

CODE OF CONDUCT

ENERGY EFFICIENCY ALBERTA

Date of Board Approval: April 20, 2018

I. PREAMBLE AND INTERPRETATION

A. Preamble

The people of Alberta have the right to a public agency which is conducted with impartiality and integrity. It is this special obligation to Albertans that demands that there not be, nor appear to be, any conflict between the private interests of members and employees of Energy Efficiency Alberta and their duty to the public. This Code of Conduct reflects a commitment to Energy Efficiency Alberta's values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of Energy Efficiency Alberta. To demonstrate a commitment to transparency and accountability, this Code of Conduct is available to the public on Energy Efficiency Alberta's website.

B. Definitions

In this Code of Conduct:

- (a) **"Agency"** means Energy Efficiency Alberta;
- (b) **"Associated"** means:
 - (i) any person with one of the following relationships with a Member:
 - (1) the Member's spouse or adult interdependent partner;
 - (2) a corporation having share capital and carrying on business or activities for profit or gain and the Member is a director or senior officer of the corporation;
 - (3) a private corporation carrying on business or activities for profit or gain and the Member owns or is the beneficial owner of shares of the corporation;
 - (4) a partnership of which the Member is a partner or of which one of the partners is a corporation associated with the Member by reason of subsection (2) or (3); or
 - (5) a person or group of persons acting with the express or implied consent of the Member; or
 - (ii) a transaction or connection such that the transaction or connection:
 - (1) has the potential to affect or give the appearance of affecting the ability of a Member to act impartially on behalf of the Agency; or

- (2) between the Agency and the person would, or would be seen to, confer a direct or indirect benefit upon a Member;
- (c) “**Board**” means the Board of Directors of the Agency;
- (d) “**CEO**” means the Chief Executive Officer of the Agency;
- (e) “**Chair**” means the Chair of the Board;
- (f) “**Code**” means this Code of Conduct;
- (g) “**Code Administrator**” has the meaning set forth in subsection II.B.;
- (h) “**Committee**” means a Committee of the Board or Sub-Committee of the Agency;
- (i) “**Director**” means a member of the Board of the Agency;
- (j) “**Employee**” means a person employed by the Agency;
- (k) “**Gift**” means a direct or indirect pecuniary or non-pecuniary advantage and includes the avoidance of a detriment, but does not include the prestige associated with the position of Director nor participation in activities or programs of the Agency in which the public has an opportunity to participate;
- (l) “**Member**” means any Employee, Officer, or Director of the Agency and includes members of any Committee and “**Members**” means all of them;
- (m) “**Offence**” means an offence created under the *Criminal Code of Canada* and/or the *Controlled Drugs and Substances Act*;
- (n) “**Officer**” means a Director who is appointed as an officer of the Agency and includes, without limitation the Chair and the Vice-chair;
- (o) “**Private Interest**” refers to an individual’s self-interest (e.g. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage), the interests of the individual’s immediate family or business partners, or the interests of another organization in which the individual holds a position (voluntary or paid);
- (p) “**Publicly Traded Securities**” means:
- (i) securities of a corporation that are listed or posted for trading on a recognized stock exchange; or
 - (ii) securities of a corporation that has more than 15 shareholders and any of whose issued securities were part of a distribution to the public;
- (q) “**Related Person**” means a person or party who is Associated with a Member;
- (r) “**Sub-Committee**” means a committee established by a Committee;
- (s) “**Transaction**” means an arrangement, other than a Gift, under which:

- (i) the Agency and another person agree to exchange value or services;
- (ii) the Agency confers a benefit on another person; or
- (iii) the Agency receives a benefit from another person; and
- (t) “**Vice-Chair**” means the Vice-Chair of the Board.

II. **BACKGROUND REQUIREMENTS AND GENERAL DUTIES**

A. **Application of Code**

This Code applies to all Members, except for any individuals that have been expressly exempt from one or more provisions of this Code. This Code is in addition to any statute governing Members. Members are expected to behave in a way that aligns with this Code. Members understand that this Code does not cover every specific scenario, therefore, they use the principles and intent behind this Code to guide their conduct and exercise care and diligence in the course of their work with the Agency.

B. **Code Administrator**

The Code Administrator for:

- (a) Directors and the CEO is the Chair;
- (b) Employees, other than the CEO, is the CEO; and
- (c) the Chair is the Vice-Chair, who receives disclosures from the Chair and responds to an allegation that the Chair has breached this Code.

C. **Core Values**

Members must:

- (a) conduct their duties with impartiality at all times; and
- (b) demonstrate respect, integrity, and accountability in carrying out their duties.

D. **Guiding Principles**

These principles guide the behaviour and decisions of Members:

- (a) The actions and decisions of Members are made to promote the public interest and to advance the mandate and long-term interests of the Agency.
- (b) Members are responsible stewards of public resources.
- (c) To serve the public interest, Members have a responsibility to uphold the Agency's mandate.
- (d) Members have a responsibility to act in good faith and to place the interests of the Agency above their own Private Interests.

- (e) Members behave in a way that demonstrates that their behaviour and actions are fair and reasonable in the circumstance.
- (f) Members enjoy the same rights in their private dealings as any other Albertan, unless it is demonstrated that a restriction is necessary for the public interest.
- (g) When a Member, as an individual, is subject to more than one code of conduct, the Member must consider the expectations in each of them. Members understand that this Code is not intended to conflict with other codes of conduct, and will discuss any potential conflicts with the Code Administrator.
- (h) This Code applies to all Members unless a specific exemption is granted by the Code Administrator.
- (i) Members understand that when they become aware of a real or apparent conflict of interest, they must at the first opportunity disclose this conflict to the Code Administrator.
- (j) Members understand that disclosure itself does not remove a conflict of interest.
- (k) Members encourage their colleagues to act fairly and ethically and know that they are able to raise concerns about a suspected breach by another to the Code Administrator without fear of reprisal.
- (l) Members know that breaches of this Code may result in disciplinary action, up to and including removal of a Director or termination of the CEO or an Employee, as the case may be.
- (m) Members know that if they have any questions about this Code, or are not sure how to apply these principles, they should consult with the Code Administrator.
- (n) Each Member will confirm on an annual basis their understanding of, and commitment to, this Code's expectations.

E. Standards of Conduct

(a) General

The guidelines set forth herein help Members make appropriate decisions when the issues they face involve ethical considerations. Behavioural standards cannot cover all scenarios but provide guidance in support of day-to-day decisions. All Members must adhere to the following standards:

- (i) Members must not engage in any criminal activity and comply with all relevant laws, regulations, policies, and procedures;
- (ii) Members must not act in self-interest or further their Private Interests by virtue of their position with the Agency, or through the carrying out of their duties with the Agency;
- (iii) Members must not use their status or position with the Agency to influence or gain a benefit or advantage for themselves, their families, their business

associates, or others with whom they have a significant personal or business relationship;

- (iv) Member conduct contributes to a safe and healthy workplace that is free from discrimination, harassment, or violence;
- (v) Members must not use drugs or alcohol in a way that affects their performance and safety or the performance and safety of their colleagues, or that negatively impacts the reputation or operations of the Agency;
- (vi) Members must act in a way that is consistent with the Agency's protocols on public comment;
- (vii) Members, upon appointment or hire, and on an annual basis thereafter, will complete a Declaration of Interest form attached as Appendix "A" to enable the Agency to understand potential conflicts and to manage them appropriately;
- (viii) In respect of conflicts that have been identified by Declaration of Interest forms attached to this Code, Board materials and information will not be provided to the Members who have identified a conflict of interest;
- (ix) Members must take reasonable steps to avoid situations where they may be placed in a real or apparent conflict between their Private Interests and the interests of the Agency. In other words, actions or decisions that Members take on behalf of the Agency must not provide them with an opportunity to further the Private Interests of themselves, their families, their business associates, or others with whom they have a significant personal or business relationship; and
- (x) Where an actual or proposed business or financial interest of a Member, or of a Member's adult interdependent partner or minor children is affected, appears to be affected or may be affected by actions taken or decisions made in which the Member participates in the course of their appointment, they shall disclose the interest to the Code Administrator.

(b) Confidential Information

Members must handle confidential information with the utmost care and integrity and shall not disclose, release, or transmit confidential information except as specifically authorized. The responsibility for maintaining the confidentiality of information includes the responsibility of ensuring that the information is not directly or indirectly made available to unauthorized persons and that the information is not used for personal gain. Members must comply with protocols that guide the collection, storage, use, transmission and disclosure of confidential information and must adhere to the requirements of the *Freedom of Information and Protection of Privacy Act*.

(c) Gifts

- (i) Members must not accept or receive Gifts that are connected directly or indirectly with the performance of their duties with the Agency, from any individual, organization, or corporation.

- (ii) Subsection (i) does not apply to Gifts that are accepted by Members as an incident of protocol or the normal presentation of Gifts to people participating in public functions.
 - (iii) The total value of Gifts given from the same source in any calendar year cannot exceed \$200.00 and must not include cash or cheques.
- (d) Outside Activities
- (i) There must not be a conflict between the Private Interests of Members and their responsibility to the Agency. A conflict of interest is any situation in which a Member, either for themselves or some other person or organization, attempts to promote a private or personal interest which results, or appears to result, in an:
 - (1) interference with the objective exercise of the Member's responsibilities; or
 - (2) opportunity or advantage by virtue of the Member's position with the Agency.
 - (ii) Conflicts of interest could arise from business interests, external employment, political activity, or volunteer activity. Above all, Members are expected in all regards to conduct their duties with impartiality.
 - (iii) With respect to the Board, the affected Director must declare a conflict, fully disclose their interest in the Transaction to the Code Administrator, and refrain from voting upon the matter. Whether the Transaction shall be approved shall be a matter for the Board to determine.
- (e) Concurrent Employment or Appointment to Other Offices
- (i) Members may take supplementary employment, including self-employment, and participate in volunteer activities while employed by the Agency, including leaves of absence, unless such pursuits:
 - (1) cause an actual or perceived conflict of interest;
 - (2) are performed in such a way as to appear to be an official act or to represent an Agency opinion or policy;
 - (3) interfere with carrying out of their duties with the Agency; or
 - (4) involve the use of the Agency's premises, equipment, or supplies, unless such use is otherwise authorized.
 - (ii) Prior to accepting any supplementary employment or participating in a voluntary activity where it appears or where they believe that a conflict of interest might arise, Members must notify the Code Administrator in writing about the nature of such supplementary employment or volunteer activity.

- (iii) Members cannot accept additional compensation for duties performed in the course of their responsibilities for the Agency.
- (iv) Members must not allow the performance of their official duties to be influenced by offers of future employment or the anticipation of offers of employment nor may they use their position or the Agency's premises, equipment, or supplies to solicit services as a private consultant.

(f) Pre-Separation

Members considering a new offer of appointment or employment must be aware of and manage any potential conflicts of interest between their current position and their future circumstance, and must remove themselves from any decisions affecting their new appointment or employment.

(g) Post-Separation

Once Members have left the Agency, they must not disclose confidential information that they became aware of during their time with the Agency and must not use their contacts with their former colleagues to gain an unfair advantage for their current circumstance.

(h) Property

Members may have limited use of the Agency's premises, equipment, and supplies for authorized incidental purposes providing such use involves minimal additional expense to the Agency, must not be performed on the Member's work time, must not interfere with the mission of the Agency, and must not support a personal or private business.

(i) Related Persons

Members must avoid dealing with those Related Persons in which the relationship between them might bring into question the impartiality of the Member.

(j) Agency Programs

Nothing in this Code restricts a Member from participating in any of the Agency's activities or programs in which the public has an opportunity to participate, provided that the Member adhere to standard public process, including wait times.

(k) Disclosure of Criminal Charges

- (i) If a Member is charged with an Offence arising from their conduct while on duty and/or off duty, the Member shall immediately report such charge to the Code Administrator.
- (ii) The Code Administrator may issue supplementary instructions which modify but do not detract from matters dealt with in this Code, provided that the supplemental instructions are not more permissive than this Code.

- (iii) Any subsequent use and disclosure of information provided to the Agency pursuant to this Code will be subject to the privacy provisions of Part 2 of the *Freedom of Information and Protection of Privacy Act*.

F. CEO AND CHAIR

Without limiting any other section of this Code, the CEO and the Chair are subject to the following provisions:

- (a) Decisions Furthering Private Interest
 - (i) The CEO and the Chair must not take part in a decision in the course of carrying out their office or powers knowing that the decision might further a Private Interest of themselves, a person Associated with them, or their minor or adult child.
 - (ii) The CEO and the Chair must not use their office or powers to influence or to seek to influence a decision to be made by or on behalf of the Crown in right of Alberta, the Agency, or another public agency to further a Private Interest of the CEO or the Chair, a person Associated with the CEO or the Chair, or the CEO of Chair's minor child or to improperly further any other person's Private Interest.
 - (iii) The CEO and the Chair must not use or communicate information not available to the general public that was gained by the CEO or the Chair in the course of carrying out their office or powers to further or seek to further a Private Interest of the CEO, the Chair, or any other person's Private Interest.
 - (iv) The CEO and the Chair must appropriately or adequately disclose all real or apparent conflicts of interest.

This subsection (a) comes into effect for the current CEO and Chair on April 4, 2018.

G. CEO

Without limiting any other section of this Code, the CEO is subject to the following provisions:

- (a) Concurrent Employment or Appointment to Other Offices

The CEO must not 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 *Conflicts of Interest Act*, unless they received written approval from the Ethics Commissioner to do so and comply with any conditions that the Ethics Commissioner has included in the approval.

This subsection (a) comes into effect for the current CEO on April 4, 2020.

- (b) Restrictions on Holdings

- (i) After the expiration of the relevant period referred to in subsection (iii) below, the CEO must not own or have a beneficial interest in Publicly Traded Securities.

- (ii) In accordance with the *Conflicts of Interest Act*, subsection (i) does not apply if:
 - (1) the Publicly Traded Securities are held in a blind trust approved by the Ethics Commissioner;
 - (2) the Publicly Traded Securities are held in an investment arrangement approved by the Ethics Commissioner;
 - (3) prior to the expiration of the relevant period referred to in subsection (iii), the CEO applies to the Ethics Commissioner for approval to retain ownership of or a beneficial interest in the Publicly Traded Securities and either obtains the Ethics Commissioner's approval or, if the approval is refused, takes any steps that the Ethics Commissioner directs with respect to the disposition of the ownership or beneficial interest; or
 - (4) after the expiration of the relevant period referred to in subsection (iii), the CEO acquires ownership of or a beneficial interest in Publicly Traded Securities with the prior approval of the Ethics Commissioner.
- (iii) For the purposes of subsections (i) and (ii):
 - (1) the relevant period is:
 - (A) in the case of a person who becomes the CEO after April 4, 2018, 60 days after the CEO or any longer period that the Ethics Commissioner directs; or
 - (B) April 4, 2020 or any longer period that the Ethics Commissioner directs, in the case of a person who is the CEO on April 4, 2018; or
 - (2) with respect to a CEO who acquires ownership of or a beneficial interest in Publicly Traded Securities by gift or inheritance, the relevant period is 60 days after receiving the gift or inheritance or any longer period that the Ethics Commissioner directs.

This subsection (b) comes into effect for the current CEO on April 4, 2020.

(c) Disclosure Statements

- (i) The CEO shall file with the Ethics Commissioner a disclosure statement in the form and manner determined by the Ethics Commissioner:
 - (1) in the case of a person who:
 - (A) becomes the CEO after April 4, 2018, within 60 days after becoming the CEO; or
 - (B) is the CEO on April 4, 2018, on April 4, 2020;
- and

- (2) in each subsequent year at the time specified by the Ethics Commissioner.
- (ii) The CEO shall, within 30 days after the occurrence of any material changes to the information contained in a current disclosure statement, file with the Ethics Commissioner an amending disclosure statement in the form provided by the Ethics Commissioner setting out the changes.
 - (iii) The disclosure statement:
 - (1) shall include a statement, as of a date determined by the Ethics Commissioner, of the assets, liabilities, and financial interests of the CEO, of any private corporation controlled by the CEO and of any private corporation controlled by a combination of the CEO and the CEO's spouse or adult interdependent partner or minor children, but not including investments in a blind trust or investment arrangement;
 - (2) shall include a statement, as of a date determined by the Ethics Commissioner, of the assets, liabilities, and financial interests of the CEO's spouse or adult interdependent partner and minor children and of any private corporation controlled by the CEO's spouse or adult interdependent partner, minor children or any combination of them, so far as known to the CEO after the CEO has requested information from the CEO's spouse or adult interdependent partner;
 - (3) shall, as of a date determined by the Ethics Commissioner, identify any legal proceedings of which the CEO is aware being brought against the CEO;
 - (4) shall, as of a date determined by the Ethics Commissioner, identify whether the CEO is in arrears of maintenance payable, including legal costs, interest and penalties, in respect of a maintenance order or agreement;
 - (5) need not include obligations being incurred for ordinary living expenses that will be discharged in the ordinary course of the CEO's affairs; and
 - (6) shall include a statement:
 - (A) of the income that the CEO and persons referred to in subsection (1); and
 - (B) of the income that, so far as known to the CEO after the CEO has requested information from the CEO's spouse or adult interdependent partner, any other person mentioned in subsection (2),

have received in the preceding 12 months or expect to receive in the next 12 months and, to the extent required by the Ethics Commissioner, of the sources of the income.

This subsection (c) comes into effect for the current CEO on April 4, 2020.

(d) Returns Relating to Associated Persons

- (i) The CEO shall file with the Ethics Commissioner a return relating to persons Associated with the CEO, in a form and manner determined by the Ethics Commissioner:
 - (1) in the case of a person who:
 - (A) becomes the CEO after April 4, 2018, within 60 days after becoming the CEO; or
 - (B) is the CEO on April 4, 2018, on April 4, 2020;
 - (2) within 30 days after the occurrence of any material change in the information contained in a current return; and
 - (3) within 30 days after the day they ceases to be the CEO.
- (ii) The initial return to be filed 60 days after becoming the CEO must show:
 - (1) the name and address of each person with whom the CEO was Associated on the day of becoming the CEO and with whom the CEO became Associated after that date and before the date of the return; and
 - (2) if the CEO's direct association with any person referred to in subsection (1) terminated before the date of the return, the date of the termination.
- (iii) Every CEO shall furnish to the Ethics Commissioner:
 - (1) a return showing:
 - (A) the name and address of each person with whom the CEO became Associated on or after the date of the CEO's initial return under subsection (ii) or (iii); and
 - (B) the date on which the direct association began,
within 30 days after the direct association began; and
 - (2) a return showing the date on which the CEO's direct association with any person terminated, within 30 days after that date.

This subsection (d) comes into effect for the current CEO on April 4, 2020.

(e) Post-Employment Restrictions

- (i) No former CEO shall, for a period of 12 months from the last day they ceased to act as the CEO, lobby as defined in the *Lobbyists Act* any public office holder as defined in the *Lobbyists Act*.

- (ii) No former CEO shall, for a period of 12 months from the last day they ceased to act as the CEO, act on a commercial basis or make representations on their own behalf or on behalf of any other person in connection with any ongoing matter in connection with which the former CEO, while the CEO, directly acted for or advised a department or public agency involved in the matter.
- (iii) No former CEO shall, for a period of 12 months from the last day the former CEO had a direct and significant official dealing with a department or public agency, make representations with respect to a contract with or benefit from that department or public agency.
- (iv) No former CEO shall, for a period of 12 months from the last day the former CEO had a direct and significant official dealing with a department or public agency, solicit or accept on their own behalf a contract or benefit from that department or public agency.
- (v) No former CEO shall, for a period of 12 months from the last day the former CEO had a direct and significant official dealing with an individual, organization, board of directors or equivalent body of an organization, accept employment with that individual or organization or an appointment to the board of directors or equivalent body.
- (vi) Nothing in this section restricts the CEO or former CEO from being appointed to the board of directors or a governing body of another public agency.
- (vii) Nothing in this section restricts the CEO or former CEO from accepting employment with a department of the public service or a public agency in accordance with Part 1 of the *Public Service Act*.

This subsection (e) comes into effect for the current CEO on April 4, 2020.

H. Administrative Processes

Administrative processes help Members manage ethical dilemmas, including any real or apparent conflict of interest concerns.

(a) Administration

The Code Administrator receives and ensures the confidentiality of all disclosures and ensures that any real or apparent conflict of interest is avoided or effectively managed. As well, the Code Administrator is responsible for providing advice and managing concerns and complaints concerning potential breaches of this Code, including conflicts of interest within the Agency. Regardless of the process of for responding to and managing conflict of interest concerns, the Code Administrator is responsible for ensuring procedural fairness.

(b) Disclosure

- (i) It is the responsibility of each Member to declare in writing to the Code Administrator those Private Interests and relationships that they think could be seen to impact the decisions or actions they take on behalf of the Agency. When

there is a change in their responsibilities within the Agency or in their personal circumstance, Members shall disclose in writing any relevant new or additional information about those interests as soon as possible. Where a real or apparent conflict of interest cannot be avoided, Members must take the appropriate steps to manage the conflict.

(ii) Members disclose these real or apparent conflicts of interest so that the Code Administrator is aware of situations that could be seen as influencing the decisions or actions they are making on behalf of the Agency. This provides Members, following a review by the Code Administrator, an opportunity to take action to minimize or remove the conflict. To actively manage a conflict of interest, options include:

- (1) removing themselves from matters in which the conflict exists or is perceived to exist;
- (2) giving up the particular Private Interest causing the conflict; and
- (3) in rare circumstances, resigning from their position with the Agency.

(c) Reporting a Potential Breach by Another

Members are encouraged to report in writing a potential breach of this Code by another to the Code Administrator. When reporting a potential breach in good faith and with reasonable grounds, Members are protected from retaliation for such reporting.

(d) Responding to Potential Breach

Once a potential breach has been reported, the Agency's procedures for responding to and managing a potential breach will be promptly initiated. The Code Administrator will review the circumstance and details of the potential breach and will notify the alleged Member. The alleged Member has the right to complete information and the right to respond fully to the potential breach. The identity of the reporter will not be disclosed unless required by law or in a legal proceeding. The Code Administrator makes a decision and completes a report in a timely manner. The decision may range from finding no potential breach to one that reveals suspected criminal conduct.

(e) Consequences of a Breach

Members who do not comply with the standards of behaviour identified in this Code, including taking part in a decision or action that furthers their Private Interests, may be subject to disciplinary action up to and including removal of the Director or termination of the CEO or Employee, as the case may be.

(f) Review of a Decision

- (i) An Employee can request in writing that the Chair review the decision made by the Code Administrator (the CEO) that they have breached this Code.

- (ii) A Director or the CEO can request in writing that the Minister review the decision made by the Code Administrator (the Chair) that they have breached this Code.

I. Permitted Transactions

- (a) The Agency may enter into a Transaction with a Member or Related Person if,
 - (i) the affected person:
 - (1) declares a conflict of interest to the Code Administrator in respect of the proposed Transaction; and
 - (2) discloses to the Code Administrator the full nature and extent of their interest in the proposed Transaction and, to the extent that they are able, the interest of any Related Person in the proposed Transaction;
 - (ii) the Code Administrator reports to the Board or Committee and legal counsel the conflict of interest and the nature and extent of the interest;
 - (iii) it is established to the satisfaction of the Board or Committee that:
 - (1) the proposed Transaction is fair and reasonable to the Agency; and
 - (2) the proposed Transaction would meet or exceed community expectations about the conduct of the Agency; and
 - (iv) the Board or Committee approves the proposed Transaction.
- (b) When authorizing a Transaction under this Code, the Board may impose any conditions it deems necessary in the circumstances to protect the Agency or to safeguard public confidence in its undertakings.
- (c) The affected person shall not participate in any decisions relating to the proposed Transaction.
- (d) The affected person shall not be counted as part of the quorum making any decisions relating to the proposed Transaction.
- (e) Where the Board approves a Transaction under this Code, an entry shall be made into the minutes of the meeting confirming the approval of the Transaction by the Board or Committee.
- (f) The Board may review any decision made by a Committee to approve a Transaction under these Conflict of Interest Guidelines.

J. Other Resources

- (a) Where to Get Advice

When Members require advice and guidance in determining whether misconduct or a conflict exists, or need clarification, they may discuss their issue with the Code Administrators.

(b) Questions to Consider

When Members are faced with a difficult situation, the following questions may help them decide the right course of action:

- (i) Have I reflected on or consulted with my Code Administrator about whether I am compromising this Code's values, principles or behavioural standards?
- (ii) Have I considered the issue from a legal perspective?
- (iii) Have I investigated whether my behaviour aligns with a policy or procedure of the Agency?
- (iv) Could my Private Interests or relationships be viewed as impairing my objectivity?
- (v) Could my decision or action be viewed as resulting in personal gain, financial or otherwise?
- (vi) Could my decisions or actions be perceived as granting or receiving preferential treatment?

III. MISCELLANEOUS

A. Notice

Unless otherwise provided herein, this Code comes into effect April 30, 2018.

B. Regulations

This Code may be modified to conform to any requirement and include any matter specified in the regulations to the *Conflicts of Interest Act*.

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