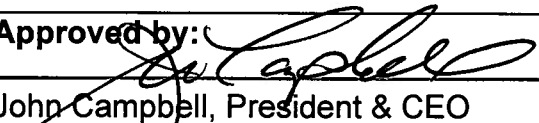




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<b>HR Guideline:</b> Gifts	<b>Guideline #:</b> 6
<b>Effective Date:</b> November 26, 2007	<b>Approved by:</b>  John Campbell, President & CEO

### Guideline

Waterfront Toronto recognizes and appreciates that vendors and contractors want to show their appreciation to the employee's of Waterfront Toronto.

Consistent with WT Code of Conduct however, vendors and consultants should be discouraged from providing gifts to show their appreciation. Please refer to the excerpt from the WT Code of Conduct noted below:

- a) All those who do business with the Corporation as contractors or service providers (including consultants, suppliers, advisors and independent managers) have access to the Corporation on equal terms.
- b) Employees shall not solicit or accept benefits, entertainment or gifts of any kind (including cash, preferred pricing, preferred loans, securities or secret commissions) or any other direct or indirect benefit as a condition of the exercise of their duties or as an inducement for performing an act associated with their duties or in exchange for preferential treatment.
- c) Employees may accept modest gifts, hospitality or other benefits associated with the Employee's official duties and responsibilities if such gifts, hospitality or other benefits:
  - i) are within the bounds of propriety, a normal expression of courtesy or are within the normal standards of hospitality;
  - ii) would not bring suspicion on the Employee's objectivity and impartiality; and
  - iii) would not compromise the integrity of the Corporation.
- d) Entertainment and similar things (such as business lunches, the exchange of modest items between business associates, the presentation of small tokens of appreciation at the public function or an expensive memento) should be reasonable and never lead to a sense of obligation. As a rough guide, Employees should not accept any entertainment that could not be justified on the



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Corporation's expense statement if the Employee were providing or offering such entertainment rather than receiving it.

- e) Unless they have obtained the approval of the Chief Executive Officer, employees may not accept free airfare or accommodation from any firm or organization associated with the Corporation or from any provider of goods or professional or other services to the Corporation.
- f) Inappropriate gifts that are received by an Employee should be returned to the donor together with a letter making reference to this Code.
- g) Any Employee experiencing or witnessing conduct contravening or not in compliance with the letter and spirit of this Code, or having reasonable grounds for believing that such conduct has occurred, must immediately report the incident to the Chief Executive Officer or the Chair of the Governance Committee.
- h) In any instance where there is doubt whether particular conduct complies with this Code, full and immediate disclosure to the Chief Executive Officer or the Chair of the Governance Committee will indicate good-faith compliance with this Code.

This confirms that all employees are required to sign the Code of Conduct annually.

### **Application**

This guideline is applicable to all full-time permanent employees and full-time contract employees working for Waterfront Toronto.

### **Responsibilities:**

#### **Management Team:**

The Management Team needs to continually remind employees, vendors and suppliers of WT guidelines surrounding the receipt of gifts.



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Employees:

Employees need to ensure that any gifts given are either taken to their VP's for donation to selected charitable organizations or returned to the contractor or vendor. A letter to the contractor or vendor should be attached to the gift explaining that as we are funded by the governments it is not appropriate to accept this gift.