required, ensuring the rights of all parties are respected, including the employee(s) making the disclosures, witnesses, and those implicated or alleged to be responsible for wrongdoing, and;
4. Upon completion of the investigation, make recommendations and/or initiate appropriate actions to address the wrongdoing.

Note 12: An internal investigation does not preclude an independent police investigation or criminal prosecution, where warranted.

Updating and Checking Status of “Report of Wrongdoing”

When making a report of wrongdoing, either on ClearView’s web site or through a hotline agent, ClearView will assign you a secure login name and password for your report so that you are able to periodically check the status of your report.

Important: SaskTel and ClearView strongly encourage you to check the status of your report, as this is the only way that the investigator or one of the senior SaskTel managers can communicate with you to ask further questions about the incident.

Again, the reporting process will maintain your anonymity throughout the course of the investigation.

Confidentiality

SaskTel chose the current whistle blowing process because it uses a third party to handle reports of wrongdoing, thereby protecting the anonymity of employees who make the reports.

SaskTel will make every reasonable effort to keep incidents of wrongdoing confidential, and to protect the identity of persons involved in the disclosure process including the individual(s) making the allegation, witnesses, and the alleged wrongdoer. However, disclosure may be necessary in order to conduct an effective investigation or legal proceedings, or in other circumstances otherwise consistent with provisions in the *Freedom of Information and Protection of Privacy Act* [Saskatchewan], or any other applicable legislation.

Note 13: Where information or an investigation is referred to law enforcement authorities, confidentiality is subject to the applicable régime – e.g. police informer privilege may or may not apply.

Protection From Reprisal

No employee should be subject to any reprisal from having made a report of an actual or potential wrongdoing when the report is made in good faith, on reasonable grounds, and in accordance with the proper disclosure process.

SaskTel will discipline employees up to and including termination of employment if they retaliate against another employee who has made a proper disclosure of wrongdoing, or against an employee who has been called as a witness, or who otherwise assists or participates in the process.

[\(Home\)](#)

If an employee feels they have been subject to reprisal as a direct or indirect consequence of having made a report of wrongdoing, or for assisting or participating in the process, the employee should contact:

- Vice President, Corporate Counsel and Regulatory Affairs at 306 777-2223;
- Chief Financial Officer at 306 777-3185, or;
- Director of Internal Audit at 306 777-2302.

False Accusations of Wrongdoing Are Punishable

All reports of actual or potential wrongdoing are taken seriously. As allegations of wrongdoing can cause irreparable harm to a person's reputation, employees must respect the reputation of individuals by not making false, malicious, frivolous, or vexatious allegations.

Any employee who knowingly makes false, malicious, frivolous or vexatious allegations – that is, allegations made in bad faith and without good reason, or to discredit SaskTel or any employee of SaskTel, or for no other purpose than to cause trouble or annoyance – will be subject to an investigation to determine whether disciplinary action should be taken.

Important: SaskTel will discipline employees who perpetrate false accusations of wrongdoing up to and including termination of employment.

Conclusion

Leadership and Responsibility

The Code will derive its force and effect from the example and leadership set by the officers, and the management team of SaskTel. However, the ultimate responsibility for the Code rests with each SaskTel employee.

If an employee is unsure as to what decision to make or action to take or not certain whether a situation is covered by the Code, he/she should refer to SaskTel corporate policies and procedures, ask their manager or contact the Human Resources Manager – Performance Management.

[\(Home\)](#)