

COUNTY OF ST. PAUL NO. 19

Our Mission - To create desirable rural experiences



HR-36 Code of Conduct, Ethics and Conflict of Interest Policy

Department: Human Resources

Purpose

The County of St. Paul No. 19 (the County) is committed to providing clarity and transparency for its employees on the expectations for working with each other and conducting business on behalf of the municipality. These expectations or workplace commitments are intended to establish an environment and work culture that is professional, respectful, ethical, free of conflict of interest, and in alignment with our core values. Complying with the expectations in this Policy and any administrative procedures or processes that support this Policy protects the reputation and trust of the County and its employees.

Scope

This policy applies to every employee of the County, whether working at a County worksite, offsite, or working remotely.

Policy Definitions

Breach means being in violation of or performing wrongdoings about subjects covered by this Policy. The following represent a breach of this Policy, but are not exhaustive: failure to uphold the requirements of this Policy; failure to act and behave in ways that are in keeping with this Policy; being in a conflict of interest; failure to declare or disclose an actual or potential conflict of interest; failure to declare or disclose any product, service, or other form of gift received as a result of municipal business; failure to declare or disclose any monetary interest in a business that may do business with the municipality.

Business associate means any person legally associated with the County employee, including but not limited to, business contracts, partnerships, firms, enterprises, franchises, trusts, joint ventures, finances, real estate, or in other for-profit legal entities or agreements.

County assets includes all County buildings and land, equipment, supplies, stores, vehicles, materials, technology resources, financial assets, information, and work time.

Confidential information or confidential, privileged, proprietary, or personal and private information means any information which is not public property, or in the public domain, and/or would cause harm to individuals or the County if improperly disclosed. Information within this category includes information communicated in confidence, either by being expressly identified as confidential, or because the character of the information is obviously confidential or reasonably ought to be known as confidential. Information provided that is personal or private, and under the protection of *POPA* also falls into this category of information.

Closely associated means that the County employee's actions or involvement will or could potentially further their private interests or those of their relatives, business associates, friends, or an individual with whom the employee has a personal relationship with or an individual with whom the employee has an intimate personal relationship.

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Gifts, social events, hospitality, and other benefits includes items such as meals, beverages, invitations to social or recreational events, accommodation, and travel.

Good faith disclosure means a submission of information that is based on a reasonable belief and is not malicious, frivolous, or vexatious.

Immediate Family means the following individuals related to the employee:

- Spouse, adult interdependent partner, or common-law partner
- Children, stepchildren, foster children, wards, or children of the employee's spouse or partner
- Parents, foster parents, or guardians
- Siblings
- Grandparents
- Grandchildren
- A person living with the employee as a member of their family

Management means the director of a department to which the employee reports into.

Outside interests includes, but is not limited to, secondary employment, business undertakings or ownership, teaching and involvement with charitable, political, community service and professional organization.

Political activity includes, but is not limited to, being a candidate for elected office, campaigning for a candidate for elected office, fundraising for an election campaign, and/or promoting a political party or cause. Upon commencement of a Leave of Absence for political purposes, an employee would no longer have access to the building, County emails, computer programs, County cell phone, and any other item that would give the employee access to information that other candidates would not have.

Reprisals or retaliation or punishment means punitive or negative actions taken against a person for making a disclosure in good faith or participating in good faith, including, but not limited to: disciplinary action, termination, adversely affecting employment conditions, or a threat to do any of these listed. Reprisals, retaliation, or punishment will not be tolerated.

Relatives or friends is defined as a member of the employee's immediate family.

Supervisors and managers refer to any County employee who exercises supervisory or managerial authority over other County employees.

Stakeholders means any of the following: permanent residents, temporary residents, visitors, seasonal residents, landowners, rural and urban municipal neighbours, County of St. Paul No. 19 reeve and councillors representing our municipality, agriculture producers, industry, contractors, and small business, neighbouring First Nations, Metis Settlements, students, educators, community volunteers, Family and Community Support Services, Alberta HUB, and the media.

Policy Statements

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General Matters

It is the responsibility of the County Chief Administrative Officer (CAO), to ensure that the County's management is aware of this Policy and are communicating it to their respective staff. Any administrative procedures, processes, or forms required to support this Policy are the responsibility of the County administration as delegated by the CAO.

Expectations

All County supervisors and managers will:

- Act as role models for all employees, demonstrating honesty, integrity, trustworthiness, and respect in their actions and behaviours at all times.
- Maintain an atmosphere of an open-door policy that allows for discussion of suggestions and concerns from employees.
- Ensure employees under their supervision or department are aware of this Policy at the time of onboarding and orientation.
- Identify and obtain guidance on issues or situations that are complicated or cannot be easily resolved and may have implications to this Policy.
- Work closely with County employees to identify, manage, reduce, or resolve potential violations of this Policy.
- Protect all County employees who, in good faith, report a potential breach of the policy from any retaliation or other forms of retribution.

All County employees will:

- Act and behave in ways that are consistent with this Policy and the workplace expectations.
- Read, understand, and stay current with any updates of County policies and administrative procedures and processes, as amended from time to time.
- Obtain guidance on issues or situations that do not present obviously correct answers or approaches, and where uncertainty exists, to work directly with their immediate supervisor or manager relative to disclosure or reporting in the areas of conflict of interest, or code of conduct or ethics violation.
- Understand that the absence of a particular policy covering a particular situation does not relieve an individual of the responsibility to apply the highest ethical standards or respectful workplace behaviours in that situation.
- Disclose any conflicts of interest as defined within this Policy and report any suspected violations in accordance with this Policy.

Safe Disclosure and Disclosure and Reporting Requirements

The County will maintain an environment of safe disclosure when a report is made. Any employee, who in good faith, seeks advice about making a disclosure, makes a disclosure, cooperates with an investigation, or declines to participate in a wrongdoing or violations about the subjects covered by this Policy will not be subject to, and will be protected from, retaliation or reprisal or punishment.

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A County employee who has evidence of an actual or possible breach of this Policy or is in an actual or perceived conflict of interest and is required by this Policy to disclose this, will do so in accordance with the administrative procedures and processes that accompany this Policy.

A County employee who breaches this Policy or fails to report an actual or possible breach of the Policy will be subject to corrective or disciplinary action, up to and including termination of employment, as provided for in the Performance Improvement and Progressive Discipline Policy.

Violations

Where an employee violates any of the Code of Conduct and Ethics, or Conflict of Interest contained within this Policy, the County will employ disciplinary measures that reflect the seriousness of the offence up to and including termination of employment, in accordance with the Performance Improvement and Progressive Disciplinary Policy and administrative procedures and processes.

Some violations may permanently or irreparably harm our business or reputation, and if that is the case, we may pursue punitive measures, including legal action.

Code of Conduct and Ethics Expectations

Core Values

- **Community at the Core:** Community and people are top-of mind in everything we do. We build relationships, work together, and support our neighbors.
- **Accountability in Action:** We are reliable, consistent, accessible and informative. We take responsibility and understand that we must answer to the public. Follow through is expected and delivered upon.
- **Lead and Succeed:** Empowering people and creating positive environments which foster success. We work together to inspire and influence others. Create together, achieve together, and share in success together.
- **Unwavering Integrity:** Doing the right things for the right reasons. Open and honest communication. Taking actions that generate trust. Decisions are based around people and creating a better life for all.
- **Innovate to Elevate:** Thinking outside the box and proactively solving problems. Seeking continuous improvement and fostering growth. Actively looking for innovative ways to excel and enhance services to stakeholders.

Accountability

- We are accountable for our actions and behaviours to all those that we work and interact with.
- We understand that concern for what is right should be our first consideration in all our decisions and actions, including compliance with all provincial and federal laws, and all County Bylaws, policies and administrative procedures and processes.

Respectful Conduct

- We treat everyone with respect, dignity, and fairness.
- We are open, honest, and undertake actions that generate trust with those we work with.

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- We do not tolerate harassment, bullying, violence, or discrimination in the workplace.

Ethical Conduct

- We are not party to the intent or appearance of unethical, compromising practices, illegal, unprofessional, or negligent conduct in our municipal, public, or business relationships. This means that we do not:
 - contravene federal or provincial legislation or regulations,
 - intentionally misuse or mismanage County funds or assets,
 - commit actions that are an actual or perceived conflict of interest,
 - commit fraudulent actions or theft, or
 - create a specific danger to life, health, or safety of any person or the environment, other than the danger inherent in the performance of our duties as employees of the municipality.
- Employees who exercise County duties and responsibilities, regulatory, inspection and/or other discretionary authority over others:
 - Will disqualify themselves from dealing with anyone with whom the relationship between them may bring the employee's impartiality into question, with respect to those functions; and
 - Will not knowingly use or contract with suppliers or other third parties who violate the law or operate unethically.

Safety and Health

- We uphold the County's occupational health and safety legislative requirements, standards, policies, and administrative procedures and processes.
- In our daily work interactions, we protect the health and safety of ourselves and others.

Confidential Information

- We only collect, use, and disclose information for County purposes and in accordance with all County policies and administrative procedures and processes, and in adherence to the *Access to Information Act (ATIA)* and the *Protection of Privacy Act (POPA)*.
- We understand that, as part of our employment or interaction with the County, we may come in contact with information of a confidential, privileged, proprietary, or personal and private nature and respect the need for holding all information gained as part of our employment or interaction with the County as confidential.
- County employees will not seek to achieve personal or private gain by using confidential, privileged, proprietary, or personal and private information.

Political Activity

- Political activity by County employees like assisting with a campaign is permitted but must be conducted during non-work hours and outside the workplace.
- A County employee who intends to run for an elected office in a municipal election will do so in accordance with the provisions of the *Local Authorities Election Act*.
- A County employee who intends to run for an elected office in a municipal, provincial or federal election must seek approval for a leave of absence without pay from the County. If elected, the employee must resign from their employment with the County. If not elected, the employee shall

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return to the same or similar employment effective the day after the official election results have been announced.

- All County employees are expected to be politically neutral in the performance of their work duties.

Public Statements

- Public statements will be made only by the CAO, the Chief Elected Official for the County, or an approved designate (e.g. Communications, etc.).

Conflict of Interest Expectations

Conduct in Interest of County and Conflict of Interest

- No employee will engage in activities outside of their employment which are contrary to the interest of the County, conflict with their obligation to the County, or where there may appear to have an advantage from their employment with the County.
- Employees will not make use of County assets, equipment, property, time, or resources for outside interests or activities.
- Employees will use all County assets, equipment, property, time, or resources for County purposes only, unless provided authorization for legitimate personal use (e.g., use of County vehicle for on-call or provision of County vehicle for take home use given job responsibilities or functions).
- Employees will understand and monitor any outside interests or perceived outside interests to ensure that they can provide full commitment to the County without providing an opportunity for a conflict of interest.
- Employees must declare any conflicts of interest and remove themselves from:
 - participating in a decision affecting a supplier or other business, third party, or individual which may be dealing with the County, if the employee has an interest in that business, third party, or is related to, or closely associated with that individual.
 - any involvement in business decisions affecting immediate relatives and must provide alternate means of approvals so that an employee's relatives are not unnecessarily hampered from conducting business with the municipality.
 - participating in the recruitment process or decision where a relative or friend has applied for a County position as provided for in the Recruitment and Selection Policy.

Acceptance of Gifts

- For honesty and impartiality to be beyond question, County employees will not accept a gift, honoraria, favour(s), or services from any individual, organization, or corporation that may result in the following:
 - A personal gain or benefit,
 - The perception by an outside person, co-worker, or media, that the action is unethical,
 - Another person or organization will be owed something as a result, or
 - A decision may be influenced.
- Employees of the County are encouraged to decline gifts that are offered to them. However, they may accept the following:
 - Food and beverages at banquets, receptions, or similar events;

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- Services provided without compensation by persons volunteering their time;
 - Food, lodging, transportation and entertainment provided by other levels of governments or by other local governments, boards or commissions;
 - A reimbursement of reasonable expenses incurred in the performance of duties, in accordance with relevant County policy;
 - Token gifts such as souvenirs, mementoes and commemorative gifts that are given in recognition of service on a committee, for speaking at an event or representing the County at an event; and
 - Gifts that are received as an incident of protocol or social obligation that normally and reasonably accompany the responsibility of a Director or CAO of the County.
- County employees should be aware that acceptance of these gifts may result in a taxable benefit to the receiver, depending on the nature of the gift, benefit, reward or advantage and is subject to Canada Revenue Agency interpretation.
 - Opportunities may arise where employees of the County are invited to participate in an event where there would be a benefit to the County as well as a personal benefit. It is incumbent on the County employee to consider the above prior to accepting the invitation. Such events are not considered gifts for the purposes of this Policy.

Gifts, Social Events, Hospitality, and Other Benefits

- A County employee may attend a social event or may accept any gift, hospitality, or other benefit which:
 - is offered or awarded to them by the County.
 - is of nominal value (e.g. a small gift of appreciation such as cookies or chocolate).
 - falls within the normal standards of courtesy or protocol in the public sector (e.g. pens, lapel pins, calendars).
 - constitutes a normal presentation made to persons participating in public functions or an award presented to an employee who is representing the County.
 - is a catered meal ordered in the normal course of a meeting with colleagues, citizens, community groups, other municipalities or service providers.
 - is attendance at a social event which is hosted by the County or stakeholder or partner or other levels or representatives of government (e.g. other Alberta municipalities, a Canadian province, or the Government of Canada)

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Related Policies

- Confidentiality Policy
- Code of Conduct, Ethics, and Conflict of Interest Policy
- Performance Improvement and Progressive Discipline Policy
- Recruitment and Selection Policy
- Social Media Policy
- Drugs and Alcohol in the Workplace Policy
- Harassment, Bullying, Violence, and Discrimination in the Workplace Policy

Supersedes Policy HR-1 Employee Ethics; HR-9 Conflict of Interest

Council Approval: August 10, 2021

Amended (Omnibus): June 11, 2026



ADMINISTRATIVE PROCEDURES AND PROCESSES

Employees	CAO	Manager or Supervisor
<p>If you have questions or concerns about the Policy or what to do in a particular situation, you should:</p> <ul style="list-style-type: none"> • Consider the expectations and guidelines outlined in this Policy and the County values. • Consider whether consulting colleagues or speaking to the person or persons involved may be appropriate. • Speak to your supervisor or manager. 	<p>The CAO will:</p> <ul style="list-style-type: none"> • Provide guidance and direction on the Policy, including determining if the issue needs to be referred to an independent third party. • Based on the investigation findings, address any breaches or violations of this Policy. • Ensure documentation regarding the complaint and resolve is kept in accordance with applicable privacy legislation. 	<p>Managers or supervisors will:</p> <ul style="list-style-type: none"> • Promote awareness and understanding of the Policy, the County's Values, and the identified Related Policies. • Lead by example by demonstrating the behaviours and expectations as intended by the Code, the County's Values, and those identified in any of the Related Policies. • Maintain an environment where everyone feels comfortable asking questions, raising concerns, and making reports, while respecting the privacy and confidentiality of those who do. • Respond to questions and concerns, including discussing any recommended action to resolve with their next level of management, and taking action to resolve these as soon as practical. • Promptly escalating concerns and reports of possible or actual misconduct as appropriate and follow up to ensure they are addressed. • Where appropriate, referring the issue to their next level of management as appropriate.

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Disclosure and Reporting Procedures

Employees

If an employee believes that they may be in an actual or potential conflict of interest situation, the employee must make prompt and full disclosure in writing to their department head or to the CAO or their designee.

Employees must declare any products, services or other forms of gifts received because of municipal business to their supervisor or manager, if the gift is valued over \$500. If deemed substantial and/or potentially influencing decisions made, those items may be returned, and further offerings prohibited. This does not include donations for professional development.

All employees who have a monetary interest in a business that may do business with the municipality should register the interest with the CAO.

Employees who believe that they have witnessed a conflict of interest or violation of the code of conduct and ethics and have supportive evidence of the alleged conflict of interest, or violation, must notify their supervisor or manager immediately so that the County may take appropriate action.

Supervisors and Managers

County supervisors and managers must take all appropriate steps to prevent and stop conflicts of interest or violations of the code of conduct and ethics within their areas of responsibility.

Any supervisor or manager who is subject to, is witness to, or is given written or verbal complaints of conflict of interest or violation of the code of conduct and ethics shall work to minimize or eliminate the concern or complaint or issue. If a conflict of interest or violation of the code of conduct and ethics is established, the situation will be discussed with the employee to determine a resolve for the conflict.

Where this is not possible, the supervisor or manager is required to report the conflict of interest or violation of the code of conduct and ethics to the CAO or their designee.

If the complaint involves a person to whom the complaint should be submitted to, the complaint will proceed immediately to the next higher level. In the case of the CAO, the complaint will be submitted to an independent third-party external to the County for investigation and/or resolution.

Protection from Reprisals or Retaliation

No individual filing a complaint will be penalized nor subjected to any prejudicial treatment as a result of making a complaint in good faith.

No employee shall take retaliatory action against a complainant with the intention of dissuading or punishing an individual for participating in the complaint process. Sanctions may be imposed for any such retaliation. Retaliation against individuals participating in the complaint process should not be confused with any sanction which may be imposed for making or reporting false allegations.

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The County will not tolerate any complaints made in bad faith. If a complaint is demonstrated to have been provided in bad faith, or malicious, frivolous, or vexatious, the County will undertake disciplinary actions up to and including termination.

Confidentiality and Fair Treatment

Employees must be aware that the County is subject to the *ATIA* and *POPA* Acts. *ATIA* includes provisions to allow for the disclosure of information, and *POPA* includes provisions for the protection of personal or business information where disclosure would be harmful to business interests of a third party, harmful to personal privacy, harmful to individual or public safety, harmful to law enforcement, or that is considered privileged information. The County will follow any disclosure requirements as governed by this legislation in light of an *ATIA* request.

The County will protect the privacy of individuals involved and ensure that the complainant and the respondent are treated fairly and respectfully. The County will protect the privacy of those involved so long as doing so remains consistent with the enforcement of this Policy and its administrative procedures and processes, and compliance with the applicable legislation.

All disclosures or reporting of an actual or perceived conflict of interest or violation of the code of conduct and ethics will be handled confidentially. Throughout the complaint or investigation process, to the greatest extent possible, reasonable efforts shall be made to respect the confidential nature of a complaint. However, employees must understand that absolute confidentiality cannot be guaranteed, as a result of the need for a full and fair investigation, including the need to inform the respondent of the allegations. All employees investigating or providing evidence in respect of a complaint shall keep such information confidential. Violation of the confidentiality obligations in may result in disciplinary action.

Employees are reminded that all disclosures or reporting must be done in good faith and supported by evidence.

The County, through the office of the CAO, shall retain documents related to the investigation and any findings in accordance with *ATIA* or for the duration that there is any legal action arising out of the complaint is pending.

Investigations

The County seeks to resolve the claims of a conflict of interest or violation of the code of conduct and ethics within a reasonable timeframe. Investigations shall be conducted no longer than 10 working days following the filing of a complaint. The complainant will be provided with a timeframe once the complaint has been assessed.

The County has the authority and discretion to hold out of service or suspend, with pay, any employee who is believed to have violated this Policy, pending the results of the investigation.

The County will appoint an investigator and/or an investigation team, which may include the complainant's supervisor or manager. This team may vary depending upon the position held by the

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alleged offender identified in the complaint. The County may also, in its sole discretion, elect to retain an independent third party to investigate.

Employees are required to cooperate in the investigation process as directed by the County, and an employee may be subject to discipline if they are uncooperative.

Investigations of a formal complaint will be carried out in accordance with the following:

- Incidents will be investigated as promptly as possible, taking the circumstance into consideration;
- The County will not disclose the circumstances related to the complaint, or names of the complainant, the respondent, or any witness, except:
 - where necessary to fully and fairly investigate the incident or take corrective action, or to inform the parties of the results of the investigation and any corrective action to address the complaint;
 - where necessary to inform the CAO if the complaint has serious imminent risk to the County or involves criminal activity;
 - where necessary to inform Regional Director of Occupational Health and Safety if the complaint has a serious health and safety risk;
 - where necessary to inform an independent third party if they have been directed to investigate on behalf of the County; or
 - as required by law.
- In all cases, both the complainant and the respondent will be interviewed, and the respondent will be advised of the allegations they face, and provided with an opportunity to answer the same;
- Where appropriate, the County will interview any witnesses identified and review any relevant documents; and
- Individuals with knowledge of the complaint will be encouraged not to discuss the complaint with others.

Violations of Conflict of Interest and Code of Conduct and Ethics

Where it has been established that the employee has violated any of the Conflict of Interest or Code of Conduct or Ethics subject matters contained within this Policy, the County will employ disciplinary measures, up to and including termination, to reflect the severity of the violation. Where a violation may permanently or irreparably harm the County's business or reputation, we may pursue punitive measures, including legal action.