
Date

The following was approved as an Administrative Policy on March 28, 2013.

Purpose

The purpose of this Code of Ethics policy is to ensure that all District of Lake Country (“District”) employees have a clear understanding of the company’s expectations regarding their conduct and decision making at work and to provide them with a clear understanding of what to do in the event that they witness unethical behaviour at work or are faced with making a decision which may not be in alignment with our core values.

The District has established a set of core values, developed by District employees, managers and directors. These core values should be relied upon by employees in all decisions affecting District business activities.

Our ongoing commitment to our core values is necessary to ensure that we operate with the highest regard for integrity and ethical standards. The District’s vision and core value statements are as follows:

Core Values Statement

The District of Lake Country is an innovative, vibrant community celebrating its history, diversity and unity.

Vision Statement

Lake Country is enriched by active volunteers, concerned citizens and business, all participating in an open, inclusive government, which strives to:

- Develop a strong sense of community
- Promote a positive community image
- Support the diverse and attainable provision of housing
- Encourage responsible economic development
- Promote an active, safe, inclusive and integrated transportation network
- Create a vibrant social and commercial town centre
- Protect and enhance our natural environment
- Foster diverse agricultural opportunities
- Encourage enjoyment of our unique lake resources
- Promote environmental stewardship
- Promote an active schedule of cultural and social events
- Develop a sustainable financial plan for servicing and growth

Mission Statement

The District of Lake Country will provide exciting opportunities for diverse housing, tourism, culture, recreation, agriculture, and economic development that integrate and protect the natural beauty and rural assets of our district.

Policy

Local governments are governed by the *Freedom of Information and Protection of Privacy Act* (“FOIPOP”) (the “Act”) and overarching laws such as the Canadian Charter of Rights and Freedoms. While local governments are not governed by the federal privacy legislation, the District considers the fair information principles upon which the federal privacy legislation is built when dealing with privacy issues.

The underlying principle of the *Act* is that all recorded information is available to the public, except information which is subject to the exceptions in the *Act*. The *Act* also protects personal privacy by preventing the unauthorized collection, use or disclosure of personal information.

1. Confidential Information

- All information and intellectual property created in the course of an individual’s employment with the District is the exclusive property of the District.
- Employees have a duty to safeguard and hold in strict confidence all information of a confidential nature acquired in the course of his or her employment with the District.
- Employees must not disclose such confidential information without the proper authorization from their department director or from the FOI Head or Coordinator.
- Employees shall not use, copy, or disclose confidential information or any other information not generally available to the public, for personal gain or advantage or for the profit or benefit of staff or any other person.
- Employees who know there has been an unauthorized disclosure of information must immediately notify their department director or the FOI Head.

2. Personnel Information

- Information concerning employees of the District may only be disclosed in accordance with the provisions of the *Act*. Employees should be aware that under the *Act*, certain information is not considered ‘personal information’ and may be accessed through a FOI request. Some of this information includes:
 - Job title
 - Details of employment contract
 - Responsibilities of the job
 - Salary range; and
 - Work contact information (address, phone, fax, email)
- Access to an employee’s personal information is limited only to those people who absolutely need to know such as the immediate manager or director, human resources and payroll.
- Employees may make a request to view their own personnel information, although third party information will be severed under the provisions of the *Act* prior to the employee viewing the file.
- If required, the District may take actions necessary to protect the interests of the local government by accessing and monitoring computers provided by the District. This may only be done if there is no

alternative to obtaining the information and must be done in accordance with sections 26 and 27 of the *Act*. Situations where an employee's computer may be accessed or monitored must be determined reasonable by the Human Resources and Safety Advisor or the Chief Administrative Officer ("CAO") and may include breach of agreement, personnel matters, human rights complaints and illegal activities.

- Employees responsible for IT are not permitted to access employee's personal information without direction from the Human Resources and Safety Advisor, FOI Head or CAO.
- Questions regarding the release of employee information to any outside party should be referred to the District Human Resources and Safety Advisor or the FOI Head.

3. Conflicts of Interest

- A conflict of interest arises in any situation where an employee's obligation to serve the best interests of the District could be affected by the employee's personal interests.
- Personal interests include any interest in a matter that could benefit the employee in his or her relationships with other persons or organizations or in his or her private activities, unless that interest is one that the employee has in common with the general public.
- Employees shall avoid all situations where their personal interests or objectives may influence, or be perceived to influence, the employee's authority or the interests of the District.
- Employees either directly or indirectly shall not gain personal financial benefits by use of their position or information obtained in the course of their employment.
- Employees shall refrain from any business activity, financial interest or other personal employment interest, direct or indirect, which may impair, or which could be seen to impair, their independence of judgment or action.

4. Influence

Employees shall not use their position to influence or attempt to influence a decision, recommendation or other action to be made by Council, a committee, or employee if he or she has an interest in the decision, recommendation or other action.

5. Gifts

Employees shall not accept or agree to accept a gift, gratuity, favour, compensation or benefit of any kind from any person or organization as consideration for the employee performing or not performing his or her duties causing that person or organization to benefit from such action or lack of action.

6. Committees

The District recognizes the right of employees to be involved in activities as citizens of the community, but employees must keep their role as private citizens separate and distinct from their responsibility as District employees and avoid conflict of interest situations. Applications from employees to sit on District committees will not be accepted as they would create a conflict of interest, or a perceived conflict of interested.

7. Secondary Employment

Employees may participate in employment outside of the District, however this is only allowed if:

- The secondary employment in no way interferes with the employee's duties, availability or performance of their duties for the District.
- The secondary employment does not require the use of any District property, tools or other assets, including phones, fax, computers, etc.
- The secondary employment is in no way connected with a supplier, contractor, sub-contractor, customer, competitor or any other entity with which the District does business.
- The secondary employment does not create or appear to create ethical or legal conflicts of interest.

8. Disclosure of Conflicts of Interest

When an employee is or believes he or she may be in a position of conflict of interest with regard to the District, the employee is required to disclose this to their department manager, or in his or her absence, to the CAO. The employee is required to refrain from exercising his or her authorities relevant to the conflict until authorized to do so.

9. Use of Company Property and Equipment

The use of District property including time, facilities, vehicles, equipment, tools, supplies or other material is permitted only when performing company duties, unless expressly authorized by company policies

10. Workplace Respect and Employee Relations

The District is committed to maintaining a respectful workforce free of workplace discrimination, bullying, and harassment. Employees are expected to abide by the company's Workplace Respect Policy and all provisions of applicable federal and/or provincial discrimination and harassment legislation.

It is the responsibility of the CAO, Chief Financial Officer ("CFO"), directors, managers, supervisors, and all employees to take action to ensure that violations of respect are eliminated and reported. If at any time an employee has been subjected to or witnessed a respect incident in the workplace, they are encouraged to act and report the violation, anonymously if desired, and without fear of reprisal.

11. Business Irregularities

A business irregularity is considered to be an activity or behaviour that disregards the District's policies or procedures and business integrity. No employee at any time shall deliberately and/or unlawfully misrepresent or conceal facts to benefit themselves or cause loss to the District or to any other District employees. Employees, who commit, aid and abet behaviours that promote business irregularities will be subject to investigation under the procedures outlined within this policy. Examples of business irregularities include, but are not limited to:

- Misappropriation of District assets;
- Unethical behaviour associated with using one's position or association with the District;
- Authorizing or receiving remuneration for time not worked;
- Authorizing or receiving payment for goods and/or services not received or performed;

- Altering or incorrectly reporting information; or
- Unauthorized use of District assets, expense accounts, and resources.

12. Environmental, Health and Safety

District employees have an obligation to and must report any suspected violations of the company's safety, quality, and environmental and health policies immediately.

Procedures

All employees have a duty to report suspected violations against the District's Code of Ethics policy. If at any time an employee has been subjected to or witnesses a Code of Ethics violation, they are encouraged to act and report the incident, without fear of reprisal, to:

- their supervisor or manager, or
- a human resources representative, or
- a department director, the CFO or CAO.

It is the responsibility of supervisors, managers, and directors to ensure that a violation that is reported to them is immediately reported to the Human Resources Department. Suspected incidents or complaints received will initiate an immediate investigation conducted by senior management together with the Human Resources and Safety Advisor.

All reported violations against the Code of Ethics will be documented by the individuals designated as responsible for the investigation. Documentation will be labeled "Strictly Confidential" and must include the following as a minimum:

- The original report of the incident;
- A summary of investigation;
- Copies of any documentation gathered in support of the investigation;
- A log of any communications with the person(s) reporting the incident; and
- A summary of the disposition of the incident.

Every effort will be made to protect the anonymity of the employee making the complaint, however due to the nature of an event; this may not always be possible. Any occurrences of reprisal or harassment stemming from raising a concern will be addressed appropriately by the CAO.

All employees involved in an investigation maintain their rights in accordance with District policies and/or labour agreements as applicable.

Employees who commit, aid and abet behaviours that promote Code of Ethics violations will be subject to disciplinary and/or corrective action as deemed necessary up to and including termination. The CAO will make the final determination of the disciplinary or corrective action, with guidance provided by the department director and the Human Resources and Safety Advisor.

Details of cases in which employees are found in breach of District policy or policies may be published in such a manner as the company deems appropriate.

Complaints or violations against the District's Code of Ethics can be reported confidentially at any time:

By phone, in writing, or in person OR anonymously by phone or in writing to:

Their immediate supervisor or manager, or
A human resources representative, or
The department director, CFO or CAO.

Original signed by Alberto De Feo

Alberto De Feo, CAO

28.03.2013

Date

I have read and understood **Code of Ethics Policy No. 130**.

Employee Name (print)

Signature

Date