



Host First Nation Charitable Casino Policies Handbook

aglc.ca

Host First Nation Charitable Casino Policies Handbook

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SUBJECT: INTRODUCTION

POLICY

- 1.1.1 The Host First Nation Charitable Casino Policies Handbook (HFNCCPH) was developed in consultation with Host First Nations (HFN). The Alberta Gaming, Liquor and Cannabis Commission (AGLC) is created by statute and must interpret its policies in a way that best ensures that attainment of its objects is consistent with the *Criminal Code*, the *Gaming, Liquor and Cannabis Act* and the Gaming, Liquor and Cannabis Regulation. When determining what is charitable in law, AGLC must have regard to the unique position of Canadian First Nation people. The HFNCCPH includes policies for charitable casinos regarding:
- a) eligibility for charitable casino licences;
 - b) the requirements related to conducting and managing a charitable casino event at a HFN casino facility;
 - c) the use of charitable proceeds; and
 - d) financial reporting, internal control standards and audit requirements for charitable proceeds.
- 1.1.2 Board policies are conditions of the casino licence. The policies contained in the HFNCCPH comply with the requirements of the *Criminal Code*, the *Gaming, Liquor and Cannabis Act* and the Gaming, Liquor and Cannabis Regulation.
- 1.1.3 *(Deleted Apr 2022)*
- 1.1.4 The policies contained in the HFNCCPH do not apply to bingo, raffle and pull ticket licensing. For information about bingo, raffle and pull-ticket licensing refer to the Commercial Bingo Handbook, Raffle Terms & Conditions and Pull-Ticket Terms and Conditions. Copies of terms and conditions for all licensing streams are available on AGLC's website at aglc.ca.

SUBJECT: DEFINITIONS

POLICY

1.2.1 In this handbook,

- a) “Advisor” means all independent advisors (i.e., cash cage advisor, count room advisor or dual role advisors).
- b) “AGLC” means the Alberta Gaming, Liquor and Cannabis Commission.
- c) “Applicant” means an applicant as defined in section 1(5) of the Gaming, Liquor and Cannabis Regulation.
- d) “Applicant’s associate” means an applicant’s associate as defined in section 1(7) of the Gaming, Liquor and Cannabis Regulation.
- e) “Board” means the Board of AGLC.
- f) “Bursary” means non-repayable financial support to students based on financial need. *(Added Nov 2022)*
- g) “Casino facility licensee” means the individual, partnership or corporation holding a casino facility licence which authorizes the operation of a facility in which a casino event may be conducted and is the business entity named as the casino retailer in the retailer agreement respecting electronic games.
- h) “Casino licence” means a licence issued by AGLC to the charity authorizing the charity to conduct and manage casino Events.
- i) “Casino Terms & Conditions and Operating Guidelines (CTCOG)” means AGLC’s set of policy requirements and operating guidelines which apply to casino Events held in a licensed casino facility.
- j) “Charitable community benefit” means a benefit delivered to the HFN community in one of the areas recognized as charitable by AGLC [see subsection 1.2.1k)].
- k) “Charitable purpose” means a purpose that is recognized as charitable by AGLC and includes the following: *(Amended Nov 2022)*
 - i) relief of poverty;
 - ii) advancement of education;

SUBJECT: DEFINITIONS

- iii) advancement of religion; and
- iv) other purposes beneficial to the community.
- l) “Charity worker” means a registered gaming worker who is a paid employee of the licensed charity that is working in the capacity of a general manager, alternate general manager, CGMA, banker, cashier, chip runner, count room supervisor, sorter, counter, recorder or amalgamator.
- m) “Combined general manager/advisor (CGMA)” means a person employed by the licensed charity to perform the duties of a general manager or alternate general manager and an Advisor (i.e., cash cage advisor, count room advisor or dual role advisor).
- n) “Conflict of interest” means there is real or perceived influence over a decision. *(Amended Nov 2022)*
- o) “Discrepancy Report” means a report prepared by the casino facility licensee, licensed charity, registered gaming worker and/or charity worker regarding a breach of the CTCOG, security breach or any other illegal activity.
- p) *(Deleted Oct 2022)*
- q) “EFT” means electronic fund transfer.
- r) “Event” means all casino table games conducted on a daily basis during the hours specified on the casino licence.
- s) “Host First Nation (HFN)” means a First Nation on whose reserve land there is located a casino facility licensed by AGLC.
- t) “Host First Nation Charitable Casino Policies Handbook (HFNCCPH)” means AGLC’s set of policies which apply to licensed charities established by a HFN who are conducting casino events in a HFN casino facility.
- u) “Inspector” means someone designated by AGLC as an Inspector under the *Gaming, Liquor and Cannabis Act* or any Police Officer as defined in the *Police Act*.
- v) “Licensed charity” means the charitable organization holding a Casino licence issued by AGLC authorizing an event within a HFN casino facility. *(Amended Nov 2022)*

SUBJECT: DEFINITIONS

- w) "Minor" means a person under the age of 18 years.
- x) "Other entity" means a group that has been approved by AGLC to receive proceeds from the licensed charity to be disbursed on charitable objects or programs. *(Amended Nov 2022)*
- y) "Pit boss" includes the floor supervisor or any other person employed in that capacity.
- z) "Pit supervisor" includes pit manager or any other person employed in that capacity.
- aa) "Proceeds" means the gross casino revenue less casino prizes and casino expenses, and the commission paid to licensed charities at whose licensed casino events AGLC conducts provincial lotteries. It also includes all interest, dividends or other income earned on casino proceeds deposited in interest accounts or held, with AGLC approval, in deposit certificates or investments made by a trustee.
- bb) "Registered gaming worker" means a person registered by AGLC to perform the function(s) specified in their registration.
- cc) "Related party transaction" means the transfer of economic resources or obligations between related parties, or the provision of services by one party to a related party, regardless of whether any consideration is exchanged. *(Added Nov 2022)*
- dd) "Scholarship" means a non-repayable financial support to students based on academic development. *(Added Nov 2022)*
- ee) "Self-Exclusion" means when an individual voluntarily agrees to be excluded from all casino facilities in the Province of Alberta. (Forms are to be made available at all casino facilities.) The "Self-Exclusion Program" is designed for people who feel it is in their best interest not to participate in casino gambling. By participating in this program, an individual is agreeing to be banned from all casino facilities in Alberta. *(Amended Jul 2019)*
- ff) "Sub-charity" means a charitable organization which primarily carries on its own charitable activities and is eligible to receive proceeds under AGLC policies from the licensed charity. *(Amended Nov 2022)*



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NUMBER: 1.2

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SUBJECT: DEFINITIONS

- gg) "Total annual donation" means the total dollar value of donations to a single organization between the 12-month period beginning April 1st and ending March 31st. *(Added Nov 2022)*
- hh) "Volunteer" means a person who works for an organization without pay or other personal benefit.

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AUTHORITY:

Original signed by
Len Rhodes

SUBJECT: LEGISLATION AND BOARD POLICIES

POLICY

- 1.3.1 AGLC is the province's gaming authority, responsible for administering and regulating the gaming industry in Alberta, including the licensing and regulation of charitable casino gaming activities. AGLC is established under the *Gaming, Liquor and Cannabis Act*.
- 1.3.2 Charitable casino gaming refers to events conducted by the licensed charity.
- 1.3.3 Casino events, facility licensees, licensed charities, registered gaming workers, registered gaming suppliers, registered gaming worker suppliers and registered service providers must operate in accordance with the *Gaming, Liquor and Cannabis Act*, the Gaming Liquor and Cannabis Regulation and Board policies established under the legislation including these terms and conditions and all federal, provincial and municipal laws. *(Amended Apr 2022)*
- 1.3.4 *(Deleted Oct 2022)*
- 1.3.5 *(Deleted Apr 2022)*
- 1.3.6 *(Deleted Apr 2022)*
- 1.3.7 *(Deleted Apr 2022)*
- 1.3.8 Non-compliance with the legislation or Board policies contained in this handbook may result in disciplinary action up to and including suspension or cancellation of licence or registration. *(Amended Apr 2022)*

SUBJECT: ALBERTA GAMING, LIQUOR AND CANNABIS

POLICY

- 1.4.1 AGLC is the province's gaming authority, responsible for conducting and managing provincial lotteries (as defined in section 1(1)(x) of the *Gaming, Liquor and Cannabis Act*) and for licensing and regulating charitable gaming activities including HFN casino facilities. The administration and monitoring of licensed casino facilities and casino events is the responsibility of AGLC.
- 1.4.2 AGLC issues casino licences to eligible charitable organizations to conduct casino events. *(Amended Nov 2022)*
- 1.4.3 Casino facility licences are issued by AGLC and the casino facility licensees must operate under the charitable gaming model of the province. A casino event may only occur under a casino licence issued by AGLC to an eligible charitable organization. *(Amended Nov 2022)*
- 1.4.4 The licensed charity and its charity workers:
- a) are responsible for knowing the legislation and the policies referred to or contained in the HFNCCPH;
 - b) must ensure that all records, reports and financial control forms as required by AGLC or its representatives are complete and accurate; and
 - c) must ensure that all communications (written or oral) with AGLC or its representatives are accurate.
- 1.4.5 The HFNCCPH may be accessed on AGLC's website at aglc.ca.
- 1.4.6 The legislation may be accessed on AGLC's website at aglc.ca.



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NUMBER: 1.5

HOST FIRST NATION CHARITABLE CASINO POLICIES HANDBOOK

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SUBJECT: CONTACTING AGLC

POLICY

1.5.1 There are five AGLC offices in the province. Normal office hours are 8:15 a.m. to 4:00 p.m. Monday to Friday, excluding statutory holidays. Outside normal office hours and when staff is unavailable, messages may be left on voicemail.

St. Albert (Head Office)

50 Corriveau Avenue	Phone:	1-800-272-8876
St. Albert, Alberta	Phone:	780-447-8600
T8N 3T5	Fax:	780-651-7626

Calgary

310 Deerfoot Atrium		
6715 - 8 Street NE		
Calgary, Alberta	Phone:	403-292-7300
T2E 7H7	Fax:	403-292-7302

Red Deer

#3, 7965 – 49 Avenue		
Red Deer, Alberta	Phone:	403-314-2656
T4P 2V5	Fax:	403-314-2660

Grande Prairie

100, 11039 – 78 Avenue		
Grande Prairie, Alberta	Phone:	780-832-3000
T8W 2J7	Fax:	780-832-3006

Lethbridge

655 WT Hill Blvd South		
Lethbridge, Alberta	Phone:	403-331-6500
T1J 1Y6	Fax:	403-331-6506

1.5.2 Gaming irregularities may be reported to 1-800-742-7818.

1.5.3 AGLC's website address is: aglc.ca.

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Len Rhodes



SECTION: GENERAL INFORMATION

NUMBER: 1.6

HOST FIRST NATION CHARITABLE CASINO POLICIES HANDBOOK

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SUBJECT: LICENSING AND REGISTRATION

POLICY

1.6.1 *(Deleted Apr 2022)*

1.6.2 An applicant for a casino event licence must be an eligible charitable or religious organization and must satisfy the Board that the proceeds from the casino will be used for a charitable object or purpose. *(Amended Nov 2022)*

1.6.3 The board of directors and key personnel of the licensed charity are subject to a background check and must be approved by AGLC. *(Amended Oct 2022)*

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Len Rhodes

SUBJECT: TRAINING

POLICY

1.7.1 Training is available, upon request, to Host First Nation licensed charities through AGLC's First Nation Gaming Liaison unit. The training includes, but is not limited to information on the following topics: *(Amended Apr 2018)*

- a) charitable program eligibility;
- b) the approved use of charitable proceeds;
- c) legislation, regulation and policy; and
- d) financial reporting, internal control standards, and audit requirements for charitable proceeds.

Further information about AGLC's First Nation training may be obtained by contacting AGLC at firstnationgamingliaisons@aglc.ca.

1.7.2 Host First Nation charities may employ charity workers as identified in Section 3 of the CTCOG. The Host First Nation charity is responsible to ensure all charity workers are properly trained to perform their assigned role. *(Amended Apr 2022)*

SUBJECT: DEAL US IN CASINO STAFF TRAINING

POLICY

(Amended May 2016)

1.8.1 *(Deleted Oct 2022)*

1.8.2 A licensed charity must meet Deal Us In Phase One Casino Staff Training certification requirements. Equivalency will not be granted for certification offered in other provinces.

1.8.3 Persons requiring Deal Us In Phase One certification must be certified within 30 days of the employment start date for all new hires to positions identified in subsection 1.8.9.

1.8.4 *(Deleted Apr 2022)*

1.8.5 Deal Us In Phase One certification must be maintained by successfully repeating the Deal Us In Phase One program (including passing the exam) before the certification expiration date.

1.8.6 Charity workers must provide proof of Deal Us In Phase One certification at the request of an AGLC inspector. Proof of Deal Us In certification includes: *(Amended Apr 2022)*

- a) paper printed certificate that has a QR code;
- b) a plastic card that does not have a QR code;
- c) clear images of either of the above (i.e., image, photograph or screen shot) saved on the charity worker's mobile device/phone.

1.8.7 When a Deal Us In certificate is required, it is the responsibility of the Host First Nation charity to ensure that at least one Deal Us In Phase One certified staff member is on shift at all times. *(Amended Apr 2022)*

1.8.8 *(Deleted Oct 2022)*

1.8.9 Deal Us In Phase One certification is mandatory for all full-time and part-time charity workers. This includes:

- a) general manager or CGMA;
- b) alternate general manager;
- c) banker;
- d) cashier;
- e) chip runner

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SUBJECT: DEAL US IN CASINO STAFF TRAINING

f) count room supervisor; and

g) count room staff (sorter, counter, recorder and amalgamator).

Note: Charity workers do not require Deal Us In Phase Two certification.

1.8.10 *(Deleted Apr 2022)*

1.8.11 *(Deleted Apr 2022)*

1.8.12 Deal Us In certification options are found on the SMART Training website. For more information on Deal Us In, contact: *(Amended May 2016)*

SMART Training Programs

Alberta Gaming, Liquor and Cannabis Commission

50 Corriveau Avenue

St. Albert, Alberta

T8N 3T5

Toll Free: 1-877-436-6336

Fax: 780-651-7626

Website: smartprograms.aglc.ca

SUBJECT: SELF-EXCLUSION PROGRAM

POLICY

(Amended Apr 2018)

- 1.9.1 If a charity worker identifies a patron enrolled in the Self-Exclusion (SE) program within the casino facility, the worker must notify casino security immediately.
- 1.9.2 Information regarding the Self-Exclusion (SE) Program may be found in Section 1.8 of the [CTCOG](#).

SUBJECT: ABANDONED OR UNATTENDED CHILDREN

POLICY

- 1.10.1 If a charity worker becomes aware of children left abandoned or unattended on casino facility property, the charity worker must notify casino security immediately.
- 1.10.2 Information regarding abandoned or unattended children on casino facility property may be found in Section 1.9 of the [CTCOG](#).



SECTION: GENERAL INFORMATION

NUMBER: 1.11

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SUBJECT: MINORS

POLICY

1.11.1 *(Deleted Oct 2022)*

1.11.2 A licensed charity must not use minors as charity workers for a casino.

1.11.3 *(Deleted Oct 2022)*

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Len Rhodes

SUBJECT: EXTENDING CREDIT

POLICY

1.12.1 Cashing personal cheques or extending credit in any form by the casino operator, office staff, registered gaming workers, charity workers or any other casino or facility staff is prohibited.

Exception: Cash call cheques as per subsection 1.20 of the [CTCOG](#) may be accepted.

1.12.2 *(Deleted Apr 2022)*

SUBJECT: CASINO ACCESS

POLICY

- 1.13.1 Casino facility licensees, licensed charities, registered gaming workers and charity workers are required to cooperate fully with AGLC inspectors and police officers attending at a casino. A licensee must, on the request of an inspector, AGLC or an employee of AGLC:
- a) assist the inspector in carrying out an inspection; and
 - b) provide the inspector with records, documents, books of account and receipts and provide a place where they may be inspected, audited, examined or copied.
- 1.13.2 *(Deleted Apr 2022)*
- 1.13.3 A field technician, employed by or working on behalf of AGLC in a casino facility, installing, servicing or removing electronic gaming or gaming related equipment, has been designated by AGLC as an inspector pursuant to section 98(1) of the *Gaming, Liquor and Cannabis Act*.
- 1.13.4 An auditor or person employed or working on behalf of AGLC in a casino facility has been designated by AGLC as an inspector pursuant to section 98(1) of the *Gaming, Liquor and Cannabis Act*.



SECTION: GENERAL INFORMATION

NUMBER: 1.14

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SUBJECT: HOURS OF OPERATION

POLICY

(Deleted Apr 2022)

DATE ISSUED: April 1, 2022

AUTHORITY: Original signed by
Len Rhodes

SUBJECT: DRESS

POLICY

- 1.15.1 Each Host First Nation charity must develop and enforce their own dress code for charity workers to allow for easy recognition by patrons of the casino and reduce the possibility of criminal activities taking place in a gaming pit or for cash cage/count room duties.
(Amended Apr 2022)
- 1.15.2 Charity workers must wear a pocket-less uniform while performing their duties as approved by the licensed charity.
- 1.15.3 *(Deleted Apr 2022)*
- 1.15.4 *(Deleted Apr 2022)*
- 1.15.5 Patrons are not permitted to wear costumes in the casino which conceal their identity (e.g., face or eye masks).



SECTION: GENERAL INFORMATION

NUMBER: 1.16

HOST FIRST NATION CHARITABLE CASINO POLICIES HANDBOOK

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SUBJECT: ADVERTISING

POLICY

1.16.1 The casino facility licensee is responsible for all costs of advertising. None of the advertising expenses may be paid either directly or indirectly by the licensed charities.

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Len Rhodes



SECTION: GENERAL INFORMATION

NUMBER: 1.17

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SUBJECT: PROMOTIONS

POLICY

1.17.1 The casino facility licensee is responsible for all costs associated with a promotion. Any promotional activity that results in the licensed charity's revenue being reduced is prohibited.

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Len Rhodes



SECTION: GENERAL INFORMATION
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SUBJECT: TOURNAMENTS

POLICY

(Deleted Apr 2022)

DATE ISSUED: April 1, 2022 **AUTHORITY:** Original signed by Len Rhodes

SUBJECT: HOST FIRST NATION ELIGIBILITY

POLICY

2.1.1 Charities applying for a casino licence must:

- a) be representative, and act for the benefit, of the HFN community;
- b) have a board of directors elected by HFN members at large or appointed by chief and council, who provide governance and oversight of the charity's programs, and are accountable for the charitable proceeds; *(Amended Apr 2018)*

Note: In order to maintain independence from chief and council, a maximum of 35 per cent of the board of directors may be members of chief and council;

- c) be a charitable organization and have a not-for-profit objective; *(Amended Nov 2022)*
- d) have charitable purposes or objects that benefit the HFN community, not a member's self-interest; *(Amended Nov 2022)*
- e) be established or incorporated in a manner acceptable to AGLC pursuant to one of the following:
 - i) Band Council Resolution (BCR);
 - ii) *Societies Act* (Alberta);
 - iii) Part 9 of the *Companies Act*;
 - iv) Part II of the *Canada Corporations Act*;
 - v) *Religious Societies Land Act*;
 - vi) a charter from a recognized international governing body (e.g., service club charter); and
 - vii) other Alberta statutes, approved by AGLC.
- f) have by-laws that upon dissolution of the applicant charity, require any assets remaining after paying debts and liabilities to be: *(Amended Nov 2022)*
 - i) disbursed to eligible charitable entities or purposes; or
 - ii) transferred in trust to the chief and council until such time as the assets can be transferred from the chief and

SUBJECT: HOST FIRST NATION ELIGIBILITY

council to a charitable entity or purpose approved by AGLC.

2.1.2 To have its eligibility for casino licensing determined by AGLC, the applicant charity must submit an application in the prescribed form, signed by a minimum of two authorized members of the charity, and attach the following information:

- a) for charities established by BCR, a copy of the BCR and by-laws or articles of association authorized by chief and council or approved by the membership of the charity;
- b) for charities incorporated under the *Societies Act*, Part 9 of the *Companies Act*, the *Religious Societies Land Act* and other statutes, copies of the Objects or Memorandum of Association, registered by-laws and articles of association;
- c) for charities incorporated under Part II of the *Canada Corporations Act*, Letters Patent;
- d) current executive list, including position titles, addresses and telephone numbers (business, residence and fax) and a description of how the charity's board and executive were determined;
- e) BCR authorizing the request to make an application for a casino licence; and
- f) a written declaration or statement of the Charitable Community Benefit provided by the programs or services the charity delivers either directly or indirectly. The declaration must identify:
 - i) the types of programs or services delivered or supported by the charity;
 - ii) an explanation as to why the programs or services are important to the HFN community;
 - iii) the number of persons participating in the programs or receiving services and the fee structure charged;
 - iv) the number of persons who may potentially benefit from the programs or services offered;

SUBJECT: HOST FIRST NATION ELIGIBILITY

- v) the date(s) and approximate time(s) of program or service delivery (if requested by AGLC); and
- vi) the premises from which the program or service delivery is made (if requested by AGLC).

2.1.3 For a charity incorporated under a statute, the charity must ensure it is listed as “active” with Corporate Registry.

2.1.4 The charity’s registered objects as stated in a Statement of Objects, in its registered by-laws or in its Memorandum of Association, must:

- a) be expressed in precise terms;
- b) be charitable in law;
- c) be not for profit; and
- d) describe a charitable community benefit as listed in subsection 2.1.2 f).

2.1.5 The charity’s proposed use of proceeds must comply with specific use of proceeds policy. *(Amended Nov 2022)*

2.1.6 Charities engaged in any commercial activity which generates income for the personal gain of the charity’s membership or others are ineligible for licensing, unless otherwise approved by AGLC.

2.1.7 Charities that charge fees for their programs or services for the purpose of generating a profit rather than on a cost-recovery basis are ineligible for licensing, unless otherwise approved by AGLC.

2.1.8 A charity whose application for licensing is being reviewed by AGLC, or any charity that AGLC already licenses, is expected to advise AGLC of any significant or material changes to their structure or operations, including but not limited to: *(Amended Nov 2022)*

- a) the intended recipients, participants or beneficiaries of its programs or services;
- b) for charities who operate a public facility, changes to the access policy or procedures to the facility;
- c) the date and time of program and/or service delivery (if requested by AGLC); and
- d) the premises from which the program and/or service delivery is made (if requested by AGLC).



SECTION: ELIGIBILITY

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SUBJECT: HOST FIRST NATION ELIGIBILITY

- 2.1.9 A charity established by a HFN for the purpose of applying for a casino licence on reserve, is not eligible to apply for a casino licence off its reserve.
- 2.1.10 If an application for a casino licence is refused by AGLC, the applicant charity may request a hearing before the Board pursuant to section 94(1) of the *Gaming, Liquor and Cannabis Act*.

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Len Rhodes

SUBJECT: SUB-CHARITY/OTHER ENTITY ELIGIBILITY

POLICY

- 2.2.1 To be eligible to receive proceeds from a licensed charity, a sub-charity must be in compliance with subsection 2.1.1, unless otherwise approved by AGLC.
- 2.2.2 Entities that do not comply with subsection 2.1.1 may be eligible to receive proceeds from a licensed charity if:
- a) the entities are approved by AGLC beforehand (the written declaration provided to the licensed charity, as specified in subsection 2.2.4, may be reviewed by AGLC when making its determination); and
 - b) the entities use the proceeds for charitable purposes. *(Amended Nov 2022)*
- 2.2.3 If a sub-charity/other entity dissolves, all of its remaining proceeds and any assets acquired with proceeds must be returned to the licensed charity.
- 2.2.4 The sub-charity/other entity must provide to the licensed charity a written declaration or statement of the charitable community benefit provided by the programs or services the sub-charity/other entity delivers. The declaration must identify:
- a) the types of programs or services delivered;
 - b) an explanation as to why the programs or services are important to the HFN community;
 - c) the number of persons participating in the programs or receiving services and the fee structure charged;
 - d) the number of persons who may potentially benefit from the programs or services offered;
 - e) the date(s) and approximate time(s) of program or service delivery; and
 - f) the premises from which the program or service delivery is made.
- 2.2.5 The sub-charity's/other entities' proposed use of proceeds must comply with specific use of proceeds policy. *(Amended Nov 2022)*

SUBJECT: SUB-CHARITY/OTHER ENTITY ELIGIBILITY

- 2.2.6 Sub-charities/other entities engaged in any commercial activity which generates income for the personal gain of the sub-charities'/other entities' membership or others are ineligible to receive proceeds, unless otherwise approved by AGLC.
- 2.2.7 Sub-charities/other entities that charge fees for their programs or services for the purpose of generating a profit rather than on a cost-recovery basis are ineligible to receive proceeds, unless otherwise approved by AGLC.
- 2.2.8 Sub-charities/other entities receiving proceeds from the licensed charity must immediately advise the licensed charity in writing of any significant or material changes to its structure or operations, including but not limited to: *(Amended Nov 2022)*
- a) the intended recipients, participants or beneficiaries of its programs or services;
 - b) the date and time of program and/or service delivery;
 - c) the premises from which the program and/or service delivery is made; and
 - d) for sub-charities/other entities who operate a public facility, changes to the access policy or procedures to the facility.

SUBJECT: DUE DILIGENCE INVESTIGATION

POLICY

- 2.3.1 A thorough background check is conducted on the applicant or licensed charity and all key personnel and associates related to the applicant or licensed charity as defined by AGLC to ensure that those who could be a detriment to the integrity or lawful conduct of gaming in the province are prevented from having an association with the applicant or licensed charity. *(Amended Oct 2022)*
- 2.3.2 The applicant or licensed charity's key personnel include individuals that exercise influence or control over day to day operations or decision-making and individuals who have the authority to hire or terminate employees, and include but are not limited to:
- a) directors;
 - b) individuals employed in senior management positions such as CEO or executive directors and CFO or controller;
 - c) individuals who have signing authority on any bank accounts where charitable proceeds are held or maintained; and
 - d) general manager, alternate general manager, and combined general manager/advisor(s).
- 2.3.3 Key personnel associates include but are not limited to:
- a) a spouse or a person with whom the individual is living in a relationship of interdependence;
 - b) any corporation controlled by a key person; and
 - c) any key personnel or associate of the controlled corporation.
- 2.3.4 Directors of the charity and related associates may be permitted to complete a background check, specified by AGLC, depending upon their responsibilities on the board. *(Amended Oct 2022)*
- 2.3.5 The applicant or licensed charity must ensure that all key personnel and associates submit all documents or provide information as required by AGLC and deemed necessary to complete the background checks. Failure to submit the documents or information within the time frame specified in the document or information request may result in sanctions as determined by the Board up to and including the termination of the casino licence. *(Amended Oct 2022)*

SUBJECT: DUE DILIGENCE INVESTIGATION

2.3.6 AGLC may refuse to issue a casino licence if, in its opinion, the applicant or licensed charity has misled AGLC or provided inaccurate or incomplete information.

2.3.7 AGLC may refuse to issue a casino licence, or may terminate a casino licence if, in its opinion, the applicant or licensed charity's key personnel or associate:

- a) is a person who has not acted or may not act in accordance with the law, with honesty and integrity or in the public interest, having regard to the past conduct of the person;
- b) would be a detriment to the integrity or lawful conduct of gaming activities or provincial lotteries;
- c) is a person whose background, reputation and associations may result in adverse publicity to the gaming industry in Alberta; or
- d) has, within the five years prior to the submission of the application contravened: *(Amended Oct 2022)*
 - i) the *Gaming, Liquor and Cannabis Act* or Gaming, Liquor and Cannabis Regulation;
 - ii) a predecessor of the Act or Regulation; or
 - iii) a condition imposed on a licence or registration issued or made under the Act or a predecessor of the *Gaming, Liquor and Cannabis Act*.
- e) fails to pass a records check as outlined in section 10 of the Gaming, Liquor and Cannabis Regulation; or
- f) has, within the five years prior to the submission of the application:
 - i) had a licence or registration issued or made under the *Gaming, Liquor and Cannabis Act* or predecessor of the Act or a foreign licence or registration of the applicant, any of the applicant's key employees or any of the applicant's associates has been cancelled or suspended by the issuing authority; or
 - ii) been refused a foreign licence or registration. *(Added Oct 2022)*



SECTION: ELIGIBILITY
NUMBER: 2.3

SUBJECT: DUE DILIGENCE INVESTIGATION

2.3.8 Notwithstanding subsections 2.3.1 to 2.3.7, AGLC may refuse to issue a casino licence to the applicant or licensed charity.

2.3.9 *(Deleted Oct 2022)*

SUBJECT: CHARITY WORKER EVENT REQUIREMENTS

POLICY

3.1.1 *(Deleted Apr 2022)*

3.1.2 A licensed charity must employ charity workers to fill the following positions: *(Amended Nov 2022)*

- a) general manager or CGMA;
- b) alternate general manager;
- c) banker;
- d) cashier;
- e) chip runner;
- f) count room supervisor; and
- g) count room staff (sorter, counter, recorder and amalgamator).

Note: For information regarding combining the duties of the counter with other charity worker positions see CTCOG 3.2.13.

3.1.3 Any additional charity worker positions not listed in subsection 3.1.2 must be approved by AGLC.

3.1.4 AGLC may approve requests to modify staffing requirements for the charity to reduce charity staffing when necessary or under extenuating circumstances (e.g., combine charity roles). If approved, AGLC may require additional procedures to maintain the security and integrity of the event (e.g., logging worker roles). *(Amended Apr 2022)*

SUBJECT: ELIGIBILITY REQUIREMENTS

POLICY

3.2.1 Eligibility requirements for charity workers are as follows: *(Amended Apr 2022)*

- a) charity workers must be registered with AGLC. Applications for registration as a charity worker may be obtained from AGLC;
- b) charity workers cannot perform any of the following functions at the same HFN casino facility in which they are employed:
 - i) games manager;
 - ii) pit supervisor;
 - iii) pit boss;
 - iv) dealer;
 - v) director/manager of security;
 - vi) director/manager of surveillance;
 - vii) security guard;
 - viii) monitor room personnel;
 - ix) slot manager; and
 - x) slot operator (slot attendant or cashier).
- c) The general manager may perform the CGMA duties in a HFN casino facility if:
 - i) the casino facility has been in operation for a minimum of six months; and
 - ii) the general manager meets the registration requirements of an Advisor.
- d) an individual on the board of the licensed charity cannot hold any charity worker or advisor positions within the HFN casino facility the licensed charity operates and where the individual is a board member;
- e) additional eligibility requirements for charity workers may be found in Section 3.1.1 of the CTCOG.

3.2.2 Pursuant to section 11 of the Gaming, Liquor and Cannabis Regulation, the Board may refuse to register an applicant if the Board

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AUTHORITY:

Original signed by
Len Rhodes

SUBJECT: ELIGIBILITY REQUIREMENTS

is satisfied that the applicant has within the five years prior to the submission of the application contravened: *(Amended Apr 2022)*

- a) the *Gaming, Liquor and Cannabis Act* or Gaming, Liquor and Cannabis Regulation;
- b) a predecessor of the *Gaming, Liquor and Cannabis Act* or Gaming, Liquor and Cannabis Regulation; or
- c) a condition imposed on a licence or registration issued or made under the *Gaming, Liquor and Cannabis Act* or a predecessor of the Act.

3.2.3 Registration is issued at the discretion of the Board. *(Added Apr 2022)*

3.2.4 A licensed charity must notify AGLC immediately upon becoming aware of any charity worker being charged with or convicted of an offence listed in section 10 the Gaming, Liquor and Cannabis Regulation. *(Amended Apr 2022)*

3.2.5 A charity worker must notify AGLC and the licensed charity immediately when charged with or convicted of an offence under: *(Amended Apr 2022)*

- a) the *Criminal Code* (Canada);
- b) the *Excise Act* (Canada)
- c) the *Food and Drugs Act* (Canada);
- d) the *Income Tax Act* (Canada);
- e) the *Controlled Drugs and Substances Act* (Canada), other than under section 4(1) of that Act for possession of any substance included in Schedule II to that Act;
- f) a foreign Act or Regulation that is substantially similar to an offence referred to in a), b), c), d) or e) above;
- g) the *Gaming, Liquor and Cannabis Act* (Alberta); or
- h) the Gaming, Liquor and Cannabis Regulation (Alberta).

3.2.6 If a charity worker is charged or convicted, as described in subsection 3.2.5 the Board may take disciplinary action including, but not limited to, suspension or cancellation of the registration.

3.2.7 If a charity worker has misled the Board, failed to provide information or provided inaccurate information, the Board may take

SUBJECT: ELIGIBILITY REQUIREMENTS

disciplinary action including, but not limited to, suspension or cancellation of the registration.

3.2.8 Charity workers may only work in the position(s) for which they are registered and may only be paid for the work performed in these positions. Where the charity worker is performing the role of a CGMA, the individual cannot be paid for two separate positions.

3.2.9 *(Deleted Apr 2022)*

3.2.10 Any changes to personal information (e.g., address or name) must be reported immediately in writing, to gaming.registrations@aglc.ca or by telephoning AGLC's Registration Unit at 1-800-272-8876. *(Amended Apr 2022)*

3.2.11 *(Deleted Nov 2022)*

3.2.12 Charity worker registration applications (Form 5533) are located on AGLC's website at aglc.ca and will only be processed if: *(Amended Apr 2022)*

- a) it is complete in all the information requested;
- b) the information in the application is truthful; and
- c) there is a records check included with the application. AGLC must receive the records check within three months of records check being issued.

SUBJECT: CONDUCT

POLICY

3.3.1 Charity worker conditions of registration requirements are specified under CTCOG 6.2.1 – 6.2.3 and 3.2.15 – 3.2.18. *(Added Oct 2022)*

3.3.2 Charity worker conduct requirements while working in a licensed facility are specified under CTCOG 1.11.1, 6.2.13 – 6.2.15 and 7.1.3. *(Added Oct 2022)*

3.3.3 *(Deleted Oct 2022)*

3.3.4 *(Deleted Oct 2022)*

3.3.5 *(Deleted Oct 2022)*

3.3.6 *(Deleted Oct 2022)*

3.3.7 *(Deleted Oct 2022)*

3.3.8 A charity worker may provide their second CasinoTrack card to the licensed charity. The CasinoTrack card must be stored in a safe at the respective casino facility. A log must be maintained whereby the individual is required to sign out the CasinoTrack card when it is needed: *(Amended Oct 2022)*

- a) the log must contain the registration number of the CasinoTrack card, date and the time card is signed-out, the reason the card is required and signatures of both the individual and licensed charity.

3.3.9 *(Deleted Oct 2022)*

3.3.10 *(Deleted Oct 2022)*

3.3.11 *(Deleted Dec 2021)*

3.3.12 Charity workers are only allowed to work one position during an event except:

- a) if the general manager assigns a count room worker to witness table closing chip counts. This must not interfere with count room duties;
- b) in casinos with less than 300 slot machines, those individuals assuming the positions of banker, cashier(s) and chip runner may, once their cash cage duties have been concluded, also work in various count room positions. The one exception being

SUBJECT: CONDUCT

the banker, who must not be allowed to assume the position of count room supervisor;

c) for information regarding combining the duties of the counter with other charity worker positions see CTCOG 3.2.13; and
(Amended Nov 2022)

d) the licensed charity may make a written request to AGLC for approval to combine the cashier and chip runner positions, where the combination would not adversely affect the operation of the event. *(Added Apr 2020)*

i) the charity worker assigned to the combined role must hold a current registration as a chip runner and cashier.

3.3.13 The general manager or combined general manager/advisor and banker are deemed to be on continual duty during the event. They may not participate in any activity that detracts from their casino duties.

SUBJECT: GENERAL MANAGER

POLICY

3.4.1 General manager position requirements are specified under CTCOG Section 3.3. *(Amended Oct 2022)*

3.4.2 *(Deleted Oct 2022)*

3.4.3 *(Deleted Oct 2022)*

3.4.4 *(Deleted Oct 2022)*

3.4.5 Prior to the end of the event, the general manager in a Host First Nation casino will sign off on all discrepancy reports in addition to the advisor or games manager. *(Amended Oct 2022)*

- a) The general manager:
 - i) ensures secure handling and storage of chips and cash at all times during the event;
 - ii) enforces access provisions to restricted areas; and
 - iii) keeps the safe combination confidential or maintains possession of safe keys (if applicable).

3.4.6 In situations where the licensed charity does not use advisors (see Section 4.3), the general manager may be used to perform the advisor duties if they meet the registration requirements of an advisor (see Section 6.3 of the CTCOG).

3.4.7 An alternate general manager must be on duty in the general manager's absence. All references to the general manager may be considered references to the alternate general manager. *(Amended Dec 2021)*

SUBJECT: COMBINED GENERAL MANAGER/ADVISOR

POLICY

- 3.5.1 To act as a CGMA the requirements and registration process must be completed for both an advisor and a general manager. If an individual has only completed the advisor requirements for one of the cash cage or count room, they can only complete the CGMA duties for the area for which the requirements have been met (i.e., only eligible to work in the cash cage if only the cash cage requirements have been completed).
- 3.5.2 A CGMA is directly accountable to AGLC. They must ensure the licensed charity complies with provisions of the *Gaming, Liquor and Cannabis Act*, Gaming, Liquor and Cannabis Regulation and Board policies as they relate to cash cage and count room activities. Failure to do so may result in disciplinary action including, but not limited to, suspension or cancellation of the registration.
- 3.5.3 A CGMA is responsible for identifying and reporting the circumstances surrounding any shortages by submitting a Discrepancy Report to AGLC. An investigation may be conducted based on the submitted Discrepancy Report. If negligence is involved in the shortage, Board action may be considered to secure the missing funds. If the shortage occurred as the result of a criminal act, the appropriate *Criminal Code* charges will be laid (see section 9).
- 3.5.4 *(Deleted Oct 2022)*
- 3.5.5 The CGMA is responsible to perform the duties of the general manager and advisor (see CTCOG Sections 3.3 and 6.3): *(Amended Oct 2022)*
- a) to ensure the casino is conducted in accordance with the HFNCCPH and the CTCOG; and
 - b) to perform the duties of the general manager and advisor for casino event table game operations regarding opening and closing procedures, cash/chip transfers, pull of drop boxes and interim counts that are specified under CTCOG Sections 7 and 8.
- 3.5.6 *(Deleted Apr 2022)*

SUBJECT: CHARITY WORKER POSITIONS

POLICY

3.6.1 Charity worker position requirements for the banker, cashier, chip runner, count room supervisor, sorter, counter, recorder, and amalgamator are specified under CTCOG Sections 3.4 to 3.11. *(Amended Oct 2022)*

3.6.2 Where the licensed charity has received approval to combine the chip runner duties with the cashier position, the licensed charity must:

- a) create and retain a log, for a period of no less than six months, that will identify which charity worker was assigned the licensed charity's CasinoTrack card. The log is to be made available to AGLC upon request;
- b) ensure the charity worker will use their own assigned CasinoTrack card to perform their cashier duties;
- c) ensure the charity worker is responsible for all transactions completed with the licensed charity's CasinoTrack card; and
- d) confirm that the log shows the last transaction (time, table, transaction description) performed by the cashier it was previously assigned to when the CasinoTrack card is issued to more than one person during an event.

3.6.3 *(Deleted Dec 2021)*



SECTION: CHARITY WORKERS
NUMBER: 3.7

SUBJECT: CASHIER

POLICY

(Deleted Oct 2022)

The requirements for the cashier are specified under Section 3.5 in the CTCOG.



SECTION: CHARITY WORKERS
NUMBER: 3.8

SUBJECT: CHIP RUNNER

POLICY

(Deleted Oct 2022)

The requirements for the chip runner are specified under Section 3.6 in the CTCOG.



SECTION: CHARITY WORKERS
NUMBER: 3.9

SUBJECT: COUNT ROOM SUPERVISOR

POLICY

(Deleted Oct 2022)

The requirements for the count room supervisor are specified under Section 3.7 in the CTCOG.



SECTION: CHARITY WORKERS
NUMBER: 3.10

SUBJECT: SORTER

POLICY

(Deleted Oct 2022)

The requirements for the sorter are specified under Section 3.8 in the CTCOG.



SECTION: CHARITY WORKERS
NUMBER: 3.11

SUBJECT: COUNTER

POLICY

(Deleted Oct 2022)

The requirements for the counter are specified under Section 3.9 in the CTCOG.



SECTION: CHARITY WORKERS
NUMBER: 3.12

SUBJECT: RECORDER

POLICY

(Deleted Oct 2022)

The requirements for the recorder are specified under Section 3.10 in the CTCOG.



SECTION: CHARITY WORKERS
NUMBER: 3.13

SUBJECT: AMALGAMATOR

POLICY

(Deleted Oct 2022)

The requirements for the amalgamator are specified under Section 3.11 in the CTCOG.

SUBJECT: LICENSED CHARITY'S ROLES AND RESPONSIBILITIES

POLICY

4.1.1 *(Deleted Apr 2022)*

4.1.2 The licensed charity must immediately report to AGLC any irregularities, theft, fraud, cheating at play or violations of policy in the conduct of its licensed event and in the use of proceeds.

4.1.3 Where casino revenue or proceeds are missing due to suspected theft or fraud, the licensed charity must not initiate any civil action against, or enter into any repayment agreements or other agreements with, persons suspected of being responsible for the missing casino revenue or proceeds.

4.1.4 The licensed charity is responsible for ensuring that the CasinoTrack card assigned to them is secured at all times: *(Added Apr 2020)*

- a) AGLC will determine the number of cards to be assigned to the licensed charity;
- b) the licensed charity must report immediately to AGLC any lost or stolen card(s); and
- c) the licensed charity is responsible for the costs of replacing a lost, stolen or damaged card.

SUBJECT: CASINO FACILITY AND SERVICES AGREEMENT

POLICY

4.2.1 *(Deleted Dec 2021)*

4.2.2 *(Deleted Apr 2022)*

4.2.3 The Casino Facility and Services Agreement must include a provision that at the completion of the event it will be determined if the total of the fixed fees and charges of the casino facility licensee exceeds:

- a) for casinos with over 400 slot machines, 50 per cent of the net table game proceeds;
- b) for casinos with 350 to 399 slot machines, 65 per cent of the net table game proceeds; and
- c) for casinos with less than 350 slot machines, 75 per cent of the net table game proceeds.

If such fees and charges exceed the above net proceeds, the casino facility licensee will only be entitled to payment of an amount equivalent to 50 per cent, 65 per cent or 75 per cent of the net table game proceeds.

4.2.4 GST (if applicable) is paid at the end of each event and is based on the casino facility operator's fees from that event.

4.2.5 The casino facility licensee may keep table game surpluses generated at events to cover table game deficits which may occur at subsequent events. Net accumulated surpluses that exist at the end of each quarter of the licensed period must be paid by the casino facility licensee to the licensed charity within three days of the end of the quarter.

4.2.6 *(Deleted Dec 2021)*

4.2.7 The casino facility licensee is responsible for the applicable percentage of losses (net proceeds after prizes are paid is negative), in casinos with over 400 slot machines 50 per cent; in casinos with 350 to 399 slot machines 65 per cent; and in casinos with less than 350 slot machines 75 per cent.

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Len Rhodes



SECTION: CASINO EVENT OPERATIONS
NUMBER: 4.3

SUBJECT: ADVISOR CONTRACTS

POLICY

- 4.3.1 The licensed charity is required to employ advisors for a minimum of six months after the opening of the casino facility.
- 4.3.2 After the six month requirement is met, the licensed charity has the option to continue to use an advisor or use a CGMA to perform the advisor duties. The CGMA must be registered as an advisor and a general manager or alternate general manager.
- 4.3.3 For casinos with 16 or more table games, both a cash cage and count room advisor in each role is required. For casinos with 15 or less table games, one dual role advisor is required.



SECTION: CASINO EVENT OPERATIONS

NUMBER: 4.4

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SUBJECT: COMBINED GENERAL MANAGER/ADVISOR

POLICY

4.4.1 The combined general manager/advisor role's registration and conduct requirements are specified under CTCOG 6.1, 6.2 and 6.3.4.
(Amended Oct 2022)

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Len Rhodes

SUBJECT: CASINO CLEARING ACCOUNT

POLICY

4.5.1 A separate casino event clearing bank account must be set up to facilitate the management of event proceeds. The following procedures must be followed when managing event proceeds and the clearing bank account:

- a) all event proceeds (plus cash overages/less cash shortages), as calculated in the CasinoTrack system, must be deposited into the approved clearing bank account on an event by event basis;
- b) the following disbursements must be made from the clearing bank account by debit card, pre-authorized debit (PAD), electronic funds transfer (EFT), bank draft or cheque: *(Amended Apr 2020)*
 - i) fixed fee payment to the casino facility licensee as stipulated in subsection 4.2.3; and
 - ii) remaining balance of proceeds to the licensed charity.
- c) if disbursements from the clearing bank account are not made on an event by event basis, they must be made on a minimum of a bi-weekly basis;
- d) if disbursements are not made on an event by event basis, a reconciliation of the proceeds deposited into the account and the portion of the balance that is the casino facility licensee's fixed fee and the licensed charity's proceeds must be maintained on an event by event basis;
- e) in the case of an event loss, the licensed charity must disburse from its casino account by debit card, pre-authorized debit (PAD), electronic funds transfer (EFT), bank draft or cheque an amount equal to the licensed charity's portion of the event loss (see subsection 4.2.7) to the casino clearing account within five banking days of the event loss. A transfer to the casino facility licensee must then be completed to help offset the total loss; and *(Amended Apr 2020)*
- f) if event proceeds are not disbursed from the casino clearing account on an event by event basis, proceeds net of losses may be disbursed to the casino facility licensee and the licensed charity. *(Amended Apr 2018)*

SUBJECT: CASINO EXPENSES

POLICY

4.6.1 The licensed charity is responsible for paying the following expenses at the conclusion of each event: *(Amended Oct 2022)*

- a) cash cage advisor and count room advisor fees; and
- b) any other expenses approved by the Board.

4.6.2 If the licensed charity contracts the services of a cash cage advisor and/or a count room advisor on a per diem basis, the per diem fees must not exceed: *(Amended Apr 2022)*

- a) cash cage advisor:
 - i) for casinos with 16 or more table games: \$744/day (plus applicable taxes); plus \$45/hour for each extra hour the table games are open longer than 14 hours/day (e.g., if table games are open for 16 hours, an advisor may earn an extra two hours pay or \$90).
 - ii) for casinos with 15 or less table games: \$537/day (plus applicable taxes) plus \$45/hour for each extra hour the table games are open longer than 14 hours/day.
- b) count room advisor:
 - i) for casinos with more than 16 table games: \$330.50/day (plus applicable taxes); or
 - ii) for casinos with 15 or less table games: \$289/day (plus applicable taxes).

4.6.3 The licensed charity is responsible for paying, from its designated casino account, licence fees to AGLC on a quarterly basis. The licence fees, as listed in schedule 1 of the Gaming, Liquor and Cannabis Regulation, are as follows:

- a) \$15 x the number of gaming tables opened during an event.

SUBJECT: CASINO EVENT TABLE GAMES PROCEDURES

POLICY

(Amended Apr 2022)

- 4.7.1 All licensed casino event table game operations regarding opening and closing procedures, cash/chip transfers, pull of drop boxes and interim counts must be conducted in accordance with CTCOG Sections 7 and 8. *(Added Oct 2022)*
- 4.7.2 HFN charities operate under a one-day event cycle which includes all procedures listed in CTCOG Sections 7.1 and 7.2. This includes opening procedures for the event (Identified as Day 1 CTCOG) and closing procedures for the event (Identified as Day 2 CTCOG). *(Added Oct 2022)*
- 4.7.3 *(Deleted Oct 2022)*
- 4.7.4 *(Deleted Oct 2022)*
- 4.7.5 *(Deleted Oct 2022)*
- 4.7.6 *(Deleted Oct 2022)*



SECTION: CASINO EVENT OPERATIONS

NUMBER: 4.8

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SUBJECT: CASH/CHIP TRANSFERS

POLICY

(Deleted Oct 2022)

The requirements for cash/chip transfers are specified under Section 7.2 of the CTCOG.

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SECTION: CASINO EVENT OPERATIONS
NUMBER: 4.9

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SUBJECT: CLOSING PROCEDURES

POLICY

(Deleted Apr 2022)

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SECTION: CASINO EVENT OPERATIONS
NUMBER: 4.10

SUBJECT: PULL OF DROP BOXES

POLICY

(Deleted Oct 2022)

The requirements for the pull of drop boxes are specified under Section 8.1 of the CTCOG.



SECTION: CASINO EVENT OPERATIONS

NUMBER: 4.11

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SUBJECT: INTERIM COUNT

POLICY

(Deleted Oct 2022)

The requirements for the interim count are specified under Sections 8.1 and 8.2 of the CTCOG.

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SECTION: CASINO EVENT OPERATIONS

NUMBER: 4.12

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SUBJECT: COUNT ROOM CLOSING

POLICY

(Deleted Oct 2022)

The requirements for the count room closing are specified under Section 8.3 of the CTCOG.

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SUBJECT: ANTI-MONEY LAUNDERING (AML)

POLICY

(Added Apr 2018)

4.13.1 The licensed charity, as a reporting entity under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA), has statutory reporting, record keeping and filing obligations to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) for all table games, excluding those involving dice.

4.13.2 The licensed charity is required to appoint an AML compliance officer (CO) who is responsible for developing and administering its Anti-money Laundering (AML) Program as it relates to table games, excluding those involving dice.

4.13.3 The licensed charity's AML program must comply with:

- a) the PCMLTFA and associated regulations;
- b) FINTRAC AML/TF compliance regime guidelines;
- c) all federal and provincial legislation; and
- d) AGLC AML policies (see CTCOG Section 18), with the exception of any policies and procedures related to, record keeping and reporting of table games; Large Cash Transaction Report (LCTR); and Casino Disbursement Reports (CDR) transactions.

4.13.4 *(Deleted Oct 2022)*



SECTION: ELECTRONIC GAMES
NUMBER: 5.1

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SUBJECT: GENERAL INFORMATION

POLICY

(Deleted Oct 2022)

DATE ISSUED: October 27, 2022 **AUTHORITY:** Original signed by Len Rhodes

SUBJECT: REMUNERATION

POLICY

- 5.2.1 AGLC allocates 15 per cent of slot machine net sales and five per cent of gross keno sales to the licensed charity.
- 5.2.2 Net sales are calculated as cash played less cash won. *(Amended Oct 2022)*
- 5.2.3 Gross sales for keno are calculated as total sales prior to prize payout.
- 5.2.4 The licensed charity must deposit the allocated charitable proceeds, as specified in subsection 5.2.1, into its casino account.
- 5.2.5 The licensed charity must spend the charitable proceeds only on charitable purposes approved by AGLC (see Section 6.4). *(Amended Nov 2022)*



SECTION: ELECTRONIC GAMES
NUMBER: 5.3

SUBJECT: FLOATS

POLICY

(Deleted Oct 2022)



SECTION: GENERAL USE OF PROCEEDS
NUMBER: 6.1

SUBJECT: CASINO TABLE REVENUE

POLICY

- 6.1.1 Casino table revenue refers to the total income from sales of casino table games of chance at licensed events.
- 6.1.2 Casino table revenue must only be spent on approved prizes, approved event expenses and on charitable purposes approved by AGLC. *(Amended Nov 2022)*
- 6.1.3 The licensed charity must comply with Board policy including the terms and conditions for event expenses and use of proceeds which are provided in the HFNCCPH and the CTCOG.
- 6.1.4 Changes to approved event expenses and use of proceeds after the licence is issued must be submitted in writing to AGLC for approval. The submission must be made prior to the licensed charity disbursing any funds on the requested change. Two authorized personnel of the licensed charity must sign the request for approval to make changes.
- 6.1.5 If a proposed use of casino table revenues is refused by AGLC, the licensed charity may request a hearing before the Board pursuant to section 94(1) of the *Gaming, Liquor and Cannabis Act*.



SECTION: GENERAL USE OF PROCEEDS
NUMBER: 6.2

SUBJECT: CASINO TABLE GAME PRIZES

POLICY

- 6.2.1 In this subsection, prizes are anything of value, such as money, property, merchandise or services, which a player of a game of chance, played during a licensed event, has a chance to win.
- 6.2.2 Casino table revenue must only be used to pay for prizes which have been approved by AGLC.
- 6.2.3 Table game prizes are the responsibility of the casino facility licensee. Standards for event prizes are specified in the rules of play for each approved game in the CTCOG.



SECTION: GENERAL USE OF PROCEEDS

NUMBER: 6.3

HOST FIRST NATION CHARITABLE CASINO POLICIES HANDBOOK

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SUBJECT: CASINO EVENT EXPENSES

POLICY

- 6.3.1 Event expenses are the costs incurred by the licensed charity to operate an event and may include the following:
- a) the casino facility fee (see Section 4.2);
 - b) Advisor fees (see Section 4.6); and
 - c) any other expenses approved by AGLC.
- 6.3.2 All payments from the casino account for approved event expenses must be made in accordance with AGLC's approved methods of payment as outlined in Subsection 6.5.2 e). *(Amended Apr 2020)*
- 6.3.3 Casino table game revenue may be used to pay event expenses which have been approved by AGLC.
- 6.3.4 Eligible event expenses are specified in Section 4.5.

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Len Rhodes

SUBJECT: GENERAL USE OF PROCEEDS

POLICY

6.4.1 With regard to Sections 6.4, 6.5 and 7, all references to sub-charity include other entities approved by AGLC, as specified in subsection 2.2.2.

6.4.2 Proceeds are funds remaining from total gaming event revenue after the payment of approved prizes and event expenses, and the commission for licensed charities at whose licensed gaming events AGLC conducts provincial lotteries. *(Amended Nov 2022)*

Note: Proceeds include all donations received from gaming funds and interest, dividends, insurance payouts, or other income earned from gaming proceeds.

6.4.3 Proceeds include a licensed Host First Nation charity's proceeds generated from a licensed gaming event other than casino (bingo, raffle and/or pull ticket) which may also be spent under the approved HFNCCPH use of proceeds, as follows: *(Added Jul 2022)*

- a) gaming event revenue from bingo, raffle (more than \$20,000), and/or pull ticket licences, must be deposited into the licensed charity's designated gaming account for that licence;
- b) gaming event revenue from raffle licenses, \$20,000 and less, must be deposited into the licensed charities existing gaming bank account (e.g., bingo or casino); and
- c) once prizes and expenses have been paid, in coordination with AGLC, the licensed charity must transfer the net proceeds from their designated gaming account into their casino account.

6.4.4 Expenses for charitable programs that generate or receive revenue (e.g., admission fees, registration fees, donations, grants, advertising revenue, facility rental revenue, etc.) must be managed on a cost-recovery basis. *(Amended Nov 2022)*

- a) Program revenue must be used to pay for program expenses first.
- b) Any revenue, donations, and/or grants received for programs or activities must be spent prior to any proceeds being used.

SUBJECT: GENERAL USE OF PROCEEDS

c) If program revenues are not sufficient to cover program expenses, proceeds may be used to pay the shortfall for approved expenses.

6.4.5 Proceeds are to be used to supplement, and should not reduce or replace, existing government funding for HFN programs and services.

6.4.6 Proceeds must be deposited with a recognized financial institution in Alberta and must remain in the respective gaming account(s) until spent on the licensed charities approved uses. If not immediately required, gaming proceeds may be:

a) deposited into separate Canadian Deposit Insurance Corporation (CDIC) insured account(s); or

b) used to purchase Guaranteed Investment Certificates.

Note: The financial institution, account or deposit number, and value of funds in the account(s) must be identified on all financial reports. All interest, dividends, or other income earned by these funds are deemed proceeds. *(Amended Nov 2022)*

6.4.7 *(Deleted Nov 2022)*

6.4.8 Proceeds must only be used for AGLC approved purposes and objects which are essential to the delivery of the licensed charity's or sub-charities' charitable programs and services. *(Amended Nov 2022)*

6.4.9 Proceeds must be used to support the licensed charity's or sub-charities' overall objectives, programs and services as approved and not solely to provide benefits to specific or select members of the licensed charity or sub-charity.

6.4.10 *(Deleted Apr 2016)*

6.4.11 Program proposals (Form 5624) must be submitted to AGLC for approval; proposals must include the following: *(Amended Apr 2016)*

a) a description of each program outlining the goals and objectives;

b) the total amount of money received or budgeted to receive for each program including government sources;

c) a budget for each program outlining the total program delivery costs, total administrative costs and total wages/salaries anticipated; and

SUBJECT: GENERAL USE OF PROCEEDS

d) a list of all salary/wage positions for all programs including the current individual holding the position, the position title, the employer (licensed charity or sub-charity name), date of employment, and the total approved remuneration (including benefits). The list must correspond to the wages/salaries anticipated in the overall program budget.

6.4.12 For any programs not previously funded with proceeds, programs not identified in 6.4.11 or as requested by AGLC, program proposals are required to be submitted to AGLC for approval before any proceeds are disbursed. The program proposal must be completed with the requirements as outlined in subsection 6.4.11.

6.4.13 Substantial amendments to programs are required to be submitted to AGLC for approval.

6.4.14 Proceeds disbursed for goods or services purchased by the licensed charity or sub-charity must be reasonable. A reasonable disbursement must:

a) be comparable to industry prices or fair market value and other relevant considerations (e.g., job creation, training, supplier relationships and capacity building), unless otherwise approved by AGLC; and

b) obtain a minimum of two quotations when the goods and services purchased are over \$100,000 unless otherwise approved by AGLC.

6.4.15 If proceeds are disbursed on unapproved uses, the amount of the disbursement must be re-deposited into the designated casino account.

6.4.16 The licensed charity or sub-charity must receive approval by AGLC prior to entering into any financing or lease agreements when the monthly financing or monthly lease payment is over \$5,000. A letter of intent or quotation is acceptable documentation to be submitted to AGLC.

6.4.17 The licensed charity is accountable to AGLC for all proceeds, including the proceeds distributed to sub-charities.

6.4.18 The licensed charity must review all requests for use of proceeds from sub-charities and is responsible for ensuring all proceeds

SUBJECT: GENERAL USE OF PROCEEDS

disbursed to sub-charities are used for AGLC approved purposes or objects.

6.4.19 The licensed charity must record all proceeds disbursed to sub-charities and the purpose of each disbursement.

6.4.20 When the licensed charity disburses proceeds to a sub-charity the sub-charity will:

a) maintain a record of the disbursements from the licensed charity showing the:

i) date and amount of proceeds received; and

ii) date, amount and purpose of all uses of proceeds received.

b) allow AGLC access to all records, including those at any financial institution, to make copies of such records and/or remove them for further examination.

6.4.21 The licensed charity must keep a record of all sub-charities receiving proceeds and, if requested, must provide the list to AGLC. Any sub-charity in receipt of an annual amount of \$50,000 or more in proceeds must set up a designated casino account in which all proceeds received must be deposited, unless otherwise approved by AGLC. The sub-charity must maintain the minimum internal control standards over the designated casino account as stated in Section 6.5.

6.4.22 Other entities approved by AGLC to receive proceeds from the licensed charity must deposit all proceeds into a designated casino account and make all payments for charitable expenditures directly to vendors from this bank account, unless otherwise approved by AGLC. The other entities must maintain the minimum internal control standards over the designated casino account as stated in Section 6.5. *(Amended Nov 2022)*

6.4.23 The licensed charity or sub-charity can only disburse proceeds to entities approved by AGLC as a sub-charity/other entity (see Section 2.2).

6.4.24 *(Deleted Nov 2022)*

SUBJECT: GENERAL USE OF PROCEEDS

6.4.25 Proceeds may be used to pay for charity worker wages and associated benefits (including the cost of food and non-alcoholic refreshments while on duty).

6.4.26 The purchase of liquor is not an eligible use of proceeds.

6.4.27 Related-party transactions must be: *(Added Nov 2022)*

- a) conducted at fair-market value or less; and
- b) fully disclosed to the group's membership and documented in the meeting minutes, including:
 - i) a description of the relationship between the transacting parties;
 - ii) a description of the transaction(s), including those for which no amount has been recorded;
 - iii) the recorded amount of the transaction(s); and
 - iv) contractual obligations with related parties.

Note: Quotes from third parties must be obtained prior to the completion of related-party transactions to determine fair-market value. This information must be provided to AGLC upon request.

SUBJECT: MINIMUM INTERNAL CONTROL STANDARDS

POLICY

6.5.1 Licensed charities and sub-charities must maintain adequate internal controls over proceeds and assets purchased with proceeds.

6.5.2 An appropriate authorization structure for the disbursement of proceeds must be maintained. An appropriate authorization structure shall:

- a) reside with board unless otherwise delegated to specific board members or key personnel of the licensed charity or sub-charity and must be approved by a board motion;
- b) only be delegated to board members or key personnel of the licensed charity or sub-charity whose position is appropriate for such delegation or any member of Chief and Council that has completed a background check (see Section 2.3); *(Amended Oct 2022)*
- c) include specified dollar limits for individuals who have been delegated authorization from the board; and
- d) *(Deleted Apr 2016)*
- e) include a requirement that all payments for approved charitable purposes must be: *(Amended Apr 2020)*
 - i) made directly from the gaming account to the vendor or supplier by credit card, debit card, pre-authorized debit (PAD), electronic funds transfer (EFT), bank draft or cheque;
 - ii) be fully supported by receipts, invoices and/or other documents such as contracts, agreements, time sheets, etc.; and
 - iii) signed or approved by two authorized personnel of the licensed charity or sub-charity;
 - iv) printed signatures may be used for transactions under \$25,000 if:
 - the accounting system used to print the cheques and the cheque distributing process has adequate internal controls and segregation of duties; and

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SUBJECT: MINIMUM INTERNAL CONTROL STANDARDS

- the internal controls and segregation of duties for the accounting system and cheque distributing process has been reviewed and approved by AGLC.

6.5.3 There must be proper segregation of duties including segregation of:

- a) review and disbursement process:
 - i) revenue receipts;
 - ii) approval for disbursements;
 - iii) access to cheque stock;
 - iv) general ledger data entry;
 - v) cheque printing and distribution; and
 - vi) bank reconciliations.
- b) payroll process:
 - i) addition/change of employees and pay rates to payroll system/software;
 - ii) approval of hours worked; and
 - iii) entry of hours to payroll system/software.

6.5.4 *(Deleted Apr 2020)*

6.5.5 Payments to individuals are permitted under the following conditions:

- a) prior approval has been granted by AGLC; or
- b) when payments are made to individuals the following information must be maintained:
 - i) claimant's first name, last name and position title;
 - ii) a summary of the expenses incurred including the amount, date, description and reason for the expense;
 - iii) if for travel, the location traveled to, reason for travel, the time and dates of departure/return;
 - iv) signature of the claimant and signature of authorization; and

SUBJECT: MINIMUM INTERNAL CONTROL STANDARDS

- v) original receipts, invoices and/or other applicable supporting documents for the expenditures requiring reimbursement.

6.5.6 The licensed charity must implement and adhere to a written conflict of interest policy that covers employees with financial and/or human resource decision-making authority. Those required to comply with the conflict of interest policy include:

- a) board members;
- b) directors;
- c) individuals employed in senior management positions such as CEO or executive directors, and CFO or controller;
- d) individuals who have signing authority on any bank accounts where charitable proceeds are held or maintained; and
- e) any employee with financial and/or human resource decision making authority. *(Amended Apr 2016)*

6.5.6.1 Employees required to comply with the conflict of interest policy as per subsection 6.5.6 must sign a conflict of interest declaration. The conflict of interest declaration must state that the employee or board member:

- a) understands the conflict of interest policy;
- b) has disclosed all conflicts of interest, and;
- c) will disclose any conflicts of interest as they arise. *(Added Apr 2016)*

6.5.6.2 The licensed charity must have a process for addressing a conflict of interest. *(Added Apr 2016)*

6.5.7 The licensed charity and sub-charity must maintain a complete list of all fixed assets with an individual purchase price greater than or equal to \$2,500. The listing must include the capital assets purchased by the licensed charity and sub-charities and at minimum must include:

- a) original cost;
- b) date of purchase;
- c) program asset was purchased for;

SUBJECT: MINIMUM INTERNAL CONTROL STANDARDS

d) location of asset or the individual responsible or in possession of the asset (e.g., vehicle); and

e) date of sale (when disposed). *(Amended Jun 2017)*

6.5.8 Assets with a purchase price between \$2,500 and \$50,000 must be tracked for a minimum of five years. *(Amended Jun 2017)*

6.5.9 Assets greater than or equal to \$50,000 must be tracked until sold or until there is no longer a useful life.

6.5.10 Assets sold or transferred by means of a non-arm's length transaction must be disposed of at fair market value. AGLC may request an appraisal supporting the value of the transaction.

6.5.11 The licensed charity must ensure that assets are safeguarded with proper locks, key controls and sign out procedures.

6.5.12 *(Deleted Apr 2016)*

6.5.13 A full accounting of all sources of funding and disbursements for all charitable casino funded programs must be maintained. All disbursements must be supported by invoices or receipts. AGLC must have access to all records and may make copies of such records and remove them for further examination. *(Added Apr 2021)*

SUBJECT: ADMINISTRATIVE EXPENSES

POLICY

7.1.1 Proceeds may be used to pay for reasonable administrative costs which are necessary to the delivery of a charitable program or service, or to administer the distribution of proceeds to the sub-charities. *(Amended Nov 2022)*

7.1.2 Administrative costs are expenditures associated with the general management of the licensed charity and sub-charities that are not directly related with delivering charitable programs. Administrative costs include, but are not limited to: *(Amended Nov 2022)*

- a) office facility overhead (e.g., heating, rent, telephones and janitorial costs);
- b) space rented for meetings of the licensed charity or sub-charity members, employees and executive;
- c) stationery, postage, computers, software and other equipment for which the main purpose of use is administrative; and
- d) conferences, seminars or training workshops that are not directly related to charitable program delivery;
- e) bookkeeping and preparation of financial statements; and
- f) storage, including rental and purchase of items to accommodate storage (e.g., sheds, shipping containers, cabinets, trailers, etc.).

7.1.3 Proceeds may be used to pay for reasonable salaries, wages, contracts, fee for service or honorariums for persons employed by the licensed charity or sub-charity for the performance of administrative duties. Administrative positions are defined as senior executives, managers, and individuals completing general services (e.g., clerical, accounting and funding/program compliance officers) that are related to the charity as a whole as opposed to specific charitable programs. Managers of charitable programs whose duties are directly related to the delivery of charitable programs are not considered administrative by AGLC (see Section 7.31 for additional information regarding wages). *(Amended Nov 2022)*

7.1.3.1 Proceeds may be used to pay for reasonable honorariums or fees for service for board members of the licensed charity. Documentation

SUBJECT: ADMINISTRATIVE EXPENSES

supporting board remuneration amounts must be provided to AGLC for approval *(Added Apr 2016)*.

- 7.1.3.2 The provision to pay for board remuneration must be set out in the licensed charity's by-laws or articles of association. *(Added Apr 2016)*
- 7.1.4 Proceeds may be used to pay for meals that are provided at board meetings, community meetings and workshops.
- 7.1.5 Proceeds may be used to pay for reasonable professional fees necessary for the administration of the licensed charity or sub-charities.
- 7.1.6 Proceeds may be used by the licensed charity to hire a Chartered Professional Accountant (CPA) in good standing to satisfy the financial reporting requirements of AGLC. *(Amended Apr 2018)*
- 7.1.7 Financial statements of the licensed charity must be audited by a CPA in good standing. *(Amended Apr 2018)*
- 7.1.8 Approved administrative costs must normally be limited to a maximum cumulative total of 20 per cent of proceeds earned in the previous year. Written AGLC approval must be obtained prior to using more than 20 per cent of proceeds on administrative costs. A written request must be forwarded to AGLC, providing a breakdown of the costs involved. *(Amended Nov 2022)*
- 7.1.9 *(Deleted Apr 2021)*
- 7.1.10 Wages paid for charity workers are not considered administrative costs.

SUBJECT: ADDICTIONS TREATMENT & AFTERCARE PROGRAMS

POLICY

- 7.2.1 Proceeds may be used to pay for the costs associated with treatment and aftercare programs for alcohol, drug, gambling and other addictions of individuals of the HFN community.
- 7.2.2 The treatment and aftercare programs must be reasonably available to all eligible members of the HFN community who make application.
- 7.2.3 Eligible treatment costs include, but are not limited to:
- a) treatment facility fees;
 - b) direct-route transportation to the facility;
 - c) meals (if not included in facility fees);
 - d) accommodation fees (if not included in the facility fees); and
 - e) supplemental household expenditures for supporting affected family members as approved by AGLC (e.g., utility bills, childcare costs).
- 7.2.4 Proceeds may be used to pay for individual or group aftercare program activities, outlined in subsection 7.2.5, under the following conditions:
- a) the individual involved in the aftercare program must have successfully completed a minimum 19-day program;
 - b) the individual must meet with an accredited addictions counsellor to evaluate their aftercare plan detailing activities that would most benefit the individual for long-term recovery on an annual basis; and
 - c) if an individual relapses funding for aftercare programs must cease until the individual has been assessed by an accredited addictions counsellor to ascertain why they relapsed and determine what type of services are required.
- 7.2.5 Proceeds may be used to pay for individual or group aftercare program activities including, but not limited to:
- a) stress management, grief/loss, assertiveness training, relaxation techniques/training, self-control techniques, anger management, parenting programs, self-esteem programs, general social skills, career, legal, sexuality and marriage

SUBJECT: ADDICTIONS TREATMENT & AFTERCARE PROGRAMS

counselling, individual and entire family therapy and spiritual healing;

- b) vocational rehabilitation training (e.g., carpentry, landscaping, cooking, janitorial skills);
- c) academic training/education and employment training; and
- d) recreation, exercise, hobbies and crafts up to a maximum of \$1,000 per individual per fiscal year. *(Amended Jul 2019)*

7.2.6 Proceeds may be used to pay for the development and operation of an addictions treatment facility. The facility must be located on-reserve or on land where the licensed charity or sub-charity holds title, unless otherwise approved by AGLC (see Section 7.17).

7.2.7 *(Deleted Apr 2021)*



SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.3

SUBJECT: AID OF THE DISTRESSED

POLICY

- 7.3.1 Proceeds may be used to pay for the social services and/or educational programs which have identified specific issues of social concern in the HFN community and actively work to address these issues.
- 7.3.2 Proceeds may be used to pay for educational, counselling and/or information programs in the HFN community.
- 7.3.3 Proceeds may be used to support programs and/or individuals providing the necessities of life for those in distress (e.g., homeless shelters, battered person’s shelters, youth shelters, food banks, soup kitchens, and in-home supplemental food or meal assistance for seniors and persons with disabilities).
- 7.3.4 *(Deleted Apr 2021)*

SUBJECT: ARTS

POLICY

- 7.4.1 Proceeds may be used to support non-profit sub-charities that actively deliver a program or activity to the HFN community in the visual arts (e.g., drawing, painting, sculpting), the literary arts (e.g., creative writing, poetry), the media arts (e.g., computer graphics, film making) and the performing arts (e.g., music, dance, drama).
- 7.4.2 Proceeds may be used to support programs whereby individuals are sent to structured and developmental arts programs offered outside the HFN community. Any travel expenses for a group or individual must meet the criteria for approved travel outlined in Section 7.30.
- 7.4.3 To be eligible to receive proceeds, the sub-charity delivering the arts program or activity must:
- a) actively encourage the HFN community's participation in the program;
 - b) give the HFN community opportunities to participate in the program;
 - c) promote the program or activity to the HFN community; and
 - d) provide performances of the program or activity to the HFN community or the public, or provide training to the HFN community in the program or activity.
- 7.4.4 Proceeds may be used to pay for the development and operation of HFN community facilities in which visual, literary, media, or performing arts activities are undertaken (see Section 7.17).
- 7.4.5 Proceeds may be used to pay for the production costs of performances or displays which are provided to the HFN community. If a fee is charged to attend the performance or display, the revenue generated from the fees must be used to support the related costs. Proceeds may only be used after all revenue generated has been used to off-set related costs.
- 7.4.6 Proceeds may be used to pay salaries, wages or fees of artists if:
- a) the duties performed are essential to the sub-charity's program delivery; and

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SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.4

SUBJECT: ARTS

b) the duties are performed by a person with specialized qualifications.

7.4.7 *(Deleted Apr 2021)*

SUBJECT: BURSARIES AND SCHOLARSHIPS

POLICY

- 7.5.1 Proceeds may be used for educational bursaries or scholarships.
- 7.5.2 The bursaries and scholarships must be made reasonably available to all qualified HFN individuals.
- 7.5.3 Requests to use proceeds to establish and administer a charitable program and/or trust fund to support educational bursaries and scholarships must be submitted to and approved by AGLC. The following information about the proposed program and/or trust fund must be provided with the request:
- a) the purpose and proposed detailed budget of the program and/or trust fund; and
 - b) *(Deleted Apr 2016)*
 - c) the application selection process for determining the recipients of the bursaries and scholarships, which will include the following information:
 - i) the composition of the decision-making body responsible for reviewing the applications;
 - ii) the eligibility criteria of the applicants; and
 - iii) the selection criteria used to determine the recipients.
- 7.5.4 In instances whereby a trust fund is not used to administer the bursary and scholarship program, a designated bank account must be used to administer the disbursement of funds.
- 7.5.5 AGLC must have access to all records related to the application selection process, including the names of the recipients.
- 7.5.6 The licensed charity or sub-charity may only make payments directly to individuals as a means of providing bursaries and scholarships under the following conditions:
- a) if the recipient is attending a school or institution that is recognized by the Government of Alberta or otherwise approved by AGLC;
 - b) the licensed charity or sub-charity has verified the recipient is attending a recognized post-secondary educational institution (e.g., tuition receipt), and

SUBJECT: BURSARIES AND SCHOLARSHIPS

c) is based on either academic achievement or financial need.

7.5.7 Proceeds that are donated to approved trust funds administered by the licensed charity or sub-charity may be invested in short-term deposit certificates with AGLC approval. The interest earned must become part of the proceeds. If requested, the licensed charity or sub-charity must provide to AGLC the serial number, value, interest rate, interest paid and the term of all approved short-term deposit certificates (see subsection 6.4.6).

7.5.8 The trust funds may also be administered by an AGLC approved body, such as a post-secondary educational institution which is governed by the *Post-Secondary Learning Act*.

7.5.9 Prior to AGLC approval of a donation to a trust fund specified in subsection 7.5.7, the documentary evidence as to the legal status of the trust and the manner in which it is administered must be provided to AGLC.

7.5.10 *(Deleted Apr 2021)*

SUBJECT: CHILDREN/ADULTS IN CARE

POLICY

- 7.6.1 Proceeds may be used to pay for services and/or programs that:
- a) deal with children or dependent adults in care and their families;
 - b) are not commercial enterprises; and
 - c) have identified specific issues of social concern in the HFN community and actively work to address these issues.
- 7.6.2 With regard to this policy:
- a) a child in care is a person under the age of 22; and
 - b) a dependent adult means a person who has a physical or mental disability that requires institutional/home care and is at least 22 years of age.
- 7.6.3 The programs and/or services must be reasonably available to all HFN children and/or dependent adults in care, on or off-reserve, who qualify and wish to participate.
- 7.6.4 Eligible uses of proceeds for children/adults in care programs and/or services include, but are not limited to:
- a) counselling services;
 - b) medical treatment;
 - c) clothing, food and shelter;
 - d) transportation and specialized equipment for children/adults in care;
 - e) respite care; and
 - f) social/recreation activities to a maximum of \$1,000 per individual per fiscal year. *(Amended Jul 2019)*
- 7.6.5 Non-profit child care sub-charities may be eligible to receive proceeds under the following conditions *(Amended Apr 2016)*:
- a) the sub-charity's child care application process is open to all parents or guardians in the HFN community;
 - b) the sub-charity has a waitlist process which is open to all parents or guardians in the HFN community; and



SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.6

SUBJECT: CHILDREN/ADULTS IN CARE

c) the sub-charity complies with the eligibility requirements as stated in Section 2.

7.6.6 *(Deleted Apr 2021)*

SUBJECT: COMMUNITY SAFETY PROGRAMS

POLICY

7.7.1 Licensed charities or sub-charities involved in programs to improve the on-reserve safety and crime reduction of the HFN community may be eligible to use proceeds under the following conditions:

- a) *(Deleted Jul 2019)*
- b) any person or organization that undertakes to monitor, patrol, guard, or provide security for another person or the property or premises of another person or organization must be licensed in accordance with applicable law.

7.7.2 Eligible uses of proceeds for community safety include:

- a) the costs of training HFN community members in neighbourhood watch activities such as observing and reporting crime;
- b) the training of HFN community members in the provision of alternative measures/rehabilitation programs such as victim/offender reconciliation and community service work programs;
- c) the purchase, installation, operation, maintenance and repair of video surveillance systems to monitor community property;
- d) the purchase or development of a facility from which community safety programs can be delivered (see Section 7.17);
- e) the provision of security officers and third party security agencies to protect community property and ensure safety at community events (e.g., cultural events, community meetings);
- f) the purchase of equipment or a facility for a volunteer fire department. Equipment must be specifically used for fighting fires or training volunteer fire fighters. Requests to use proceeds for volunteer fire departments must be submitted to and approved by AGLC before any proceeds are disbursed; and
- g) animal control programs, as approved by AGLC.

7.7.3 Proceeds must not be used to pay for the provision of traditional and/or tribal police officers.



SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.7

SUBJECT: COMMUNITY SAFETY PROGRAMS

- 7.7.4 Proceeds must not be used to create or enforce by-laws.
- 7.7.5 Ownership of any equipment, uniforms or other community safety assets purchased with proceeds must remain with the licensed charity or sub-charity, unless otherwise approved by AGLC.
- 7.7.6 *(Deleted Apr 2021)*

SUBJECT: CULTURE

POLICY

- 7.8.1 Proceeds may be used for the costs of specific HFN cultural events which preserve, promote or enhance HFN heritage, traditions, First Nation languages or culture (e.g., pow-wows, treaty days, round dances, sun dances, feasts, sweats, funerals, memorials, and annual fairs, exhibitions and rodeos).
- 7.8.2 Proceeds may be used for the costs of nationally-observed community events including Easter, Canada Day and Christmas. These events must be family-oriented and open to all members of the HFN community. *(Amended Jun 2017)*
- 7.8.3 *(Deleted Apr 2016)*
- 7.8.4 Memorials are an eligible use of proceeds for a maximum of four years, unless otherwise approved by AGLC. Memorials involving sports events must be advertised and offered to all members of the HFN community. The advertisements must be maintained by the licensed charity and AGLC must have access to the advertisements.
- 7.8.5 Proceeds may be used for costs which are essential to the cultural or HFN community event including, but not limited to:
- a) First Nations regalia or costumes;
 - b) food and non-alcoholic beverages;
 - c) fees and travel costs of elders, healers, medicine men, fire keepers, drummers and dancers;
 - d) pipe ceremony costs;
 - e) gifts of nominal value;
 - f) travel costs to attend cultural events (see Section 7.30);
 - g) security costs (see Section 7.7);
 - h) facility rental charges;
 - i) equipment rental; and
 - j) clean-up costs.
- 7.8.6 Proceeds may be used to pay for awards such as trophies, plaques and ribbons. Such awards must be earned by achievement and not granted for volunteer appreciation.

SUBJECT: CULTURE

- 7.8.7 Proceeds may be used for the payment of cash prizes to promote traditional cultural events (e.g., drumming, singing, dancing and hand game competitions) under the following conditions:
- a) the use and amount of cash prizes is approved by AGLC for each competition;
 - b) the HFN must demonstrate the prizes are reasonable and essential to the cultural event;
 - c) the licensed charity is responsible for the handling and disbursement of cash prizes. The licensed charity may delegate the handling of the cash prizes at the event to an individual or group of individuals;
 - d) the following records are maintained and retained by the licensed charity:
 - i) date and type of competition;
 - ii) amount of cash prize;
 - iii) name of prize winner(s);
 - iv) address and telephone number of prize winner(s);
 - v) the signature(s) of winner(s) acknowledging receipt of specific cash prize. This sheet must reconcile the amounts of cash withdrawn from the designated gaming bank account; and
 - vi) records detailing how the judges were selected for each specific competition; and
 - vii) the judge's records showing the complete results of the specific competition;
 - e) the licensed charity must demonstrate that the proceeds used for cash prizes are secure at all times and appropriate security personnel will be in place when the cash prizes are distributed.
 - f) *(Deleted Apr 2016)*
- 7.8.8 Proceeds must not be used to pay for cash prizes, merchandise gift cards or any other prize of value for sports competitions (e.g., hockey, baseball and golf).



SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.8

SUBJECT: CULTURE

- 7.8.9 Proceeds must not be used to purchase sporting equipment for individuals 22 to 59 years of age.
- 7.8.10 Revenue generated at cultural or community events must be used to support the related costs. Proceeds may only be used after all revenue generated has been used to off-set related costs.
- 7.8.11 *(Deleted Apr 2021)*

SUBJECT: DEBT RETIREMENT

POLICY

- 7.9.1 Proceeds may be used to pay the outstanding balance of debt incurred in the delivery of their approved charitable programs or services. *(Amended Nov 2022)*
- 7.9.2 All proposed debt financing or servicing must be approved by AGLC prior to any payments being issued. Copies of debt financing or servicing agreements are to be provided to AGLC upon request. *(Amended Apr 2020)*
- 7.9.3 Proceeds from one licence cannot be used to cover gaming losses from another gaming licence (i.e., bingo, raffle, pull ticket or casino) unless specific approval is given by AGLC.
- 7.9.4 *(Deleted Apr 2021)*

SUBJECT: DONATIONS WITHIN ALBERTA

POLICY

- 7.10.1 Proceeds may be donated to, or used in support of, charitable groups within Alberta that actively deliver a program or service which provides a community benefit. *(Amended Nov 2022)*
- 7.10.2 Donated proceeds must only be used for charitable purposes. *(Amended Nov 2022)*
- 7.10.3 The donor group (i.e., licensed charity or sub-charity) must maintain a record of all donations and the purpose of each donation, and, if requested, provide the information to AGLC. *(Amended Jul 2019)*
- 7.10.4 The donor group, an individual member of the donor group, or a corporation, society, non-profit group, partnership, limited partnership or proprietorship that the donor group or an individual member of the donor group is related to, must not directly or indirectly receive funds, goods, services or any other item of value from the recipient group or from any individual member of the recipient group or intermediary in return for a donation of proceeds. *(Amended Jul 2019)*
- 7.10.5 Licensed charities may make a total annual donation up to \$50,000 to any eligible charity group within Alberta without the prior approval of AGLC if the recipient is a group licensed and in good standing with AGLC. The recipient must place donations of charitable gaming proceeds in a gaming bank account. Donations of gaming proceeds must be used in accordance with currently approved use of proceeds. The donor group must retain the information on a completed "Recipient Agreement" (Form 5627) and provide it to AGLC upon request. *(Amended Nov 2022)*
- 7.10.6 Licensed charities may make a total annual donation exceeding \$50,000 to an eligible charity group, with prior AGLC approval, if the group is licensed and in good standing with AGLC. The recipient must place approved donations of charitable gaming proceeds in a gaming bank account. The donor group must submit to AGLC a completed "Recipient Agreement" (Form 5627). *(Amended Nov 2022)*
- 7.10.7 Licensed charities may make a total annual donation up to \$5,000, without prior AGLC approval to an eligible charitable group within Alberta that is not licensed with AGLC. The recipient must use the donation for purposes that comply with the Charitable Gaming



SECTION: SPECIFIC USE OF PROCEEDS

NUMBER: 7.10

HOST FIRST NATION CHARITABLE CASINO POLICIES HANDBOOK

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SUBJECT: DONATIONS WITHIN ALBERTA

Policies Handbook. The donor group must retain a completed "Recipient Agreement" (Form 5507) and provide it to AGLC upon request. *(Amended Nov 2022)*

7.10.8 Licensed charities may make a total annual donation exceeding \$5,000 with prior AGLC approval to an eligible individual charitable o group within Alberta that is not licensed with AGLC. The recipient must use the donation for purposes that comply with the Charitable Gaming Policies Handbook. The donor group must submit to AGLC a completed "Recipient Agreement" (Form 5507). *(Amended Nov 2022)*

7.10.9 If the recipient group is not a recognized charitable group such as the Red Cross or is not involved in charitable activities such as a food bank, then an eligibility review of the group, as per AGLC eligibility policy in this handbook or in the Charitable Gaming Policies Handbook, must be completed prior to any donations to the group being approved. *(Amended Jul 2019)*

7.10.10 The donations referred to in subsection 7.10.1 do not include proceeds disbursed by the licensed charity to its sub-charities.

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AUTHORITY:

Original signed by
Len Rhodes

SUBJECT: DONATIONS OUTSIDE OF ALBERTA

POLICY

- 7.11.1 Proceeds may be donated to, or used in support of, charitable groups outside of Alberta that actively deliver a program or service which provides a community benefit. *(Amended Nov 2022)*
- 7.11.2 Donated proceeds must only be used for charitable purposes. To be an eligible use of proceeds outside of Alberta, the nature of the project would have to be an eligible use of proceeds within Alberta. *(Amended Nov 2022)*
- 7.11.3 Donations outside of Alberta must be limited to a maximum cumulative total of \$100,000 or 5 per cent of proceeds earned by the licensed charity in the previous fiscal year, whichever is less. The entire amount may be donated within Canada, however, only \$50,000 or 2.5 per cent of the proceeds earned the previous fiscal year, whichever is less, may be donated outside of Canada. *(Amended Jul 2019)*
- 7.11.4 Donations of proceeds outside of Alberta require the prior approval of AGLC.
- 7.11.5 Donations outside of Alberta but within Canada will only be approved for the purpose of:
- a) disaster/emergency relief;
 - b) supporting nationally recognized charitable programs; and
 - c) supporting medical and educational research programs.
- 7.11.6 Donations of proceeds outside of Canada will only be approved for the purpose of:
- a) international disaster/emergency relief; and
 - b) projects in countries that the Board considers as developing or underdeveloped and countries that the Canadian federal government approves for international development, which support:
 - i) the development of local self-sufficiency in the provision of basic human needs for water, food, sanitation or shelter; or

SUBJECT: DONATIONS OUTSIDE OF ALBERTA

- ii) the provision of primary health care (i.e., acute care and public health) and basic education (i.e., reading, writing and basic math).

7.11.7 Donations may be made directly to a specific eligible project or may be made directly to an organization which complies with the following standards:

- a) registered or incorporated in Canada for the purpose of carrying out projects and programs of international development assistance or international emergency relief (e.g., World Vision Canada, Care-Canada, Canadian Red Cross);
- b) actively engaged in projects and programs of international development assistance or international emergency relief;
- c) maintains a clearly identifiable fund to which Canadians voluntarily contribute funds for purposes of international development assistance or international emergency relief; and
- d) accepts donations of proceeds and uses donated proceeds for purposes approved by AGLC. *(Amended Jul 2019)*

7.11.8 The donor group (licensed charity or sub-charity) must maintain a record of all donations and the purpose of each donation, and, if requested, provide the information to AGLC.

7.11.9 The donor group, an individual member of the donor group, or a corporation, society, non-profit group, partnership, limited partnership or proprietorship that the donor group or an individual member of the donor group is related to, must not directly or indirectly receive funds, goods, services or any other item of value from the recipient group or from any individual member of the recipient group or intermediary in return for a donation of proceeds. *(Amended Jul 2019)*

7.11.10 Licensed charities requesting to donate proceeds outside of Alberta in an amount up to but not exceeding \$10,000 must provide the following information with the request:

- a) description of the project/facility to which funds will be applied;
- b) description of method of transfer for funds to final destination; and

SUBJECT: DONATIONS OUTSIDE OF ALBERTA

- c) identify one responsible officer for each stage of the movement of funds including designated recipient at the final destination.

If the request is approved, the donor group must have available to AGLC cancelled cheques/receipts documenting transfer of funds to designated recipients.

7.11.11 Licensed charities requesting to donate proceeds greater than \$10,000 outside of Alberta, but within Canada, must provide the following information with the request:

- a) project title and location;
- b) detailed objectives of the project, total budget for the project and a budget specifying use of funds;
- c) other sources of funding for the project;
- d) personnel responsible for project administration and disposal of funds at project's location;
- e) identify one responsible officer for each stage of the movement of funds including designated recipient at the final destination; and
- f) a written agreement signed by the recipient group stating the recipient group will:
 - i) maintain a record of donations showing the date, amount and source of donated funds received, as well as the date, amount and purpose of all disbursements of donated funds; and
 - ii) allow AGLC access to all records, including those at any financial institution, to make copies of such records and/or remove them for further examination.
 - iii) *(Deleted Nov 2022)*

SUBJECT: DONATIONS OUTSIDE OF ALBERTA

7.11.12 If the request is approved, the following terms and conditions shall form part of the licence:

- a) financial reporting requirements must be accompanied by documents of expenditure which specifically relate to detailed items in proposed budget submitted with original request;
- b) the financial documents must be verified as correct by an official at final destination; and
- c) AGLC may request an audited statement of use of funds.

7.11.13 For donations outside of Canada, a “Request to Donate Proceeds - Out of Canada Projects” (Form 5484) must be submitted and approved by AGLC before any proceeds are spent. In addition the licensed charity or sub-charity must: *(Amended Jul 2019)*

- a) be registered or incorporated in Alberta for the purpose of carrying out projects and programs of international development assistance or international emergency relief;
- b) maintain a clearly identifiable fund to which Canadians voluntarily contribute funds for purposes of international development assistance or international emergency relief;
- c) be actively engaged in projects and programs of international development assistance or international emergency relief; and
- d) accept donations of proceeds and use donated proceeds for purposes approved by AGLC.

7.11.14 Groups requesting to donate proceeds greater than \$10,000 outside of Canada must provide the following information with the request:

- a) project title and location;
- b) projected start/completion dates;
- c) detailed objectives of the project, total budget for the project and a budget specifying use of funds;
- d) other sources of funding for the project;
- e) address and telephone number of group and person responsible for the project in the recipient country;

SUBJECT: DONATIONS OUTSIDE OF ALBERTA

- f) identify one responsible officer for each stage of the movement of funds including designated recipient at the final destination;
- g) a written agreement signed by the recipient group stating the recipient group will:
 - i) maintain a record of donations showing the date, amount and source of donated funds received as well as the date, amount and purpose of all disbursements of donated funds; and
 - ii) allow AGLC access to all records, including those at any financial institution, to make copies of such records and/or remove them for further examination.
- h) *(Deleted Nov 2022)*

7.11.15 If the request is approved, the following terms and conditions shall form part of the licence:

- a) financial reporting requirements must be accompanied by documents of expenditure which specifically relate to detailed items in proposed budget submitted with original request;
- b) the financial documents must be verified as correct by an official at final destination;
- c) the relevant Canadian Foreign Service official may be notified of the request and be asked to verify the project; and
- d) AGLC may request an audited statement of use of funds.

7.11.16 The donations referred to in subsection 7.11.1 do not include proceeds disbursed by the licensed charity to its sub-charities.

SUBJECT: EDUCATION

POLICY

- 7.12.1 Proceeds may be used for the costs of specific educational program(s) or support within or affiliated with schools or educational institutions.
- 7.12.2 The school or institution must be recognized by the Government of Alberta or otherwise approved by AGLC.
- 7.12.3 Proceeds may be used to provide a specific educational experience for students which is not principally recreational or social in nature and which otherwise would not be available (e.g., field trips, athletic tournaments and cultural exchanges). Any travel expenses must meet the criteria for approved travel outlined in Section 7.30.
- 7.12.4 The educational programs must be reasonably available to the HFN community.
- 7.12.5 Proceeds may be used to purchase educational equipment and supplies such as audio-visual equipment, athletic equipment and musical instruments which otherwise would not be available. The ownership of these assets must remain with the educational institution, school, licensed charity or sub-charity.
- 7.12.6 Proceeds may be used to pay for the nutritional meals (e.g., breakfast, hot lunch program) and snacks of students attending educational institutions or schools.
- 7.12.7 Proceeds may be used to pay for public or separate school bus transportation for students attending educational institutions or schools.
- 7.12.8 Proceeds may be used to pay the difference between the educational allowance received for each student and the actual cost incurred for public/private schooling. Documentation verifying the shortfall must be maintained and be available to AGLC on request.
- 7.12.9 Proceeds may be used to subsidize accredited private/charter schooling under the following conditions:
 - a) an individual assessment is completed, by an independent school counsellor or other qualified professional, demonstrating the need for the individual to attend a private school; and

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Len Rhodes

SUBJECT: EDUCATION

b) that the education required is not readily available through the school on-reserve, the public or separate school system or if applicable, the geographic area.

7.12.10 Proceeds may be used to enhance or expand, but not reduce, the existing funding of an educational institution or school on-reserve (e.g., employee salaries, wages, and benefits, building additions, renovations and utilities).

7.12.11 Proceeds may be used to provide educational bursaries or scholarships as specified in Section 7.5.

7.12.12 Proceeds may be used to award and honour students of educational programs. The awards must be widely available to all students in the community. The following information must be submitted to AGLC prior to purchasing the award(s) with gaming proceeds:

- a) eligibility and selection criteria of award recipients;
- b) related cost of the award(s); and
- c) a description of the award(s). *(Amended Jun 2017)*

7.12.13 *(Deleted Apr 2012)*

SUBJECT: ELDERS

POLICY

- 7.13.1 Elders are considered to be individuals of any age who are recognized and valued in the HFN community for their cultural or spiritual knowledge and wisdom.
- 7.13.2 Proceeds may be used to pay Elders in recognition of any cultural or spiritual services that they provide to the HFN community and any costs incurred by Elders while performing cultural or spiritual activities.
- 7.13.3 Upon request by AGLC, the licensed charity must provide AGLC with a list of the Elders or an explanation on the process for recognizing an Elder.
- 7.13.4 Eligible Elders' costs include, but are not limited to:
- a) reasonable honorariums, fees or gifts, including merchandise gift cards;
 - b) ceremonial tobacco;
 - c) direct-route travel to various events;
 - d) meals while attending events;
 - e) accommodation fees while attending events; and
 - f) training costs of Elders.
- 7.13.5 The licensed charity or sub-charity may use proceeds to provide the necessities of life for Elders, including:
- a) personal residence utility expenses;
 - b) major household appliances or repair of existing appliances (i.e., fridge, stove, dishwasher, washer, dryer and/or microwave); and
 - c) essential household furniture (i.e., sofa, bed, dresser, kitchen table and chairs).
- 7.13.6 Proceeds may be used to pay for additional expenditures for Elders outlined in subsection 7.13.5 under the following conditions:
- a) the items are reasonably priced and consistently provided to all HFN community Elders;

SUBJECT: ELDERS

- b) the items are paid directly by the licensed charity or sub-charity to the vendor where possible; and
- c) an assessment is completed by the licensed charity or sub-charity, to the satisfaction of AGLC, documenting that the household appliances and essential furniture are required.

7.13.7 For travel outside of Alberta, a Travel Itinerary form (Form 5443) must be submitted and approved by AGLC before any proceeds are spent.

7.13.8 A ledger detailing cash disbursements or merchandise gift cards to an Elder must be maintained. The ledger must indicate the following:

- a) the name of the Elder;
- b) the date of the disbursement;
- c) the amount of the disbursement;
- d) the purpose of the disbursement; and
- e) the name of the event.

7.13.9 *(Deleted Apr 2021)*

7.13.10 Elders over the age of 59 may also qualify for senior programs (see Section 7.27).

SUBJECT: EMERGENCY FUNDS

POLICY

7.14.1 Proceeds may be used to provide relief for individuals or families who are victims of a disaster or emergency (e.g., fires, floods, gas leaks, boil water advisory and sewer backup).

7.14.2 Eligible uses of proceeds for individual or families affected by a disaster or emergency include, but are not limited to:

- a) accommodations;
- b) meals;
- c) purchase of potable drinking water; and
- d) clean up and/or disinfecting costs.

7.14.3 Proceeds may be used to provide equipment and supplies during emergency situations or to train volunteers for emergency situations.

7.14.4 Proceeds may be used to develop and maintain a disaster or emergency preparedness/recovery plan or program under the following conditions:

- a) the program is managed by an individual with disaster and/or emergency planning experience. The individual's duties may include planning for a disaster/emergency and organizing training drills; and
- b) the program has documented objectives and outcomes.

7.14.5 A ledger detailing the disbursements associated with a disaster or emergency must be maintained. The ledger shall indicate the following:

- a) the date and description of the disaster or emergency; and
- b) the date(s), amount(s) and purpose of all disbursements.

7.14.6 Any insurance funds or reimbursements received as a result of the emergency must be deposited to the licensed charity's designated casino account up to the amount originally disbursed from the designated casino account.

7.14.7 *(Deleted Apr 2021)*

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SUBJECT: ENDOWMENT FUNDS

POLICY

7.15.1 “Endowment fund” means a fund where the principal is not normally used and only the investment income, or a portion thereof, is used.
(Amended Nov 2022)

7.15.2 Proceeds may be used to establish and/or donate to an endowment fund, whose purpose is to support approved charitable purposes.
(Amended Nov 2022)

7.15.3 The licensed charity may request AGLC approval to withdraw a portion, or all, of the principal of the endowment fund to be spent on approved charitable purposes. AGLC will only grant such approval if the licensed charity can demonstrate that the funds are required to ensure the continued delivery of one or more of its charitable programs to the community and that no other source of funding is available. *(Amended Nov 2022)*

7.15.4 Endowment fund contributions are limited to a maximum cumulative total of 50 per cent of proceeds earned the previous calendar year. The group must obtain AGLC approval prior using more than 50 per cent of proceeds for an endowment fund. *(Amended Nov 2022)*

7.15.5 *(Deleted Nov 2022)*

7.15.6 The licensed charity may administer its own endowment fund or have a third party administer the fund on its behalf. *(Amended Nov 2022)*

7.15.7 Licensed charity administered endowment fund:

A licensed charity must request AGLC approval to administer its own endowment fund before any proceeds are placed in the fund for the first time. The licensed charity must provide: *(Amended Nov 2022)*

- a) the purpose of the fund;
- b) *(Deleted Apr 2016)*
- c) confirmation that proceeds placed into the fund will be separated for accounting purposes;
- d) explanation of how proceeds will be disbursed from the fund and how the fund will be administered including: *(Amended Nov 2022)*
 - i) who determines how the proceeds from the endowment fund will be invested;

SUBJECT: ENDOWMENT FUNDS

- ii) the identity of the investment manager responsible for the endowment fund's investments. A copy of the draft agreement between the licensed charity and investment manager must be submitted;
- iii) a breakdown of how the proceeds from the endowment fund will be invested;
- iv) the signing authorities for the endowment fund; and
- v) the fee structure associated with the administration of the fund.

7.15.8 Third party administered endowment funds:

A licensed charity must request AGLC approval to have a third party administer an endowment fund before any proceeds are placed in the fund for the first time. The licensed charity must provide the following information with its request: *(Amended Nov 2022)*

- a) *(Deleted Nov 2022)*
- b) *(Deleted Apr 2016)*
- c) confirmation that proceeds placed into the fund will be separated for accounting purposes;
- d) *(Deleted Nov 2022)*
- e) *(Deleted Nov 2022)*
- f) the identity of the third party administrator; and
- g) a copy of the draft agreement between the licensed charity and the third party administrator which states:
 - i) the purpose of the fund; *(Amended Nov 2022)*
 - ii) an explanation of how proceeds placed into the fund will be separated for accounting purposes;
 - iii) a breakdown of how the proceeds from the fund will be invested;
 - iv) the signing authorities for the fund;
 - v) the identity of the third party's investment manager;
 - vi) the fee structure associated with the administration of the fund; and

SUBJECT: ENDOWMENT FUNDS

vii) how often financial statements from the fund are provided to the licensed charity.

7.15.9 Investments for endowment funds must be deposited with a trust company or recognized financial institution in Alberta. Investments must also be managed in accordance with the *Trustee Act* by a person possessing a recognized professional investment designation (e.g., Certified Financial Planner (CFP), Chartered Financial Analyst (CFA)) or a recognized licensed investment management corporation.
(Amended Nov 2022)

7.15.10 A proposed change in the purpose of the endowment fund, the intended recipient of the fund's disbursements or the party administering the endowment fund, must have AGLC approval, prior to the change taking effect. *(Amended Apr 2016)*

7.15.11 Proceeds donated to an endowment fund held by other charitable groups or eligible institutions (e.g., hospitals, post-secondary institutions) must be made in accordance with Sections 7.10 and 7.11. *(Amended Nov 2022)*

7.15.12 *(Deleted Nov 2022)*

7.15.13 Endowment funds must not be merged with other endowment funds without prior AGLC approval. *(Amended Nov 2022)*

7.15.14 If the endowment fund ceases, all gaming proceeds must be transferred back to the gaming bank account and spent on approved charitable purposes. *(Amended Nov 2022)*

7.15.15 Licensed charities must provide all endowment fund records, including those of the fund manager or third party administrator, to AGLC upon request. *(Amended Nov 2022)*

SUBJECT: EQUIPMENT/UNIFORMS/COSTUMES/VEHICLES

POLICY

- 7.16.1 Proceeds may be used to purchase or rent equipment, furnishings, uniforms, costumes and/or a vehicle if they are essential to the delivery of the licensed charity's or sub-charity's charitable programs or services.
- 7.16.2 Ownership of the items purchased must remain with the licensed charity or sub-charity.
- 7.16.3 Items of a personal, social or promotional nature may not be purchased.
- 7.16.4 Equipment or supplies that are used in any activity or operation which is intended to produce income cannot be purchased with proceeds.
- 7.16.5 Proceeds may be used to purchase uniforms and costumes under the following circumstances:
- a) the uniform or costume is required for school, cultural activities, competitive play, practice or artistic performance;
 - b) the item is provided to the player or participant during the season and at the end of the season or event is returned to the licensed charity or sub-charity, except those items which:
 - i) wear out; or
 - ii) for hygienic purposes should not have to be returned; or
 - iii) clothing essential or a key element for a special event or competition, as approved by AGLC.
 - c) uniforms must have a distinctive logo or markings;
 - d) players or participants do not use the item for activities not related to cultural activities, games, practices or performances; and
 - e) the licensed charity or sub-charity maintains a written policy for the use of uniforms and costumes.
- 7.16.6 Proceeds may be used to professionally clean required uniforms and costumes.

SUBJECT: EQUIPMENT/UNIFORMS/COSTUMES/VEHICLES

7.16.7 Proceeds may be used to purchase a vehicle under the following circumstances: *(Amended Apr 2018)*

- a) the vehicle must be registered and insured in the name of the HFN licensed charity or sub-charity;
- b) the vehicle must only be used for the administration and/or delivery of community service programs (the vehicle cannot be used for the personal use of any members);
- c) when not in use for the administration and/or delivery of community service programs, the keys must be controlled to prevent unauthorized use; and
- d) a transportation log must be maintained detailing the date, purpose, mileage, and driver of all trips taken by the vehicle.

7.16.8 Proceeds may be spent on vehicle repairs, operation and insurance, if essential to the delivery of the licensed charity or sub-charity program or service.

7.16.9 If equipment/uniforms/costumes/vehicles purchased from proceeds are rented or sold, funds received from the rental or sale must be returned to the designated casino account.

7.16.10 *(Deleted Apr 2021)*

SUBJECT: FACILITY

POLICY

- 7.17.1 With regard to this policy, facility means a physical structure and/or land.
- 7.17.2 Proceeds may be used for the capital, leasehold, rental and operating costs of a community, not for profit facility (commercial properties are not included).
- 7.17.3 Proceeds may be used for facility disbursements if:
- a) the licensed charity or sub-charity either:
 - i) owns the facility; or
 - ii) has the legal right to occupy the facility; and
 - b) the facility is accessible to the HFN community.
- 7.17.4 Proceeds may be used to purchase or develop facilities. Prior to disbursing any proceeds towards the purchase or development of a facility, a detailed business plan must be submitted to AGLC, which will include the following:
- a) the proposed purpose or use of the facility;
 - b) the location, square footage, and zoning of the proposed land and/or facility;
 - c) sources of funding available and/or proposed funding arrangements to accommodate the purchase or development;
 - d) documentation, through a Band Council Resolution or a Chief and Council Resolution, demonstrating community support of the purchase or development plans; *(Amended Apr 2016)*
 - e) the proposed facility's admission procedures; and
 - f) if the facility is under the ownership of a local municipality, a statement of municipal support for the proposed purchase.
- 7.17.5 Eligible facility disbursements include, but are not limited to:
- a) purchase of fixtures, furnishings and equipment (see subsection 7.17.6);
 - b) facility mortgage, lease or rental payments;
 - c) utilities;

SUBJECT: FACILITY

- d) insurance;
- e) property taxes;
- f) janitorial costs and supplies;
- g) repairs and maintenance;
- h) renovations and leasehold improvements; and
- i) professional fees associated with the purchase or development of a building (e.g., legal, architectural, engineering, financial consulting).

7.17.6 Proceeds cannot be used for the purchase, maintenance or repair of equipment, furniture or a facility for income-producing operations or any other activity which appears to be of a commercial nature, unless otherwise approved by AGLC.

7.17.7 Proceeds may be used to pay for the development and operation of an athletic or recreational facility if:

- a) all individuals of the HFN community have the right to make use of the facility at least 50 per cent of the time the facility is in operation and the hours of public use are reasonable. Membership cannot be a requirement for public use; and
- b) the facility is used by sports teams and/or participants representing the HFN community.

7.17.8 If the facility includes space for both charitable activities and non-charitable activities the licensed charity or sub-charity must provide AGLC with a breakdown of the square footage of the entire facility, including which entity uses which space, and how proceeds will be spent for each respective space. *(Amended Nov 2022)*

7.17.9 Proceeds cannot be used for the facility disbursements of a facility used for private social activities where the HFN community are not allowed access.

7.17.10 Eligible facility disbursements may be spent from the casino account or from a separate account designated as a "building fund". If a separate account is created, AGLC must have access to the bank statements, cancelled cheques and invoices/receipts from the account.

7.17.11 *(Deleted Apr 2021)*

SUBJECT: FUNDRAISING

POLICY

(Amended Jul 2019)

- 7.18.1 With the approval of AGLC, fundraising activities may be eligible to use proceeds provided:
- a) there is an identifiable fundraising need for the charitable program;
 - b) the activity is tied to the charitable benefit of the program;
 - c) the activity is a nominal part of the program delivery and not the purpose of the licensed charity or sub-charity;
 - d) revenue will be used to offset all related fundraising expenses (cost-recovery) prior to its intended charitable use; and
 - e) revenue, less expenses, will be spent on charitable uses approved by AGLC.
- 7.18.2 Proceeds may be used to supplement the purchase/rental of equipment, supplies, or services needed to conduct AGLC approved fundraising activities.
- 7.18.3 Revenue from a fundraising activity where proceeds were used to supplement its expenses must first be used to reimburse the gaming account 100 per cent of any proceeds used to pay for these expenses.
- 7.18.4 The licensed charity or sub-charity conducting a fundraising activity must maintain records of all revenue and disbursements associated with the activity. Any financial disbursements reported must be supported with receipts or vouchers.
- Note: fundraising activity records must be kept for six years and available to AGLC upon request.

SUBJECT: HISTORICAL RESOURCES

POLICY

- 7.19.1 Proceeds may be used to pay for public programs and activities which provide the HFN community access to historical resources (e.g., historical book committees, archives and museums).
- 7.19.2 Proceeds may be used to pay for the development and operation of facilities (e.g., museums) which provide access to historical resources and are open to the HFN community (see Section 7.17).
- 7.19.3 Proceeds may be used to pay for the restoration of historical sites.
(Amended Apr 2016)
- 7.19.4 Proceeds may be used to pay for the collection of oral histories.
- 7.19.5 Proceeds cannot be used to pay for activities which primarily involve the social, recreational, hobby, commercial or professional interests of its members.

SUBJECT: HOUSING AND INFRASTRUCTURE

POLICY

7.20.1 Proceeds may be used to pay for new on-reserve housing projects and the maintenance, repair and renovation of existing housing. Proceeds may be used to pay for off-reserve housing programs under the following conditions:

- a) the off-reserve housing is reasonably available and advertised to all HFN community members; and
- b) the off-reserve housing is located in Alberta or the community surrounding the HFN unless demonstrated by the licensed charity that specific housing is required out of Alberta for individuals undergoing specific medical treatment, addictions treatment, or attending an educational program.

7.20.2 Housing must be reasonably available to all members of the HFN community who make application. AGLC must have access to all records related to the application selection process, including the names of the recipients.

7.20.3 Requests to use proceeds for on-reserve and off-reserve housing projects must be submitted to and approved by AGLC. The following information about the proposed housing project must be submitted with the request:

- a) the purpose and a detailed budget of the housing project;
- b) documentation, through a Band Council Resolution or a Chief and Council Resolution, demonstrating community support of the housing project *(Amended Apr 2016)*;
- c) the application selection process for determining the recipient(s) of the housing project, which will include the following information:
 - i) the composition of the decision-making body responsible for reviewing the applications;
 - ii) the eligibility criteria of the applicants; and
 - iii) the selection criteria used to determine the recipients.
- d) any requests for off-reserve housing outside of the community surrounding the HFN must be detailed in the request.

SUBJECT: HOUSING AND INFRASTRUCTURE

- 7.20.4 Proceeds may be used for major housing repair and renovation projects. The licensed charity or sub-charity must retain all documentation that supports the project and provide it to AGLC upon request. This includes, but is not limited to: *(Amended Apr 2018)*
- a) professional assessments, inspection reports, drawings etc.; and/or
 - b) before and after photos of the repair or renovation project.
- 7.20.5 Upon request, the licensed charity or sub-charity must arrange tours of the new and/or renovated houses for AGLC.
- 7.20.6 Proceeds may be used to pay for security deposits to secure off-reserve housing for members of the HFN community. When applicable, the security deposits and associated interest are returned to a designated gaming bank account when refunded.
- 7.20.7 Proceeds may be used to pay for infrastructure projects on-reserve.
- 7.20.8 Infrastructure includes electricity, sewage disposal, water and waste management systems, roads, gas lines, telephone lines and landscaping. Requests to use proceeds for on-reserve infrastructure projects must be submitted to and approved by AGLC. The following information about the proposed infrastructure project must be submitted with the request:
- a) the purpose, location and proposed detailed budget of the infrastructure project; and
 - b) documentation, through a Band Council Resolution or a Chief and Council Resolution, demonstrating community support of the infrastructure project. *(Amended Apr 2016).*
- 7.20.9 Proceeds must not be used to pay for commercial housing or infrastructure projects on-reserve or off-reserve.
- 7.20.10 Proceeds are to be used to supplement, and should not reduce or replace, existing government funding for housing and infrastructure on-reserve.
- 7.20.11 All housing and infrastructure projects funded with proceeds must be completed to provincial or federal building codes and standards.
- 7.20.12 All housing and infrastructure projects funded with proceeds must have inspections completed by an independent certified inspector.



SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.20

SUBJECT: HOUSING AND INFRASTRUCTURE

Inspections must be completed as required in provincial or federal building codes and standards, or applicable laws, and any major deficiencies must be resolved. *(Amended Apr 2018)*

7.20.13 *(Deleted Apr 2021)*

SUBJECT: LIFE SKILLS, EMPLOYMENT & APPRENTICESHIP TRAINING PROGRAMS

POLICY

7.21.1 Proceeds may be used to pay for life skills, employment and apprenticeship training programs of all members of the HFN community.

7.21.2 Eligible programs may include, but are not limited to:

- a) career training and development;
- b) behavioural counselling;
- c) communication skills;
- d) human relations training;
- e) contingency management;
- f) employment counselling;
- g) parenting skills; and
- h) budgeting/financial skills.

7.21.3 The life skills, employment and apprenticeship training programs must be reasonably available and advertised to all members of the HFN community who make application.

7.21.4 Requests to use proceeds for life skills, employment and apprenticeship training programs must be submitted to and approved by AGLC. The following information about the proposed life skills program must be submitted with the request:

- a) the purpose and a detailed budget of the life skills, employment and apprenticeship training program;
- b) *(Deleted Apr 2016)*
- c) the application selection process for determining the recipient(s) of the life skills, employment and apprenticeship training program, which will include the following information:
 - i) the composition of the decision-making body responsible for reviewing the applications;
 - ii) the eligibility criteria of the applicants; and
 - iii) the selection criteria used to determine the recipients.

SUBJECT: LIFE SKILLS, EMPLOYMENT & APPRENTICESHIP TRAINING PROGRAMS

7.21.5 AGLC must have access to all records related to application selection process, including the names of the recipients and the dates and names of the programs.

7.21.6 Eligible life skills, employment and apprenticeship training program costs include, but are not limited to:

- a) instructor fees;
- b) facility rental fees;
- c) equipment and supplies;
- d) required safety equipment or clothing; and
- e) childcare costs when attending an eligible training program identified under subsection 7.21.2.

7.21.7 Proceeds may be used to pay for the wages of an individual in a job shadow or apprenticeship program under the following conditions:

- a) the individual must report to a full-time employee who currently holds the position for which the individual is job shadowing;
- b) wages cannot exceed the wages of the employee who is being job shadowed and must be reasonable for the duties performed;
- c) must be completed during a specified period of the time, generally no longer than 12 months; if a longer time frame is required at the end of the placement than the original time frame indicated, an application for an extension must be made to the decision making body responsible for the application process. The approval for an extension must be granted prior to wages being paid for the extend time frame. The application must indicate:
 - i) an explanation of why the job shadow duties could not be completed during the original time frame; and
 - ii) the extension period required and the rationale for extending the time frame.

SUBJECT: LIFE SKILLS, EMPLOYMENT & APPRENTICESHIP TRAINING PROGRAMS

- d) the individual enrolled must receive interim and final reports that assess performance and provide recommendations for improvement by the individual they are shadowing.

7.21.8 Proceeds may be used to pay for wages for an individual in a student work experience program under the following conditions:

- a) must be for youth (under the age of 22) or individuals enrolled in an education program;
- b) must be completed during a specified period of time, generally no longer than six months;
- c) should be a position that is not considered a key position; and
- d) the individual enrolled must receive interim and final reports that assess performance and provide recommendations for improvement.

7.21.9 Proceeds may be used for other eligible expenses as specified in Sections 7.5 and 7.12.

7.21.10 Proceeds must not be used to pay individuals, provide merchandise gift cards or any other good or service of value for attending a training program or for successful completion of a training program.

7.21.11 *(Deleted Apr 2021)*

SUBJECT: LOBBYING

POLICY

7.22.1 Proceeds must not be used for: *(Amended Nov 2022)*

- a) lobbying activities aimed at influencing or attempting to influence government for a specific cause or to achieve changes in public policies; and
- b) political activities such as campaign or candidacy costs for on or off-reserve elections, conventions of political parties and research costs for a particular political party or candidate.

7.22.2 With regard to this policy, lobbying means conducting activities aimed at influencing or attempting to influence any level of government or members of the public either on or off-reserve to support or not support a specific cause or other activities directed toward achieving changes in public policy.

7.22.3 *(Deleted Nov 2022)*

7.22.4 Proceeds may be used to provide information through public education programs, research, and/or submissions to government which reflect a balance of views on a particular issue of public concern. *(Amended Nov 2022)*

SUBJECT: MEDICAL/HEALTH AID AND RELIEF

POLICY

- 7.23.1 Proceeds may be used for the cost of medical/health aids, programs and treatments of members of the HFN community.
- 7.23.2 Proceeds may enhance or expand, not reduce, other funding received (e.g., federal and provincial funding, employer group benefits or other health insurance). Documentation must be provided to demonstrate that all other sources of funding were depleted, with the exception of proceeds used in the spirit of Jordan's Principle (see subsection 7.23.11). *(Amended Jun 2017)*
- 7.23.3 A medical/health program may be established to pay for medical/health aids, programs and treatments of members of the HFN community. Eligible items include, but are not limited to, the following:
- a) vision coverage (e.g., glasses, eye exam fees);
 - b) dental coverage;
 - c) prescription drugs;
 - d) required aids to daily living (e.g., hearing aids, inhalers, wheel chairs, walkers, crutches, home care beds, etc.);
 - e) transportation costs to medical/health appointments;
 - f) traditional healers and spiritual counsellors;
 - g) in-home palliative care by a care giver or a recognized palliative care facility;
 - h) mental health programs;
 - i) counselling (e.g., family, individual, bereavement); and
 - j) nutritionist consultations.
- 7.23.4 Proceeds may be used to fund costs of food for individuals who require a special diet (i.e., celiac's disease, low sodium, low cholesterol, diabetes) if a medical practitioner's note is received and retained by the licensed charity or sub-charity outlining the medical conditions and dietary requirements.
- 7.23.5 For travel outside of Alberta, a Travel Itinerary form (Form 5443) must be submitted to and approved by AGLC before any proceeds

SUBJECT: MEDICAL/HEALTH AID AND RELIEF

are disbursed. When travel is required for medical treatments, an explanation describing the medical treatment being funded and why it is not available in Alberta must be provided.

7.23.6 The medical/health program must be reasonably available to all members of the HFN community who make application.

7.23.7 Requests to use proceeds for a medical/health program must be submitted to and approved by AGLC. The following information about the proposed medical/health program must be submitted with the request:

- a) the purpose and proposed detailed budget of the medical/health program;
- b) *(Deleted Apr 2016)*
- c) the application selection process for determining the recipient(s) of the medical/health program, which will include the following information:
 - i) the composition of the decision-making body responsible for reviewing the applications;
 - ii) the eligibility criteria of the applicants; and
 - iii) the selection criteria used to determine the recipients.

7.23.8 All payments from the medical/health program, where possible, must be paid directly to the vendor and be supported by an invoice, explanation of benefits (EOB), receipt and/or voucher.

7.23.9 A ledger detailing the medical/health programs' disbursements must be maintained. The ledger shall indicate the following:

- a) the name of the recipient;
- b) the date of the disbursement;
- c) the amount of the disbursement; and
- d) the purpose of the disbursement.

7.23.10 *(Deleted Apr 2021)*

SUBJECT: MEDICAL/HEALTH AID AND RELIEF

7.23.11 In the spirit of Jordan's Principle, payment for children's medical/health aid and relief may be made with charitable proceeds, meeting the following requirements:

- a) eligible children must be a member of the community;
- b) the charity must request reimbursement for the medical services from the responsible government or organization after the medical services have been provided;
- c) if the funds can be reimbursed, the reimbursed funds must be deposited back into the charitable gaming account; and
- d) as per subsection 6.4.11 and 6.4.12, a proposal to use proceeds in the spirit of Jordan's Principle must be submitted to and approved by AGLC prior to using gaming proceeds. *(Added Jun 2017)*

SUBJECT: NATURE CONSERVATION

POLICY

- 7.24.1 Proceeds may be used to pay for educational programs which promote nature conservation in the HFN community.
- 7.24.2 Proceeds may be used to pay for the development and operation of facilities which preserve, restore and improve wildlife and its habitat (see Section 7.17).
- 7.24.3 Proceeds may be used to pay for the treatment of injured or damaged domesticated or wild animals, birds, insects or plants.
- 7.24.4 Proceeds must not be used to pay for the treatment, support, breeding or promotion of animals, birds, insects or plants for commercial profit.
- 7.24.5 Proceeds must not be used to support a particular breed or species of animal for hobby, recreational, social or commercial purposes.
- 7.24.6 Proceeds must not be used to pay for any costs affiliated with commercial activities such as the trapping or camping industry.

SUBJECT: PROMOTIONAL ACTIVITIES

POLICY

7.25.1 Proceeds may be used to promote HFN community participation and increase awareness in a licensed charity's charitable programs, including: *(Amended Nov 2022)*

- a) advertising the licensed charity's programs and membership within newspapers, radio, television, posters, signs, pamphlets, letters, and internet web pages;
- b) website development, design, updates, maintenance, domain, and hosting; and
- c) providing recognition of the licensed charity's programs or contribution to the community through plaques, benches, murals, monuments, statues, cenotaphs, memorial walls, etc.

7.25.2 *(Deleted Nov 2022)*

7.25.3 The licensed charity must retain copies of advertisements, pamphlets, posters or other such promotional items and must be made available to AGLC when requested.

7.25.4 Proceeds must not be used to pay for personal promotional items used as an incentive for HFN community members to attend community meetings or to increase HFN community awareness and participation in charitable programs. *(Amended Nov 2022)*

7.25.5 Proceeds must not be used to pay for promotional activities which benefit a commercial activity or enterprise or advance political purposes.

SUBJECT: RELIGION/SPIRITUAL PROGRAMS

POLICY

- 7.26.1 Proceeds may be used to pay for programs which further religious/spiritual principles or objectives (e.g., Sunday school, church choir, marriage counselling and fellowship).
- 7.26.2 Proceeds may be used to pay for the purchase, development and operation of places of religious/spiritual worship. These places must offer regular services and be open to all members of the HFN community (see Section 7.17).

SUBJECT: SENIOR CITIZENS

POLICY

- 7.27.1 For this policy, a senior is at least 60 years of age. *(Amended Nov 2022)*
- 7.27.2 Proceeds may be used to develop and deliver regularly scheduled programs and activities that assist seniors to remain physically, mentally, and socially active in the community, such as: *(Amended Nov 2022)*
- a) educational programs for seniors to learn a new skill such as technology, language, arts, and hobbies (e.g., card games);
 - b) physical activity for seniors to play, strengthen, compete, and re-energize themselves through physical and mental activities; and
 - c) programs to encourage social interaction among seniors (e.g., day trips to various attractions or venues, organized celebratory events, etc.).
- 7.27.3 Seniors entertainment, including meals but excluding liquor, is an eligible use of Proceeds under the following circumstances:
- a) the entertainment is available to all seniors in the HFN community;
 - b) a minimum of 75 per cent of those partaking in the entertainment are seniors; and
 - c) the expenditures paid from proceeds are on a cost recovery basis and not intended to generate profit.
- 7.27.4 Seniors' travel is an eligible use of proceeds under the following circumstances:
- a) the travel is available to all seniors in the HFN community;
 - b) a minimum of 75 per cent of those travelling are seniors; and
 - c) expenditures are restricted to direct transportation, meals and accommodation costs. *(Amended Nov 2022)*
 - d) for travel outside of Alberta, a Travel Itinerary form (Form 5443) must be submitted and approved by AGLC (see Section 7.30).



SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.27

SUBJECT: SENIOR CITIZENS

7.27.5 Proceeds may be used to pay for the development and operation of facilities in which all seniors in the HFN community have reasonable access (see Section 7.17).

7.27.6 *(Deleted Apr 2021)*

7.27.7 Seniors that are also Elders may also be eligible for additional programs (see Section 7.13).



SECTION: SPECIFIC USE OF PROCEEDS
NUMBER: 7.28

SUBJECT: SOCIAL EVENTS

POLICY

- 7.28.1 With regard to this policy, social events are defined as activities primarily designed to serve, or further the self-interest of, the licensed charity's or sub-charity's members/participants through the pursuit of leisure time activities based upon hobby, recreational or personal interest.
- 7.28.2 Proceeds must not be used to pay for social events unless otherwise noted in the HFNCCPH.

SUBJECT: SPORTS

POLICY

- 7.29.1 Proceeds may be used by the licensed charity or sub-charity for the delivery of an amateur sports program either on an individual or team basis for the HFN youth, seniors and/or disabled individuals.
- 7.29.2 With regard to this policy:
- a) youth sports sub-charities refer to sub-charities where 75 per cent or more of its membership or participants are under the age of 22;
 - b) senior sports sub-charities refer to sub-charities where a majority of its membership or participants are 60 years of age or older;
 - c) disabled sports sub-charities refer to sub-charities where 75 per cent or more of its membership or participants are disabled.
- 7.29.3 The programs must be available and be advertised to all HFN community members.
- 7.29.4 Proceeds may be used to pay for the rental fees of a facility or a venue for a sub-charity's sporting events.
- 7.29.5 Proceeds may be used to pay for officiating and judges' fees.
- 7.29.6 Sub-charities may use proceeds to pay for the reasonable costs of certifying officials and judges in their sport, including training and education costs.
- 7.29.7 Proceeds may be used to pay for coaching/instructor fees providing the duties performed by the coach/instructor are essential to the sub-charity's program delivery, the duties of the coach/instructor are performed by a person with specialized qualifications and the duties of the coach/instructor cannot be reasonably performed by a volunteer.

SUBJECT: SPORTS

7.29.8 Proceeds may be approved to purchase and clean uniforms and equipment that are required for the participation in the sport. The uniforms and equipment may not be for personal use, and ownership must remain with the licensed charity or sub-charity, except those items which:

- a) wear out; or
- b) for hygienic purposes should not have to be returned; or
- c) are essential or a key element for a special event or competition, as approved by AGLC.

7.29.9 Proceeds may be used to pay for membership, registration, affiliation or insurance fees to tournaments or to local, provincial, national or international governing bodies when the membership, registration, affiliation or insurance is related to a sub-charity's specific objectives and individual members of the sub-charity do not also pay the fee.

7.29.10 Proceeds may be used to pay for the following costs associated with attending a competition away from the team's or athlete's home facility. The athlete or team must meet the criteria for approved travel (see Section 7.30):

- a) transportation costs to and from the competition;
- b) local transportation costs while at the competition; and
- c) accommodation and meal costs during the period of competition.

7.29.11 Proceeds may be used to pay for awards (e.g., trophies, plaques and ribbons) earned by achievement and not granted for volunteer appreciation. Proceeds must not be used for cash or merchandise prizes or any other prize of value.

7.29.12 The participants must not be paid, directly or indirectly, for their participation.

7.29.13 Proceeds must not be given to adult sports groups.

7.29.14 *(Deleted Apr 2021)*

7.29.15 Consistently the courts have held that sports by themselves are not charitable. The courts have found some sports activity to be charitable due to the object sought to be advanced and the character of the intended beneficiary. For example, sports has been recognized

SUBJECT: SPORTS

as part of the education of the young, and as therapy and relief of suffering for the disabled, which are themselves recognized as charitable activities. The provision of sports facilities for public use has also been recognized as charitable.

- 7.29.16 Non-profit sports groups that are not eligible to receive proceeds under this policy may be eligible for a small raffle licence as per section 207(1)(d) of the *Criminal Code*, provided all proceeds after payment of the raffle prizes are donated to an eligible charity.

SUBJECT: TRAVEL

POLICY

- 7.30.1 Proceeds may be used for a licensed charity's or sub-charity's travel expenses if the travel is directly related to the delivery of the licensed charity's or sub-charity's charitable programs and services in a HFN community. *(Amended Nov 2022)*
- 7.30.2 Proceeds must only be used for the costs of direct-route transportation, meals, and accommodation during the period of the travel. If the licensed charity or sub-charity uses per diems to pay for travel costs such as meals, incidental expenses and kilometres traveled in a personal vehicle, standard per diem rates must be approved by the board of the licensed charity. These rates must be comparable to per diem rates used by the provincial or federal government *(Amended Apr 2016)*.
- 7.30.3 Proceeds may be used to pay travel expenses to workshops, conferences, seminars, etc. outlined in Section 7.32 or otherwise approved by AGLC.
- 7.30.4 Proceeds may be used for travel that enriches an educational school or institution's curriculum if the trip provides an educational experience which otherwise would not be available.
- 7.30.5 The school or institution must be recognized by the Government of Alberta or otherwise approved by AGLC and the governing body of the school or institution must approve the trip in writing and confirm it is an enrichment of the approved educational curriculum. The proper authorities are:
- a) board of governors of a university, college, community college, etc.;
 - b) president of a post-secondary trade school, vocational school (e.g., NAIT, SAIT or NorQuest College), or First Nation college or institute; and
 - c) principal of a high school, junior high or elementary school.
- 7.30.6 Proceeds may be used to pay for the travel expenses of sub-charities involved in activities such as visual, literary, media and performing arts (e.g., music, dance, drama) or cultural activities.

SUBJECT: TRAVEL

7.30.7 Proceeds may be used to pay for the travel expenses of individuals and teams (including school teams) involved in HFN youth, seniors and/or disabled individuals sports, as approved by AGLC.

7.30.8 Proceeds may be used to pay for the allowable expenditures of students/participants and a limited number of support personnel. The number of support personnel is determined by the number of students/participants.

- a) a licensed charity or sub-charity may use proceeds to pay for the allowable travel expenditures of a maximum of one support person per five students/participants, or portion thereof;
- b) the travel expenditures of two support personnel may be paid for using proceeds if there are six to 10 students/participants;
- c) the travel expenditures of three support personnel may be paid for using proceeds if there are 11 to 15 students/participants; and
- d) for a higher number of support personnel per students/participants a written request must be submitted to and approved by AGLC before any proceeds are disbursed.

Note: Support personnel are defined as teachers, instructors, coaches, managers, trainers, Elders, parents and other adult chaperones. Individuals holding a coaching, instructor or similar position are not expected to also fulfill chaperone responsibilities.

7.30.9 For travel outside of Alberta, a Travel Itinerary form (Form 5443) must be submitted to and approved by AGLC before any proceeds are disbursed. In addition, for travel outside of Canada the licensed charity or sub-charity must demonstrate a similar activity does not exist in Canada.

7.30.10 Proceeds must not be used for travel expenditures which are recreational or social in nature unless related to seniors, disabled or youth development programs. *(Amended Apr 2021)*

SUBJECT: WAGES, SALARIES, FEES FOR SERVICE AND HONORARIUMS

POLICY

7.31.1 This section covers senior managers, managers and administrative and charitable program employees of the licensed charity and sub-charities and not charity workers. Please refer to Section 3 for more information regarding charity workers.

7.31.2 Proceeds may be used for remuneration of individuals if the duties performed are essential to the licensed charity's or sub-charity's charitable program delivery. Remuneration may include the following: *(Amended Nov 2022)*

- a) salaries, wages, honorariums and fees for service;
- b) employment benefits including dental, medical, pension, etc.; and
- c) items of a nominal value provided for recognition.

7.31.3 *(Deleted Apr 2016)*

7.31.4 The licensed charity is responsible for ensuring that all remuneration paid to employees and contractors of the licensed charity and sub-charities or other individuals are for:

- a) duties that are performed by a person with qualifications or technical skills directly related to the position held; and
- b) amounts that are reasonable and comparable to similar positions held within the licensed charity's Nation, other First Nations, and the same or similar trades or industries within the First Nations geographic region.

7.31.5 The remuneration of persons employed by the licensed charity and sub-charities may be paid for the performance of administrative duties. Remuneration for positions and duties classified as administrative are included in the total administrative costs and therefore are subject to subsection 7.1.6. Administrative positions are defined as senior executives, managers, and individuals completing general services (e.g., clerical, accounting and funding/program compliance) that are related to the licensed charity and sub-charity as a whole as opposed to specific charitable programs. Managers of charitable programs whose duties are

SUBJECT: WAGES, SALARIES, FEES FOR SERVICE AND HONORARIUMS

directly related to the program delivery are not considered administrative by AGLC. *(Amended Nov 2022)*

7.31.6 The licensed charity may use proceeds to pay employees for more than one position at the licensed charity and/or sub-charities if:

- a) the duties are not completed during simultaneous timeframes; and
- b) AGLC approves the individuals receiving the proposed remuneration beforehand.

7.31.7 The licensed charity must maintain a ledger, spreadsheet or database for all positions paid with proceeds by the licensed charity and sub-charities that contains the following information:

- a) employee name;
- b) position title;
- c) employer (licensed charity and sub-charity name);
- d) date of employment;
- e) date of termination (if applicable); and
- f) total approved remuneration (including benefits).

7.31.8 Detailed position descriptions signed by the employee who holds the position and an appropriate individual of authority must be maintained by the licensed charity and sub-charity for all employees remunerated with proceeds.

7.31.9 Proceeds may be used to pay honorariums at meetings only if the duties performed are essential to the licensed charity and sub-charity's program delivery and record of attendance and meeting minutes are maintained. Employees and members of a licensed charity and sub-charity cannot collect honorariums for attending meetings. *(Amended Apr 2016)*

7.31.10 All remuneration paid is subject to audit by AGLC.

7.31.11 *(Deleted Apr 2021)*

SUBJECT: WORKSHOPS, CONFERENCES AND SEMINARS

POLICY

7.32.1 Proceeds may be used by a licensed charity or sub-charity to host or send delegates to workshops, conferences or seminars under the following conditions:

- a) the workshop, conference or seminar is primarily organized for educational or administrative purposes and is related to a specific charitable program or service the licensed charity or sub-charity delivers to the HFN community; workshops, conferences or seminars that are primarily organized for administrative purposes will be subject to subsection 6.5.13 and must be included in the 10 per cent allowable administration costs.
- b) the location of the workshop, conference or seminar is reasonable and/or essential to the delivery of the objectives.

7.32.2 Proceeds may be used to pay for registration fees and travel costs for delegates attending a workshop, conference or seminar (see Section 7.30).

7.32.3 Proceeds may be used for costs essential to hosting workshops, conferences, seminars, or community meetings that include but are not limited to:

- a) facilitator fees;
- b) food and non-alcoholic beverages;
- c) audio/visual or other required equipment rental;
- d) facility rental; and
- e) clean-up costs.

7.32.4 Proceeds may be used to pay for facilitator fees if:

- a) the duties are performed by an individual with specialized qualifications related to the topic being presented; and
- b) the presentation or duties performed are essential to the licensed charity or sub-charity's program delivery.

7.32.5 If a fee is charged to attend a workshop, conference or seminar, the revenue generated from the fees must be used to support the

SUBJECT: WORKSHOPS, CONFERENCES AND SEMINARS

related costs. Proceeds may only be used after all revenue generated has been used to off-set related costs.

7.32.6 Delegates attending workshops, conferences, or seminars primarily organized for educational purposes must be in a position:

- a) where the training is required to fulfill or enhance their duties related to a specific charitable program or service the licensed charity or sub-charity delivers to the HFN community, or
- b) where the delegate can train other members of the licensed charity, sub-charity and/or HFN community after completion.

7.32.7 Delegates attending workshops, conferences or seminars primarily organized for administrative purposes must be in a position:

- a) where the delegate is required to partake in the planning or other administrative functions related to a specific charitable program or service the licensed charity or sub-charity supports or delivers to the community, or
- b) where the delegate can train other members of the licensed charity, sub-charity and/or HFN community after completion.

7.32.8 Employees of a licensed charity and/or sub-charity attending an approved workshop, conference or seminar, etc. may be paid their regular wage if the workshop, conference or seminar is during their regular hours of work.

7.32.9 *(Deleted Apr 2021)*

SUBJECT: YOUTH DEVELOPMENT

POLICY

7.33.1 Proceeds may be used to support youth development programs and services for the HFN community.

7.33.2 Requests to use proceeds for youth development programs and services must be submitted to and approved by AGLC. A youth is defined as a person under the age of 22 *(Amended Apr 2016)*.

7.33.3 Youth development programs must have one of the following characteristics:

- a) have a regular group of adult leaders or employees who administer the program;
- b) provide an environment where youth can develop leadership, citizenship, and community skills; or
- c) supports both individual and group youth participation in activities including but not limited to cultural programs, art programs, swimming, skiing, snowboarding, camping or gymnastics.

7.33.4 Youth development programs and services must be reasonably made available and advertised to all HFN youth, on or off-reserve. The advertisements must be retained by the licensed charity and must be provided to AGLC when requested.

7.33.5 Proceeds may be used to pay for equipment that is required for the participation in the youth development programs. Ownership must remain with the licensed charity or sub-charity, except those items which:

- a) wear out; or
- b) for hygienic purposes should not have to be returned.

7.33.6 Proceeds may be used to pay for travel costs for attending a youth development program (see Section 7.30).

7.33.7 *(Deleted Apr 2021)*

SUBJECT: AGLC AUDIT REQUIREMENTS

POLICY

- 8.1.1 With regard to Section 8, all references to sub-charity include other entities approved by AGLC, as specified in subsection 2.2.2.
- 8.1.2 The books and records of the licensed charity or sub-charity are subject to review and/or audit by AGLC and must be maintained in a manner acceptable to AGLC.
- 8.1.3 The books and records of the licensed charity or sub-charity must be kept for a period of six years from the date of the end of the annual reporting period.
- 8.1.4 The areas normally subject to review and/or audit for the licensed charity or sub-charity will include, but not be limited to:
- a) books of original entry (including computerized records such as the income statement and general ledger specified in subsection 8.1.5);
 - b) original purchase/service requisitions, invoices and receipts;
 - c) bank statements and cancelled cheques;
 - d) all casino event documents;
 - e) schedules of sub-charities' and other entities' disbursements;
 - f) contracts, agreements, loan documents or similar documents;
 - g) payroll records, including timesheets;
 - h) capital asset and inventory listings and records;
 - i) documents specified in Section 7 of the HFNCCPH required for specific use of proceeds;
 - j) applicable tax returns;
 - k) minutes of annual general meetings, and meetings of general membership, board and executive;
 - l) external accountant's/auditor's working paper files;
 - m) annual (audited) financial statements; and
 - n) program delivery records, including participation sign-in sheets for programs, expenses incurred, advertisements, pamphlets or any other details applicable to the program.

DATE ISSUED: April 1, 2015

AUTHORITY: Original signed by Susan Green

SUBJECT: AGLC AUDIT REQUIREMENTS

- 8.1.5 When requested, the licensed charity and/or sub-charity must provide AGLC with internally prepared financial statements and a general ledger. The information contained in these documents must include:
- a) the amount of casino table revenue earned (see subsection 6.1.1);
 - b) the commissions received from AGLC for slot machines and keno;
 - c) the costs incurred for event expenses (see subsection 6.3.1); and
 - d) a complete listing of all use of proceeds' disbursements, including those made directly by the licensed charity and those to sub-charities and other entities.
- 8.1.6 When requested, the licensed charity and/or sub-charity must provide AGLC with an electronic copy of all the financial transactions related to the receipt and disbursement of proceeds. If a custom accounting software program is used by the licensed charity, a working copy of the accounting software used to record the financial transactions as well as any updates to the accounting software must also be provided to AGLC.
- 8.1.7 AGLC will conduct real-time, unannounced audits at the casino facility and/or the licensed charity's office.
- 8.1.8 The licensed charity and their employees are responsible for ensuring that, at all reasonable times, AGLC has access to all records. AGLC may copy or temporarily remove records at their discretion.

SUBJECT: ANNUAL AUDIT REQUIREMENTS

POLICY

- 8.2.1 Audited financial statements and a management letter/reportable audit findings letter of the licensed charity must be submitted annually. It must be prepared by an independent Chartered Professional Accountant (CPA) in good standing. *(Amended Apr 2018)*
- 8.2.2 The audited financial statement and a copy of the management letter must be submitted to AGLC within 120 days of the licensed charity's fiscal year end.
- 8.2.3 When requested, the licensed charity must ensure AGLC is allowed access to and make copies of the following:
- a) the auditor's working paper files of the licensed charity; and
 - b) the auditor's working paper files related to the receipt and disbursement of proceeds of sub-charities and other entities.
- 8.2.4 The licensed charity must ensure the recommendations made by the auditor under subsection 8.2.1 (except recommendations which may be contrary to the policies of the HFNCCPH or the CTCOG) are acted upon immediately and the recommended financial operating procedures are established and maintained.

SUBJECT: ENFORCEMENT OF LEGISLATION

POLICY

- 9.1.1 AGLC is the province's gaming authority, responsible for administering and regulating the gaming industry in Alberta, including the licensing and regulation of charitable casino gaming activities. AGLC is established under the *Gaming, Liquor and Cannabis Act*.
- 9.1.2 The licensed charities and charity workers must comply with all federal and provincial laws, including the *Gaming, Liquor and Cannabis Act* and the Gaming, Liquor and Cannabis Regulation, and Board policies established under the legislation, including the policies in this handbook.
- 9.1.3 AGLC conducts inspections, investigations and audits to ensure compliance with the *Gaming, Liquor and Cannabis Act*, the Gaming, Liquor and Cannabis Regulation and Board policies.
- 9.1.4 Where casino revenue or proceeds are missing due to suspected theft, fraud or cheating at play, the matter will be forwarded to the Investigations Branch of AGLC for criminal investigation. Where there is sufficient evidence that persons are involved in theft, fraud or cheating at play, they will be criminally prosecuted.
- 9.1.5 Non-compliance with the legislation or Board policies may result in disciplinary action up to and including suspension or cancellation of licence or registration.

SUBJECT: PENALTY GUIDELINES

POLICY

- 9.2.1 The Board has established guidelines which provide a framework for penalty decisions regarding licensed charity and charity worker violations of the *Gaming, Liquor and Cannabis Act*, Gaming, Liquor and Cannabis Regulation and Board policies.
- 9.2.2 Penalties may vary from the guidelines at the discretion of the Board based upon the nature or circumstance of a violation.
- 9.2.3 The Board, when making an order under section 91(2) of the *Gaming, Liquor and Cannabis Act*, will consider the relevant disciplinary record of the licensed charity/charity worker.
- 9.2.4 *(Deleted Apr 2018)*