

To:

CA – ALL Associates

Subject:

“Do What’s Right”: FirstLine Ethics Hotline

Attachments:

1. FirstLine FAQ
2. Code of Conduct

Body:



A Message From:

Human Resources

Dear Associates,

Our Core Values are the foundation upon which FirstService Residential is built. We hold ourselves to the highest standards of transparency and accountability and aim to “Do What’s Right” when it comes to our conduct and how we do business.

However, building an ethical work environment means more than simply doing what’s right. It also means we must be aware of what’s going on around us and have the courage to report fraudulent activity that can potentially harm our company, our clients and our people.

To help us do this, FirstService Residential created our **FirstLine**, a 24-hr ethics hotline, so our associates may anonymously report situations that may compromise our company’s reputation or financial integrity.

Speaking to your Human Resources partner or someone in senior management should always be the first step in reporting any concern; however, we recognize this may not always be possible.

In those situations, we encourage you to call our toll-free FirstLine hotline (1-800-624-2195) which is operated 24/7 by Navex, an independent third-party company.

When you call, a specially trained interviewer will document your concern and relay the information to FirstService Residential for review and follow-up. You may also file your report online at [FirstService.ethicspoint.com](https://www.firstserviceethicspoint.com) (you may choose to remain anonymous if you wish).

Here are some examples of types of fraudulent and other issues you should report:

- Conflicts of interest, including bribery and kickbacks
- Accounting or audit irregularities
- Theft and fraud
- Any violation of our Code of Ethics and Conduct
- Misuse of company assets
- Antitrust or competition violations
- Improper dealing with customers or vendors
- Use or sale of illegal drugs
- Creating or ignoring safety hazards
- Harassment or discrimination
- Destroying or falsifying company records
- Impermissible gifts or entertainment
- Inappropriate sales discounts or bookings
- Disclosure of proprietary or confidential information
- Inappropriate expense reporting
- Violations of federal, state or local laws or regulations

FirstLine should not be used to report HR-related issues such as payroll questions, conflicts with co-workers or leaders. Human Resources and operational-related concerns should be discussed with your leader or Human Resources partner first.

We have attached our [FirstLine FAQ](#) and a copy of our [Code of Conduct](#) for your reference.

“There is never a wrong time to do what is right.”

Each of us has an obligation to protect our reputation and to abide by the highest standards of honesty and integrity. We must do our part to prevent or stop any unethical, illegal or unsafe activities before they can cause us harm. Thank you for your continued commitment to “Do What’s Right.” We are proud of the reputation that we have built over the years and I thank you for doing your part to protect it.

Sincerely,

Samantha Sullivan
VP, Human Resources, West Region