

Code of Conduct and Ethics

*Reflecting our **Values***



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Letter from the Office of the President and Chief Executive Officer

Our values are at the heart of everything we do and as such are reflected in the AGLC's Code of Conduct and Ethics.

We all have a responsibility to act in good faith and to ensure integrity is always at the core of what we do. We also need to encourage and support our colleagues to act fairly and ethically, and to promote an environment where we are comfortable reporting ethical breaches.

With your help, we continue to live up to our promise to be a leader in creating progressive gaming and liquor experiences trusted and enjoyed by Albertans.

A handwritten signature in black ink, appearing to read 'DWR', with a horizontal line extending to the right from the end of the signature.

D.W. (Bill) Robinson

President and Chief Executive Officer

AGLC Values

1. Integrity

We play by the rules, do the right thing and do what we say we'll do.

2. Respect

We create an environment where each individual is valued and heard, and celebrate the diversity that makes us stronger.

3. Collaboration

Together we are better. Working as a team and with our partners we achieve extraordinary results.

4. Innovation

We imagine the possibilities. We challenge ourselves to look beyond *what is* to *what can be*.

5. Excellence

We are all leaders. We work with passion, pride and purpose and own our part in the success of the team.

Why do we need a Code of Conduct and Ethics?

The Code of Conduct and Ethics (Code) reflects a commitment to the AGLC's values and provides a framework to guide ethical conduct in a way that upholds our integrity and reputation. You are expected to behave in a way that aligns with this Code. While this Code does not cover every specific scenario, it is the spirit and intent behind this Code which should guide your conduct.

To demonstrate a commitment to transparency and accountability, this Code is available to the public on the AGLC website.

Who does the Code apply to?

The Code applies to all employees of the AGLC.

You are required to participate in training on how to apply the Code and must acknowledge a commitment to uphold the Code on an annual basis.

If you are a manager, you are relied on to promote an ethical culture within your area and to lead by example. In addition, you must be available to discuss ethical issues with your staff, ensure they understand the requirements of the Code and direct staff appropriately if you are unable to address their concerns.

Violations of the Code

Violations of the Code are treated seriously. Failure to comply with the spirit and intent of the Code may result in disciplinary action up to, and including, termination.

Our Ethical Principles

These principles help employees make appropriate decisions when the issues they face involve ethical considerations. They cannot cover all scenarios but provide guidance in support of daily decisions.



All employees must adhere to the following principles:



Uphold the law

You may not engage in any criminal activity and you must report any criminal charges to your supervisor immediately.

Workplace environment

Your conduct must contribute to a safe and healthy workplace that is free from discrimination, harassment or violence.

You may not use drugs or alcohol in a way that affects your performance, safety or the safety of your colleagues or negatively impacts the reputation or operations of the AGLC.

Safeguarding AGLC assets

You are responsible for the appropriate care and protection of AGLC property and must exercise reasonable safeguards to prevent theft or damage.

You must report any lost, stolen or damaged AGLC property to your supervisor.



Participation in gaming activities

You may not participate in any electronic gaming activity controlled through systems operated or maintained by the AGLC. This includes, but is not limited to, vlts, casino gaming terminals, electronic tables and electronic bingo games.

Unless you are specifically prohibited as a result of your employment duties, you may participate in gaming activities not conducted and managed by the AGLC. These activities include casino table games, paper play bingo, draw based games (lotteries) offered by WCLC, instant win tickets and live horse racing events.



Computer usage

You must use the AGLC computer systems and social media in a responsible manner that supports the integrity of AGLC's business.

Your use of the AGLC computer systems is for business purposes and all use and communications must be conducted with professionalism and the integrity of the AGLC in mind.

Personal use of AGLC computer systems is permitted in compliance with Information Security and the AGLC Social Media Policy and where it does not interfere with professional duties.

The AGLC is able to monitor all computer use and employees should not expect privacy when using AGLC computing resources.

Conflicts of interest

Your words, actions, or decisions, taken on behalf of the AGLC, must not provide you with an opportunity to further your private interests, those of your family, or others with whom you have a significant personal or business relationship outside of the AGLC.

You must take reasonable steps to avoid or remove yourself from situations where you may be placed in a real or apparent conflict between your private interests and the interests of the AGLC.

Potential conflicts of interest include but are not limited to:



Confidential information

You must respect and protect confidential information, use it only for the work of the AGLC and not for personal gain.

You must comply with protocols that guide the collection, storage, use, transmission and disclosure of information and be familiar with the requirements of the *Freedom of Information and Protection of Privacy Act* as it applies to the collection and disclosure of personal information by a public body like the AGLC.

Q A vendor I do business with at the AGLC provided me with a gift card to my favourite restaurant after our last meeting. Can I accept this gift?

A You may not accept gifts you receive as an AGLC employee. A gift of this nature is neither part of business protocol nor hospitality. You must return this gift card.



Gifts and hospitality

You must take care to avoid any situations where the receipt of a gift or hospitality could be seen as influencing expectations or creating business advantages with external parties.

You may not accept gifts. The only exception is where the gift is a token received as part of business protocol or the normal presentation of gifts to people participating in public functions. The value of these gifts may not exceed \$100.

You may accept hospitality (includes meals, sporting and cultural events) where the value of the hospitality does not exceed \$100.

Hospitality exceeding \$100 must be pre-approved by the employee's supervisor and reported to the Ethics Officer.



Personal relationships/nepotism

You must disqualify yourself from making compliance or licensing decisions or any other decisions through the course of your employment with the AGLC that impact relatives or friends or those with whom you have a personal relationship.

Relationships of a personal nature between employees have the potential to create a perception of bias or conflict of interest. As such, you may not be in a supervisory position to another employee with whom you have a personal relationship.

A personal relationship means a family relationship; a sexual or romantic relationship; or a business or commercial relationship.

Outside business activity

You may not engage in any outside business activity that:

- a) uses information, not otherwise publicly available, from AGLC operations; or
- b) influences the decisions of the AGLC.



You must disclose any investments or outside business activities that you, your spouse, your parents or your children have with AGLC registered or licenced entities.

You may not hold a liquor licence (except for a special event licence) or be an owner or part owner of the licensed premises.

You may not review, negotiate or approve AGLC transactions with organizations or individuals with whom you have an outside business or personal relationship.

Outside employment

You may participate in outside employment. Such employment may not:

- a) interfere with your job performance, availability for work or impartiality with the AGLC;
- b) include the use of AGLC property (equipment, tools, computers, materials or supplies); or
- c) result in you being directly or indirectly engaged in any other business or undertaking dealing in liquor or gaming.

Prior to accepting any outside employment where a conflict of interest might arise, you are required to notify the Ethics Officer in writing about the nature of such outside employment.



Political activity

You may participate in political activities including membership in a political party or supporting a candidate for elected office. You may become a candidate in a municipal election with prior approval of the Ethics Officer.

You may not seek nomination in a federal or provincial election, hold office in a political party or constituency association or participate directly in soliciting contributions for a political party.

Any political activity must be clearly separated from activities related to work for the AGLC; must not be done while carrying out the work of the AGLC; must not make use of AGLC facilities, equipment or resources in support of these activities; and must not impair your objectivity in the position in which you are employed with the AGLC.

Volunteer activity

You may participate as a volunteer in gaming activities.

Your involvement in volunteer activities should not interfere with your employment duties and should not influence or conflict with decisions relating to the AGLC.

Q In addition to my employment at AGLC, I have a home-based business. Can I use my connections at work to promote and sell my products?

A **Any outside employment that takes time away from your duties as an AGLC employee or uses AGLC property or confidential information obtained through your work at the AGLC (this includes employee email and contact information) is not permitted.**

Disclosure of conflicts of interest

It is your responsibility to declare in writing to the Ethics Officer those private interests and relationships that could be seen to impact the decisions or actions you take on behalf of the AGLC.

Where a real or apparent conflict of interest cannot be avoided, you must take the appropriate steps to manage the conflict including: removing yourself from matters in which the conflict exists or is perceived to exist; giving up the particular private interest causing the conflict; and, where necessary, resigning your position with the AGLC.

Contact the AGLC Ethics Officer if you aren't sure whether something you're involved in is a conflict of interest.

Q I recently reported my supervisor's violation of the Code to the AGLC Ethics Officer. My supervisor was disciplined for this violation but lately I have been treated with hostility and reassigned to junior tasks. What should I do?

A You should report this possible reprisal immediately to the Ethics Officer or to *ConfidenceLine* at 1-800-661-9675 or online at www.aglc.confidenceline.net. Any reprisal for reporting of Code violations, made in good faith, will be investigated and dealt with without delay.

Reporting a Potential Breach of the Code

You are encouraged to report a potential breach of this Code to a) your Supervisor; b) the AGLC Ethics Officer; or c) through the *ConfidenceLine* at **1-800-661-9675** or online at www.aglc.confidenceline.net.



Protection from reprisal

The AGLC is committed to protecting you from any reprisal you may experience as a result of having, in good faith, reported a potential breach.

If you experience reprisal as a result of reporting a breach of the Code, report it immediately to the AGLC Ethics Officer or through the *ConfidenceLine* at **1-800-661-9675** or online at www.aglc.confidenceline.net.

Responding to a potential breach of the Code

Once a potential breach has been reported, the AGLC procedures for responding to, and managing, a potential breach will be promptly initiated.



Where to get advice about the Code

If you require advice and guidance in determining whether misconduct or conflict exists or if you need clarification, you may ask a question through the *ConfidenceLine* at **1-800-661-9675** or online at www.aglc.confidenceline.net or discuss the issue with:

- a. a supervisor;
- b. a Human Resources consultant; or
- c. the AGLC Ethics Officer.

Ethical Decision Tree



Before acting ask yourself:



