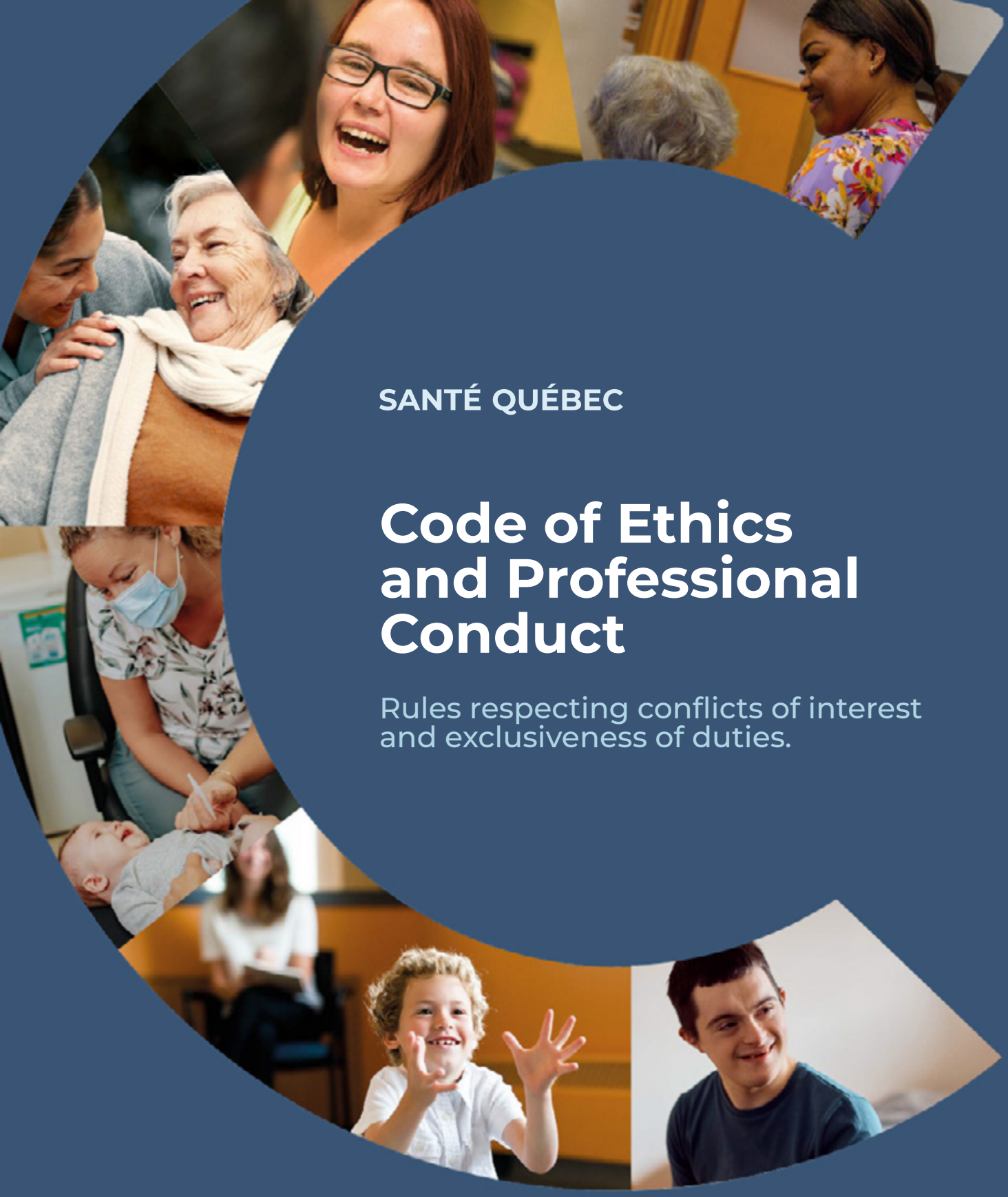

SANTÉ QUÉBEC

Code of Ethics and Professional Conduct

Rules respecting conflicts of interest and exclusiveness of duties.

Code approved by the Board of Directors,
Direction de l'éthique et de la conformité

Québec
Santé Québec

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Preamble

Santé Québec is a state-owned enterprise that provides the Quebec population accessible, high-quality healthcare and social services suited to individual needs. It operates within a rapidly evolving environment in which public trust and quality care are essential. As such, every decision made by members of Santé Québec directly influences the users' experience and the credibility of the healthcare system.

This Code outlines the principles and expected behaviors of all individuals who work for Santé Québec or participate in its mission. It is based on the five organizational values set out in the *Planification stratégique de Santé Québec (2025-2028)*: **respect, commitment, collaboration, compassion and excellence**. These values reflect how we aim to act on a daily basis, both with users and in our working relationships.

The objective of this Code is to provide clear guidelines to support decision-making, encourage consistent practices across the network and help address complex situations that may arise in the provision of care and services. It also aims to reinforce a shared understanding of every person's ethical responsibilities.

It invites ongoing reflection on how to act with integrity, transparency and accountability. It acknowledges the importance of local realities and the expertise of people who work in the institutions, while aligning with a shared vision for the entire health system.

By adopting and implementing these principles, every member of Santé Québec contributes to improving the operation of the health system, maintain public trust and provide the care and services that fully reflect our mission.

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1. Definitions

Any term not specifically defined in this section shall be interpreted based on its ordinary meaning, unless an act, a regulation or the context specifies otherwise.

a) **External activity:** any activity performed outside Santé Québec, with or without financial compensation, for a legal person, corporation, business or for-profit or not-for-profit organization (e.g., serving on a Board of Directors, teaching, holding another job, directing a business or being self-employed, volunteering with an organization, conducting research activities and other similar roles).

b) **Advantage:** any benefit, for oneself or for others, that constitutes or provides a material or moral advantage, such as a present, gift, hospitality, sum of money, loan, repayment of a debt, compensation, advance, service, commission, reward, consideration, remuneration, recompense, financial gain, indemnity, discount, trip, promise of future benefit, job offer, special favour or anything of a similar nature.

c) **Code:** this *Code of Ethics and Professional Conduct*.

d) **Conflict of interest:** any situation in which the personal interests of a member of Santé Québec, or the interests of their relatives create a tension with that member's obligations and responsibilities toward Santé Québec, the users or the public. This tension may compromise, or appear to compromise, the member's capacity to perform their duties objectively, impartially and effectively.

A conflict of interest covers a wide range of situations in which the decisions or actions of a Santé Québec member may be influenced by the existence of multiple or conflicting interests. These interests are not limited to direct or indirect personal benefits or gains. They can also include disadvantages or pressures likely to affect the judgment, independence or impartiality of the Santé Québec member.

- **Real conflict of interest:** a situation in which personal interests influence or compromise a member's ability to act objectively, impartially and effectively.
- **Apparent conflict of interest:** a situation that may not be real but is perceived as such by the public or stakeholders. The mere appearance of a conflict of interest is sufficient to undermine confidence in the integrity of the decision-making process.
- **Potential conflict of interest:** a situation that has not yet arisen but could occur in the future, depending on the evolution of the member's roles, relationships, or interests.

e) **Conduct:** refers, here, to professional conduct, that is, the duties and obligations that individuals are required to uphold in their work. Failure to comply with these obligations may result in sanctions.

f) **Ethics:** both a reflection on appropriate conduct and an approach integrated at all levels of an organization. At Santé Québec, it is related to the principles that guide individual behaviours, interpersonal relationships and organizational decisions. It aims to support individuals in handling the pressures and dilemmas related to the functions of their office by fostering a culture of accountability, integrity and discernment.

g) **Interest:** a direct or indirect benefit or advantage (commercial, philanthropic, financial, non-pecuniary), sought for oneself, a third party or an organization; may be related to information, influence or power.

h) **Santé Québec member:** any individual who works for or contributes to Santé Québec. This includes but is not limited to employees, healthcare and social services professionals, students, interns, medical residents, intermediate and senior officers, senior administrators and officer physicians, members of an institution's board of directors, volunteers and members of Santé Québec's executive and operational management. It also includes any other person who contributes to the fulfilment of Santé Québec's missions, whether or not they are remunerated by Santé Québec.

i) **Member of Santé Québec's executive management:** the President and Chief Executive Officer and the vice-presidents of Santé Québec.

j) **Member of Santé Québec's operational management:** the assistant vice-president, president and executive directors and assistant president and executive directors of Santé Québec institutions.

k) **Partners:** all suppliers, partners and organizations, as well as their representatives, shareholders, affiliated corporations, directors, employees and subcontractors, regardless of rank, and any self-employed individuals who provide goods or services to Santé Québec or who have commercial or business relations with Santé Québec. This term also includes potential tenderers, regardless of rank. Business relations include any verbal or written exchange between Santé Québec and these partners.

l) **Close relative:** a spouse, child, parent, brother or sister of an individual, as well as any person closely related to that individual. Also includes the spouse and children of those listed above, as well as an associate.

m) **User:** any person who is receiving, has received or requires healthcare or social services from a Santé Québec institution, as an inpatient or outpatient. This also includes individuals living in a facility (residents).

n) **Value:** a fundamental belief or conviction of marked importance and great significance for individuals, which guides ethical reflection on what is appropriate to do in the circumstances.

2. Application framework and scope

The Code establishes a shared ethical framework to guide professional and partner interactions within Santé Québec and the institutions.

It constitutes the principal ethical standard at Santé Québec and always applies to all Santé Québec members, including during telework, and takes precedence over any other ethical framework adopted by the organization. While it cannot address every situation, it requires the exercise of judgment and the application of values and principles with excellence, transparency and accountability.

Each Santé Québec institution is responsible for ensuring the Code's implementation and application.

Members of Santé Québec are required to comply with the Code and commit to upholding it, in particular by:

- adopting responsible, committed and caring conduct, including in the application of the rules in effect;
- seeking appropriate guidance when circumstances require it;
- taking all necessary measures to understand the nature and scope of the obligations set out in the Code;
- commit to upholding the values of Santé Québec and the Code, and formalize this commitment by signing an undertaking at the start of employment and/or when requested to do so;
- promptly report any problematic situation, whether real or potential.

The Code also requires the managers and employees of the intermediate resources referred to in section 544 of the *Act respecting the governance of the health and social services system* (CQLR, c. G-1.021) to comply with the expected practices and conduct in their interactions with the users, with the required adaptations. Moreover, any person who intervenes with users is also required to comply with the expected practices and conduct, as defined in this Code and its supplementary frameworks.

Santé Québec expects everyone related to the organization to comply with the applicable laws and to behave in accordance with the values and principles set out in this Code, as well as with the rules of conduct that govern their relationship with the organization.

When a Santé Québec member is subject to standards of conduct, under the *Professional Code* (CQLR, c. C-26), for example, they must maintain their professional independence and uphold their responsibilities with regard to conflicts of interest; the Code applies in complement to those requirements.

3. Legal framework

The Code is governed by (non-exhaustive list):

- *Charter of Human Rights and Freedoms* (CQLR, c. C-12)
- *Charter of the French Language* (CQLR, c. C-11)
- *Civil Code of Québec* (CQLR, c. CCQ-1991), preliminary provision and sections 3, 6, 7, 302, 761, 1817 and 2088, hereinafter the CCQ.
- *Act respecting the governance of the health and social services system* (CQLR, c. G-1.021) (AGHSSS)
- *Act respecting the governance of state-owned enterprises* (CQLR, c. G-1.02)
- *Act respecting health and social services information* (CQLR, c. R-22.1)
- *Act respecting contracting by public bodies* (CQLR, c. C-65.1)
- *Act to facilitate the disclosure of wrongdoings relating to public bodies* (CQLR, c. D-11.1)
- *Anti-Corruption Act* (CQLR, c. L-6.1)
- *Act respecting labour standards* (CQLR, c. N.1.1)
- *Act respecting end-of-life care* (CQLR, c. S-32.0001)
- *Act to establish the cultural safety approach within the health and social services network* (CQLR, c. A-20.1.1)
- *Act to recognize and support caregivers* (CQLR, c. R-1.1)
- *Lobbying Transparency and Ethics Act* (CQLR, c. T-11.011)
- *Sustainable Development Act* (CQLR, c. D-8.1.1)
- *Act respecting the laicity of the State* (CQLR, c. L-0.3)

4. Ethics at Santé Québec

Ethics is at the heart of Santé Québec's public mission. It guides behaviours and decisions at all levels of the organization, in complement to the law and codes of conduct. It encourages us to put the human being at the centre of every action, considering personal consequences and the consequences for the users and their close relatives for the teams, for the organization and for society.

Acting ethically means acknowledging the complexity of situations and their social, cultural and relational dimensions and fostering dialogue among those concerned. Ethics is not limited to applying rules: it relies on a shared reflection, discernment in the face of dilemmas and engagement with the public interest.

Santé Québec proposes five areas of engagement that translate the principles of the Code into concrete guidelines to guide behaviours, support reflection and foster a culture of ethics that is shared at all levels of the organization.

To support this ethical stance in daily activities, Santé Québec advocates the integration of ethics expertise within each team, to offer readily available support to Santé Québec members. This expertise helps strengthen the teams' ethical capacities, support complex decisions and establish spaces of open, compassionate dialogue where different points of view can meet, issues can be clarified and decisions can be made in a way that is equitable, explicit and respectful of people and principles.

4.1. Putting people first in our decision-making

Ethics invites us to consider people in their uniqueness, to consider the repercussions of our actions and choices and to behave in accordance with the values of dignity, respect and solidarity. It exhorts us to reflect on the consequences of our actions for individuals, teams, the organization and society.

4.2. Cultivating ethical vigilance every day

At Santé Québec, ethics is enacted as a stance: a way of being and acting that is rooted in vigilance, openness and critical reflection. This stance can anticipate tensions, recognize areas of uncertainty and support decisions in the complexity of day-to-day practices. It helps establish a climate of trust, accountability and safety.

4.3. Building ethical leadership

Santé Québec acknowledges the importance of strengthening the ethical competence of every person, whatever their role. Ethical leadership depends on openness, personal and collective reflection, sincere consideration of others and the commitment to improve practices. It is expected of everyone, in daily actions and strategic decisions.

4.4. Navigating dilemmas with discernment

Members of Santé Québec are regularly confronted with complex situations where values may clash. These ethical dilemmas can occur in a variety of circumstances, such as when:

- making choices related to the use of limited resources;
- considering a technical innovation that raises questions about data protection or equitable access;
- balancing individual freedoms with collective safety, particularly in the psychiatric or public health context;
- seeking to establish effective interprofessional collaboration that includes users and their close relatives;
- determining the best interests of a child or youth in a complex family situation;
- encouraging both the autonomy and the safety of vulnerable people;

- considering a real estate or development project that optimizes flows and safety but involves compromises for other services or for the physical access of certain clients;
- applying management principles that seem to contradict the values of care.

Rules or protocols do not always provide simple answers to such situations. In these cases, an ethical approach is essential: it allows us to understand the standards at play, question their application, recognize their limits and come to decisions based on justice, clarity and respect for the people concerned.

Santé Québec encourages the use of structured individual or collective ethical reflection approaches to support decision-making in these situations. These approaches can be supported by discussion, committees or specialized resources, to bring perspectives together, clarify issues and foster shared, justifiable decisions.

4.5. Promote a culture grounded in open dialogue and mutual trust

Beyond complex situations and dilemmas, the quality of care, service and work settings depends on an organizational culture rooted in respect, listening and collaboration. It is essential to create spaces where everyone can express themselves freely, be heard without fear of being judged and contribute to ongoing ethical reflections. These places of dialogue encourage the recognition of diverse perspectives and reinforce trust among the participants.

5. Users' rights

Santé Québec recognizes the users' fundamental rights, as well as their economic and social rights:

- Fundamental rights, such as dignity, autonomy, safety and respect, are universal and inalienable. They must be protected in all direct or indirect interactions, by providing an environment that is free of discrimination and harassment.
- Economic and social rights concern equitable access to services, the quality of support and the material conditions in which the care is provided. Their implementation depends on legislative and regulatory provisions, as well as the availability of human, material and financial resources.

Respect for users' rights relies on a coordinated and reciprocal approach that also recognizes the rights of Santé Québec members. This dynamic promotes a care and work environment that is healthy, equitable and safe for everyone.

5.1. Right to be informed about the available services and resources and modes of access

Every person is entitled to be informed of the existence of health and social services and resources available in their community and of the terms governing access to them.

5.2. Right to receive scientifically, humanly and socially adequate services, with continuity and in a way that is personalized and safe

Everyone has the right to receive healthcare and social services that are appropriate, continuous, personalized and safe from scientific, human and social perspectives.

5.3. Right to choose the professional or institution

Every person is entitled to choose the professional and the institution from whom or which they wish to receive healthcare or social services. They are also entitled to receive such services in person. However, nothing limits a professional's autonomy to agree or refuse to treat a person.

5.4. Right to receive the care required in the case of danger to life or integrity

Every person whose life or bodily integrity is endangered is entitled to immediately receive the required care and services. Every institution must, when requested, ensure that such care is provided.

5.5. Right to information about their health and the available options, including in the event of an accident

Users are entitled to be informed of their state of health and well-being, so as to know, as far as possible, the options open to them and the consequences and risks generally associated with each option before consenting to care and services.

They are also entitled to be informed of accidents that occur during the provision of services that had actual or potential consequences for their state of health or well-being and of the corrective measures taken, if any, regarding such consequences, or to prevent such an accident from recurring.

5.6. Right to free and informed consent to care

No person may be made to undergo care of any nature, whether for examination, specimen taking, treatments or any other intervention, except with their consent. Consent to care or authorization to provide care is to be given or refused by the user or, where applicable, their representative or the court, in the circumstances and manner provided for in articles 10 and following of the Civil Code.

5.7. Right to participate in decisions concerning their health or well-being

Users have the right to take part in decisions that affect their health and well-being, including the development and modification of their care and service plan.

Santé Québec's institutions have the duty to foster the autonomy and accountability of users regarding their own health, to recognize their contribution to the care and services received and to respect the knowledge that stems from their experience.

5.8. Right to be accompanied and assisted by a person of their choosing

Every user is entitled to be accompanied and assisted by the person of their choice when they wish to obtain information or take steps in relation to any service provided by an institution, or on its behalf, or by any professional practising within the institution.

5.9. Right to be represented by a close relative or mandatary in case of incapacity

A user's recognized healthcare rights must be upheld even when the person is incapable of consenting to care, managing their property or taking care of their person. In these situations, their rights can be exercised by a representative, in accordance with the legal provisions in effect. The following people are presumed to be representatives, according to the priorities provided for in the Civil Code:

1) the person with parental authority or the tutor of a user who is a minor;

2) the tutor, spouse or close relative of an incapable user of full age;

3) the person designated by a protection mandate established before the incapacity;

4) a person who demonstrates a special interest in the user.

The representative must always act solely in the user's best interests, complying, to the extent possible, with the wishes that the user expressed before their incapacity.

5.10. Right to accommodation until an equivalent solution is available

No institution may cease to accommodate a user who has been discharged from one of its centres unless their condition allows their return home or integration into a home, or unless their admission to another centre, a facility or an intermediate resource or family-type resource is assured where the user will be able to receive the services required by their condition.

Subject to the foregoing, a user must leave the centre operated by the institution that is providing lodging services immediately upon discharge in accordance with the provisions of the regulation made under section 386 of the AGHSSS.

5.11. Right to receive services in English or another language

English-speaking persons are entitled to receive healthcare and social services in the English language, in keeping with the organizational structure and human, material and financial resources of the institutions providing such services and to the extent provided by an access program referred to in section 415 of the AGHSSS.

Every Santé Québec institution must also facilitate, taking resources into account, accessibility to healthcare and social services in their own language for members of the various ethnocultural communities of Québec, as well as for Indigenous people, when the situation so requires (section 408, AGHSSS).

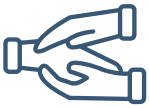
5.12. Right to the observance of professional secrecy, confidentiality and access to healthcare and social services information

Users have the right to the observance of professional secrecy and the confidentiality of their personal information.

This information cannot be disclosed to unauthorized individuals, other than with the consent of the user or their legal representative or in certain circumstances provided for by law.

Users also have the right to access their health information and social services information, subject to legislative exceptions governing this right of access. This right includes the possibility of receiving help from a professional to understand this information. A user who wants access to their health information and social services information can be referred to the medical archives service of the institution that holds the desired information. The medical archives service will ensure that it applies the legislative provisions that govern the right of access to healthcare and social services information.

5.13. Rights related to palliative care, end-of-life care and medical aid in dying



Every person at the end of life has the right to palliative care and services adapted to their condition, provided with compassion, courtesy and fairness, in a spirit of respect and open and transparent communication with the interprofessional team. This care, whether offered in an institution, at home or in a palliative care hospice, aims to relieve suffering, preserve the person's dignity and respect their wishes until the end of life.

The person can, at any time, refuse care or withdraw their consent, including for life-sustaining care. These decisions must be free and informed, made after receiving the necessary information, and can be made by the person or, where necessary, by their legal representative, in accordance with the laws in effect.

Some rights may also be exercised in advance, through advance medical directives, which must be upheld when the person's condition no longer allows them to express their wishes. This includes, where applicable, the advance expression of consent to medical aid in dying, under the conditions set out by law.

5.14. Right to pursue a remedy and be informed about users' rights and the complaints examination regime

Every user, or their successors, conserves the right to exercise recourse against Santé Québec, a public or private institution, an intermediate or family-type resource, their directors, employees or attendants or a professional for a professional or other fault. This right is protected by the law and in no case may [this right] be waived.

The user has the right to be informed in clear and accessible language about their rights and their obligations. Every Santé Québec institution has the obligation to communicate and actively promote this information, as set out in the AGHSSS, including by publishing the applicable procedure.

Anyone who submits or plans to submit a complaint has the right to do so without fear of reprisals.

6. Practices and expected behaviour toward the users

Members of Santé Québec must respect the users' rights and ensure that these rights are upheld in the decisions, processes and communications that influence the users' experience.

Santé Québec recognizes cultural diversity, traditional knowledge and the historical and social realities specific to the First Nations and Inuit. In accordance with the *Act to establish the cultural safety approach within the health and social services network* (CQLR, c. A-20.1.1), Santé Québec members must pay special attention to the needs, expectations and experiences of First Nations and Inuit users by providing respectful, culturally safe support that is free of any form of discrimination or stigmatization. This means considering cultural, social and territorial specificities in actions and decisions, fostering dialogue and collaboration with the communities and their representatives and adapting practices where required.

6.1. Respect, dignity, civility and humanism

At all times, members of Santé Québec must demonstrate courtesy, compassion, respect and objectivity, in order to establish relationships based on trust, equity, inclusion and transparency. They must recognize and protect the dignity of every user, ensuring that their actions, attitudes and words help maintain the users' integrity, autonomy and self-esteem. Members of Santé Québec must offer care and services without discrimination and with respect for the principles of the laicity of the State.

6.2. Professionalism, impartiality and appropriate boundaries

Members of Santé Québec uphold a professional standard in all interactions with users, demonstrating sound judgment in both their conduct and their communications. They maintain appropriate professional boundaries to prevent any degree of closeness or familiarity that could compromise their impartiality or erode trust in the care relationship.

Communications must take place through official channels only and must not include private exchanges on social media, except where clinically justified. Members of Santé Québec refrain from forming personal, romantic, or sexual relationships for the duration of the professional relationship and avoid discussing personal matters in the presence of users.

6.3. Professional secrecy and confidentiality

Members of Santé Québec must maintain professional secrecy and the confidentiality of the users' personal information, ensure that all communications are secure and legitimate and avoid any informal discussion concerning users, their close relatives or clinical situations, even without mentioning names. The use of the users' image, through photography or recording, requires explicit consent and a purpose that aligns with Santé Québec's mission.

This rule applies subject to the exceptions provided for by law, including in the case of serious and imminent danger or maltreatment.

6.4. Communication

Members of Santé Québec are expected to foster positive relationships, active listening and constructive dialogue, especially in sensitive situations. They must make sure that the user understands the information related to their care and services, by adjusting their vocabulary and means of communication to the user's needs and by taking the time to answer the user's questions. When required, they must facilitate access to services in another language, including for English-speaking people and people from ethnocultural or Indigenous communities, to the extent of the resources and programs available.

6.5. Safety, health and well-being

Members of Santé Québec must take all necessary measures to ensure the users' safety. They must adopt behaviours free from violence, intimidation or harassment, and they must intervene in situations as required. Any restrictive measure, such as a physical intervention, must be used as a last resort and must be proportionate and compliant with the laws and policies in effect. Members of Santé Québec must also respect the users' privacy during care and adapt their practices to the users' needs to ensure their well-being.

6.6. Participation, consent and self-determination

Members of Santé Québec must foster the active participation of the users in decisions related to them, including the development and review of their intervention plan. Before any intervention, they must obtain free, informed and ongoing consent, except in an emergency, without pressure or constraint. They must recognize the experiential knowledge of the users and their close relatives, respect the wishes and choices expressed, including the right of refusal, and encourage the user to fulfil their potential, considering their pace, strengths and limitations.

6.7. Continuity of care and transitions

Members of Santé Québec must provide continuity of care and services at transition points (transfers, changes of service providers or living environment, discharge, etc.), appropriately document the relevant information and ensure that the user and their close relatives understand the instructions related to these transitions. They must also support access to external resources when required.

6.8. End-of-life and palliative care

Members of Santé Québec must present the entire offer of palliative and end-of-life care services so that the user can make a free and informed decision. They must comply with advance directives, encourage the presence of close relations and provide moral and physical support to people at the end of life and to those who accompany them. They must be considerate of rituals and cultural practices within the limitations of the available resources and means.

6.9. Dissatisfaction, complaints and absence of reprisals

Members of Santé Québec must inform the user of the possibility of filing a complaint or expressing dissatisfaction, explain the conditions for doing so, guide the user to the appropriate mechanisms, if required, and refrain from any form of reprisals. They must also demonstrate real openness to hearing about the user's dissatisfaction or their comments and actively cooperate to find a satisfactory solution.

7. Rules of conduct for users, close relatives, representatives and visitors

Users, their close relatives, their representatives and visitors are expected to comply with the laws, regulations and standards in effect in Québec and Canada.

Santé Québec recognizes that the quality of care and services relies on a relationship of mutual trust between these individuals and Santé Québec members, particularly the members of their caregiving team.

Accordingly, they have not only rights but also essential responsibilities toward members of Santé Québec, other users, and the proper operation of the institutions.

The rules of conduct below apply to all the people mentioned above, as appropriate for their role and situation.

These rules can be adapted to local and cultural realities by Santé Québec institutions.

7.1. Actively participate in the care and services

This responsibility mainly concerns users and, as appropriate, their close relatives or representatives. It implies:

- communicating honestly and openly with healthcare and social services professionals;
- providing complete and accurate information regarding their health condition;
- asking questions in order to fully understand the proposed healthcare and social services and expressing their preferences or concerns;
- actively participating in their care;
- participating in the development of their intervention plan and clearly stating their needs and expectations;
- encouraging their close relatives to participate in their care and services;
- being responsible for their personal belongings, money and valuables, other than those taken into the custody of the institution.

This participation must respect the expertise of the physicians and all other healthcare and social services professionals, in a spirit of cooperation and mutual trust.

This participation is essential to ensure the quality and safety of care.

7.2. Maintain a courteous and respectful attitude

A courteous, respectful and non-violent attitude is expected toward all members of Santé Québec and other users. This includes:

- respecting every person's dignity, physical and psychological integrity;
- not engaging in actions or words that are aggressive, intimidating, discriminatory, insulting, indecent or of sexual nature, in person or virtually;
- recognizing the role and responsibilities of the staff in the provision of care and services;
- communicating relevant information about their state of health and asking questions that support informed decision-making;
- protecting the confidentiality and privacy of the other users and the staff,
- including in digital communications and on social media;
- respecting the rights and property of others.

Any behaviour that undermines respect for or the safety of the staff may lead to appropriate measures to ensure a safe and respectful care and service environment. No form of violence will be tolerated.

7.3. Use the services responsibly and judiciously

The responsible use of healthcare and social services is expected. This implies:

- keeping scheduled appointments or providing notice if unable to attend;
- following the professionals' recommendations, to the extent possible;
- using the services with discernment, avoiding repeated, abusive or non-essential demands;
- using emergency services only in the event of true need;
- providing the contact information of a designated person for assistance or representation, when necessary and available.

The responsible use of resources ensures equitable access to care and services for everyone and supports the network's capacity to meet the needs of the public.

7.4. Comply with institutional rules

The operational rules in each institution must be respected. As such, everyone is expected to:

- comply with safety, infection prevention and confidentiality instructions;
- comply with the terms of admission, registration and discharge;
- use premises, equipment and materials appropriately;
- comply with rules related to tobacco, smoking, visiting hours and number of visitors;
- take care of items provided by an institution;
- express their opinion or file a complaint using the mechanisms in place;
- pay accommodation contributions by the expected time limit, where applicable.

8. Rules of conduct for the members of Santé Québec

The following rules apply to Santé Québec members. They constitute the shared foundation of the behaviours expected in all Santé Québec work settings and activities.

8.1. Uphold the laws and all other provisions, including regulations and guidelines

Members of Santé Québec are required to uphold the law and all other provisions, including the regulations and guidelines in effect, intended to protect users, ensure high-quality care and services and provide a fair and safe work environment. They must also comply with policies, procedures and internal guidelines within the institution where they carry out the functions of their office to respond to specific situations encountered during their professional activities. Santé Québec members are also encouraged to uphold the values and principles that undergird these laws with discernment and as suited to the situation.

8.2. Act with loyalty and restraint

8.2.1. Act with loyalty

Members of Santé Québec must always act with loyalty toward Santé Québec and its institutions, including during external activities.

Loyalty prohibits, in particular, using the name, status, role or position held within Santé Québec to solicit anyone, obtain a personal advantage, unduly favour a third party or inappropriately influence professional, administrative or contractual relationships.

This obligation of loyalty **continues at the end of employment or the expiry of a mandate**, to the extent required to avoid compromising the integrity of the organization and public trust in it. As such, a former member must refrain from using their former role, status or internal relationships and contacting or influencing current members in a way that could obtain an improper advantage for themselves or a third party, circumventing established processes or creating a real, apparent or potential conflict of interest arising from their former role.

This obligation must be carried out in accordance with the professional independence of each discipline, as well as the laws protecting freedom of expression and governing the disclosure of wrongdoings.

8.2.2. Communication in the name of Santé Québec

Members of Santé Québec must avoid participating, directly or indirectly, in activities, making statements or engaging in behaviours that could undermine the image, reputation or credibility of Santé Québec or any of its institutions, particularly when such actions could compromise the trust of partners or the public (for example, corruption).

Members of Santé Québec must demonstrate caution, good judgment and professionalism in the use of the Internet, traditional media and social networks. In the event of uncertainty, Santé Québec members should refer to the teams in charge of brand image and communications.

8.2.2.1. Prohibition against speaking on behalf of Santé Québec without authorization

Members of Santé Québec must avoid speaking on behalf of Santé Québec or any of its institutions (or giving the impression of doing so), unless explicit authorization has been granted for that purpose. Any statement likely to be perceived as institutional must be made exclusively by the designated spokespeople or through the appropriate mechanisms.

8.2.2.2. Advance authorization for any institutional publication

Members of Santé Québec must obtain prior authorization before publishing any content that could be interpreted as coming from Santé Québec, carried out as part of the functions of their office or likely to be associated with the organization.

8.2.3. Political neutrality

In performing the functions of their office, members of Santé Québec must set aside their opinions, beliefs or political affiliations and carry out their responsibilities with objectivity, independence, loyalty and equity, in the interests of the public and in accordance with the applicable laws and policies.

This obligation does not deprive Santé Québec members of their rights and freedoms as citizens. Subject to the provisions of this Code and the applicable laws, they can be members of a political party, participate in political activities or make political contributions in accordance with the law. They must, however, refrain from taking any public position or participating in any activity that could compromise the impartial exercise of their duties or create an appearance of conflict between their political interests and their professional responsibilities.

The extent of the obligation depends on the functions performed, the hierarchical level, the public visibility of the position held and the member's real or perceived influence. Increased restraint may be expected, for example, for members of Santé Québec's executive or operational management and any members whose reputation or professional credibility is likely to amplify the weight of their statements or actions.

Assessment of compliance with this obligation considers the overall circumstances, including the context, the content and the means of disseminating the statements or actions in question.

8.3. Protect confidential information and personal information at all times

8.3.1 Maintain confidentiality

The data and information systems held by Santé Québec, whether related to personal information, healthcare and social services information, organizational information, technical, administrative, financial or strategic information or any other internal information, in any form (electronic, written or other), which, by their nature or under a legislative provision, constitute strategic assets.

Members of Santé Québec are bound by the confidentiality of such information, in accordance with its nature, characteristics and value. Members of Santé Québec have a duty of absolute confidentiality, in the following situations but not only these situations:

- Industrial, financial, commercial, technical or scientific information belonging to Santé Québec, the disclosure of which could cause harm to the organization.
- Information provided by third parties and handled confidentially.
- Personal information, including information related to healthcare and social services information and personal information concerning staff members.
- Information which, if communicated, could undermine an investigation, legal proceedings or negotiations.

Members of Santé Québec undertake to protect all the information to which they have access in the functions of their office, maintain its confidentiality, integrity and security, and uphold all obligations related to the governance of personal information, documentary management, information security and cybersecurity.

As such, members of Santé Québec must:

- limit the access, use, communication, conservation and destruction of information to what is strictly necessary;
- use only the platforms, systems, technologies and tools authorized by Santé Québec;
- appropriately file documents and follow the applicable documentary management rules, including conservation schedules;
- demonstrate vigilance, both on-site and while teleworking, to prevent any breach of confidentiality, security or integrity of information;
- refrain from obtaining, trying to obtain, viewing or disclosing information that is not required to perform the functions of their office or for which they are not duly authorized;
- immediately report, using the procedures in effect, any confidentiality or information security incident, as well as any situation in which there are reasonable grounds to believe that such an incident has occurred or may occur.

This commitment to confidentiality and protection of information persists after the end of their employment or the expiry of a mandate.

8.3.1.1. Rules of use concerning users' personal information

Institutions may use certain contact information for users (name, address, phone number, email and other means of contact) to conduct surveys to evaluate the experience and health and social needs of the communities served. This use must be carried out thoughtfully, responsibly and in compliance with laws, limiting the data collection to relevant information, ensuring anonymity when possible and applying measures to ensure the confidentiality and security of the data. Only duly authorized people can access this information. Users may, at any time, request that their information no longer be used for survey purposes, and the institutions must allow them to exercise this right.

8.4. Act with transparency, honesty, probity and integrity

Members of Santé Québec must, at all times, demonstrate transparency, uprightness and integrity. This implies sharing complete and accurate information with colleagues, the organization, the users and the public, in order to improve processes, care and services, including, for example, declaring accidents that occur with the user or in the performance of work.

Honesty also implies refraining from participating in acts of fraud, corruption or the abuse of trust, so that Santé Québec can carry out its mission and achieve its goals in keeping with the principles of proper management of public funds, which reinforces public trust and protects the integrity of Santé Québec.

This requirement is demonstrated through:

- refusing to offer or accept any illicit or improper payment, to or from a user, partner, Santé Québec member or any other person, in order to obtain an improper advantage or favourable treatment or to benefit from a business opportunity;
- reporting immediately to their direct supervisor any corruption or extortion scheme or any attempt thereof;
- actively promoting a culture of integrity and anti-corruption, including by participating in the mandatory training related to the position held.

Material, financial and informational resources (assets) must be used responsibly, securely and solely for the functions performed.

8.4.1. Adopt sustainable practices

In performing the functions of their office, Santé Québec members must adopt practices that are respectful of the environment. They must use resources responsibly, avoid waste and incorporate simple and daily ecological actions that help reduce the collective environmental footprint.

8.4.2. Use artificial intelligence responsibly

All use of artificial intelligence must be compliant with Santé Québec values and principles. Santé Québec members must demonstrate vigilance and discernment, including in terms of confidentiality, equity, transparency, security and human oversight. In the event of uncertainty, they must consult with their immediate supervisor and refer to the guidelines in effect.

8.4.3. Respect intellectual property

Intellectual property created, developed or produced in the context of the members' functions of office is a Santé Québec asset and is the property of Santé Québec.

Members of Santé Québec must respect copyright and intellectual property rights, refrain from misappropriating, reproducing or disseminating content without authorization, solely use duly authorized software programs and content and report any non-compliant use.

8.5. Act with respect and civility

Members of Santé Québec must conduct themselves with respect and courtesy in all circumstances. Santé Québec members must:

- adopt respectful language and behaviour regardless of the circumstances;
- encourage open, constructive dialogue, especially during disagreements or in sensitive situations;
- help prevent harassment, violence, discrimination, intimidation or exclusion by reporting;
- any worrisome situation or by intervening appropriately if they witness such conduct;
- respect hierarchical authority while maintaining a spirit of collaboration and transparency;
- collaborate and cooperate effectively with everyone involved in the provision of care to users;
- respect, recognize and value the fields of practice, professional activities and experiential knowledge of all members of the interprofessional team.

Collaboration means fulfilling duties diligently and seeking support, if necessary, in a spirit of dialogue and the search for solutions. Respect also encompasses shared objectives that support the users' well-being.

Members of Santé Québec must also conduct themselves with the same respect and professionalism in all their digital exchanges, in accordance with the rules of netiquette. This includes emails, online discussions, videoconferences and any other electronic communication tool.

8.6. Act with competency, professionalism and diligence

Every member must perform the functions of their office with competency and professionalism (including in their attire), complying with the standards that apply to their role and keeping their knowledge up to date (for example, infection prevention and control).

They must act with conscientiousness, diligence and assiduity, ensuring the quality and safety of the activities they are responsible for. This requirement includes the responsibility to seek support or advice when the situation so requires, to ensure informed decisions that reflect the values and obligations of Santé Québec.

8.6.1. Prohibition on substance use that impairs duties

Members must not perform their duties or fulfill their mandate while impaired by any substance that could compromise the quality or safety of activities or the delivery of care and services. For substances used for therapeutic purposes, members must consult their physician to confirm that such use does not affect their ability to perform their duties safely. Where there is any potential impact, they must inform their immediate supervisor.

9. Regulation respecting conflicts of interest

Given the complexity of Santé Québec's environment, members of Santé Québec may be exposed to multiple interests related to their team, their profession, certain users, their close relatives or their own values. Although legitimate, these interests may clash with those of the organization and lead to conflicts of interest that must be handled to maintain the trust of the public.

9.1. Prevention of conflicts of interest

Members of Santé Québec must, at all times, avoid placing themselves in a conflict of interest, be it real, potential or apparent.

The conflict of interest is not, in itself, a fault, but it calls for a proactive approach and ongoing vigilance: Santé Québec members must demonstrate discernment and integrity in the performance of the functions of their office, prevent any situation that could compromise their objectivity, impartiality or loyalty and report any relevant interest in accordance with the procedure in effect.

To prevent conflicts of interest, it is prohibited for members to:

- hold or assert, directly or indirectly, a financial or business interest in a contract, project or decision of Santé Québec or any of its institutions, including through the intermediary of a close relative or related business;
- receive compensation, an advantage or a consideration from a third party in relation to the functions of office they perform within Santé Québec;
- intervene in or influence a decision concerning a close relative, partner or any other person with whom they have a meaningful personal or professional relationship, or benefit or penalize a person or group due to their convictions or personal relationships;
- use, disclose or retain confidential or privileged information obtained through the functions of their office for personal purposes or to benefit a third party;
- access information without authorization or beyond the needs related to the performance of the functions of their office;
- use their authority or influence to obtain a personal advantage or to benefit a third party;
- solicit or accept a gift, token of hospitality or any other advantage that could influence the impartial performance of the functions of their office;
- participate in a decision or process concerning a person or entity in which they have a personal interest;
- allow their decisions or actions to be influenced by prospects of professional advancement, appointment or job opportunities.

The following obligations apply in particular contexts:

9.1.1. Specific obligation related to an interest in a business

When a Santé Québec member has a direct or indirect interest in a business that could enter into conflict with the interests of Santé Québec, the member must adopt exemplary stance and comply with the following obligations:

- Immediately declare this interest by following the procedure in effect;
- Refrain from participating in any decision concerning that business and especially in decisions related to the allocation of resources;
- Not use the name, logo, image or resources of Santé Québec for the purposes of promoting or advertising that business;
- Not advertise their private services in Santé Québec premises or communications;
- Not conclude or permit a related business to conclude a contract with Santé Québec without authorization from their immediate superior.

9.1.2. Specific obligation related to the conclusion of supply, service, construction or information technology contracts

All Santé Québec members involved in contract management must comply with Santé Québec's rules governing conflicts of interest in terms of the acquisition and management of supply, service, construction and information technology contracts. The provisions of this Code and Regulation also apply and must be interpreted consistently and cumulatively.

9.1.3. Specific obligation related to management decisions for the allocation of resources for care and services within the institution

Decisions concerning the allocation of human, material and information resources within institutions must be made in accordance with the principles of equity, transparency, impartiality and sound management.

All members involved in these decisions must ensure that their personal, professional or relational interests do not compromise the objectivity or loyalty required in the performance of the functions of their office. These decisions must reflect Santé Québec's objectives, meet the needs of the population served and take into account the specific missions of each institution.

9.1.4. Specific obligation related to research activities

A researcher who is a staff member of an institution or who is a member of the Council of physicians, dentists, pharmacists and midwives of an institution or who otherwise practises their profession there is first subject to the frameworks on the institution's research organization and best practices, which must set out specific provisions to manage conflicts of interest in research.

9.2. Gifts, favours, donations and other advantages: principles and prohibitions

Members of Santé Québec must refrain from soliciting or accepting any personal advantage that could compromise their impartiality, influence their decisions or create an apparent conflict of interest. This requirement aims to preserve the integrity of decision-making processes and public trust in the organization.

This includes presents, invitations, favours, gifts, bequests or any other advantage offered as part of or in relation to the performance of the functions of their office.

Even when an interaction is governed by the *Lobbying Transparency and Ethics Act* (CQLR, c. T-11.011), no personal advantage can be accepted. Compliance with transparency rules does not provide exemption from the obligation of impartiality and integrity.

In any situation, the person responsible of ethics and integrity can be consulted to support ethical reflections or guide appropriate action.

a) **Gifts, invitations and advantages:**

Members of Santé Québec must refuse any gift, invitation or advantage offered by third parties, including:

- financial rewards (tips, cash gifts);
- recurring or gifts of significant value;
- invitations not related to the performance of the functions of office;
- any advantage, even modest, from a current or potential partner, in order to avoid any influence on decisions, particularly supply decisions.

Subject to a detailed ethical examination and the approval of the immediate superior, the following situations are excluded from this prohibition:

- an ordinary, non-recurring gift of modest value (≤ $60) or reasonable value based on professional customs;
- a gift that is impossible to refuse based on custom or protocol;
- a reduction under a corporate agreement;
- an occasional invitation related to the office, of reasonable value and approved by the immediate superior;
- a token of internal recognition (e.g., gifts offered by Santé Québec), if it complies with the principles of impartiality, transparency and objectivity and the rules set out above.

If an inappropriate gift is given, the member must inform their superior. Appropriate measures must be taken, such as returning the gift to giver, raising awareness, documenting the situation

b) Solicitation or acceptance of favours

It is prohibited for members to request, offer or accept a favour in exchange for a service or intervention related to the functions of their office. This includes:

- free samples provided in exchange for visibility or a promotion consideration;
- any advantage related to a professional decision.

c) Gifts and bequests

It is prohibited to personally accept a gift or bequest from a user who is receiving or has recently received care or services, unless it is a spouse or close relative. Any gift or bequest contrary to this principle is invalid. The member must inform their immediate superior without delay, and no acceptance can be permitted without prior examination.

d) Solicitation by foundations

Santé Québec's executive officers and management officers are prohibited from accepting any sum of money or any direct or indirect benefit from a foundation or legal person that solicits gifts from the public in relation to the field of healthcare and social services. Failure to comply with this rule may lead to sanctions up to and including dismissal.

9.3. External activities and personal engagement

Members of Santé Québec can take part in an external activity, compensated or uncompensated, as long as it is not incompatible with the functions of their office and does not compromise the performance of their responsibilities within Santé Québec or their availability. The activity must not compromise their impartiality, objectivity or loyalty or undermine the reputation or interests of the organization. Santé Québec members must take the required measures to prevent any real, potential or apparent conflict of interest. Members of Santé Québec must:

- report this external activity by following the procedure in effect;
- refrain from using their work time or the material, financial or information resources of Santé Québec for external activities;
- refrain from using the name, image or visual identity of Santé Québec for promotional purposes;
- refrain from advertising their private services in Santé Québec premises or communications;
- refrain from making statements or participating in activities that are likely to undermine the image, reputation or interests of Santé Québec, subject to applicable rights and obligations;
- give priority to their office within Santé Québec, in terms of the accessibility and continuity of care and services.

In case of questions or ethical dilemmas related to an external activity, Santé Québec members are encouraged to consult with their immediate superior to evaluate the situation and, if needed, seek recommendations.

10. Exclusiveness of duties

Exemptions to the obligation of exclusivity set out in the AGHSSS or its regulations can only be authorized under the following conditions and must be compatible with the functions of office performed by the person in question.

10.1. President and Chief Executive Officer of Santé Québec, vice-presidents and assistant vice-presidents of Santé Québec

The President and Chief Executive Officer of Santé Québec, as well as all vice-presidents and assistant vice-presidents, must dedicate their attention exclusively to the tasks related to Santé Québec and the obligations inherent in the functions of their office.

They may, however, engage in other professional activities, compensated or uncompensated, if they obtain an individual exemption from exclusiveness of duties.

For the President and Chief Executive Officer, this exemption must be authorized by the Board of Directors.

For vice-presidents and assistant vice-presidents, it must be authorized by the President and Chief Executive Officer.

It is prohibited to give the President and Chief Executive Officer and any vice-president or assistant vice-president any compensation or advantage not provided for by law. However, compensation can be paid if it is related to the performance of another professional activity to which the President and Chief Executive Officer has consented.

10.2. President and executive director and assistant president and executive director

The president and executive director and the assistant president and executive director are appointed full-time and must exclusively carry out the work of Santé Québec and the duties of their office. They can, however, with the consent of the President and Chief Executive Officer, engage in other professional activities, whether remunerated or not, if they obtain an individual exemption from exclusiveness of duties. They may also carry out any mandate the President and Chief Executive Officer entrusts to them.

10.3. National inspector for services in the field of health and social services and assistants

The national inspector and their assistants must maintain their independence at all times and perform the functions of their office exclusively and on a full-time basis.

Individuals serving as analysts, inspectors or investigators cannot perform any of these functions for another person or another group. These people cannot perform the functions of any other office for Santé Québec without the authorization of the national inspector.

The other members of the national inspector's administrative unit must obtain the national inspector's authorization to perform other functions. The national inspector can delegate this authorization to an assistant national inspector.

10.4. National service quality and complaints commissioner, service quality and complaints commissioners and their assistants

The national service quality and complaints commissioner and their assistants must maintain their independence at all times and perform the functions of their office exclusively and on a full-time basis.

Service quality and complaints commissioners and their assistants exclusively perform the functions of their office.

Staff members acting under the authority of the national service quality and complaints commissioner and the authorities of the service quality and complaints commissioners cannot perform any other functions within Santé Québec or a grouped institution or for an authorization holder or a provider.

People who wish to perform the functions of another office must be authorized by the national service quality and complaints commissioner, in accordance with the procedure in effect.

Medical examiners are not subject to a requirement of exclusiveness of duties. They can perform other functions within the institution to which they are appointed, provided this does not compromise their independence or put them in a situation of conflict of interest.

10.5. Senior administrators and senior officers

All administrators and senior management officers who are appointed full-time must exclusively perform the work of Santé Québec and the duties of their office.

Requests for individual exemptions from exclusiveness of duties must be authorized by the immediate superior of the person in question, in accordance with the procedure in effect.

10.6. Officer physicians

When a person with the status of officer physician wishes to dispense medical services in one of Santé Québec's institutions outside the periods for which their services were retained, they must, after satisfying the requirements of their office at Santé Québec, obtain the relevant authorization, in accordance with the procedure in effect.

11. Final provisions

11.1. Interpretation

11.1.1. Discrepancy among provisions

Members of Santé Québec must comply with the ethical principles and rules of conduct set out in the laws, applicable regulations and this Code. In case of a discrepancy, the strictest rules and principles shall take precedence.

11.1.2. Questions regarding the Code

For any questions related to the application or interpretation of the Code, Santé Québec members can address the ethics support service at their institution or Santé Québec's Direction de l'éthique et de la conformité (ethique@sante.quebec), which can provide clarification and guide Santé Québec members in the adoption of practices that comply with Santé Québec's values.

11.1.3. Reporting breaches, disclosing wrongdoings and complaints

Santé Québec encourages the reporting of any behaviour that is contrary to this Code (breach), as well as the disclosure of wrongdoings. It ensures the confidentiality of such steps, in accordance with its legal obligations and best practices.

Certain reports may concern behaviours observed between colleagues or within a team, in terms of labour relations. In these cases, a Santé Québec member can approach their immediate superior to discuss the situation, obtain support or launch a management process. This ethical staff management approach aims to achieve a respectful, preventive and compassionate resolution, in the spirit of accountability.

Under this Code, a breach includes not only the act itself but also an attempt to commit such an act, as well as participation in, concealment of and incitement to commit it.

Reporting a breach of the Code:

Anyone can report behaviour that is contrary to the Code to the ethics and integrity manager of the institution or Santé Québec headquarters, following the procedure in effect.

Disclosing a wrongdoing:

When a person wants to report a serious action that could compromise the integrity or proper functioning of Santé Québec, such as:

- an abuse of the funds or property of a public body;
- a serious breach of the standards of ethics and professional conduct;
- a serious case of mismanagement within a public body or an abuse of authority;
- an instance of ordering or advising someone to commit wrongdoing;
- damage or a risk of damage to the health or safety of a person or the environment;
- any form of reprisals or attempted reprisals against a person who makes a disclosure or collaborates with an investigation;
- the violation of a law or regulation applicable in Québec.

People can also file a disclosure with the Protecteur du citoyen. This type of disclosure is governed by laws that guarantee, for example:

- the confidentiality of the identity of the person who files the disclosure;
- protection against reprisals, such as threats or penalties;
- the right to disclose in the public interests, even if the deed has not yet been committed.

The Protecteur du citoyen is the only body authorized to receive and handle this type of disclosure. It is possible to file a disclosure by:

- the online form *Disclosing wrongdoing*
- phone: 1-800-463-5070
- fax: 1-866-902-7130
- mail: printable complaint form: 800, place D'Youville, 19th floor, Québec (Québec), G1R 3P4

Other complaint mechanisms:

For any dissatisfaction, complaint or concern related to healthcare or social services, research activities, the contract process or the services offered by a Santé Québec institution, facility or service provider, the mechanisms set out in the applicable laws and policies must be used.

11.1.4. Penalties

Failure to comply with the provisions of this Code will lead to appropriate consequences, in accordance with the processes in effect, up to and including dismissal.

11.2. Publication

To ensure transparency and access to information, this Code must be accessible to the public. Santé Québec publishes it on its website. Every Santé Québec institution is responsible for disseminating information about the Code, in particular by giving a copy of the Code to every user it lodges or who requests it.

11.3. Adoption and entry into force

This Code comes into force on February 26, 2026, the date of which the original French version was adopted by the Board of Directors under Resolution No. CASQ-2026-02-26-01.

11.4. Next revision

The Code can be amended at any time by a decision of the Board of Directors, on the recommendation of the Governance and Ethics Committee. A complete review must be carried out at least every three years or on the revision of Santé Québec's strategic plan.

Québec

Santé Québec