

ICBC's Code of Ethics

Effective December 1, 2018



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Introduction: Our Values in Action

ICBC's Code of Ethics

This Code of Ethics is intended to help ICBC employees, Board members and contractors put our corporate values into action every day by providing guidance on the behaviours that support our values of Integrity, Dedication to Customers, Accountability and Caring.

Living Our Values

Through their actions and decisions, our employees, Board members, contractors, and others who represent our company must apply our values on a daily basis. This is an essential part of our commitment to our customers, our company, our colleagues and ourselves.

Integrity

Our business is based on trust. We are honest, ethical, straightforward, and fair.

Dedication to Customers

We exist to serve our customers. We listen actively and are responsive to their needs.

Accountability

We hold ourselves, and each other, accountable for our actions and the success of our business.

Caring

We care about our customers' well-being and ensure they feel supported by treating them with dignity and respect.

We care about each other's well-being and create an environment that promotes personal growth.

We care about our communities by supporting road safety programs and being environmentally responsible.



Application of the Code

This Code of Ethics provides concrete guidance in applying our corporate values to our day-to-day working lives.

The Code of Ethics applies to all ICBC Board members, employees, and contractors (in the course of providing services to ICBC).

All new employees, contractors and Board members must review and agree to the terms of the Code of Ethics prior to commencing employment or other work with ICBC.

Employees with doubts or questions concerning any aspect of this policy are encouraged to discuss the matter with their manager. Contractors should raise questions or concerns through their primary business contact.

Managers should direct their inquiries to their manager, or to the appropriate member of their Leadership Team. Board members should direct their inquiries to the Chair of the Board, the CEO or Corporate Secretary.

Employees who are concerned about potential breaches of the Code of Ethics are encouraged to raise their concerns. Please speak with your manager, another senior manager in the company, or [HR Consulting](#). If you are not comfortable raising concerns with someone directly, please consider using ClearView [www.clearviewconnects.com], an external and anonymous reporting service.

Employees using [ClearView](#) cannot be identified by ICBC unless they choose to make their identity known. See [Appendix 1](#) for more information on reporting concerns about breaches of the Code.



Nicolas Jimenez
President and CEO

Integrity

Our business is based on trust. We are honest, ethical, straightforward and fair.

We demonstrate integrity by avoiding [conflicts of interest](#) between our personal and business lives.

We demonstrate integrity by not accepting inappropriate [gifts and entertainment from third parties](#).

We demonstrate integrity by avoiding conflicts of interest arising from [personal relationships with our co-workers](#).

We demonstrate integrity through strict compliance with our policies on the [purchase of company property](#) (including salvage).

We demonstrate integrity by never accepting or offering [bribes](#).

We demonstrate integrity by not becoming involved in the business of a [stakeholder](#).

We demonstrate integrity by ensuring that [personal transactions](#) conducted with the company as an insurer are conducted honestly and transparently.

We avoid conflicts of interest arising from our [participation in political processes](#).



Conflict of Interest

As an insurer and issuer of driver licences, we make decisions which can have a significant impact on peoples' lives. We demonstrate integrity by actively avoiding real or perceived conflicts of interest. A **conflict of interest** is a situation that undermines, or has the potential to undermine, our impartiality because of the possibility that our personal interests are at odds with or opposed to our professional duties and obligations. This has the potential to impair our ability to make fair and honest decisions.

Our customers, stakeholders, and colleagues must be able to trust that we will exercise our discretion in a manner that is free from taint of personal interest. We must all exercise care in the conduct of the company's business and be open and straightforward when the potential for a conflict of interest arises.

General Principles on Conflict of Interest

In the workplace, conflicts of interest typically occur when the personal interests of employees, contractors, Board members, or members of their families and friends conflict with the business of the company, raising doubts about the impartiality of the business decisions made and the integrity of the person making those decisions, and the company which employs them.

If we are to preserve a reputation for honest and fair dealing, we must avoid situations where someone could reasonably perceive that there is a conflict between our personal interests and our role as employees, even if we have no intention of acting unfairly or dishonestly.

To understand whether a given situation might create a conflict of interest, consider the following questions:

- Would other ICBC employees or a member of the public think it might affect how I do my job for the company?
- Could someone perceive that I am using my work relationship with ICBC to gain a personal benefit from any external party?
- Do I, my friends, or my family stand to gain anything by virtue of my employment with ICBC or my ICBC relationship with an external party doing business with ICBC?
- Could it affect or be perceived to influence any decision which I might make at ICBC?
- Do I feel under any obligation to an external party due to the relationship I have with that external party doing business with ICBC?
- Would I be embarrassed if anyone inside ICBC knew about the situation?
- Would someone outside ICBC, such as a customer or stakeholder, question whether they had been treated fairly?

If the answer to any of the above questions is "yes" or "perhaps" or could be perceived by third parties to be "yes" or "perhaps," you may be involved in a conflict of interest. If this is the case, you **must** advise your manager or HR Consulting as soon as possible regarding the existence of the potential conflict, and must be open and honest in providing ICBC with the information it needs to determine an appropriate response.

In addition to the above, Board members are subject to specific guidelines on conflict of interest, which can be found in [Appendix 2 – Conflict of Interest Guidelines for Board Members](#).



Acceptance of Gifts and Entertainment

Giving or receiving gifts or entertainment can build understanding and expand relationships in everyday business life, but it can also cause a conflict of interest between personal interests and professional duty. Gifts and entertainment may erode the confidence and trust of others in the honesty and fairness of our business decisions, and undermine confidence and trust in the integrity of the management of the company.

We must not accept gifts from suppliers, customers or anyone else connected to ICBC in a business relationship. The only exceptions are modest promotional or expressions-of-gratitude items which are of limited value and which are available on a widespread basis (i.e., which are not specifically reserved for us) such as inexpensive pens, mugs, or calendars. Cash, as well as alcohol, regardless of the value, are never an acceptable form of gift giving or receiving and must be refused.

Q Is it permissible for an entire team or office to accept a gift from a client or vendor that is meant to be a group gift?

A Yes, however only if the gift does not exceed \$10.00 total value. The acceptance of a gift, regardless of whether it is intended for an individual or a group of individuals, is subject to the limitations set out in the Code of Ethics; that is, the value of the gift must not be greater than \$10.00. In other words, a gift intended for one person must not exceed the \$10.00 limit; similarly a gift intended for 10 people or an office must not exceed \$10.00 total.

The acceptance of prizes based on random chance or skill can be perceived as potential influence and represent a possible conflict of interest for employees if they are attending an event on behalf of ICBC. Any significant prizes claimed by an employee in such circumstances are to be declined. A prize is considered significant if its value exceeds \$100, or the receipt of such a prize by an ICBC employee or contractor is worthy of attention or scrutiny. If there is any doubt, contact Human Resources. Notwithstanding the foregoing, prizes won by chance or skill may be kept if: (i) participation requires a purchase of tickets or a donation personally made by the employee; (ii) the chance to win the prize is not included in the cost of attending the event; and/or (iii) the ability to purchase tickets or to donate leading to the chance to win is made generally available to the public or to all attendees at the event.

Q ICBC supported my attendance at a conference where everyone who attended was entered in a raffle for a trip to Florida. If I win, can I go?

A No. Since ICBC supported your attendance and the raffle is included in the cost of attending the event, the company technically won the prize, and so you must refuse the prize. However, if you paid for a raffle ticket out of your own pocket and the raffle was available to all attendees of the event, then you may keep the prize if you win.

Q I am attending a golf tournament sponsored by a company ICBC does business with and I win a driver. Can I accept the prize?

A No. It is alright to accept promotional items associated with attendance at such an event up to a value of \$100 when won by chance, skill or achievement. However, prizes that are worth more than \$100 cannot be kept and must be refused.

Gifts and prizes must be distinguished from events where we are building business relationships. If a supplier offers an employee free tickets to an event to use as they please, the tickets are gifts and **must be refused**. If, on the other hand, an employee is invited to attend the event with a supplier, this is acceptable. To avoid the perception of undue influence with a given supplier, the frequency of attendance at an event with a given supplier must be justifiable in the circumstances.



Q I have been offered two free tickets to a concert from a vendor and was told that I can use them as I please. Can I keep the tickets?

A No. The offer of free tickets to any type of event is considered a gift of significant value and cannot be accepted. However, you may attend the event with the vendor if it is considered a customary practice of business relationship development. To avoid a perceived conflict of interest, you must not accept more than one invitation to any event from the same supplier in a calendar year, unless it is justifiable in the circumstances and you seek prior approval. For example, it would be inappropriate to accept an invitation from a supplier to utilize the supplier's season tickets to attend every home game with the supplier. If in doubt about whether attending an event is appropriate in the circumstances, talk to your manager or Human Resources.

Entertainment may be offered or accepted in the ordinary course of business provided it is reasonable and modest and the frequency is justifiable in the circumstances. If you are in doubt whether the entertainment is reasonable and modest, you should obtain prior approval from your manager or an appropriate member of the Leadership Team.

You should always consider the following questions in relation to gifts or entertainment:

- Would the gift or entertainment be likely to or appear to influence my objectivity or the objectivity of the person to whom I am giving the gift or providing the entertainment?
- Is the invitation from someone who is, or could be, involved in a planned competitive process to provide services to ICBC?
- Would my impartiality or the impartiality of the person to whom I am giving the gift or entertainment be compromised in any way or appear to others to be compromised?
- Is the entertainment for a private purpose as opposed to being for a business purpose? Is business going to be discussed as part of the event or only in a very limited way?
- Would the gift or entertainment or its frequency be considered unique or extraordinary?
- Would it be a problem or would you be embarrassed if you were to disclose the gift or entertainment to other employees or third parties?

If the answer to any of the above questions is “yes” or “perhaps” or could be perceived by third parties to be “yes” or “perhaps”, by accepting or offering such gifts or entertainment you are creating the appearance of a conflict of interest.

If you are not certain you should seek guidance from your manager or [HR Consulting](#).

Q I have a monthly lunch meeting with a supplier with whom I regularly deal. The supplier normally pays for the lunches. Is this okay?

A It is important that we maintain our business relationships. However a high frequency of lunches or other entertainment with the same supplier or business partner may lead to the perception that they have an undue level of influence with the employee in question. This is potentially a conflict of interest situation. Meals and entertainment must be limited in their number and only utilized where there is a legitimate business reason for such meal or entertainment. Lunch with a supplier or business partner can be paid by them no more than three or four times a year and must be pre-approved by your manager. Otherwise, business meetings should be conducted during regular working hours and in a regular office setting.

Q I work in a job that requires me to keep up business relationships with several vendors at the same time. Does this mean that I can go to lunch with each vendor 3 or 4 times a year where the vendor pays?

A 3-4 is a general guideline that gives an indication of an appropriate frequency. If in doubt about the frequency of lunches, your manager needs to discuss this with the appropriate member of the Leadership Team. As a public body, ICBC and its employees are under enhanced scrutiny with respect to its and their business practices. The spirit of the Code of Ethics is meant to address and avoid the perception or appearance of a conflict of interest. ICBC's expectation is that employees adhere to not only the words but the spirit of the Code by exercising good judgment in their dealings with our suppliers and vendors. An employee who has the intention of “maxing out” the number of lunches paid for by her/his various vendor or supplier contacts in a year is not living within the spirit of the Code of Ethics and may therefore be in breach of it.



Q I am attending a conference sponsored by a company ICBC does business with. They are giving iPods to every attendee. Can I accept one?

A No. It is alright to accept modest promotional items associated with attendance at a conference. An iPod would have more than nominal value. In the circumstances, you should decline the gift.

Q Is it appropriate to request and use “Government rates” when travelling for personal reasons?

A The answer is ‘yes’ for hotels and ‘no’ for rental of vehicles. Hotels may choose to extend this rate to Government employees who show their ID regardless of whether they are traveling for business or personal reasons, and this is not in the control of ICBC. Other general corporate discounts that ICBC receives should be used for business purposes only.

For vehicle rentals please see [Hertz and Avis’ policy](#).

Q A customer wants to give me a gift certificate to thank me for helping them. Is this OK?

A In the same way it is OK to accept modest items such as pens and mugs, there is nothing wrong with accepting a small expression of gratitude from a customer, such as a card, flowers or other item. If the gift certificate is a coffee or gift card, this would not be considered unique or unusual as a thank you provided that it is not more than \$10.00 in value. Each case must be considered in light of all of the questions outlined in the policy. If you are offered a gift certificate or other item worth more than \$10.00, you must decline the gift. If in doubt, please raise the issue with your manager, or [HR Consulting](#).

Q I have an invitation to attend a seminar sponsored by a company who may become involved in an EOI process to provide services to ICBC. There will be lots of companies attending. Can I go?

A No. Your attendance at the event would create the appearance of a conflict of interest, and could harm the fairness and transparency of our bidding processes. The invitation should be refused.

This does not mean we must refuse invitations to all of these types of events. If a supplier has recently won a competition, it would not be abnormal or unreasonable to meet employees of the business partner at a seminar or conference, even though they could become involved in another process after the expiry of their agreement. Please contact, or ask your manager to contact Supply Management in the event you have concerns about a specific situation involving bidders in competitive processes.



Personal Relationships in the Workplace

Conflicts of interest arising out of personal relationships in the workplace must be avoided. Employees and Board members must never have influence, input or decision-making over the hiring, evaluation, promotion or establishment of terms and conditions of employment of anyone with whom they have a close personal relationship. This includes, but is not limited to, influence over the hiring, evaluation or retention of contractors.

Employees and contractors in close personal relationships must not be employed or retained in positions where the company requires that the incumbents be unrelated for risk management or audit purposes (e.g. a close personal relationship between two employees who are jointly required to approve a type of financial transaction for risk management purposes).

Close personal relationships include, but may not be limited to:

- spouses
- other intimate relationships
- parent/guardian/caregiver and child
- siblings
- mothers, fathers, brothers- and sisters-in-law
- cousins, aunts, uncles, nephews, and nieces.

Q What will ICBC do when it is made aware of a close personal relationship in the workplace that creates a potential conflict of interest?

A Where a close personal relationship may create a real or perceived conflict of interest, ICBC will ensure that there is no ability for the individuals to influence each other's hiring, evaluation, promotion or establishment of terms and conditions of employment. The work and reporting relationships between the two individuals may be altered. The extent of such alterations will depend on the nature of the reporting relationship and the steps needed to eliminate the potential conflict. Examples of what ICBC may consider include, but are not limited to:

- Can workflow or job duties be altered to eliminate the appearance of conflict?
- Can one party be moved to another reporting line, location, division or job?

Only if no other arrangement is possible will ICBC consider notice of the termination of employment to resolve the conflict.

ICBC employees must not in any way participate in or influence the hiring of an external individual with whom they have a close personal relationship. ICBC will endeavour wherever possible to avoid hiring individuals who have a close personal relationship into the same division, and never within the same direct or indirect reporting line. In circumstances where a close personal relationship develops between two employees in a direct or indirect reporting line, or in other circumstances which may create a real or perceived conflict of interest, both employees must report the existence of the relationship without delay to their manager(s). Failure to report such a relationship openly and promptly may result in disciplinary action, up to and including termination. **Anyone in doubt as to whether a close personal relationship falls within this policy should err on the side of disclosure and seek advice.**

Q Will ICBC ever permit an employee to be employed in a position where they report to someone to whom they are related?

A No. This is not permissible.

Employees must be open and honest when these relationships develop. Only then can ICBC attempt to find a way to reduce the potential for conflict.

Q Does this prohibit relationships between me and someone I work with, but do not report to?

A Generally, no. As long as we act openly and honestly, employees may work at ICBC with partners, family members or relatives.



This could become a concern where employees share a common reporting line or some form of joint accountability for audit purpose, or the possibility for collusion could exist. These situations may be rectified by amending procedures where possible.

We must also ensure that we contribute to an atmosphere of respect in the workplace, consistent with our value of Caring. Employees who are related to co-workers are expected to behave professionally and not allow personal conflicts or difficulties to impact working relationships.

Q Can I refer a friend or someone with whom I have a close personal relationship for employment with ICBC?

A Employee referrals are a good source of recruitment at ICBC. However, when referring a candidate to ICBC, employees should refer them only to Human Resources, not to a manager who is a friend or colleague who could perceive that you are trying to influence a hiring decision. Referring employees must not, in any way, be involved in the selection process and must not attempt, directly or indirectly, to influence the selection process.



Interaction with Stakeholder Businesses

Involvement in stakeholder businesses can create the appearance of a conflict between an employee's personal financial interests and his/her duty to ICBC and our customers. ICBC Board members and employees must immediately advise their manager or HR Consulting in the event they have a personal interest in any enterprise with which ICBC does business, such as an Autoplan broker, a towing company, a supplier of goods and services, a body shop, a landlord, etc. This includes, without limitation:

- having a financial interest in the business
- participating in setting the business' policies
- influencing the business' operating decisions
- accepting employment with, or agreeing to provide services or goods to, the business
- having a close personal relationship with an owner or employee of the business.

Employees and Board members must, without delay, disclose any interactions with stakeholder businesses which could give rise to the appearance of a conflict of interest. Board members and employees must avoid contracting with or procuring the services of any external party on behalf of ICBC where they have a personal, financial or other relationship with or interest in the external party and must always comply with the [Corporate Acquisition Policy](#).

Q I was in a collision and I am dealing with a repair shop. Is it okay to tell them I am an MD Adjuster so they know that I am knowledgeable about vehicle repairs?

A No. You should avoid any situation where someone may perceive that you are using your position with ICBC to pressure them into exercising discretion in your favour.

Q I am dating someone whose family runs a body shop. I work as an MD Estimator in the community where they operate. Is this a problem?

A Yes. If you are making discretionary decisions which could affect a stakeholder business, your involvement with someone from that business could lead to the appearance of a conflict. You should let your manager know about the conflict right away, and we will try to find ways around the conflict (e.g. rearrange workflow or transfer of location).

Q My wife has been looking to open a business and wants to buy a brokerage that sells Autoplan. Is this a problem?

A This situation definitely has the potential to be a conflict of interest. At the very least, it is a perceived conflict of interest. You should discuss the situation with your manager or the person set out in the Code (depending on your position with ICBC) before your wife buys the brokerage.

Q I was discussing my car with the manager of a body shop that I deal with on a regular basis at work. I want to have it painted and detailed and was asking him how much he charges. He offered to do it for me for free in his spare time. I think it's about \$3,000 worth of work. Can I accept his offer?

A No. He is likely offering you a personal deal because of your business relationship. To accept it could put you in a situation where you would feel obligated to him and that could affect the way you do business with him. Even if that is not his motivation, the perception is there.

Q If my father owns a body shop, does this mean that I am in a conflict of interest?

A Whether a conflict of interest, real or perceived, exists in the circumstances will depend on the nature of your job and your involvement in your father's business. If, in your job, you have the ability to potentially affect the business that is directed at your father's shop (e.g. claims adjuster, estimator) then a conflict of interest may exist. ICBC will look at each situation on a case-by-case basis to determine whether a conflict of interest may exist and what steps may need to be taken in order to limit or eliminate the potential for a conflict. It is the responsibility of all employees and Board members to disclose any such potential conflicts immediately. Any financial stake in a business (i.e. you own a part of the business) that has dealings with ICBC will result in a conflict of interest and is therefore inappropriate.



Offers of Bribes

On occasion, our employees will be approached by a customer or stakeholder seeking to offer some form of gift or reward in exchange for a beneficial decision in an area where an employee has discretion, such as a claim or licence application.

Q Does this actually happen at ICBC?

A Yes, particularly in Driver Licensing where our examiners are making decisions which can have a significant impact on people's lives.

We must **never** offer, give, accept, or receive a bribe in any form, whether directly or indirectly. A bribe can take the form of cash or any goods or services offered in-kind. Neither is it permitted for third parties acting on our behalf, such as agents and consultants, to do what we will not do ourselves. This type of dishonest conduct is fundamentally inconsistent with our core values.

Q What do I do if someone offers me a bribe?

A First, make sure you are safe and away from any threatening situation. Next, it is important that you report what happened to your manager as soon as you can, and there are specific procedures to follow in these cases. For more information see the [DL Policy Manual Section 18.2](#).

Q In the course of helping a customer with a claim, the customer finds out that I am looking to sell a used car. The customer tells me that she would be interested in purchasing my car. Is this a bribe?

A Potentially, yes. In this situation, by offering to purchase your car, the customer may be attempting to influence how you resolve her claim (e.g. the amount of settlement). Even if the customer ends up purchasing your car for fair market value, the facts could lead a reasonable person to believe that you were unduly influenced by the offer to purchase your car and that the offer to purchase the car was a bribe in return for a favourable settlement.

Q I have a working relationship with a body shop that ICBC does business with. The owner offered to store my vehicle or help me fix my car. Is this allowed?

A Never. This is a conflict of interest and must be reported to your manager so that ICBC can communicate its policy to the business provider.



Purchase of Salvage and Other Company Property

In the course of their duties, our employees are required to make decisions regarding the repairability of customer vehicles. It is critical that our customers be able to trust that our decisions are honest, transparent and fair. This trust is undermined if there is a potential for our employees to purchase vehicles (or parts) which are owned by the company as a result of a decision to declare a vehicle a total loss.

Q What items are considered salvage?

A Salvage items include vehicles (repaired or not), vehicle parts and contents, non-vehicle items or any items acquired by ICBC as a result of claims.

For this reason, Board members, employees and members of their immediate family must not purchase, borrow, or use salvage directly from ICBC or indirectly arrange to have a dealer or broker purchase salvage on behalf of the Board member, employee and/or their immediate family members.

Q Can I have a friend or family member purchase a vehicle from ICBC Salvage on my behalf?

A ICBC employees are not permitted to purchase any salvage, either directly or indirectly, through a friend, acquaintance, family member or other proxy. This includes items that will be disposed or recycled.

Other corporate property may be purchased only in accordance with the terms of approved corporate programs for the disposal of corporate assets, or through the usual channels also available to the public. Even then, you must not purchase such other corporate property through channels available to the public if you are involved in an official capacity in some aspect of the sale or purchase.

Q I rebuild cars as a hobby. Am I allowed to purchase parts from an auto recycler or parts yard if the parts came from a vehicle purchased from ICBC?

A You may purchase ICBC salvage parts from a third-party distributor provided you are buying in good faith and have not, for example, made prior arrangements with the third party to purchase the salvage from ICBC on your behalf. Employees must not purchase any vehicle parts where the employee was involved in any way in the claim leading to the acquisition of the vehicle parts by ICBC, or their sale by ICBC Salvage, and is aware of this at the time of purchase.

Q I want to purchase a used car from an auto lot, but the disclosure papers say it was purchased from ICBC as salvage. Can I still buy it?

A Employees may purchase ICBC salvage vehicles from a dealer or broker who has purchased the vehicle from ICBC, as long as the employee is acting in good faith, and the transaction takes place at arm's length (e.g. employees must not make prior arrangements with dealers or brokers to purchase ICBC salvage vehicles on their behalf). In addition, employees must not purchase any vehicles where the employee was involved in any way in the claim leading to the acquisition of the vehicle by ICBC, or its sale by ICBC Salvage, and is aware of this at the time of purchase.

Q Can I buy salvage that has been written off by a private insurer?

A Yes. Employees are free to purchase salvage from private insurers. The restriction only relates to ICBC salvage.

Q How can I buy things like computers or furniture that the company no longer uses?

A These types of items are periodically sold using [BC Bid](#), an online auction process which sells government property to the highest bidder, and is open to the public.



Political Participation

It is critical that we maintain impartiality in relation to our ICBC duties and responsibilities when any of us engages in political activities. The resources of a Crown Corporation cannot be used in such a way as to create an impression that the company favours one political party or candidate over another.

Q Does this mean I cannot run for elected office?

A No. ICBC permits employees to run for public office, as long as they are still able to perform their duties for ICBC and they are careful to avoid creating the appearance of a conflict of interest. Leaves are also available to facilitate political participation in some circumstances where the appearance of a conflict would be inevitable (e.g. MLA).

To avoid a perceived conflict of interest, we must avoid:

- Introducing partisan politics into the workplace. This does not apply to informal private discussion among co-workers.
- Situations where your position as an employee may have an impact, or be seen to have an impact, on political activity.
- Using ICBC facilities, equipment, systems (including email), or resources in support of political activities.
- Using our position to lend weight to the public expression of personal opinions, nor divulge any confidential information.

Q What about running for office with our Union?

A The Union is our exclusive bargaining agent and bargaining unit employees who wish to run for elected office are supported through a variety of leaves. Candidates for Union office may communicate with other members through agreed-upon channels such as Union bulletin boards, or emails which are sent to employees directly by the Union. Contact your manager, Human Resources, or the Union in the event you have specific questions or concerns in this regard.



Personal Transactions with the Company

Most of our employees, contractors and Board members are residents of British Columbia who have driver's licences and operate motor vehicles. In addition to our professional relationship with ICBC, we are therefore also customers of the company. To avoid a conflict between these roles, we must never seek to use or leverage our role as employees, contractors or Board members to gain an advantage for ourselves, our family or our friends. We must always act in an open and honest manner in reporting claims, and must refrain from accessing, using, or disclosing information regarding ICBC's claims handling or other processes which would not be available to a typical ICBC customer.

Q What do I do if I or someone else in my family has a claim? Someone involved with the claim could always figure out that I am an employee.

A ICBC has a specific process for employees and members of their immediate family to report claims with the company. Employees and immediate family members must disclose their connection with the Corporation when making a claim under insurance coverage written by the Corporation. For more information see the [Claims Procedures Manual, Section 5.5](#).

Q I was involved in a motor vehicle accident and I am represented by a lawyer who called me indicating that he needs the contact information of the third party involved in the accident. Can I access my own claims file to obtain this information?

A No. Your lawyer must utilize official channels to obtain this information. Your employment at ICBC gives you access to this information but it does not mean that you should access this information. Even if the information requested may appear innocuous, by accessing your file, you potentially gain access to information that a member of the public and even your lawyer would not have the right to access, such as the reserve amount. Even if you do not look at this information, the fact that you accessed your file creates a perceived conflict and could subject you to disciplinary action, up to and including termination of your employment. For more information see the [Protecting the Privacy of Personal Information Policy](#).

Q I witnessed a hit and run accident and I want to determine who the registered owner of the vehicle is. Can I access the file using the licence plate?

A No. You must never access a customer's information unless you are doing so in the course of your assigned work. If you access the file, you could be subject to disciplinary action, up to and including termination of your employment.



Use of Corporate Property

Company assets, whether in physical or intangible form, are intended to help employees achieve business goals. Company assets are primarily to be used for legitimate business purposes. Employees may occasionally use company resources such as a photocopier machine, telephone or e-mail for personal use provided that there are no measurable increased costs, other employees are not distracted or inconvenienced by the use of those resources and ICBC's other policies such as the [Information Systems Security Policies](#) are complied with.

Q I am supporting a candidate in a political race. Can I make a small number of copies of some candidate documentation under this policy?

A No. The problem here is the nature of the material. Even a small number of copies using corporate property could create the impression that ICBC endorsed the candidate in question, leading to the appearance of conflict of interest.

Where it is determined that the fair market value of personal use of company assets by an employee exceeds \$10.00 in a calendar year, the employee must reimburse to ICBC the difference. If an employee exceeds the \$10.00 limit, personal use of corporate assets may be deemed a taxable benefit and may subject the employee to disciplinary action. If in doubt, seek approval from your manager for the use of corporate property.

Q I am doing some home repairs and am in need of a hammer drill. I noticed that there is one at the claim centre that is never used. Can I borrow it for the weekend?

A No. Do not remove (even to borrow) any ICBC property without prior management approval.

Q It's my mother's birthday today and I need to call her long distance to wish her a happy birthday. Can I use the ICBC phone system? The rates are much better than on my cellphone!

A Yes, as long as it does not interfere with your job duties and you pay for the call when you get the bill, you can use the phone to call your mother. If you don't see the phone bills, make sure you tell your manager that you made a personal long distance call so he or she knows who to charge it to.

Employees may not use company assets for personal gain or to operate a personal business of any kind, nor may they allow any other person, not employed or authorized by ICBC, to use them.

Q I received an e-mail chain letter at work. It's harmless and really cute. Can I forward it internally and/or externally?

A No. ICBC computer and e-mail systems should not be used to forward non-business matters such as chain letters.

Q I run a home business making and selling candles. Can I sell my candles to other employees or customers of ICBC?

A Customers of ICBC interact with us for the purposes of auto insurance, driver licensing and other legitimate ICBC business. They do not expect to be solicited for goods and services unrelated to ICBC. Accordingly, no personal or non-ICBC-related business can ever be done with a customer or employee of ICBC in the normal course of your employment as long as you are employed by ICBC. Doing so leads to a conflict of interest and may leave the customer believing that ICBC warrants the unrelated good or service. This can lead to liability for both the employee and ICBC.

You may offer appropriate products or services to other ICBC employees using [Marketplace](#) on the hub (see [Marketplace guidelines](#)). You may not utilize any other ICBC resources to sell products to ICBC employees.





Dedication to Customers

We exist to serve our customers. We listen actively and are responsive to their needs.

We show our dedication to our customers by treating them with dignity and respect and ensuring that our places of business provide a [professional environment](#) free of hostile or offensive remarks, behaviour, and material.

We show our dedication to our customers by demonstrating proper regard for their interests in corporate decision making and other corporate activities or dealings.

We show our dedication to our customers by treating them in a manner which is consistent with the values which underlie this Code. We will be accountable for our customer related decisions, and will demonstrate integrity and caring in all our customer interactions.

We show our dedication to our customers by strictly maintaining the [confidentiality](#) of their personal information.



Privacy

As a result of our role in driver licensing and our monopoly over basic insurance, every driver in British Columbia is required to entrust us with their personal information.

ICBC is dedicated to protecting all of the personal information in its custody or control. This includes customers, service providers, and employees.

ICBC employees may access personal information only when and to the extent it is required by their job. We must take all reasonable steps available to us to protect the privacy of anyone whose personal information is held by ICBC.

Q I have a claim with ICBC. I just want to look up some basic information on my file. Can I look at my file if I only look at things I would be entitled to see (like my adjuster's name)?

A No. You must use the same channels as regular customers to get the information you need. We cannot gain any personal advantage in the claims process by virtue of being employees. Regardless of your intent, you should avoid any possibility for misunderstanding and stay out of the file entirely.

Q Some jerk has been harassing my sister by driving by our house every night and yelling obscenities out the window. I got the guy's licence plate number last night. Can I just look it up on the system to see who he is so I can go straighten him out?

A No. You may only access personal information on ICBC systems for business purposes. As frustrating and frightening as the above scenario is, you should let the police handle it. Give the licence plate number to the police and they will investigate for you.

Every employee and contractor is required to understand and agree to the terms of ICBC's Privacy Policy and must review that policy and complete the Privacy Tutorial on an annual basis. Find information on how to register for the tutorial in the [ICBC Fundamentals](#) section of learning & development on the hub.

ICBC conducts random audits of employee access to personal information and in certain circumstances, where warranted, engages in proactive data monitoring designed to detect fraudulent or inappropriate access in real time. Improper access to, sharing or release of customer personal information is a serious employment offence which may result in discipline, up to and including termination of employment.

Q My mother was involved in a motor vehicle accident and forgot the date and time of her claims appointment. Can I access our systems so that I can confirm the appointment for her?

A No. Access to personal information held in ICBC systems is limited to legitimate business use only. Just because you can access the information on behalf of family members does not mean that you should. Employees who have done this have suffered severe consequences, including the termination of their employment. In these circumstances, you must advise your mother to call ICBC to re-confirm her appointment.

Q I am an ICBC employee and on the way to work I witnessed an accident. I stopped to help and take pictures. When I get to work, can I access the system in order to submit my evidence?

A No. Again, access to files on ICBC systems is limited to legitimate business use only. If you do not have an assigned task to a file, you must not access the file for any reason, even if you think you are being helpful. ICBC has specific processes available to you to submit any evidence that you may have about an accident. For more information on this process, visit the hub or speak to your manager.



Accountability

Our employees have the capacity, through their actions at and away from work, to harm the business and reputation of the company.

We hold ourselves and each other accountable for our actions and their impact on the success of our business.

We demonstrate accountability when we conduct ourselves in a manner which does not harm the [reputation of the company](#).

When we are provided access to confidential information, we demonstrate accountability by not [using that information](#) improperly.

We demonstrate accountability when we do not attend work under the influence of [alcohol or illegal drugs](#).



Employee Personal Conduct

While we respect the privacy and autonomy of our employees and contractors in their personal lives, their actions, both in the workplace and outside it, have the potential to negatively impact the reputation of the company. Board members and employees whose personal conduct has the potential to harm the reputation of the company are accountable for their actions. This is particularly true if the conduct is contrary to a stated policy or position of the company.

Road safety is part of ICBC's mandate. As ICBC's public face in the community, you must not operate a motor vehicle in an unlawful manner or in a manner which would jeopardize ICBC's reputation. This may include, but is not limited to, behaviour such as distracted driving, excessive speeding or road racing, driving without a valid driver's licence or insurance, or while impaired by alcohol or drugs or otherwise. Driving a vehicle in such a manner may be both an offence under the law and a contravention of this Code of Ethics. Employees have an obligation to promptly advise the company when they are charged with any serious driving offence which could result in the suspension of their licence to drive.

Q Does this mean I can be disciplined for getting a parking violation?

A Generally, no. We are talking about out-of-work conduct which is so serious it could harm the reputation of the company, such as the criminal charges which accompany an episode of drunk driving or street racing. However, you should also keep in mind that employees of ICBC may be under enhanced scrutiny with respect to our personal lives where it might intersect with ICBC's business. ICBC is a public body that is involved in vehicle insurance but also public safety initiatives and the collection of debt relating to certain offences. Accordingly, employees whose personal out-of-work conduct that conflicts with ICBC's goals and principles that could harm ICBC's reputation may face disciplinary action for offences such as multiple speeding tickets where these offences are reasonably connected to their employment (e.g. driver examiners), excessive unpaid fines (e.g. parking tickets), or offences under the *Motor Vehicle Act*.

The Code of Ethics also applies to personal business arrangements outside of work. ICBC respects your right to operate a side business or provide services to others for a fee. However, in conducting such business, employees and Board members must ensure that their outside business activities do not interfere with their ability to perform their work for ICBC, create a real or potential conflict of interest or is competitive with the business or intended business of ICBC.

Q I read an article online about an ICBC project. Some of the points in the article and comments were incorrect. Can I set them straight?

A You are welcome to make comments on online news stories about ICBC, as long as you identify yourself as an ICBC employee and clearly state that the comments are your own personal opinion. Use a disclaimer such as "*The views expressed here are my own and do not represent the opinions or views of ICBC.*" Do not make comments that would make people think you are speaking on behalf of the company. For more information please see the [Social Media Guidelines](#).

Q Am I allowed to 'vent' about a co-worker or my manager online, for example on Facebook?

A Whether it's online or not, you are responsible for what you say about others in public. If you make comments on social media sites such as Facebook, you are responsible for those comments. You are accountable if your remarks online are interpreted as disparaging or derogatory, or if they are considered harassment or discrimination of ICBC employees, customers or clients. To understand more please see the [Social Media Guidelines](#).

Q What kind of personal business can I engage in outside of work?

A If you run a personal business outside of work, you must ensure that the business does not compete with ICBC or create a conflict of interest. For example, teaching a course would generally not create a conflict of interest. However, running or participating in ownership of an insurance brokerage or a body shop would be inappropriate.

Q Can I be a member of a Board of Directors of another company?

A It depends. If you are a member of a Board for a company that does not compete with ICBC or does not or will not provide goods or services to ICBC, then this is generally permissible. If in doubt, you should discuss your plans with your manager or Human Resources.



Compliance with Laws

You must fully comply at all times with both the letter and the spirit of all federal and provincial legislation and with all municipal by-laws applicable to the performance of your job duties and employment at ICBC. Because ICBC is constantly under public scrutiny, you must avoid any situation that could be perceived as improper or indicate a casual attitude towards compliance. You must never commit or condone an illegal act or counsel another employee, contractor or consultant to do so. If you are aware of an action or practice which you think may be in violation of the law, you must raise this concern with a manager without delay. The ClearView reporting system is available in the event you wish to make such a report anonymously. As a public company, the actions of ICBC's employees are under higher scrutiny. Accordingly, employees and Board members who engage in any illegal activity will be subject to disciplinary action, up to and including termination. If you have any questions regarding applicable laws, you should contact [Corporate Law](#).



Protection of General and Confidential Third Party Corporate Information

All data/information held by the company, in whatever form, is the property of the company. If you have access to this information, you must not use it for personal benefit or in any way that could be detrimental to ICBC. You are responsible for maintaining the confidentiality of all corporate and confidential third party business information and must not disclose it to anyone inside or outside the company except as required by your legitimate business duties. Where ICBC provides a commitment of confidentiality to a third party business, we are all accountable for ensuring that this commitment is fulfilled. The obligation to maintain confidentiality continues after your employment or contract with ICBC ceases.

All employees are required to understand our [Information Systems Security Policies](#) and review this policy and complete the Information Security and Privacy Tutorial on an annual basis. For more information and to register, select ICBC fundamentals in the Learning Centre of Employee Self-Serve.

If you are sharing sensitive corporate information with anyone outside of ICBC during the course of business, you must ensure that you have the proper documentation in place (such as a non-disclosure agreement) to protect this information. When in doubt, ask your manager, business contact, or [Corporate Law](#) for assistance. Board members should seek guidance from the Board Chair, the CEO or the Corporate Secretary.

Some employees at ICBC are engaged in various forms of research, problem solving and production of materials. For such employees, the product of their efforts produced within the scope of their employment belongs to ICBC, whether the product was produced while actually at work or not. Such products include, without limitation, computer programs, technical and business processes, inventions, research methods, manuals, artwork, reports or articles, and any other form of innovation, development or creation. Employees who create these products may be required to confirm in writing that ICBC is the owner of these products and, for copyrightable materials, waiving moral rights in favour of ICBC's use of such materials.

Q I am hiring a contractor to do some work in my business area. She will have access to some of ICBC's information, but she won't be here very long and I don't think the information is particularly sensitive. Do I have to get her to sign an agreement?

A Yes. All contractors hired to do work for ICBC will sign a contract prior to commencing work which includes confidentiality provisions. If there is a legitimate business reason why a contract is not being signed, a confidentiality agreement is still necessary to protect ICBC's confidential information. You should contact Corporate Law for assistance.

Q There are rumours flying among my online contacts on LinkedIn about one of ICBC's suppliers. I know information that would change their opinion, but it's not public yet. Can I share it with my contacts privately on LinkedIn?

A No. You are responsible for maintaining the confidentiality of all corporate information and must not disclose it to anyone inside or outside the company except as required by your legitimate business duties. When the information is public, feel free to set the record straight with your LinkedIn contacts by pointing them in the direction of relevant information posted on icbc.com. To understand more please see the [Social Media Guidelines](#).

Q I work in ICBC's procurement department and I have become aware of an upcoming public bid, which has not yet been made public. Can I disclose this to the Union?

A No. Information about public bids that has not yet been made public or has not been posted on BC Bid is considered confidential information and must not be disclosed outside ICBC, including to the Union. If you have any questions about whether information is confidential, discuss your concerns with your manager.



Alcohol and Illegal Drugs

It is forbidden to possess, consume, manufacture, or sell illegal drugs while working at ICBC. The judgment of employees and Board members must be unimpaired at all times. As such, no employee, contractor, or Board member is permitted to be under the influence of illegal drugs or alcohol while on duty.

Q When can I consume or buy alcohol at ICBC-related events?

A Please refer to the [Alcohol Consumption in the Workplace and at Events Policy](#) for ICBC's policy and expectations in this regard.

Q How does ICBC handle addiction issues? What if I disclose that I am using illegal drugs or alcohol at work?

A As part of our commitment to caring, we will take reasonable steps to assist employees struggling with addiction issues. Please see the [Alcohol, Illegal Drugs and Medications Policy](#) for further information.

Q I suspect that my co-worker may be under the influence of drugs or alcohol at work. What should I do?

A The use and consumption of illegal drugs and alcohol at work represents a danger to not only the employee in question but also co-workers, customers and members of the public. If you suspect that a co-worker is under the influence of drugs or alcohol in the workplace, it is your duty to raise this matter to the appropriate person in authority so that it can be dealt with in a timely manner. To report any concerns, you may speak to your manager, [HR Consulting](#), or use the confidential reporting provided by ClearView.





Caring

We care about the well-being of our customers and colleagues and ensure they feel supported by treating them with dignity and respect.

We care about our obligation to build and maintain a diverse, [respectful workplace](#), where customers and employees enjoy an environment in which the dignity and self-respect of every person is valued and which is free of offensive remarks, material or behaviour.

We care about our communities by supporting road safety programs and being environmentally responsible.



Maintaining a Respectful Workplace

Maintaining a respectful workplace requires the cooperation and support of every employee, contractor, and Board member. We are all accountable for setting a positive example and behaving in a manner which will not offend or humiliate others.

Bullying, harassment and discriminatory conduct are serious offences. Our employees, and anyone representing our company, must refrain from making comments or engaging in conduct which they know or should know is intimidating, humiliating, hostile, offensive or discriminatory.

We are all responsible for upholding ICBC's commitments under the *Human Rights Code*. We must refrain from any comments or behaviours which we know or ought to know discriminate on the basis of race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, gender identity, age or unrelated criminal conviction.

Q How do I raise concerns about harassing or other offensive behaviour?

A Please report concerns which cannot be dealt with through conversation with the offending person(s) to your manager, someone higher in your management hierarchy or to [HR Consulting](#).

Employees who do not feel comfortable raising concerns in this manner may also seek to use [ClearView](#), an anonymous and confidential reporting tool.

There is also a Collective Agreement process to address concerns by members that their workplace is not respectful or that they are being harassed. Please see the [Collective Agreement](#) for more information on these processes.

Further information about ICBC's policy against bullying, harassment, and discrimination can be found in the [Respectful Workplace Policy](#).

Appendix 1 — Anonymous and Confidential Reporting System

ICBC's Commitment to an Ethical Workplace

At the Insurance Corporation of British Columbia we know that maintaining an ethical workplace benefits everyone: our customers, our employees and our business partners. It involves the commitment of every employee to ensure we conduct our business in accordance with the highest standards of honesty, ethics and integrity.

We've established an "open door policy" for you to bring business or ethical concerns forward. Guidelines are in place to make sure we apply consistent treatment to similar ethical issues and business conduct breaches. We monitor the issues so the appropriate changes to policies and procedures can be made if required.

As part of our commitment, ICBC has retained ClearView Strategic Partners Inc., an independent Canadian company, to provide a secure reporting system that allows you to:

- make an anonymous and confidential report
- report via website, telephone (live operator), voice mail or regular mail
- report any time from anywhere, 24 hours a day/365 days a year
- follow up on your concern and find out the status—all in confidence.

We appreciate that coming forward with concerns of suspected wrongdoing in the workplace takes courage. We commit to you that each report will be taken seriously and an appropriate investigation conducted.

What are my options to report a concern?

You are encouraged to report your concern if you have concerns that another employee (management or staff) may be inadvertently or intentionally doing any of the following:

- breaching ICBC's Code of Ethics—covers unethical conduct or conflict of interest
- engaging in activities resulting in irregularities in financial reporting and/or accounting
- manipulating or falsifying data, records, reports or contracts
- engaging in theft, embezzlement, and/or fraud
- violating laws, company policies or procedures.

We know it's difficult to report a suspected breach; however, it is the right thing to do.

Different circumstances will impact how you report a suspected policy breach. Regardless of the approach you select, ensure you follow up with the contact to whom you reported the concern.

Option 1: Speak with your manager, unless your concern is about the CEO. Please contact the Audit Committee Chair if your concern is about the CEO.

Option 2: Speak to someone higher in the line of authority within your [department or division](#) if your concern is about your manager or it's not appropriate to talk to your manager.

Option 3: Speak to any [Human Resources representative](#).

Option 4: If none of the above is appropriate given the circumstances surrounding your concern, use the [ClearView Reporting System](#) and submit a report. All reports are anonymous and confidential unless you choose to reveal your identity.

Option 5: If you are not satisfied with the response from your ClearView report, please contact your manager, Senior Leadership Team member or the CEO to discuss your concern. You could also



contact the Chair of the Audit Committee if you wish to raise the matter internally but do not feel it is appropriate to raise it to any level of management.

How to Make an Anonymous and Confidential Report

There are four ways you can make a report using the [ClearView Reporting System](#), plus a direct channel to the Chair of the Audit Committee for reports concerning the CEO or those reports that you do not feel it is appropriate to raise to any level of management.

- [ClearView Reporting System](#)
 - phone (live operator)
 - voicemail
 - website
 - regular mail
- Reports to the Audit Committee Chair

Telephone or Voice Mail Report

A unique toll-free number has been set up for ICBC: 1-866-235-8992.

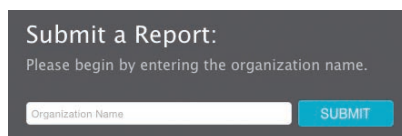
When you call the toll-free number you can choose to speak with a live operator, who will enter the report in the ClearView Reporting System as it is being given, or you can leave a voice mail message. Your message will be transcribed and entered into the system by ClearView agents. It’s important that you provide as much information as possible so we can review your concern in the most efficient manner. Have all your detailed information, such as specific facts, dates, names, and other pertinent details, at hand before you begin.

A unique login ID and password are provided in the live operator option, which will allow you to provide additional information or check on the status of your report.

Website Report

The website option is easy to use. It can be accessed from any computer with an Internet connection. **Please use the following instructions:**

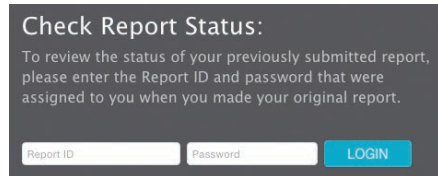
1. Go to clearviewconnects.com to access the ClearView Reporting System.
2. Insert **ICBC** in the text box.



3. This will take you to a new page with a large text box. It’s important you provide as much information as possible so we can review your concern in the most efficient manner. Have all your detailed information such as specific facts, dates, names, and other pertinent details at hand before you begin. You can also upload attachments (supporting documentation) as long as the documents are on your computer. To protect your identity, be sure that all personal and hidden information has been removed from the attachments. There are Help instructions on the website to upload attachments.
4. From here, you’ll be asked a few questions. Only answer those questions that are applicable and you are comfortable in answering. Some of the questions include: “What is your relationship to the organization?” or “How did you become aware of this unethical conduct?”
5. After completing the additional questions and selecting the button, you will be given a unique login ID and password. You should note this login ID and password and keep them somewhere safe, as you will need them to check on the status of your report.



6. You'll be asked to log back in within 48 hours to see if there is any additional information required.
7. To check the status of your report or to provide any additional information, use your login ID and password and follow the prompts.



The screenshot shows a dark grey rectangular box with the title "Check Report Status:" in white. Below the title, there is a smaller white text prompt: "To review the status of your previously submitted report, please enter the Report ID and password that were assigned to you when you made your original report." At the bottom of the box, there are two white input fields: "Report ID" and "Password", followed by a blue button with the word "LOGIN" in white capital letters.

Mail Report

A report can also be sent by regular mail through Canada Post to the following confidential PO box number:

PO Box 11017
Toronto ON
M1E 1N0

Be sure to include copies of any supporting documents with your detailed report. ClearView agents will transcribe, scan and enter the information into the reporting system.

The downside of this method is that we have no way to let you know the outcome of your report, unless you include your contact information.

Reports about the CEO

Reports about the CEO should be sent directly to the Chair of the Audit Committee (**see next page**). **Do not submit a report about the CEO through the ClearView Reporting System.**

What happens to the report?

Once your report is entered in the ClearView Reporting System, an e-mail is sent to the authorized ICBC reviewers notifying that a new report has been received.

The Director, Risk Management and Corporate Audit Services, and the Chief Human Resources Officer are the authorized reviewers. Together, these two directors initiate and coordinate appropriate investigative action by relevant groups within the organization, maintaining the anonymity of the ClearView reporter. Where necessary, these two directors will inform applicable senior management members that a ClearView report relating to their area of accountability has been received. The CEO is also a reviewer on all ClearView reports and is apprised of the status of reports by the Director, Risk Management and Corporate Audit Services.

You should know that the Director, Risk Management and Corporate Audit Services, informs the Audit Committee at an in-camera meeting held during each of its quarterly meetings of all concerns reported through the ClearView Reporting System.

Reports about the CFO; Director, Risk Management and Corporate Audit Services; Chief Human Resources Officer; and VP Corporate Affairs should be designated as sensitive reports and will be received and investigated by the CEO. The CEO will determine the appropriate action to take on these reports and advise the Chair of the Audit Committee and the Board Chair, as appropriate. While the Director, Risk Management and Corporate Audit Services, will not be privy to the content of these sensitive reports, s/he will monitor that action has been taken on all of these reports. Reports about the CEO will be investigated by the Chair of the Audit Committee of the Board (see below).



How will I know what the response is to my report?

Once you make your report using the ClearView Reporting System, you will be provided with a login ID and password so that you can check back on the ClearView website for a response. Because the system is anonymous, there is no way for the ClearView Reporting System to provide you with an automatic notice when new information has been posted to your report. Don't lose this password! ClearView cannot tell you your password and if you lose your password, you will need to create a new report.

What should I do if I'm not satisfied with the response to my report?

If you are not satisfied with the response to the report you have made through ClearView Reporting System, you can request that any level of senior management, including a member of the Senior Leadership Team and/or CEO, review your report. This means that your anonymity will disappear as you would need to personally contact a member of senior leadership team to explain your concerns. Don't let that be a discouragement. We want you to be confident that ICBC is applying the highest ethical standards in all of its dealings. If having a direct conversation with a member of our Leadership Team team to explain your concerns and hear their response aids in achieving those high standards, we think that giving up your anonymity is worth it.

If you would like to retain your anonymity, you can request the Chair of the Audit Committee review your report (see below).

Reports to the Chair of the Audit Committee

Reports about the CEO, VP Corporate Affairs, Director Risk Management and Corporate Audit, or any reports you want to raise internally but don't feel it's appropriate to raise to any level of management should be sent directly to the Chair of the Audit Committee of the Board via sealed envelope c/o Room 517–151 W. Esplanade, North Vancouver BC, V7M 3H9 (Executive Committee offices). Please do not use the ClearView Reporting System for reports about the CEO, VP Corporate Affairs, or Director Risk Management and Corporate Audit.

It's important you provide as much information as possible so the Chair of the Audit Committee can review your concern in the most efficient manner. Please include all your detailed information, such as specific facts, dates, names, and other pertinent details, in your report. Please indicate in your report if you have already reported your concern to management and/or to ClearView Reporting System and why you are not satisfied with the response(s).

If you would like to be contacted about your report, please ensure you include your name and contact information. The Chair of the Audit Committee of the Board will advise you of the status of the report.

The Chair of the Audit Committee may choose to contact an employee who has reported a concern, assuming s/he has identified her/himself, to follow up on the concern. Also, while the Chair of the Audit Committee is investigating a concern, s/he may contact any ICBC employee to obtain information.

Giving additional information, checking the status or outcome of a report

The ClearView Reporting System generates a unique login ID and password for every report submitted through the website or live telephone reporting session. If necessary, the person designated to investigate your report can conduct a confidential and secure dialogue with you through the website by referring to the unique case number attached to your report. You can at any time check the status of your report and provide additional information by using your login ID and password, all without revealing your identity if you choose to remain anonymous.



How is anonymity maintained?

Every effort has been made to maintain confidentiality of the person making a report. The ClearView Reporting System does not track IP addresses or subscribe to caller ID services. ClearView uses the latest in encryption and security technology including firewalls to ensure their system is secure.

ICBC promises not to track originating phone numbers or IP addresses of reports made from any ICBC location. If you are still concerned, use a private computer or place your phone call from home or a public telephone.

Frequently Asked Questions

Most of your questions can be answered by a comprehensive list of [Frequently Asked Questions provided by ClearView](#).

Topics include:

- making a report
- security and confidentiality
- technology
- compliance Legislation
- ClearView.

Here are some additional questions specific to ICBC:

Will there be any compensation for my reporting a breach that saves ICBC money?

No, ICBC does not compensate employees for reporting any type of concern. An ethical workplace requires every employee's commitment and participation. Financial compensation should not be the reason an employee makes a report.

What if my concern involves my manager? Who do I go to if I'm uncomfortable going to my manager's manager?

The best approach in this situation is for you to talk to a manager that you are comfortable with. You may also contact HR, the Union if you are a bargaining unit employee, a senior leader, or the CEO. If none of these options seem appropriate or you are still concerned after these discussions, you may report your concern through the ClearView Reporting System or make a report to the Chair of the Audit Committee.

I've already reported my concern to my manager and nothing was done ... what do I do now?

First, talk with your manager to understand his or her perspective. It could be the issue was resolved or there was additional information provided that demonstrated there was no ethics breach as far as your manager was concerned. If, after talking to your manager, you still feel strongly there is sufficient evidence to support the existence of a breach, contact a more senior manager in your department or division.

Why are we going outside and using a third party to deal with ICBC issues?

ICBC employees are always encouraged to use internal avenues as their first approach in reporting suspected concerns. However, where the internal options for reporting a concern have been exhausted or are inappropriate, ClearView is a reporting system that enables employees to report concerns in an anonymous and confidential manner. For clarity, ClearView is not an independent investigator function and reports made through ClearView are received by authorized ICBC reviewers who direct an appropriate investigation into the report.



I reported my concern to the ClearView Reporting System and am not satisfied with the outcome. What can I do?

You are encouraged to ask for clarification through ClearView or from the Chair of the Audit Committee. Reporting your concerns to a friend, neighbour, or the media is not appropriate and could be a potential breach of the Code of Ethics, Privacy and Information Security policies.



Appendix 2 — Conflict of Interest Guidelines for Board Members

Every Board member must avoid any situation in which there is, or may appear to be, potential conflict that could appear to interfere with the Board member's judgment in making decisions in the Corporation's best interests.

Disclosure

Full disclosure enables Board members to resolve unclear situations and gives an opportunity to dispose of conflicting interests before any difficulty can arise. A Board member must, immediately upon becoming aware of a potential conflict of interest situation, disclose the conflict in writing to the Board Chair. This requirement exists even if the Board member does not become aware of the conflict until after a transaction is complete.

If a Board member is in doubt whether a situation involves a conflict, the Board member must immediately seek the advice of the Board Chair. If appropriate, the Board may wish to seek legal advice. Unless a Board member is otherwise directed, a Board member must immediately take steps to resolve the conflict or remove the suspicion that it exists.

If a Board member is concerned that another Board member is in a conflict of interest situation, the Board member must immediately bring his or her concern to the other Board member's attention and request that the conflict be declared. If the other Board member refuses to declare the conflict, the Board member must immediately bring his or her concern to the attention of the Board Chair. If there is a concern with the Board Chair, the issue should be referred to the Vice Chair/Lead Director or to the Chair of the Governance Committee.

A Board member is required to disclose the nature and extent of any conflict at the first meeting of the Board after the facts leading to the conflict have come to that Board member's attention. After disclosing the conflict, the Board member:

- Must not take part in the discussion of the matter or vote on any questions in respect of the matter; however, the Board member may be counted in the quorum present at the Board meeting.
- If the meeting is open to the public, may remain in the room, but shall not take part in that portion of the meeting during which the matter giving rise to the conflict is under discussion, and shall leave the room prior to any vote on the matter giving rise to the conflict.
- Must, if the meeting is not open to the public, at the request of the Board, immediately leave the meeting and not return until all discussion and voting with respect to the matter giving rise to the conflict is completed.
- Must not attempt, in any way or at any time, to influence the discussion or the voting of the Board on any question relating to the matter giving rise to the conflict.

Outside Business Interests

Board members must declare possible conflicting outside business activities at the time of appointment. Notwithstanding any outside activities, Board members are required to act in the best interests of the Corporation.

No Board member may hold a significant financial interest, either directly or through a relative or associate, or hold or accept a position as an officer or Board member in an organization that has a relationship with the Corporation, where by virtue of his or her position in the Corporation, the Board member could in any way benefit the other organization by influencing the purchasing,



selling or other decisions of the Corporation, unless that interest has been fully disclosed in writing to the Corporation. A “significant financial interest” in this context is any interest substantial enough that decisions of the Corporation could result in a personal gain for the Board member. These restrictions apply equally to interests in companies that may compete with the Corporation in any of its areas of activity.

Outside Employment or Association

A Board member who accepts a position with any organization that could lead to a conflict of interest or situation prejudicial to the Corporation’s interests, shall discuss the implications of accepting such a position with the Board Chair (or, in the case of the Board Chair, with the Vice Chair/Lead Director or CEO) recognizing that acceptance of such a position may require the Board member’s resignation from the ICBC Board.

¹ *conflict* means a conflict of interest or apparent conflict of interest

² *apparent conflict of interest* means any situation where it would appear to a reasonable person that the Board member is in a conflict of interest situation.



Appendix 3 — Form of Declaration for Board Members

I ACKNOWLEDGE that I have read and considered the ICBC Code of Ethics, including the Conflict of Interest Guidelines for Board Members (Appendix 2 to the Code of Ethics) and as a member of ICBC's Board of Directors, I agree to conduct myself in accordance with the Code of Ethics.

I undertake to review the Code of Ethics from time to time during the term of my appointment and to become familiar with, and to understand the implications of, any changes to the Code of Ethics.

Signature

Name and Title (please print)

Date



Appendix 4 — Form of Declaration for Bargaining Unit Employees

ICBC (or “the Corporation”) is proud of its reputation for applying the highest ethical standards in all of its dealings. As an ICBC employee (including members of the Senior Leadership Team or a member of ICBC’s Board of Directors (referred to as a “Board member” throughout this Code), you are the face of the Corporation and are responsible for upholding its high standards.

Set out below is a policy that applies to all ICBC Board members and employees. Contractors, consultants and others hired by ICBC or who represent ICBC are also expected to adhere to the same high standards ICBC requires of its Board members and employees. If you are responsible for hiring a contractor or consultant, you should inform them of this expectation and provide them with a copy of this Code.

Employees are responsible for being aware of and understanding their responsibilities under the Code of Ethics and any employees who have any doubt or questions concerning any aspect of this policy are encouraged to discuss the matter with their manager. Managers and members of the Leadership Team should direct their inquiries to the parties named in the Code, otherwise, to the VP Corporate Affairs. Board members should direct their inquiries to the Chair of the Board or the Corporate Secretary.

Contravention of this Code of Ethics is a serious matter and may result in disciplinary action which may include dismissal.

I acknowledge receiving the Insurance Corporation of British Columbia’s Code of Ethics (dated December 1, 2018), and I acknowledge that I have read the Code of Ethics. I further acknowledge that I am aware that breaching the Code of Ethics is a serious matter that may result in disciplinary action.

Signature

Name and Title (please print)

Date



Appendix 5 — Form of Declaration for Management Group Employees

ICBC (or “the Corporation”) is proud of its reputation for applying the highest ethical standards in all of its dealings. As an ICBC employee (including members of the Senior Leadership Team or a member of ICBC’s Board of Directors (referred to as a “Board member” throughout this Code), you are the face of the Corporation and are responsible for upholding its high standards.

Set out below is a policy that applies to all ICBC Board members and employees. Contractors, consultants and others hired by ICBC or who represent ICBC are also expected to adhere to the same high standards ICBC requires of its Board members and employees. If you are responsible for hiring a contractor or consultant, you should inform them of this expectation and provide them with a copy of this Code.

Employees are responsible for being aware of and understanding their responsibilities under the Code of Ethics and any employee who has any doubt or questions concerning any aspect of this policy is encouraged to discuss the matter with their manager. Managers and members of the Leadership Team should direct their inquiries to the parties named in the Code, otherwise, to the VP Corporate Affairs. Board members should direct their inquiries to the Chair of the Board or the Corporate Secretary.

Contravention of this Code of Ethics is a serious matter and may result in disciplinary action which may include dismissal.

I acknowledge receiving the Insurance Corporation of British Columbia’s Code of Ethics (dated December 1, 2018), and I agree to adhere to the Code as a condition of my continued employment with the Insurance Corporation of British Columbia.

Signature

Name and Title (please print)

Date



Appendix 6 – Form of Declaration for Contractors Doing Business with ICBC

ICBC (or “the Corporation”) is proud of its reputation for applying the highest ethical standards in all of its dealings.

The ICBC Code of Ethics applies to all ICBC Board members and employees. Contractors, consultants and others hired by ICBC or who represent ICBC are also expected to adhere to the same high standards ICBC requires of its Board members and employees. Contractors are to read and agree that all references to “employees” in the Code of Ethics to include “contractors”.

Contractors are responsible for being aware of, understanding their responsibilities under and adherence to the Code of Ethics. If you have any doubt or questions concerning any aspect of this policy you are encouraged to discuss the matter with your ICBC contact. In addition, contractors are required to ensure that their employees and subcontractors who perform work for ICBC are aware of, understand their responsibilities under and adhere to the Code of Ethics.

Contravention of this Code of Ethics is a serious matter and may result in the termination of your contract with ICBC.

I, on behalf of _____ [Name of contractor if applicable], acknowledge receiving the Insurance Corporation of British Columbia’s Code of Ethics (dated December 1, 2018). I acknowledge that I have read and understand the Code of Ethics, including that all references to “employees” to include “contractors”, I will ensure my employees and subcontractors who perform work under the ICBC contract understand their responsibilities under and will adhere to the Code. Any employee or subcontractor of the contractor who attends ICBC work sites must acknowledge below that they have read, understand their responsibilities under and will adhere to the Code. No contractor, employee or subcontractor of the contractor, will be provided access to ICBC’s work sites unless this acknowledgement is signed below and provided to ICBC prior to access being granted.

I further acknowledge that I am aware that breaching the Code of Ethics is a serious matter that may result in the termination of my/our contract with ICBC.

Signature

Name and Title (please print)

Date

Employee Acknowledgement:

I am an employee of _____ and by my signature below acknowledge that I have read and understand my responsibilities under the ICBC Code of Ethics.

Signature	Name	Date
_____	_____	_____
_____	_____	_____
_____	_____	_____



Appendix 7 — Conflict of Interest and Post Employment Restrictions

In addition to the conflict of interest provisions contained in this Code, the language set out below shall be incorporated in the employment agreements of all employees at the Director level and above:

Conflict of Interest—Post-Employment Restrictions

1. In this clause, “confidential information” means information that is unavailable to the public; “outside entity” means a person or entity other than a public sector employer as defined in section 1 of the Public Sector Employers Act.
2. ICBC and the Employee agree that, given ICBC’s position as a Crown Corporation, real or apparent conflicts of interest must be avoided.
3. The following are conditions of the Employee’s employment with ICBC:
 - a. After the Employee’s employment ends, the Employee must not disclose confidential information obtained through their employment;
 - b. If the Employee has substantial involvement in dealings with an outside entity at any time during the year immediately preceding the end of his/her employment then, for a year after the end of his/her employment, the Employee must not:
 - i. Accept an offer of employment, an appointment to the Board of Directors or a contract to provide services to that outside entity;
 - ii. Lobby or otherwise make representations for that outside entity to ICBC; or,
 - iii. Give counsel to that outside entity, for its commercial purposes, concerning the programs or policies of ICBC.
 - c. Until one year after the termination of this Agreement, the Employee:
 - i. Must not lobby or otherwise make representations for any outside entity to ICBC; or
 - ii. Act for an outside entity in connection with any ongoing proceedings, transaction, negotiation or case in which the outside entity and ICBC are involved:
 - a) If, during his/her employment with ICBC, the Employee, acted for or advised ICBC concerning the proceedings, transaction, negotiation or case; and,
 - b) Acting for the outside entity in that connection would result in the receipt by the outside entity of a private or commercial benefit or of any benefit not for general application.
 - d. The Vice President of Corporate Affairs, in consultation with the Chief Executive Officer, may, at their sole discretion, reduce the one-year restriction, upon application by the Employee, after considering the following:
 - i. The circumstances under which employment ended;
 - ii. The Employee’s general employment prospects;
 - iii. The significance to ICBC of the information the Employee possessed by virtue of his/her position with ICBC;
 - iv. The desirability of a rapid transfer of the Employee’s skills to an employer other than ICBC;

- v. The degree to which the new employer might gain unfair commercial advantage by hiring the Employee;
- vi. The authority and influence possessed while employed by ICBC;
- vii. The disposition of other cases; and
- viii. Any other factors the VP of Corporate Affairs considers relevant.

