

Human Resources

Section 7: Code of Conduct and Ethics

7.1 OVERVIEW

Preamble

7.1.1 The Code of Conduct and Ethics for Alberta Gaming, Liquor and Cannabis Commission (AGLC) applies to all employees (including the Chief Executive Officer (CEO) who also follows the Board Code of Conduct and Ethics). It reflects a commitment to our values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of AGLC. We are expected to behave in a way that aligns with this Code. We understand that this Code does not cover every specific scenario. Therefore, we use the spirit and intent behind this Code to guide our conduct, and exercise care and diligence in the course of our work with AGLC. All aspects of the operation of AGLC must be conducted with integrity, trust, impartiality and in accordance with generally accepted standards of behaviour.

AGLC Values:

- a) Integrity: We hold ourselves to a high standard. That means operating fairly and honourably with colleagues, customers and stakeholders, even when no one is watching.
- b) Respect: We listen and empower. Our culture adapts and ensures all are heard to build a vibrant Alberta. And when we misstep, we take accountability.
- c) Collaboration: We harness the power of multiple minds and ideas. By breaking down internal and external boundaries to work together, we amplify our achievements.
- d) Innovation: We are always reinventing. The first answer is not always the best answer, so we let our curiosity continuously challenge the status quo.
- e) Inclusion: We embrace the power of diversity. Each of our unique talents, experiences and relationships come together to form one stronger AGLC.

Definitions

7.1.2 In this policy,

- a) “Code” means the Code of Conduct and Ethics for all employees of AGLC (including the Chief Executive Officer (CEO), that is reviewed annually, and is amended on a regular basis.
- b) “Code Administrator” means the person who manages the Code. The Code Administrator for employees is the Vice President, Human Resources and the Board Chair for the CEO.
- c) “Conflict of Interest” means any situation in which an employee, either for themselves or some other person(s), attempts to promote a private or personal interest which results or appears to result in (a) an interference with the objective exercise of the employee's responsibilities, or (b) an opportunity or advantage by virtue of an employee's position with the AGLC.
- d) “Personal Relationship” means a family relationship, a business/commercial/financial relationship or a sexual/romantic relationship.
- e) “Relative” means an adult interdependent partner, son, daughter, parent, brother, sister, spouse, in-laws, uncles, aunts, nieces, nephews, foster parents and foster children.

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- f) “Sexual Harassment” means unsolicited and unwelcome conduct of a sexual nature, including comments, gestures or physical contact, either on a one-time basis, or in a continuous series of incidents, that detrimentally affects the work environment or leads to adverse job-related consequences. It is behaviour that is offensive, objectionable, coercive and one-sided. Both males and females can be victims of sexual harassment. Sexual harassment is a form of workplace harassment.
- g) “Workplace Bullying” means a repeated pattern of negative behaviour aimed at a specific person or group. Workplace bullying is a form of workplace harassment.
- h) “Workplace Harassment” means any single incident or repeated incidents of objectionable or unwelcome conduct, comment, bullying or action by a person that the person knows or reasonably knows will or would cause offence or humiliation to an employee, or adversely affects the worker’s health and safety, and includes conduct, comment, bullying or action because of race, religious beliefs, colour, physical disability, marital status, source of income, family status, gender, gender identity, gender expression and sexual orientation, and a sexual solicitation or advance, but excludes any reasonable conduct of an employer or supervisor in respect of the management of employees or the workplace.

Application

- 7.1.3 The Code of Conduct and Ethics applies to all AGLC Employees (including the Chief Executive Officer) and provides employees with basic principles to guide their day-to-day behaviour.
- 7.1.4 If specific situations arise that have not been outlined in this policy, they will be administered according to the general principles established in the AGLC Code of Conduct and Ethics. Any questions concerning the application of the Code of Conduct and Ethics shall be referred to the Vice President, Human Resources.

POLICY

- 7.1.5 Employees are expected to conduct themselves in a manner which:
 - a) maximizes their contribution to AGLC;
 - b) provides quality customer service;
 - c) ensures integrity and impartiality in decision making;
 - d) promotes the health, safety and well-being of employees and clients;
 - e) promotes the safeguarding of AGLC property and assets;
 - f) ensures compliance with AGLC Policies and Procedures as well as maintaining confidentiality with regard to AGLC information (including verbal information), documents and reports; and
 - g) reflects positively on AGLC.

STANDARDS

- 7.1.6 The Code of Conduct and Ethics provides all employees with basic principles to guide their behaviours and actions while at work.
- 7.1.7 Employees are subject to and must be aware of their obligations and adhere to AGLC Corporate Policies and Procedures.
- 7.1.8 AGLC employees are expected to act professionally with the best interest of AGLC in mind. Unacceptable behaviour and conduct include but are not limited to:
 - a) discourteous service to customers or clients;
 - b) insubordination;
 - c) misuse of leaves and privileges;
 - d) theft of property;

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- e) falsifying records;
 - f) tampering with products;
 - g) negligence of duties;
 - h) a Criminal offence pursuant to a Federal Statute arising from the employee's conduct while on or while off duty; and
 - i) other acts of misconduct.
- 7.1.9 Employees must conduct themselves impartially in carrying out their duties, reflect positively on AGLC and they shall conduct themselves with integrity and avoid impropriety or the appearance of impropriety on all occasions.
- 7.1.10 A conflict of interest exists when an employee, either for themselves or some other person(s) or organization, attempts to promote a private or personal interest which results or appears to result in:
- a) an interference with the objective exercise of the employee's responsibilities, or
 - b) an opportunity or advantage by virtue of the employee's position with AGLC.
- 7.1.11 Employees must not engage in any criminal activity and must comply with all relevant laws, regulations, policies and procedures. Employees are expected to be sufficiently familiar with any legislation that applies to their work to recognize potential liabilities and to know when to seek legal advice.
- 7.1.12 Employees shall adhere to all AGLC Policies and Procedures with particular emphasis on the following areas:
- a) proper accounting and control of monies of AGLC;
 - b) proper cash handling procedures;
 - c) use of tools, equipment and vehicles in a safe and responsible manner;
 - d) conduct duties with impartiality;
 - e) ensure occupational health and safety of employees; and
 - f) corporate security.
- 7.1.13 Employees are required to maintain confidentiality with regard to AGLC information (including verbal information), documents and reports unless authorized for distribution by the division head or as the case may be, the Chief Executive Officer.
- 7.1.14 Employees must adhere to the requirements of the *Freedom of Information and Protection of Privacy Act* (FOIP). Any subsequent use and disclosure of information provided to the employer pursuant to this policy or any supplementary corporate instructions will be subject to the privacy provisions of Section 40 of the *Freedom of Information and Privacy Act*.
- 7.1.15 Employees are expected to devote sufficient time and attention to official duties and obligations for informed and balanced decision making. Any questions concerning the Code of Conduct and Ethics shall be referred to the Vice President, Human Resources.

PROCEDURES

- 7.1.16 If an employee is charged with an offence under the *Criminal Code of Canada* or the *Controlled Drugs and Substances Act* (Canada) or any other federal statute, the employee shall immediately report such a charge to his/her Supervisor/Manager or Vice President, Human Resources.
- 7.1.17 In the event that an employee makes a report pursuant to Subsection 7.1.11 and/or 7.1.16, the Vice President, Human Resources shall forthwith determine if the employee has:
- a) created a real or perceived conflict of interest that impacts AGLC's interests; and/or
 - b) seriously compromised the employee's ability to continue to perform their job duties at AGLC.

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- 7.1.18 Employees have the responsibility to report situations of real or perceived conflicts of interest of other employees, CEO or AGLC Board Members. These situations must be reported to the Vice President, Human Resources, so appropriate steps are taken to address the matter. No action shall be taken against an individual for reporting such a situation unless the report is made maliciously or without reasonable grounds. Whenever possible, the name of the person reporting such information will be kept confidential and no documentation regarding the reporting will be placed on the person's human resources file.

Respectful Workplace (Section 7.4)

POLICY

- 7.1.19 A respectful workplace is the commitment and responsibility of every AGLC employee. Inappropriate, disrespectful behaviour that does not follow our values, including bullying and harassment, will not be tolerated at our workplace.

STANDARDS

- 7.1.20 AGLC will provide a workplace which is supportive of the productivity, dignity and self-esteem of every employee.
- 7.1.21 All employees are expected to act in a manner which is consistent with creating and supporting a respectful work environment, in accordance with our guiding values. Disrespectful behaviour, which includes all forms of workplace harassment, including workplace bullying, and sexual harassment, will not be tolerated and may be subject to appropriate remedial and/or disciplinary action as provided for herein.
- 7.1.22 Examples of disrespectful behavior that may constitute workplace harassment include the following (but not limited to):
- a) Unwelcome remarks, jokes, innuendo or taunting about a person's race, religious beliefs, colour, gender, physical disability, mental disability, age, ancestry, place or origin, marital status, source of income, family status or sexual orientation of that person or of any other person
 - b) Intimidation, leering or other objectionable and insulting gestures
 - c) Threats including coercion
 - d) Angry outbursts
 - e) Unwanted physical contact such as touching, patting, pinching or punching
 - f) Display of pornographic, racist or offensive pictures or materials
 - g) Abuse of authority that undermines someone's performance or threatens his or her career
 - h) Spreading false information
 - i) Practical jokes that result in awkwardness or humiliation in front of others
 - j) Unwelcome enquiries or comments about an individual's personal life, physical attributes, or appearance
- 7.1.23 The following are management's right to run operations and are not considered disrespectful behaviours:
- a) Direct supervision, including discussions about performance expectations.
 - b) Assignment of work and direction on how it is to be accomplished.
 - c) One on one discussions between managers, supervisors and their staff.
- 7.1.24 Making a false allegation against another employee is a serious offence and is considered another form of disrespectful behaviour that will not be tolerated. Where accusations are found to be false, disciplinary action may be taken against the person who made the accusation.

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PROCEDURES

- 7.1.25 When employees are aware of or suspect any conduct that is unethical in the workplace such as fraud, theft, falsification of records or malicious property damage, they have an obligation to immediately report such conduct using any available channel (i.e., their supervisor/manager or Human Resource Business Partner).
- 7.1.26 In the event that a complaint is filed by an employee of AGLC, the Vice President, Human Resources should be advised to determine the appropriate action to be taken.
- 7.1.27 In determining whether the alleged conduct constitutes harassment the investigator must assess all of the facts and circumstances, including the nature of the alleged sexual advances, the environment and the context in which the incident is alleged to have taken place.

Conflict of Interest (Section 7.5)

POLICY

- 7.1.28 There must not be a conflict between the private interests of employees and the employee's responsibility to AGLC. Furthermore, there must not be a conflict in regard to the receipt of gifts and invitations, gaming activity, outside employment, private assets, financial assets, and nepotism.

STANDARDS

- 7.1.29 Employees are expected in all regards to conduct their duties with impartiality.
- 7.1.30 The Standards are written to clarify those activities which may constitute a conflict of interest situation; they are not designed to be exhaustive.
- 7.1.31 Employees considering a new offer of appointment or employment must be aware of and manage any potential conflicts of interest between their current position and future circumstances. They shall not allow the performance of their official duties to be influenced by offers of future employment or the anticipation of offers of employment.

PROCEDURES

- 7.1.32 Employees shall identify areas in which they have or believe they have a conflict of interest under the preceding Standards, and shall inform the Vice President, Human Resources, in writing, of these areas.
- 7.1.33 Employees unsure of being in a conflict of interest situation or unsure of the interpretation of the Standards should discuss the circumstances with the Vice President, Human Resources and seek advice on the appropriate action to take.
- 7.1.34 In confirmed instances of conflict of interest, the employee shall normally be required to take action to eliminate the conflict within a limited period of time to be established for each individual case.
- 7.1.35 Should the employee fail to take the required action, appropriate disciplinary action may be taken.
- 7.1.36 Once each calendar year, Human Resources, shall circulate a Disclosure of Interest Statement form to all Management and other selected positions employed by AGLC. This form shall be completed and returned to Human Resources within two weeks. The Vice President, Human Resources is then responsible for advising the Chief Executive Officer of any potential conflict of interests arising from the completed disclosure forms.
- 7.1.37 Once each calendar year, Human Resources, will circulate the Annual Employee Declaration form to all AGLC employees. This form must be completed and returned to Human Resources within two weeks. The Vice President, Human Resources is then responsible for advising the relevant Executive Vice President/Vice President and the Chief Executive Officer of any potential conflict of interests arising from the completed declaration forms.
- 7.1.38 The signature on the Annual Employee Declaration is a pledge that conduct as an employee of AGLC at all times will adhere to the policies and standards as outlined in the above policy.
- 7.1.39 Any false declarations will result in disciplinary action up to, and including, dismissal.

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Restrictions on the Chief Executive Officer (CEO)

7.1.40 As per the *Conflicts of Interest Act* and *Public Service Act*, the CEO is subject to additional restrictions as outlined below:

- a) The CEO must not take part in a decision in the course of carrying out his/her office or powers knowing that the decision might further a private interest of the CEO, a person directly associated with the CEO, or the CEO's minor or adult child.
- b) The CEO must not use his/her office or powers of influence or seek to influence a decision made by or on behalf of the Crown or a public agency to further a private interest of the CEO, a person directly associated with the CEO, or to improperly further any other person's private interests.
- c) The CEO must not use or communicate information not available to the general public that was gained by the CEO in the course of carrying out his/her office or powers to further or seek to further a private interest of the CEO or any other person's private interests.
- d) The CEO must appropriately and adequately disclose a real or apparent conflict of interest.

Acceptance of Gifts

7.1.41 An employee must not use their position to solicit or accept a fee, gift, hospitality, educational opportunity or other benefit that could have a real, apparent or potential influence on the employee's objectivity and impartiality in performing their duties on behalf of AGLC.

7.1.42 Employees should consult with their manager or Human Resources Business Partner if they are unsure whether they are permitted to accept a fee, gift, hospitality, educational opportunity or other benefit.

Gifts

7.1.43 An employee may accept a gift if that gift is:

- a) the normal exchange of gifts between friends;
- b) the normal exchange of hospitality between reasonable persons conducting business together;
- c) tokens exchanged as part of protocol; and
- d) the normal presentation of gifts to an employee participating in public functions, awards, speeches, lectures, presentations or seminars.

7.1.44 The value of a single gift must not exceed \$250 and must not include cash, cheques or electronic equivalent. Gifts from the same source must not exceed \$500 annually.

Hospitality

7.1.45 An employee may accept an invitation to hospitality or an educational opportunity but:

- a) the value of a single event invitation accepted, inclusive of admission, travel, hospitality and accommodation, must not exceed \$400; and
- b) the value of invitations accepted from the same source must not exceed \$800 annually.

Paid Conferences

7.1.46 An employees may accept a paid conference invitation, but the value of any single conference invitation accepted, inclusive of admission, travel, accommodation, hospitality and other incidentals, must not exceed \$5,000.

Exemptions

7.1.47 An employee may apply in writing to the Vice President, Human Resources for an exemption to the limits set out in Subsections 7.1.43 to 7.1.46.

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- 7.1.48 The Vice President, Human Resources may grant an exemption, with or without conditions, approving a specific fee, gift, hospitality, educational opportunity or other benefit. In exercising this discretion, the Vice President, Human Resources may assess factors including, but not limited to, relationship building, productivity improvements, apparent conflict of interest and AGLC's reputation.
- 7.1.49 The decision of the Vice President, Human Resources must be in writing and set out the reason for the decision.

Electronic and Gaming Activity

- 7.1.50 For reasons of public perception, AGLC employees are prohibited from participating in gaming activities that are regulated by AGLC. This prohibition includes electronic gaming (including slot machines, VLTs and online gaming) in all forms as well as casino table games but does not include products offered by WCLC including any retail or subscription product, and WCLC electronic product provided through Lotto Spot; paper and electronic play bingo, and the purchase of pull tickets or raffle tickets. The restrictions on gaming apply only in Alberta and only to AGLC employees and not to spouses or other family members.

Outside or Self-employment

- 7.1.51 Employees may participate in outside or self-employment. Such employment must not:
- interfere with job performance or availability to work;
 - involve the use of AGLC apparel, equipment, tools, computer, materials, supplies or personnel;
 - be directly or indirectly engaged in any other business or undertaking dealing in liquor, gaming, or cannabis;
 - be employed with casino, racing entertainment centres, bingo associations, lottery ticket sales, raffles or any other gaming operations regulated by AGLC.
- 7.1.52 Prior to accepting any supplementary employment where a conflict of interest might arise, employees are required to notify their Manager/Supervisor and the Vice President, Human Resources in writing about the nature of such supplementary employment. The Vice President, Human Resources shall then review the supplementary employment for potential or existing conflicts of interest.
- If no conflict exists or could arise, the Vice President, Human Resources may approve the employment in writing.
 - If a conflict does exist or could arise, the Vice President, Human Resources may in writing either deny the employment, or impose terms or conditions on acceptance to manage the potential or existing conflicts.
- 7.1.53 The CEO may not accept or be involved in any appointment, business, undertaking, or employment (including self-employment) other than the appointment, business, undertaking, or employment that is subject to the *Conflict of Interest Act*, unless they have first received written approval from the Ethics Commissioner to do so, and complies with any conditions that the Ethics Commissioner has included in the approval.

Volunteer Activities

- 7.1.54 Employees may participate in volunteer activities subject to:
- the activities must not interfere with job performance or availability to work;
 - the activities must not involve the use of AGLC apparel, property, equipment, tools, computer, materials, supplies or personnel;
 - employees are not in their official capacity.
- 7.1.55 Employees may volunteer in fundraising involving gaming or non-sale liquor events.
- 7.1.56 Employees' conduct outside working hours has the potential to impact the reputation of AGLC.

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Financial Assets and Services

- 7.1.57 Any product or technology developed by employees in the course of their tenure with AGLC is the property of AGLC. An employee shall not sell, trade, market, or distribute any such product or technology unless otherwise authorized by the Chief Executive Officer or designate.
- 7.1.58 Employees involved in the decision-making process affecting AGLC assets and services must not acquire assets from, sell assets to, or provide services to the AGLC.
- 7.1.59 *The Gaming, Liquor and Cannabis Act* (Section 53 & 90.11) and internal AGLC policies state:
- No liquor, gaming or cannabis licence may be issued to an employee, agent of the AGLC, their spouses or common-law partners.
 - No liquor, gaming or cannabis licence may be issued to an employee, or agent of the AGLC where they are an owner or part owner of the premises or holds an interest in the premises.
 - a) and b) do not apply to the issuing of a special events licence, or the issuing of a licence to an agent of the Commission authorizing the manufacture of liquor.
- 7.1.60 No employee shall have a financial interest in or be directly engaged in any business or undertaking dealing with gaming regulated by AGLC.
- 7.1.61 Where an actual or proposed business or financial interest of an employee, or of the employee's spouse or dependent children is affected, appears to be affected or may be affected by actions taken or decisions made in which the employee participates in the course of his/her employment, the employee shall disclose the business or financial interest to the Vice President, Human Resources.

Financial Disclosure

- 7.1.62 Employees who could be placed in a conflict of interest situation due to the nature of their duties and responsibilities and employees in management will be required to disclose their outside business interests and financial holdings, on a yearly basis, in writing, for approval by the Vice President, Human Resources.
- 7.1.63 If a conflict of interest situation exists, the business or financial interests shall be placed in a blind trust or otherwise disposed of with notice to the Vice President, Human Resources.
- 7.1.64 The CEO must comply with all disclosure statements and return reporting requirements, post-employment restrictions, and restrictions on holdings in connection with publicly-traded securities, in the manner and in accordance with the timelines set out in the *Conflict of Interest Act*.
- 7.1.65 As set out in s. 23.93 of the *Conflict of Interest Act*, the CEO must not own or hold a beneficial interest in publicly-traded securities unless held in a blind trust approved by the Ethics Commissioner. Approvals for other investment arrangements or exemptions must be granted in writing by the Ethics Commissioner.
- Securities must be managed within sixty (60) days of a person becoming the CEO, the Code's entry into force, or the acquisition of securities by gift or inheritance. The Ethics Commissioner may set out a longer period.
- 7.1.66 As set out in the *Conflict of Interest Act*, at a time specified by the Ethics Commissioner, and in a manner and form specified by the Ethics Commissioner, the CEO is required to provide the Ethics Commissioner an annual and full financial disclosure of all assets, liabilities, investments, holdings and other interests.
- 7.1.67 At a time specified by the Ethics Commissioner, and in a manner and form specified by the Ethics Commissioner, the CEO must also provide to the Ethics Commissioner a return of the assets, liabilities, investments, holdings and other interests of the CEO's direct associates; spouses, adult interdependent partners, dependent children, and any corporation or partnership that the CEO, his/her spouse, or his/her adult interdependent partner controls.
- The CEO must file an updated disclosure or return within thirty (30) days of any material changes to a previous return or disclosure, and within thirty (30) days if no longer designated as the Designated Senior Official.

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Post-Employment

- 7.1.68 As required by the *Conflicts of Interest Act* and *Public Service Act*, the CEO shall not, within a period of twelve (12) months after the last day they hold the position of CEO:
- Lobby any public office holder, as defined in the *Lobbyists Act*;
 - Act for or on behalf of any person, commercial entity, association or union in connection with any specific ongoing proceeding, transaction, negotiation or case to which AGLC is a party and where the CEO acted for or advised AGLC;
 - Accept service contracts, appointments to a Board of Directors of, or employment with, an entity with which they had direct and significant official dealings during the period of twelve (12) months immediately prior to the termination of his/her services to AGLC; nor
 - Make representations to, benefit from, solicit or accept, whether for remuneration or not, on behalf of any other person or entity to any department, organization, board, commission, or tribunal with which they had direct and significant dealings during the period of twelve (12) months immediately prior to the termination of his/her services to AGLC.
- 7.1.69 In addition to requirements of the *Conflicts of Interest Act* and *Public Service Act*, the CEO will not give advice to a client by using information that is not available to the Alberta public concerning the programs or policies of AGLC during the above timeframe.
- 7.1.70 The CEO may apply to the Ethics Commissioner for a waiver or reduction of the time period or restrictions imposed by the *Conflicts of Interest Act* and *Public Service Act*.

Nepotism and Personal Relationships (Section 7.6)

POLICY

- 7.1.71 It is the policy of AGLC to regulate employment, transfers and promotions to avoid potential favoritism or conflict of interest situations that might occur between employees who are either related to one another or take account of, personal relationships which overlap with professional ones.

STANDARDS

- 7.1.72 All employees are required to declare a conflict of interest or the possibility of favoritism (real or perceived) involving themselves and a relative or person with whom they have a personal relationship.
- 7.1.73 Under no circumstances shall an employee directly supervise a relative or an employee with whom they have a personal relationship. Direct supervision is considered to be supervision that involves appointment, promotion, transfer, assignment of duties, completion of performance appraisals or related responsibilities.
- 7.1.74 Employees who exercise a regulatory, inspectional or other discretionary authority must disqualify themselves from dealing with relatives and friends (whether employed by AGLC or elsewhere within the industry).
- 7.1.75 Employees are required to maintain confidentiality with regard to AGLC information (including verbal information), documents and reports when dealing with relatives, friends, and non-profit organizations/charities of which they are a member.

PROCEDURES

- 7.1.76 Interview panel members shall disqualify themselves from any involvement in a competition on becoming aware a relative; friend (external person to AGLC that you would normally socialize with outside the work environment); or person with whom the employee has a personal relationship is an applicant. The Vice President, Human Resources shall be advised of the conflict of interest.
- 7.1.77 Where it is determined that an employee has demonstrated any type of influence (direct or indirect) with regards to AGLC recruitment processes of either friends, relatives, or persons with whom the employee has a personal relationship; Human Resources will have the authority to deem the potential applicant disqualified from the competition due to potential conflict of interest.

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- 7.1.78 The Chair of the interview panel shall ensure that all applicants are questioned concerning any relatives or personal relationships working for AGLC that could potentially pose a conflict of interest. The operational requirements of AGLC will take precedence in cases where two employees are married, common-law or a relationship exists.
- 7.1.79 Any situation which may result in a conflict of interest or favoritism is to be referred by the employee affected to his/her immediate supervisor who shall in turn refer the matter to the Vice President, Human Resources. If the situation involves an employee's supervisor, or is of a sensitive nature, the employee affected may report the matter directly to the Vice President, Human Resources.
- 7.1.80 The Vice President, Human Resources, is responsible for advising the Chief Executive Officer of any conflict of interest situations in order to determine the appropriate course of action under the circumstances.

Political Activity (Section 7.7)

POLICY

- 7.1.81 AGLC is a politically neutral organization and does not support or endorse any political party or candidate at any order of government. AGLC employees including CEO may participate in political activity in a personal capacity, however AGLC is prohibited from donating to any political party or candidate.

STANDARDS

- 7.1.82 Employees may participate in political activities including holding membership in a political party, supporting a candidate for elected office or seeking elected office. Employees should ensure safeguards are in place to prevent conflict of interest arising between those activities and the employee's role at AGLC.
- 7.1.83 Employees who run as candidates in provincial or federal elections must take a leave of absence from AGLC. This leave will commence the day after the writ for the election is issued or on the day candidacy is publicly announced, whichever is earlier.
- 7.1.84 Employees elected to provincial or federal office are required to resign from their AGLC employment the day of their election.
- 7.1.85 Employee candidacy in a municipal election may be permitted if approved by the Vice President, Human Resources.
- 7.1.86 Time off will not be granted to employees who are candidates for or are elected to municipal office.

PROCEDURES

- 7.1.87 Employees deciding to run for federal or provincial political office will advise their Executive Vice President/Vice President of their intentions in writing.
- 7.1.88 An employee may request a leave of absence. The request will be evaluated based on operational requirements. If the leave is denied, the employee is required to resign from his/her employment if they intend to accept the appointment.
- 7.1.89 In the case of an employee preparing to contest a municipal, provincial or federal election, the division head shall review the circumstances with the Vice President, Human Resources, and make the necessary arrangements for the granting of leave without pay.
- 7.1.90 Employees who are unsuccessful candidates in federal or provincial elections and wish to return to active employment with AGLC shall contact the Vice President, Human Resources, or their former supervisor.

Alcohol and Drugs (Section 7.9)

POLICY

- 7.1.91 AGLC is committed to the health and safety of its employees, contractors, suppliers, environment, property and the public. Alcohol and/or drug impairment at the workplace is a hazard, which places at risk the safety of individuals on company business and company premises. AGLC's commitment to control hazards in its operations, eliminate hazards where possible and to maintain a safe work environment while ensuring its employees' privacy and human rights are protected. The use of

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illicit drugs, mood altering substances and alcohol and the misuse of medications while engaged in company business and on company premises are prohibited.

STANDARDS

- 7.1.92 This Policy applies to all employees and contractors while engaged in company business, and at all times when on company premises or affiliated sites (i.e., casinos, licensed establishments, lottery vendors, etc.), and at any time while operating a motor vehicle or mobile equipment.
- 7.1.93 To minimize the risk of unsafe and unsatisfactory performance due to the use of alcohol and/or drugs, employees are required to comply with the following standards and to report fit and remain fit for work throughout their work day or shift while conducting company business and when on-call.
- a) Illicit Drugs and other Mood Altering Substances
- i) The following are prohibited:
- The use, distribution, offering for sale of drugs or drug paraphernalia;
 - Operating a motor vehicle or mobile equipment while impaired by drugs
 - Reporting to work or being at work while under the influence of drugs
- b) Alcohol
- i) The following are prohibited:
- The use, distribution, offering for sale of alcohol;
 - The consumption of any product containing alcohol when at work including during meals or other breaks;
 - Operating a motor vehicle or mobile equipment while impaired by alcohol
 - Reporting for work or returning to work the same day after consuming alcohol at a business-related social event (whether sponsored by AGLC or not).
- 7.1.94 In the case of any Company social event, appropriate regard will be taken for the safety and wellbeing of the individuals present at the event and the public more generally. Responsible alcohol use is permitted at Company sponsored social functions which have the prior approval of the CEO Office or Vice President. Those employees who attend Company sponsored social events and elect to consume alcohol must not subsequently go to work, return to work or operate a motor vehicle or mobile equipment. Employees must be fit to return to work for their next scheduled shift.
- 7.1.95 The use of prescription and off-the-shelf drugs must not interfere with an employee's ability to adequately perform his/her job duties. Employees must take the necessary precautions to understand the potential side-effects so as to avoid dangerous or inappropriate activities while at the workplace.

Social Media (Section 16.1)

POLICY

- 7.1.96 AGLC supports the use of social media for corporate purposes. This policy provides direction and requirements which must be followed as AGLC participates in social media relations.

STANDARDS

- 7.1.97 AGLC employees shall not make statements on public issues in any way that may be perceived to represent an official act, opinion or policy of AGLC, except for those employees who are deemed as an official spokesperson by AGLC Communications Branch.
- 7.1.98 Regardless of the media being used, AGLC employees must not do anything that could harm the reputation of AGLC. They must ensure that any comment on matters of AGLC is appropriate to his/her employee role, and must respect the need to maintain confidentiality as outlined in this Code of Conduct and Ethics.

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- 7.1.99 AGLC employees have the same rights of free speech as other citizens, except they may not represent AGLC on their personal social media accounts or sites.
- 7.1.100 Employees remain bound by this Code and the *Freedom of Information and Protection of Privacy Act* (FOIP). They must not disclose any AGLC information or content that they are not specifically authorized to disclose. This prohibits posting any information known or acquired through their employment with AGLC.

PROCEDURES

- 7.1.101 Approved AGLC employees will post, monitor, respond, contribute to or seek to influence social media conversations, in a manner identifiable as being made by or on behalf of AGLC authorized spokespeople.

Investigation (Section 7.10)

POLICY

- 7.1.102 Employees shall disclose suspicions of illegal acts, threat of substantial and specific danger to the life, health or safety of individuals or the environment, gross mismanagement of public funds and unethical conduct of any AGLC staff or Board Member. AGLC will protect employees from reprisals where disclosures are made in good faith and on reasonable grounds. Investigation of disclosures shall be treated with the utmost seriousness and shall be conducted in a fair, objective and expeditious manner.

STANDARDS

- 7.1.103 AGLC is committed to maintaining a workplace with the highest standards of integrity and ethical conduct to contribute to its duty to protect the public trust.
- 7.1.104 Employees are encouraged to report in writing a potential breach of this Code to their direct Supervisor, or the Vice President, Human Resources. When reporting a potential breach in good faith and with reasonable grounds, employees are protected from retaliation for such reporting.

PROCEDURES

- 7.1.105 If a real or apparent breach is reported, the Vice President, Human Resources will advise the employee in writing. The identity of the employee who reported the breach will be kept confidential, unless required by law. The Vice President, Human Resources will investigate the matter, make a decision and, then complete a written report.
- 7.1.106 The written report may have facts about the breach found by the Vice President, Human Resources. The Vice President, Human Resources will decide whether or not the employee under investigation has breached the Code. The Vice President, Human Resources' report will also decide what type of breach it is and give any related recommendation or action. The written report will be given to the employee under investigation, placed on his/her personnel file and any other persons involved. The employee can request all information related to the breach and has the right to respond to the report.

Disciplinary Action (Section 7.10)

POLICY

- 7.1.107 Employees found in contravention of this Code of Conduct and Ethics shall be subject to disciplinary action consistent with the severity of the infraction.

STANDARDS

- 7.1.108 Disciplinary action may take one of the following forms:
- verbal warning;
 - written warning;
 - suspension without pay; or

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d) termination.

PROCEDURES

- 7.1.109 In cases where disciplinary action is contemplated, the Human Resources Business Partner reviews the disciplinary action requested with the Vice President, Human Resources as soon as possible for approval.
- 7.1.110 Bargaining unit employees may access the grievance procedure outlined in the Collective Agreement governing their employment.
- 7.1.111 All copies of written warnings or notices of disciplinary action shall be placed on the employee's personnel file maintained in Human Resources.

Reprisals

- 7.1.112 A key purpose of the *Public Interest Disclosure Act* (PIDA) and AGLC policy is the protection of employees from reprisals. Any adverse employment action taken against employees who seek advice about making a disclosure of wrongdoing, make a disclosure of wrongdoing, or who participated in an investigation into a disclosure of wrongdoing are protected under PIDA.
- 7.1.113 Any employee who experiences reprisals related to:
- a) disclosures pursuant to PIDA should submit a written complaint using the specified "Complaint of Reprisal" form to the Public Interest Commissioner. Reports of reprisals will be managed and investigated in the same manner as a disclosure.
 - b) disclosures of unethical conduct pursuant to AGLC policy should immediately inform the Vice President of HR. Reports of reprisals will be investigated and if found to have occurred, appropriate disciplinary and/or corrective action shall be taken according to AGLC policy.
- 7.1.114 Employees not satisfied with the action taken regarding a report of reprisals related to a disclosure of unethical conduct may submit a written complaint directly to the CEO or the Board Chair, as appropriate. The CEO or the Board Chair, as appropriate, will initiate the required follow up.
- 7.1.115 PIDA has strong enforcement mechanisms and has created offences for:
- a) a reprisal made in response to an individual that has made a disclosure
 - b) obstructing an investigation, knowingly withholding material information, destroying or falsifying records, making false or misleading statements to an investigator; or directing another person to do any of the same.
- 7.1.116 Penalties include:
- a) a fine of up to \$25,000 for first conviction
 - b) a fine of up to \$100,000 for subsequent convictions

Safe Disclosure (Section 7.13)

POLICY

- 7.1.117 Employees shall disclose suspicions of illegal acts, threat of substantial and specific danger to the life, health or safety of individuals or the environment, gross mismanagement of public funds, delivery of public service or employees, and unethical conduct by AGLC employees.
- 7.1.118 AGLC will protect employees from reprisals where disclosures are made in good faith and on reasonable grounds.
- 7.1.119 Investigation of disclosures shall be treated with the utmost seriousness and shall be conducted in a fair, objective and expeditious manner.

STANDARDS

- 7.1.120 AGLC is committed to maintaining a workplace with the highest standards of integrity and ethical conduct to contribute to its duty to protect the public trust.

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- 7.1.121 As a public entity to which the *Public Interest Disclosure (Whistleblower Protection) Act* (PIDA) applies, AGLC is committed to ensuring our safe disclosure policies and procedures comply with legislation.
- 7.1.122 Fraud, illegal acts, irregularities or unethical conduct by employees will not be tolerated. Employees who are found to have committed such wrongdoing will be subject to disciplinary action up to and including termination of employment, civil action and or criminal prosecution.
- 7.1.123 The identity of the employee(s) who disclosed the concerns and of those against whom the allegations were made shall be kept confidential until such time as the investigation dictates otherwise.
- 7.1.124 Matters that are covered by other corporate policies will be dealt with as directed by the applicable Policy. Such matters include, but are not limited to:
- a) employee performance management or disciplinary action;
 - b) minor infractions or non-compliance with policies and procedures – e.g., an employee coming to work late or leaving early;
 - c) workplace and sexual harassment (which is dealt with in Section 7.4); and
 - d) disagreement or dissatisfaction with policy direction, reorganization or restructuring, or business plan priorities.

PROCEDURES

Employee Disclosure

- 7.1.125 Employees shall report, illegal acts, threat of substantial and specific danger to the life, health or safety of individuals or the environment, or gross mismanagement of public funds, delivery of a public service or employees to AGLC’s designated PIDA Officer and/or report directly to the Public Interest Commissioner in certain circumstances:
- a) imminent threat to health, safety or the environment with insufficient time to disclose to designated officer;
 - b) where the employee is unsatisfied with the outcome of the internal disclosure process;
 - c) where a reprisal is taken as a result of a disclosure; or
 - d) where the disclosure involves the Designated or Chief Officer.
- 7.1.126 Employees shall report unethical conduct pursuant to AGLC’s Code of Conduct & Ethics (Section 7.1) to their immediate supervisor, next level(s) of management or Vice President, Human Resources.
- 7.1.127 Disclosures may be made confidentially and will be required to be documented.
- 7.1.128 Employees will receive acknowledgement of receipt of disclosure within five business days.
- 7.1.129 Employees must respect the reputation of others by:
- a) not making trivial or vexatious disclosures of wrong-doing;
 - b) not making disclosures in bad faith; and
 - c) not discussing allegations of wrongdoing other than through participation in the safe disclosure process.
- 7.1.130 Any employee(s) suspected of committing or directing others to commit an act to which this policy applies should not be confronted as it may compromise the investigation process.
- 7.1.131 Preliminary inquiries or disclosures may be verbal, but disclosures must be captured in writing. Disclosures specifically related to PIDA will be required to use the Public Interest Disclosure form. Reports should be factual and contain as much specific information as possible. At a minimum the following information must be provided if known:
- a) the name(s) of the person(s) involved;
 - b) the date(s) of the incidents; and

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c) a description of the wrongdoing or unethical conduct that is suspected.

- 7.1.132 The employee(s) making the disclosure may be expected to participate in any investigation and other supporting actions if required.
- 7.1.133 Any disclosures found to be made in bad faith (including those of a false, malicious, or vexatious nature), or in breach of this Policy, shall be subject to the appropriate disciplinary action as described in Section 7.10.

Investigation

- 7.1.134 Investigation of disclosures shall be treated with the utmost seriousness and shall be conducted in a fair, objective and expeditious manner.
- 7.1.135 A preliminary analysis will be conducted on all disclosures within 20 business days and the employee notified of the determination. Should a decision be made not to proceed with an investigation, the decision shall be communicated to the employee who made the disclosure, unless that communication is not reasonably possible.
- 7.1.136 Where there are grounds to warrant further investigation of illegal acts, substantial and specific threats to the life, health or, safety of individuals or the environment, gross mismanagement of public funds, delivery of a public service or employees the PIDA Designated Officer shall determine the appropriate action to be taken and may assign an Investigation Coordinator.
- 7.1.137 Where there are grounds to warrant further investigation of unethical conduct the Vice President, Human Resources shall determine the appropriate action to be taken and may assign an Investigation Coordinator.
- 7.1.138 The identity of the employee(s) who disclosed the concerns and of those against whom the allegations were made shall remain confidential until such time as the investigation may dictate otherwise, such as a criminal investigation or a disciplinary action.
- 7.1.139 Confidentiality is also protected by the provisions of the *Freedom of Information and Protection of Privacy Act (FOIP)*.
- 7.1.140 Participants of an investigation must not discuss any information regarding the investigation with any other party, internal or external to AGLC, unless directed to do so by the Investigation Coordinator and where the individual has a legitimate need to know the information to perform their duties and responsibilities.
- 7.1.141 Depending on the specific circumstances, the investigator may be required to:
- a) interview the employee(s) making the disclosure;
 - b) determine the facts and obtain as much specific information as the employee(s) is able to provide;
 - c) obtain information from other sources and / or other employees;
 - d) if appropriate, interview the subject of complaint; and
 - e) collect all relevant documents.
- 7.1.142 Disclosure investigations shall be completed and the findings reported to the PIDA Designated Officer or Vice President, Human Resources (depending on the nature of the disclosure) within 120 business days unless an extension is required.
- 7.1.143 Any bargaining unit employee who is likely to be considered for disciplinary measures as a result of the investigation is entitled to have a Union Steward present at interviews. An employee may request the presence of a Union Staff Representative in place of a Union Steward. See Article 42.02 of the Collective Agreement for more details.
- 7.1.144 Employees not satisfied with the action taken regarding a disclosure of illegal acts, threats to health, safety or the environment, gross mismanagement of public funds, delivery of a public service or employees may submit a written complaint directly to the Public Interest Commissioner, as appropriate.
- 7.1.145 Employees not satisfied with the action taken regarding a disclosure of an ethical conduct may submit a written complaint directly to the CEO or the Chairperson, as appropriate. The CEO or the Chairperson, as appropriate, shall initiate the required follow up.

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Reprisals

7.1.146 A key purpose of PIDA and AGLC policy is the protection of employees from reprisals. Any adverse employment action taken against employees who seek advice about making a disclosure of wrongdoing, make a disclosure of wrongdoing, or who participated in an investigation into a disclosure of wrongdoing are protected under PIDA.

- a) Any employee who experiences reprisals related to disclosures pursuant to PIDA should submit a written complaint using the specified "Complaint of Reprisal" form to the Public Interest Commissioner. Reports of reprisals will be managed and investigated in the same manner as a disclosure.
- b) Any employee who experiences reprisals related to disclosures of unethical conduct pursuant to AGLC policy should immediately inform the Vice President, Human Resources. Reports of reprisals will be investigated and if found to have occurred, appropriate disciplinary and/or corrective action shall be taken according to AGLC policy.
- c) Employees not satisfied with the action taken regarding a report of reprisals related to a disclosure of unethical conduct may submit a written complaint directly to the CEO or the Chairperson, as appropriate. The CEO or the Chairperson, as appropriate, shall initiate the required follow up.

Offences and Penalties

7.1.147 PIDA has strong enforcement mechanisms and has created offences for:

- a) a reprisal made in response to an individual that has made a disclosure; and
- b) obstructing an investigation, knowingly withholding material information, destroying or falsifying records, making false or misleading statements to an investigator; or directing another person to do any of the same.

7.1.148 Penalties include:

- a) a fine of up to \$25,000 for first conviction; and
- b) a fine of up to \$100,000 for subsequent convictions.

Annual Declaration

7.1.149 Employees must attest annually their understanding of, commitment to, and the expectations of the Code. This includes a signed acknowledgement to abide by this Code.

Code of Conduct and Ethics Review

7.1.150 This Code for AGLC is reaffirmed annually by the Executive Team and CEO to ensure all content remains current and relevant.

Notice Period and Effective Date

7.1.151 Upon approval from AGLC's Executive Team and the Office of the Ethics Commissioner of Alberta, this Code of Conduct and Ethics will be effective.

7.1.152 AGLC received approval of this Code of Conduct & Ethics from the Office of the Ethics Commissioner of Alberta on April 11, 2024.

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