



The Corporation of the Town of Tecumseh

Policy Manual

Policy Number:	133
Effective Date:	September 10, 2024
Supersedes:	N/A
Approval:	Click or tap here to enter text.
Subject:	Employee Code of Conduct and Ethics

1. Introduction

1.1 The Code

- 1.1.1 The Employee Code of Conduct and Ethics (the “**Code**”) is about the values, principles, and standards of behaviour that govern actions as Town of Tecumseh (the “**Town**”) Employees. Based on values, the Code sets the standard for a safe and respectful Workplace, protects the collective reputation of the Town, and strengthens the commitment of working together for sustainable community growth and service delivery to support an exceptional quality of life for residents.
- 1.1.2 The Code guides the actions and conduct of Employees as representatives of the Town in order to build trust and confidence within the organization and the community. It speaks to Employees’ responsibilities to the Town, to each other, and to the public.
- 1.1.3 The Code guides Employees:
 - a. To live the Town’s values and protect the Town’s reputation.
 - b. To be honest, ethical, fair, and transparent.
 - c. To think critically, to act objectively and impartially.

- d. To make well-informed decisions every day.
- e. To build trust with the public.
- f. To comply with laws, regulations, standards, policies, and procedures.
- g. To seek resources for assistance.

1.1.4 The Code of Conduct and Ethics is organized into themes, to provide a common reference for standards of behaviour. It helps Employees understand what to expect and what is expected of Employees in the Workplace. There are five themes that Employees are responsible for: Protect Information and Interests, Foster a Safe and Healthy Workplace, Treat People with Care, Conduct Business with Integrity, and Safeguard Assets.

2. Scope

This Policy applies to all Employees of the Town of Tecumseh including all supervisory and managerial Employees, student workers, contract workers and volunteers.

3. Definitions

- 3.1 **“Town”** for the purpose of this policy means the Town of Tecumseh, either in the same sense of the geographic area of the municipality or in the sense of the identity of the municipal corporation, as the context requires.
- 3.2 **“Employee or Employees”** for the purpose of this policy means direct Employees of the Corporation of the Town of Tecumseh, whether workers, supervisors, full time, part time, contract or volunteers but does not include members of town council, appointed committees and boards, independent contractors, or their Employees.
- 3.3 **“Supervisor”** as defined by the Occupational Health & Safety Act means a person who has charge of a Workplace or authority over a Worker.
- 3.4 **“Workplace”** as defined by the Occupational Health & Safety Act means any place means any land, premises, location, or thing at, upon, in or near which a Worker works.

4. The Town's Culture

- 4.1 The Town of Tecumseh's Values are Accountability, Equity, Diversity and Inclusion, Excellence, Integrity, Sustainability and Teamwork—they are what Town Employees embody.
- 4.2 The respect Employees have for each other, customers, and the public, is rooted in the Town's values. Employees demonstrate them in the way they build relationships and how they make decisions. The Code incorporates the Town's values and guides Employees to live them in day- to-day work.
- 4.3 'Living the Town's Values' means that Employees act without malice, judgment, or to seek benefit. It means having the courage for difficult conversations, putting trust in laws, legislation, policies, and procedures, having integrity, and standing up for what one believes in, and about showing compassion in times of need.
- 4.4 Living the Town's values can be challenging at times. It requires strength, knowledge, resilience, and perseverance. It is more than just being aware of the values or following the Code – Employees need to weave them into operations and behaviours to ensure respect, lawfulness, and compliance. These foundational pieces will build and sustain trust – the core of the relationships with each other and the community we serve.

5. Definitions of Values

5.1 Accountability

Acceptance of responsibility to the public; commitment to public engagement and issues resolution; fair and thoughtful decision-making; transparent and open communication.

5.2 Equity, Diversity, and Inclusion

Recognizing the dignity and worth of all people and the unique status and cultural diversity of Indigenous communities; removing barriers of discrimination and disadvantage faced by human rights protected groups; and creating a harmonious environment free from discrimination, harassment, and hate.

5.3 Excellence

Forward-thinking, innovative, and effective organizational and individual leadership that preserves public trust in government.

5.4 Integrity

Straightforward and ethical conduct that is open, honest, and fair.

5.5 Sustainability

Courage to persevere and achieve fiscal responsibility, environmental stewardship, cultural sensitivity, and social harmony.

5.6 Teamwork

Respectful relationships are characterized by valuing the views and contributions of others, with a demonstrated commitment to collaboration, mutual support, knowledge transfer and public service.

6. Expected Behaviours

6.1 Tell the Truth

Work and relationships require trust. The Town, the community and colleagues rely on Employees to be honest and responsible. Employees will honour commitments – do what they say they will do – to build trust and sustain it.

6.2 Make Well Informed Decisions

Employees must conduct themselves with integrity and compassion. Employees will place careful thought into actions and decisions, applying critical thinking, knowledge, and skill. Employees will apply best efforts to carry out civic responsibility and preserve the Town's collective reputation.

6.3 Uphold the Law

The Town's operations are subject to laws and regulations. The Town's policies and procedures comply with legal and regulatory obligations, with the intent and in the spirit of the laws that apply. This helps the Town preserve its reputation for acting responsibly and with integrity. Breaking the law could result in civil, criminal, and regulatory penalties, including fines for the Town and the individual involved.

6.4 Respect Other Professional Codes of Conduct

Some Employees may be accountable for upholding the principles of other professional codes of conduct (e.g., accountants, lawyers, engineers, planners, building officials, human resources professionals). Anyone in such a position is encouraged and supported to do so. If a situation arises

that may cause conflict or confusion, speak to a Supervisor or People & Culture.

6.5 Comply With Policies and Procedures

All Employees are responsible for knowing, understanding, and following the Town's policies, directives, standard operating procedures, and guidelines that apply. Employees will comply with a Supervisor's directive unless it is contrary to the Town's values, policies, against the law or may result in health & safety risks. A refusal to obey a Supervisor's order or a lack of respect directed toward that Supervisor will subject that Employee to the Town's Progressive Disciplinary Policy. Employees must always be aware of the policies and procedures specific to their business and work within the boundaries of which they have authority.

6.6 Professional Appearance

6.6.1 It is the Town of Tecumseh's expectation that Employees will observe a standard of attire and footwear appropriate to the duties, responsibilities, and requirements of their position, inclusive of all gender identities and expressions, abilities, ethnicities, and/or religious affiliations. Clothing with inappropriate, obscene, offensive, and/or discriminatory logos, statements/messages and/or images are prohibited.

6.6.2 Employees are expected to maintain a neat and professional appearance always, whether in-office, in a remote workspace or virtual, dressing in a manner appropriate for the work being performed and consistent with the Town's health and safety policies, procedures, protocols and considerations. Employees not required to wear a uniform must adhere to the guidelines outlined in the Town's Professional Appearance Policy No. 96.

6.6.3 Supervisors are responsible for ensuring that all Employees abide by the dress code. Employees who are in violation of this policy may be sent home, with no compensation, and required to return to work attired in an appropriate manner within a reasonable period of time in order to avoid formal discipline. Should repeated offences of this Policy occur, the individual may be subject to formal discipline in accordance with the Progressive Discipline Policy No. 64.

6.6.4 For more information consult:

- a. Policy No. 96 – Professional Appearance Policy

6.7 Supporting the Community

Employees support the communities where they live, work, and do business. The Town's values and the Code serve as the foundation for behaviour when Employees represent the Town at work or in communities. Employee behaviour should be beyond reproach in all dealings and particularly for the community served. The Town takes pride in all contributions and encourages Employees to volunteer and participate in the Town where possible.

6.8 A Shared Commitment

The Code of Conduct applies to all Town Employees, and everyone has the responsibility to follow it. Understanding and complying with the Code is a condition of employment. Employees abide by the Code for the well-being of the Town, its operations, and its Employees.

6.9 Consequences of Non-Compliance

6.9.1 Any Employee who breaches the Code of Conduct or fails to report an actual or perceived breach of the Code of Conduct is subject to corrective action. Corrective action is the Town's response to unacceptable behaviour and can include the use of disciplinary or non-disciplinary methods. Discipline can result in action up to and including termination of employment. Some violations or behaviours may also result in a legal response including civil litigation, or the involvement of the police. Examples include, but are not limited to, theft, fraud, and violence.

6.9.2 For more information consult:

- a. Policy No. 64 - Progressive Discipline Policy

6.10 Responsibilities for Supervisors

While all Employees are required to act in accordance with the Town's values, Supervisors have additional responsibilities under the Code of Conduct. The Town expects those who lead or supervise others, to demonstrate ethical leadership and set the right tone by:

6.10.1 Modeling appropriate behaviours that are consistent with the Code and Town values.

6.10.2 Fostering a positive work environment in which only legal, ethical, responsible, and appropriate behaviours are acceptable.

- 6.10.3 Promoting team awareness and understanding of the Town's Code, values, policies, and procedures to ensure ongoing compliance.
- 6.10.4 Identifying and mitigating ethics and compliance risks.
- 6.10.5 Responding appropriately and in a timely way to colleagues who seek advice, raise concerns and/or report misconduct in a manner that offers security and ease to do so.
- 6.10.6 Managing conflict of interest situations to achieve fair and appropriate outcomes.
- 6.10.7 Promptly escalating concerns and reports of actual or potential misconduct and following up to ensure they are addressed.
- 6.10.8 Consult with People & Culture as needed for interpretation and application of the Code.

7. Speak Up, Raise Concerns and Report Misconduct

7.1 Speaking Up and Raising Concerns

- 7.1.1 The Code and Town policies explain the ethical behaviours that the Town expects of Employees however, they cannot anticipate every situation that Employees may encounter. The Town takes violations of the Code very seriously so speak up and raise concerns to ensure that Employees, the community, and the Town's reputation are protected. The Town will address all questions and concerns.
- 7.1.2 Sometimes, individuals know when something is wrong—it just feels wrong. Other times, it is hard to tell if an action does, or will break the Code, a Town policy, procedure, or law. Use the Town's values and the Code to inform best judgment, and when in doubt, seek clarification from a Supervisor, or People & Culture in times of uncertainty.
- 7.1.3 If there are doubts, ask these questions:
 - a. Is it legal?
 - b. Does it comply with Town policies and procedures?
 - c. Is it in line with the Town's corporate values?

- d. Would I be comfortable if my actions were made public?

If the answer is “no” to any of these questions, stop what is happening.

If the answer is “yes” to all of these questions, carry on and move forward.

If the answer is “I don’t know” to any of these questions, ask a Supervisor or People & Culture for help.

7.2 Reporting Misconduct

7.2.1 Every Employee has a duty to report actual or suspected misconduct, including one’s own. Employees must immediately notify a Supervisor and/or People & Culture of misconduct that includes violations of the Code, policies, and the law.

- a. If an Employee is asked to commit (or believe that they have been witness to) a potentially illegal or unethical act, they must report it immediately.
- b. If an Employee becomes aware of a breach of the Code or any other situation that could place the Town at risk of loss or harm, they must report it immediately.

7.2.2 The Town will investigate these reports promptly, and keep the details confidential, including, where appropriate, the identity of the person making the report. The Town will only disclose information to the extent necessary to investigate and address the situation, or as legally required.

7.2.3 Anyone who knowingly makes a false accusation about non-compliance will be subject to disciplinary action.

7.3 Investigations

Reports of concerns, violations or misconduct may be investigated to determine if there was a breach of the Code, policy or law governing conduct. Investigations will be thorough, fair and in accordance with legal obligations. All Employees have a duty to cooperate with internal or external investigations concerning alleged misconduct, and provide honest, accurate, complete, and timely information. The Town will make every effort to protect the confidentiality of the investigation.

7.4 Commitment to Non-Retaliation

- 7.4.1 There will be no tolerance for retaliation for an Employee speaking up and making a truthful report of actual or potential misconduct, for participating in an investigation or for exercising legal rights. Retaliation can include behaviour or actions that punish or deter someone from speaking up such as: negative performance evaluations, creating a hostile work environment, harassment, dismissal, or assigning tasks with the intent to isolate or discourage someone.
- 7.4.2 If an Employee encounters any form of retaliation, report it to a Supervisor or People & Culture immediately. The Town commits to investigate every claim of retaliation and to take disciplinary action if necessary.

8. Protect Information and Interests

8.1 Protecting Confidential Information

The Town trusts Employees to protect the organization's information resources so they can be used effectively to deliver public services. The public trusts Employees to protect privacy, ensuring personal information is collected, used, and disclosed with caution and care. Employees must manage all information within their care ethically and responsibly.

- 8.1.1 Confidential information (which includes personal information) is information that is not public property, is not in the public domain, and/or would cause harm to individuals, or to the Town if improperly disclosed. This includes information communicated in confidence.
- 8.1.2 Personal information means any information that would identify a specific individual. The Town uses the detailed definition provided in the Municipal Freedom of Information and Protection of Privacy Act.
- 8.1.3 The inappropriate disclosure of confidential information may result in financial and/or reputational harms and may constitute a privacy breach.
- 8.1.4 Confidential information including personal information, should only be accessed, and used by authorized Employees, when required for legitimate business purposes, and only for the period required to achieve those business purposes.

- 8.1.5 Every Employee has a responsibility to secure confidential information from the risk of theft, loss, misuse, or inappropriate disclosure.
- 8.1.6 In the event of a privacy breach or improper disclosure, Employees must comply with the Town's privacy policies and directives.
- 8.1.7 Employees must report a potential or actual breach to the Information Coordinator (Director Legislative Services & Clerk) and refrain from sharing details of the breach with anyone who does not have a business need to know.

8.2 Protecting Customer Information

- 8.2.1 The Town's customers are its citizens, business partners and anyone that interacts with the Town. Customers share personal information with the Town and expect the Town to protect their privacy. Employees will only share information about customers with their consent, and only for a legitimate business purpose.
- 8.2.2 Every privacy breach results in a loss of public trust. Employees must always take the proper precautions when collecting, using, and sharing information about the Town's customers.
- 8.2.3 Employees must always be mindful and take care not to be overheard, leave information visible, behind, or unsecure when working in public spaces.

8.3 Protecting the Town's Information

- 8.3.1 The Town's business information is a critical asset, and every Employee has an obligation to safeguard it. Employees must always use proper records management processes when creating, using and maintaining, and disposing of records.
- 8.3.2 For more information consult:
 - a. Municipal Freedom of Information and Protection of Privacy Act;
 - b. Policy No. 57 – Confidentiality of Information

8.4 Responding to the Media

- 8.4.1 The media is an effective way to enhance communication with the community but, Employees must also manage media inquiries to

ensure consistency and protect the Town's reputation. The Town's Communications Department is responsible for the coordination of all communications with the media on behalf of the Town. Only designated spokespersons may communicate with the media on the Town's behalf. Refer all media inquiries to the Communications Officer.

8.4.2 For more information consult:

- a. Policy No. 76 – Communications Policy

8.5 Using Social Media Responsibly

8.5.1 Social media facilitates collaboration, sharing of information, and dynamic discussions. It provides opportunities to enhance outreach and inclusion to engage people. Bear in mind, comments made on social media are permanent and for public consumption.

- a. The Town expects Employees to realize that social media is not an appropriate avenue to express personal concerns about the Town, colleagues, or Town business.
- b. Refrain from sharing information on social media platforms that is not already available to the public, or content that reflects poorly on colleagues or the Town.
- c. Consult with a Supervisor or People & Culture if you are uncertain about appropriate social media content.

8.5.2 Official Use

To ensure that the Town's corporate social media use is appropriate and consistent with the Town's communication strategy, only the Communications Department has the authority to manage or participate in the Town's social media outreach activities.

8.5.3 Personal Use

- a. Share, comment, and repost Town news in ways that honour the Code and reflect the Town's values. Always consider the potential impact of personal posts to the Town, colleagues, and the community.
- b. For more information consult:
 - i. Policy No. 80 – Social Media

8.6 Acting Responsibly

The Town's reputation and business depends largely upon the behaviour of its Employees. Whether an Employee is "on duty" or "off duty," their behaviour and actions may reflect on the Town. If Employees fail to exercise sound judgment and engage in unethical or immoral conduct, it may reflect negatively on the Town. Be mindful and responsible and act in a way that reflects positively on the Town and fosters public confidence.

9. Foster a Safe and Healthy Workplace

9.1 Valuing Everyone's Health and Safety at Work

9.1.1 The Town is committed to providing a physically and mentally safe work environment through a culture of responsibility and accountability at all levels- Employees, Supervisors, and senior leadership. All Employees share the responsibility of making health and safety a daily priority.

9.1.2 Each Employee must adhere to health and safety policies and practices that apply to their jobs, and take the necessary precautions to protect colleagues, visitors, and themselves. Employees foster an active health and safety culture by:

- a. Making responsible choices—not accepting or directing unnecessary or unsafe acts.
- b. Knowing and complying with applicable occupational health and safety laws and Town policies.
- c. Watching out for each other and helping others avoid unsafe conditions.
- d. Promptly reporting any unhealthy or unsafe conditions or behaviours.

9.1.3 For more information consult:

- a. Policy No. 07 - Health & Safety Policy

9.2 Be Fit for Work

9.2.1 To ensure a safe Workplace and prevent potentially dangerous situations from occurring in the Workplace. Employees must perform work safely, and at an acceptable standard, without limitations due to injury, illness, fatigue, or the use of (or

aftereffects of) a substance, or other condition (physical or mental) that may impair performance. Employees must report to their jobs, fit to work (and remain as such) while conducting Town of Tecumseh business.

- a. Employees will attend to job responsibilities free of any influence from alcohol, cannabis, illegal drugs. Employees taking prescription drugs (including medical cannabis) or over-the-counter drugs with strong side effects should inform their Supervisor that a medical accommodation may be necessary.
- b. Illegal drugs or other controlled substances are not permitted and cannot be brought onto Town property or work sites.

9.2.2 Immediately report any abuse (or suspicion of abuse) of alcohol, cannabis, drugs, or an illegal substance to a Supervisor and/or People & Culture.

9.2.3 FSEAP can help:

- a. Any Employee who may be experiencing addiction or dependency or has significant interactions with someone who is experiencing addiction or dependency is encouraged to seek help. The Town has resources to support health-related concerns through the Employee and Family Assistance Program (FSEAP).
- b. For more information consult:
 - i. www.myfseap.com or 1-844-720-1212

9.3 Preventing Workplace Violence

9.3.1 The Town has a proactive approach to violence prevention in the Workplace that clearly outlines the expectations of Employees (at all levels) when reporting and responding to violent incidents.

9.3.2 Employees are all responsible for maintaining a Workplace free from violence and commit to supporting Employees who are victims of violence.

9.3.3 The Town has zero tolerance for violence in the Workplace and expects everyone to act appropriately in all dealings with others.

9.3.4 Immediately report instances of violence or attempted violence to a Supervisor and/or People & Culture.

9.3.5 For more information consult:

- a. Policy No. 129 – Workplace Violence Prevention Policy and Program

10. Treat People with Care

10.1 Maintaining a Respectful Workplace

10.1.1 All Employees have the right to work in an environment that is respectful and professional, and everyone is responsible for behaving in a way that contributes to a healthy and productive Workplace.

10.1.2 Employees will foster an atmosphere of congeniality and support. Employees will be honest, polite and courteous when dealing with people, including the public, members of Town Council, and colleagues.

10.1.3 The Town expects everyone to treat each other with mutual respect and dignity and to be conscientious of how others may perceive or misunderstand actions and comments.

10.1.4 Employees (and the Town) have zero tolerance for harassment, sexual harassment, bullying, discrimination, disrespect, and inappropriate behaviour under any circumstance.

10.1.5 Immediately report any instances of harassment or discrimination to a Supervisor and/or People & Culture.

10.1.6 For more information consult:

- a. Policy No. 128 – Workplace Harassment Prevention Policy & Program

10.2 Strengthening Diversity, Equity, Inclusion & Accessibility

10.2.1 The Town wants Employees to bring their whole selves to work, every day. Employees will conduct themselves at work with fairness and equity while fostering an inclusive culture that provides an accessible, safe, and respectful work environment that is free from harassment, discrimination, violence, or unacceptable behaviour.

- 10.2.2 Employees accept, respect and value individual differences within the Workplace and commit to equitable opportunity for advancement and growth.
- 10.2.3 Employees will combat unconscious biases to increase innovation, productivity, and creativity. By recognizing and mitigating biases, Employees will enhance relationships, build community, and garner a greater appreciation for equity, diversity, and inclusivity.
- 10.2.4 For more information consult:
 - a. Policy No.79 – Integrated Accessibility Standards Regulations

11. Conduct Business with Integrity

11.1 Preventing Fraud

- 11.1.1 The Town takes fraud—and the threat of fraud—very seriously and commits to deter, detect, report, and correct fraud. The Town expects Employees to be honest, without bias, without favour, and without outside/personal interests conflicting with work decisions. Employees must immediately report any suspected fraud activity to a Supervisor or People & Culture. Reprisal against Employees who have made a good faith report of suspected fraud activity or participated in an investigation will not be tolerated.
- 11.1.2 Fraud Definition: Activities undertaken by an individual or organization that are done in a dishonest or illegal manner and are designed to give an advantage to the perpetrating individual or the Town. Consequently, fraud includes any intentional or deliberate act to deprive another of property or money by guile, deception, or other unfair means. Fraud against an organization can happen through misappropriation of corporate assets by an organization's Employees.
- 11.1.3 Some examples of fraud include:
 - a. Providing a benefit or service to someone who does not qualify.
 - b. Failure to disclose an actual or potential conflict of interest.
 - c. Accepting bribes or kickbacks.

- d. Carrying on personal business during Town of Tecumseh work hours using Town resources.
- e. Forgery or alteration of a cheque, document, or account belonging to the Town.
- f. Unauthorized reductions in fees or fines.

11.2 Avoiding Conflicts of Interest

11.2.1 A 'Conflict' or 'Conflict of Interest' is anything that interferes (or might be perceived to interfere) with an individual's or the Town's ability to act impartially or in the best interests of the public.

11.2.2 Employees have a duty to set aside personal views and focus on what is best for the Town and the public. For that reason, Employees have an obligation to disclose any actual or perceived conflicts of interests. A conflict of interest occurs when Employee conduct involves, or appears to involve, a conflict between public duties and personal interests. The Town expects Employees to immediately disclose conflicts and manage them appropriately.

- a. The Town expects Employees to act objectively and discern obligations for their personal business, family, and social relationships, from their roles at work for the Town.
- b. Employees will think critically and perform transactions at an 'arm's length' and independent of personal relationships, outside interests, and affiliations.
- c. Employees will declare a conflict of interest or a perceived conflict of interest when it exists and appropriately remove themselves from those situations.

11.3 Outside Interests

Employees may have interests outside of the Town (e.g., additional work, volunteer activities, etc.) Employees' interests must remain separate and distinct from job obligations and employees must never use their positions with the Town to influence or further their private interests or those of friends, family, or anyone with whom they have a close personal relationship or business association. Employees will disclose any outside activities that present a conflict or potential conflict of interest.

11.4 Personal Relationships

Employees must excuse themselves from work situations and decision-making that may involve friends, relatives, or anyone with whom they have a close personal relationship or business association. Employees will never use their positions with the Town to seek personal benefit or further the interests of those with whom they have personal relationships or business associations. Employees will disclose any relationships that present a conflict or potential conflict of interest.

11.5 Political Activity and Support

11.5.1 The Town recognizes the right of all Employees to participate in a personal capacity in political, trade union or professional association activity. At the same time, Employees must be and appear to be politically neutral in their official employment duties in order to sustain public trust in local government.

11.5.2 Employees are not to:

- a. Publicly disparage or harm the reputation of the Town, Town Council, or other Town Employees
- b. Claim to speak on behalf of the Town unless specifically authorized to do so
- c. Make personal comments using Town letterhead, a Town email address or anything that implies a connection between the Employee's personal commentary or opinions and the Town.

11.6 Personal Political Activity

11.6.1 Employees who wish to be elected to a position on Council are governed by the relevant provincial legislation (See: Section 30 of the Municipal Elections Act which requires that Employees take an unpaid leave upon being nominated and resign their employment if elected).

11.6.2 Similarly, Employees who wish to seek election to a position as a member of the provincial legislature or Parliament of Canada are governed by the relevant provincial or federal legislation and are entitled to obtain a leave of absence without pay from the date of nomination as a candidate until such time as it is clear that the Employee has been successful or unsuccessful at the election.

11.6.3 Employees involved in someone's political campaign (Municipal, Provincial or Federal candidates) are to disassociate themselves from being an Employee of the Town of Tecumseh. They are not to conduct their campaign initiatives in such a way as to interfere with other Employees conducting their Town of Tecumseh work responsibilities. Inherent in this policy is that Town facilities and/or equipment are not to be used in the course of one's activities during the election process.

11.6.4 For more information consult:

- a. Policy No. 54 – Hiring of Employees
- b. Policy No. 132 - Conflict of Interest Policy
- c. Municipal Elections Act

11.7 Gifts & Hospitality

11.7.1 Employees are not precluded from accepting:

- a. personal gifts, normal hospitality among persons doing business, benefits, rewards, commissions or advantages from any person or organization not connected directly or indirectly Town;
- b. food, beverages, and/or admission fees provided by banquets, receptions, or similar events if attendance is the result of protocol or social obligation consistent with employment at the Town, and the person extending the invitation has done so infrequently and that person or a representative of the donor is in attendance;
- c. services provided without compensation by Employees volunteering their time;
- d. food, lodging, transportation, and entertainment provided by other levels of governments or by other local governments, boards, or commissions;
- e. reimbursement of reasonable expenses incurred, and honorariums received in the performance of duties connected with municipal associations;
- f. token gifts such as souvenirs, mementos and commemorative gifts that are given in recognition of service

- on a committee, for speaking at an event or representing the Corporation at an event; or
 - g. gifts that are received as an incident of protocol or social obligation that normally and reasonably accompany the position of the Employee at the Town.
- 11.7.2 Employees shall return any gifts or benefits which exceed these limits, along with an explanation of why the gifts or benefits cannot be accepted.
- 11.7.3 Gifts and entertainment must not create a sense of obligation for either party. Employees may not accept, offer, or give—directly or indirectly for themselves or anyone else—gifts, entertainment or other benefits of value that are not reasonable and appropriate under the circumstances.
- 11.7.4 If unsure, consult with your Supervisor or People & Culture before accepting an invitation.

12. Safeguard our Assets

12.1 Using Town Property Responsibly

- 12.1.1 The things used at the Town, or created for the Town, belong to the Town. Employees must ensure that the Town's property—physical, intellectual, and technological—are used properly and reflect a balance between the obligations to the Town and to Employees.
- a. Employees are responsible to protect and secure any Town property from theft, fraud, harm, loss, misuse, especially those that are in an Employee's custody or control and are their responsibility.
 - b. In general, Employees should not use Town property, technology, Employees, or other resources for activities other than the business of the Town.
 - c. The Technology & Client Services Department (TCS) will provide cyber security awareness training to all new users and on a regular basis for all users. TCS may periodically conduct simulated email phishing campaigns as part of the training. Employees that are unsuccessful identifying the

campaign will be provided with follow-up training and mitigation up to and including disciplinary action.

- d. Employees must never use Town property for illegal activity or for any purpose that might be considered offensive.

12.2 Definitions of Town Property:

12.2.1 Physical property – means buildings, facilities, vehicles, furniture, tools, and equipment, etc.

12.2.2 Intellectual property – is a creation of the mind (literary works, design, plans, etc.) of which the ownership or right to use may be owned by the Town—it may be legally protected by a copyright, patent, trademark, etc. (e.g., logos, presentations, audios / videos, etc.).

12.2.3 Technological property – means computers, printers, mobile devices, software, network resources, etc.

12.2.4 For more information consult:

- a. Policy No. 9 – Technology Acceptable Use Policy

12.3 Managing Expenses Responsibly

12.3.1 As stewards of Town resources, Employees manage the assets in their care responsibly and ethically to earn and maintain the public's trust. Employees are accountable to the public to ensure that the use of public money, property and resources is done with high regard for efficiency and effectiveness.

- a. Employees are required to comply with the requirements set out in the Town's expense policies, including claiming only reasonable expenses actually incurred for Town business.
- b. Employees are accountable to follow authorization limits when authorizing expense commitments, transactions, or Employee claims for reimbursement.
- c. Employees must not use a corporate purchasing card for any purpose other than for Town business expenses and must manage the card in accordance with applicable policies and procedures.
- d. The Town is committed to purchasing goods, services and construction from responsible suppliers that provide quality

goods, services, and construction at competitive prices and who abide by ethical standards and norms. Employees engaged in procurement must adhere to the Town's Purchasing Policy.

12.3.2 For more information consult:

- a. Policy No. 14 – Travel Policy
- b. Policy No. 16 – Corporate Credit Card Issuance and Use
- c. Policy No. 17 – Purchasing Policy

13. Administration of the Code

13.1 Acknowledgement and Renewals

As a condition of employment, and at the time of hiring, Employees will sign an acknowledgment certifying that they have read, understood, and will comply with the Code. Annually, Employees will complete an online acknowledgment certifying that they have read, understood, and will continue to comply with the Code.

13.2 Code Interpretation

Final interpretations of the Code of Conduct are the responsibility of the Director of People & Culture in consultation with the Chief Administrative Officer as appropriate.

13.3 Review and Approval

Council delegates authority to the Director of People & Culture and Chief Administrative Officer to regularly review and, if applicable, revise the Code. Any significant amendments to the Code will be reported to Council for information.