

|  |  |
|--|--|
| Council Policy No.:                                      | CP2016-018                             |
| Council Policy Name:                                     | Code of Conduct and Ethics - Employees |
| Date Approved by Council:                                | November 22, 2016                      |
| Date revision approved by Council:                       |  |
| Related SOP, Management Directive, Council Policy, Forms |  |

## Table of Contents

|           |   |           |
|-----------|---|-----------|
| <b>1.</b> | <b>Introduction .....</b>                                   | <b>3</b>  |
| 1.1       | The Code .....  | 3         |
| 1.2       | The City's Culture .....                                    | 3         |
| 1.3       | Expected Behaviours.....                                    | 4         |
| 1.4       | Supporting the Community .....                              | 5         |
| 1.5       | A Shared Commitment .....                                   | 5         |
| 1.6       | Consequences of Non-Compliance .....                        | 5         |
| 1.7       | Responsibilities for Leaders.....                           | 5         |
| <b>2.</b> | <b>Speak Up, Raise Concerns and Report Misconduct .....</b> | <b>5</b>  |
| 2.1       | Speaking Up and Raising Concerns .....                      | 5         |
| 2.2       | Reporting Misconduct.....                                   | 6         |
| 2.3       | Investigations .....  | 6         |
| 2.4       | Commitment to Non-Retaliation.....                          | 6         |
| <b>3.</b> | <b>Protect Information and Interests .....</b>              | <b>7</b>  |
| 3.1       | Protecting Confidential Information.....                    | 7         |
| 3.2       | Responding to the Media.....                                | 8         |
| 3.3       | Using Social Media Responsibly.....                         | 8         |
| 3.4       | Acting Responsibly .....                                    | 9         |
| <b>4.</b> | <b>Foster a Safe and Healthy Workplace.....</b>             | <b>9</b>  |
| 4.1       | Valuing Everyone's Health and Safety at Work.....           | 9         |
| 4.2       | Be Fit for Work .....                                       | 9         |
| 4.3       | Preventing Workplace Violence .....                         | 10        |
| <b>5.</b> | <b>Treat People with Care .....</b>                         | <b>10</b> |
| 5.1       | Maintaining a Respectful Workplace.....                     | 10        |
| 5.2       | Strengthening Diversity, Equity and Inclusion .....         | 11        |
| <b>6.</b> | <b>Conduct Business with Integrity .....</b>                | <b>12</b> |
| 6.1       | Preventing Fraud .....                                      | 12        |
| 6.2       | Avoiding Conflicts of Interest .....                        | 12        |
| 6.3       | Managing Gifts and Entertainment .....                      | 13        |
| <b>7.</b> | <b>Safeguard Assets .....</b>                               | <b>14</b> |
| 7.1       | Using City Property Responsibly .....                       | 14        |
| 7.2       | Managing Expenses Responsibly.....                          | 15        |
| 7.3       | Managing Risk.....  | 15        |
| <b>8.</b> | <b>Administration of the Code.....</b>                      | <b>15</b> |
| 8.1       | Acknowledgments and Renewals .....                          | 15        |
| 8.2       | Code Interpretation.....                                    | 15        |
| 8.3       | Review and Approval.....                                    | 16        |

# 1. Introduction

## 1.1 The Code

City of Kawartha Lakes employees reflect the diverse and dynamic makeup of the City. The Code of Conduct (the “Code”) is about the values, principles, and standards of behaviour that govern actions as City employees. Based on values, the Code sets the standard for a safe and respectful workplace, protects the collective reputation of the City, and strengthens the commitment to make Kawartha Lakes a connected, inclusive, and innovative place to work and live.

The Code guides the actions and conduct of employees as representatives of the City—to build trust and confidence within the organization and the community. It speaks to employees’ responsibilities to the City, to each other, and to the public.

The Code guides employees:

- To live the City’s values and protect the City’s reputation
- To be honest, ethical, fair, and transparent
- To think critically, to act objectively and impartially
- To make well-informed decisions every day
- To build trust with the public
- To comply with laws, regulations, standards, policies and procedures
- To seek resources for assistance

The Code of Conduct 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.

## 1.2 The City’s Culture

The City of Kawartha Lakes’ Values are Accountability, Respect and Teamwork.

Employees demonstrate them in the way they build relationships, interact with customers and how they make decisions. The Code incorporates the City’s Values and guides employees to live them in day-to-day work.

### **Accountability**

We do the right thing. We take responsibility for our own actions and honour the commitments we make. We are professional and accountable to our community. We strive to make decisions in the best interest of all citizens, balancing needs with affordability. We work to Make It Better every day.

### **Respect**

We communicate openly and honestly. We value the contributions of others and accept and appreciate our differences. We actively listen to better understand other perspectives and treat everyone with dignity and fairness.

### **Teamwork**

We are all community builders. Community building is about meeting the needs of citizens and businesses today without compromising the needs of future generations. We appreciate everyone’s strengths and willingly share our knowledge and experience to help achieve our goals. We demonstrate high levels of trust and cooperation and work to build consensus. Every team member matters.

Living the City'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.

### **1.3 Expected Behaviours**

#### **Tell the Truth**

Work and relationships require trust. The City, 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.

#### **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 responsibilities and preserve the City's collective reputation.

#### **Uphold the law**

The City's operations are subject to laws and regulations. The City's Policies, By-laws, Management Directives and Standard Operating Procedures comply with legal and regulatory obligations, with the intent and in the spirit of the laws that apply. This helps the City preserve its reputation for acting responsibly and with integrity. Breaking the law could result in civil, criminal and regulatory penalties, including fines for the City and the individual involved.

#### **Respect other professional Codes of Conduct**

Some employees may be accountable to uphold the principles of other professional codes of conduct (e.g. accountants, lawyers, engineers, planners, 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 leader or Human Resources.

#### **Comply with policies and procedures**

All employees are responsible for knowing, understanding and following the City's policies, directives, standard operating procedures, and guidelines that apply. Employees will comply with a leader's directive unless it is contrary to the City's Values, policies, against the law or may result in health or safety risks. Employees must always be aware of the policies and procedures specific to their business and work within the boundaries of what they have the authority to do.

#### **Conduct at Council/Committee Meetings**

During Council and other meetings where employees are representing the City, employees shall conduct themselves with decorum by adhering to the City's Procedural By-law as amended from time to time. Respect and courtesy will be provided to delegations, Council members, other staff, and members of the general public. Employees shall make best efforts to ensure that Council is well informed on matters before them through reports and, as necessary, through verbal clarifications at the meetings. Each employee has a responsibility to ensure that such decorum occurs, both through their own conduct and by bringing to the attention of the

CAO any offensive conduct that is observed.

## **1.4 Supporting the Community**

Employees support the communities where they live, work and do business. The City's Values and the Code serve as the foundation for behaviour when employees represent the City at work or in communities. Employee behaviour should be beyond reproach in all dealings and particularly for the community served. The City takes pride in all contributions, and encourages employees to volunteer and participate in the community (e.g. charitable food drive).

## **1.5 A Shared Commitment**

The Code of Conduct applies to everyone, 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 City, its operations, and its employees.

## **1.6 Consequences of Non-Compliance**

Anyone who breaches the Code of Conduct, or fails to report an actual or potential breach of the Code of Conduct is subject to corrective action. Corrective action is the City's response to unacceptable behaviour and can range from 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.

## **1.7 Responsibilities for Leaders**

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

- Modeling appropriate behaviours that are consistent with the Code and City Values
- Fostering a positive work environment in which only legal, ethical, responsible and appropriate behaviours are acceptable
- Promoting team awareness and understanding of the City's Code, Values, policies and procedures to ensure ongoing compliance
- Identifying and mitigating ethics and compliance risks
- 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
- Managing conflict of interest situations to achieve fair and appropriate outcomes
- Promptly escalating concerns and reports of actual or potential misconduct and following up to ensure they are addressed

# **2. Speak Up, Raise Concerns and Report Misconduct**

## **2.1 Speaking Up and Raising Concerns**

The Code and City policies explain the ethical behaviours that the City expects of employees however, they cannot anticipate every situation that employees may encounter. The City takes violations of the Code very seriously so, "Speak Up" and raise concerns to ensure that employees, the community, and the City's reputation are protected. The City will address all questions and concerns.

## **If feeling unsure**

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 City policy, procedure or law. Use the City's Values and the Code to inform best judgment, and when in doubt, seek clarification from a trusted leader, or Human Resources in times of uncertainty.

If there are doubts, ask these questions:

- *Is it legal?*
- *Does it comply with City policies, directives and by-laws?*
- *Is it in line with the City's corporate values?*
- *Would I be comfortable if my actions were made public?*
- *Would it be okay if everyone did it?*

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 someone for help.

## **2.2 Reporting Misconduct**

Every employee has a duty to report actual or suspected misconduct, even one's own. Employees must immediately notify the Employer of misconduct that includes violations of the Code, policies and the law.

- 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.
- If an employee becomes aware of a breach of the Code or any other situation that could place the City at risk of loss or harm, they must report it immediately.

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

## **2.3 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 City will make every effort to protect the confidentiality of the investigation.

## **2.4 Commitment to Non-Retaliation**

There will be no retaliation for 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, demotion, recommending dismissal, or assigning tasks with the intent to isolate or discourage someone.

- If an employee encounters any form of retaliation, report it to a leader or Human

Resources immediately. The City commits to investigate every claim of retaliation and to take disciplinary action if necessary.

**Consider this when deciding to speak up and raise concerns:**

- Does this situation support the City's Values of accountability, respect and teamwork?
- How would residents, colleagues or business partners view this situation?
- Would the City's reputation be damaged if this situation became public knowledge?

**Find more information at:**

[MD2016-013 Workplace Violence and Harassment Management Directive](#)  
[Draft MD2022-xx How to Report Concern or Misconduct](#)

## **3. Protect Information and Interests**

### **3.1 Protecting Confidential Information**

The City's information assets are public property. The City 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.

- 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 City if improperly disclosed. This includes information communicated in confidence.
- Personal information means any information that would identify a specific individual. The City uses the detailed definition provided in the [Municipal Freedom of Information and Protection of Privacy Act](#).
- The inappropriate disclosure of confidential information may result in financial and / or reputational harms and may constitute a privacy breach.
- Confidential information including personal information, should only be accessed and used by staff, when required for legitimate business purposes, and only for the period required to achieve those business purposes.
- Every employee has a responsibility to secure confidential information from the risk of theft, loss, misuse or inappropriate disclosure.
- In the event of a privacy breach or improper disclosure, employees must comply with the City's privacy policies and directives.
- Employees must report a potential or actual breach to the Deputy Clerk, Legislative Services, and refrain from sharing details of the breach with anyone who does not have a business need to know.

### **Protecting Customer Information**

The City's customers are residents, business partners and anyone that interacts with the City. Customers share personal information with the City and expects the City to protect their privacy. Employees will only share information about customers with their consent, and even then, only for a legitimate business purpose.

Every privacy breach results in a loss of public trust. Employees will always take the proper precautions when collecting, using and sharing information about the City's customers.

Employees must always be mindful and take care not to be overheard, leave information visible, behind, or unsecure when working in public spaces.

### **Protecting the City's Information**

The City'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.

#### **Remember this when protecting information:**

- Privacy protection is everyone's responsibility
- Complete a Privacy Risk Assessment for any new or modified program, service or technology that collects or uses personal information
- Limit the collection and use of personal information
- Don't keep records longer than required, comply with the Records retention by-law, and ensure records are securely destroyed

#### **Find more information in:**

[C134CAO026 Confidentiality of Information Policy](#); [CP2021-036 Access, Information, and Privacy Policy \(MFIPPA\)](#); [C135CAO027 Records Management and Electronic Service Delivery Privacy Standard Policy](#)

### **3.2 Responding to the Media**

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 City's reputation. The City's Communications, Advertising and Marketing (CAM) division is responsible for the coordination of all communications with the media on behalf of the City. Only those with the proper authority may communicate with media on the City's behalf. Refer all media inquiries to CAM.

### **3.3 Using Social Media Responsibly**

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.

- The City expects employees to realize that social media is not an appropriate avenue to express personal concerns about the City, colleagues or City business.
- 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 City.

#### **Official Use**

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

#### **Personal Use**

Share, comment and repost City news in ways that honour the Code and reflect the City's Values. Always consider the potential impact of personal posts to the City, colleagues, and the community.



**Consider this when using social media:**

- Safeguard personal and professional reputations
- Be respectful—words are public and permanent
- Confidential, non-public information relating to the City, customers, employees or other persons or business must never be a part of our social media conversations
- Personal opinions are not the position or view of the City of Kawartha Lakes
- Be clear and purposeful in communication
- Share the City's great news, stories and events

**Find more information in:**

[MD2018-002 Social Media Management Directive](#); [MD2018-003 Media Relations Management Directive](#)

**3.4 Acting Responsibly**

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

## **4. Foster a Safe and Healthy Workplace**

**4.1 Valuing Everyone's Health and Safety at Work**

The City is committed to providing a physically and mentally safe work environment through a culture of responsibility and accountability at all levels—employees, leaders and senior leadership. All employees share the responsibility to make health and safety a daily priority. Each employee must adhere to health and safety rules and practices that apply to their jobs, and for taking the necessary precautions to protect colleagues, visitors, and themselves.

Employees foster an active health and safety culture by:

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

**Set an example for a safe and healthy workplace:**

- Ask questions when unsure about something
- Volunteer to become a worker member of a Joint Health and Safety Committee
- Help your health and safety representative or Joint Health and Safety Committee with health and safety inspections by pointing out possible hazards in work areas
- Take the health and safety training seriously and put it into practice on the job

*(adapted from the Ontario Ministry of Labour)*

**Find more information in:**

[CP2016-010 Occupational Health and Safety Policy](#)

**4.2 Be Fit for Work**

To ensure a safe workplace and prevent potentially dangerous situations, employees perform work safely, and at an acceptable standard, without limitations due to injury, illness, fatigue, or the use of (or after effects of) a substance, or other condition (physically or mentally) that may impair performance. Employees must report to their jobs, fit to work (and remain as such) while conducting City of Kawartha Lakes business.

- Employees will attend to job responsibilities free of any influence from alcohol, cannabis, illegal drugs. Employees taking prescription drugs or over-the-counter drugs with strong side effects should inform their leaders that a medical accommodation may be necessary.
- Illegal drugs or other controlled substances are not permitted and cannot be brought onto City property or work sites.
- Immediately report any abuse (or suspicion of abuse) of alcohol, cannabis, drugs, or an illegal substance to a leader and / or Human Resources.

#### **EFAP can help:**

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 City has resources to support health-related concerns through the Employee and Family Assistance Plan (EFAP).

#### **Find more information in:**

[MD2016-008 Attendance Support Program Management Directive](#); [MD2019-006 Substances Causing Impairment Management Directive](#)

### **4.3 Preventing Workplace Violence**

The City 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.

- Employees are all responsible for maintaining a workplace free from violence and commit to supporting employees who are victims of violence.
- The City has zero tolerance for violence in the workplace and expects everyone to act appropriately in all dealings with others.
- Immediately report instances of violence or attempted violence to a leader and / or Human Resources.

#### **Help create a healthy workplace:**

- Address conflict in a constructive and positive way
- Support colleagues who are dealing with challenges
- Speak up when witness to disrespectful behaviour

#### **Find more information in:**

[MD2016-013 Workplace Violence and Harassment Management Directive](#)

## **5. Treat People with Care**

### **5.1 Maintaining a Respectful Workplace**

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.

- Employees will foster an atmosphere of congeniality and support. Employees will be

honest, polite and courteous when dealing with people, including the public, Elected Officials, and colleagues.

- The City 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.
- Employees (and the City) have zero tolerance for harassment, sexual harassment, bullying, discrimination, disrespect, and inappropriate behaviour under any circumstance.
- Immediately report any instances of harassment or discrimination to leaders and / or Human Resources.

**Be part of a respectful workplace:**

- Show professionalism, courtesy and consideration in everything—from action to presentation—personal choices of expression should not be demeaning or threatening
- Avoid gossip or sharing information that is not true or not to share
- Do not touch someone if it is unwelcome or uninvited
- Avoid jokes that are hurtful or belittling
- Refrain from posting or sending inappropriate messages to (or about) anyone
- Make decisions that promote a respectful and inclusive workplace

## **5.2 Strengthening Diversity, Equity and Inclusion**

The City 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 any unacceptable behaviour.

- Employees accept, respect and value individual differences within the workplace and commit to equitable opportunity for advancement and growth.
- 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.
- Unconscious (or implicit) bias is a term that describes the associations we hold, outside our conscious awareness and control. Unconscious bias affects everyone. Unconscious bias is triggered by our brain automatically making quick judgments and assessments.

**Be more diverse and inclusive:**

- Learn about unconscious bias and engage in self-reflection to uncover personal biases
- Tell stories...and listen to the stories of others
- Avoid stereotypes and over-generalizations
- Separate feelings from facts
- Have a diverse group of people around the decision-making table
- Develop safe and brave spaces and be an active ally
- Practice patience and empathy

**Find more information in:**

[Draft MD2022-xx How to Report Concerns or Misconduct](#)

[MD2016-013 Workplace Violence and Harassment Management Directive](#)

[M-HR-017 Human Rights Policy – Employees](#)

## 6. Conduct Business with Integrity

### 6.1 Preventing Fraud

The City takes fraud—and the threat of fraud—very seriously and commits to deter, detect, report, and correct fraud. The City expects everyone to be honest, without bias, without favour, and without outside/personal interests conflicting with work decisions. Recognize the signs and immediately report any unusual activity using the ‘How to Report Concerns or Misconduct’ process. There is no risk of reprimand, penalty or discipline for reporting suspect behaviour or fraud in good faith or for participation in a fraud investigation.

#### **Some examples of fraud include:**

- Providing a benefit or service to someone who does not qualify
- Failure to disclose an actual or potential conflict of interest
- Accepting bribes or kickbacks
- Carrying on personal business during City of Kawartha Lakes work hours using City resources
- Forgery or alteration of a cheque, document, or account belonging to the City

#### **Find more information in:**

[Draft MD2022-xx How to Report Concerns or Misconduct](#)

### 6.2 Avoiding Conflicts of Interest

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

Employees have a duty to set aside personal views and focus on what is best for the City and the public. For that reason, employees have an obligation to disclose any actual or potential 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 City expects that employees immediately disclose conflicts and manage them appropriately.

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

#### **Outside Interests**

Employees all have interests outside of the City (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 City 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.

#### **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 City to seek personal benefit or

further the interests of those whom they have personal relationships or business associations. Employees will disclose any relationships that present a conflict or potential conflict of interest.

### **Political Activity and Support**

If someone chooses to participate in political activity, it is a personal choice and it is not as a representative or on behalf of the City.

- Employees must never use their affiliation with the City to market or advance their personal political activities, and must ensure that personal activities and political associations will not influence, affect or compromise the obligations of their job with the City.
- Employees will be politically neutral in their work for the City, and be sensitive to maintaining a civic service that is non-partisan.
- The promotion of other causes and issues—including charitable initiatives—requires approval by the proper authority.
- Employees will disclose any political activity or affiliations that present a conflict of interest.

#### **Some examples of conflict may include:**

- A supervisory relationship with a family member or someone held in a close personal relationship
- Selecting a friend, family member, or outside business associate as the vendor to supply products or services to the City, outside of required City processes
- Giving favours to friends, family or outside business associates

#### **Find more information in:**

[CP2021-002 Recruitment Policy](#); [MD2016-003 Recruitment Management Directive](#)

### **6.3 Managing Gifts and Entertainment**

In business, it is common to foster relationships through the exchange of courtesies such as meals, gifts and entertainment. Gifting may also relate to customary protocol, social obligation, and etiquette. Regardless of the circumstance, the gifts and entertainment employees accept must not have the intent or design to influence their business decisions or judgement on behalf of the City. Similarly, employees must never give gifts with the intent of influencing a business decision or outcome.

#### **Gifts**

Gifts are anything of value given or received in relation to City business. Employees may only give or accept gifts that are customary, modest and culturally sensitive.

- Employees may accept gifts from the City of Kawartha Lakes through offer or award. Employees may also accept a token of appreciation for attending or speaking at an event, conference or meeting hosted by a professional or government organization. Employees may also receive gifts for promoting Kawartha Lakes in an official capacity as an Outbound or Inbound Delegation (e.g. an invitation from a guest or dignitary to employees travelling outside of Kawartha Lakes, or an invitation to a guest or dignitary from Kawartha Lakes, respectively).
- Employees will disclose gifts with a value of \$50 or more to the City's Treasurer. Employees will graciously decline a gift(s) and return it to the giver or donate the item to a charity in need—do not use it in a fundraising draw or for lottery purposes, unless proceeds go to a registered charity such as the United Way.
- Employees will only accept discounts on goods or services when it is the general

business practice of the City to provide discounts (e.g. on transit, theatre tickets, etc.)

- Employees will not enter draws, giveaways etc., at trade shows and professional organizations where the supplier of the prize or giveaway is a potential or existing supplier and / or customer of the City.
- Employees must never solicit gifts of any value at any time.

## Entertainment

Entertainment includes any event that we host or attend for business related purposes. Common examples may include meals, invitations to sporting events, theatrical performances and educational events. Entertainment should always be in good taste and consistent with usual business practice. Entertainment must not seem excessive or inappropriate. If unsure, consult with a leader or Human Resources before accepting an invitation.

Gifts and entertainment must not create a sense of obligation for either party. Employees may not accept, offer or give—directly or indirectly for ourselves or anyone else—gifts, entertainment or other benefits of value that are not reasonable and appropriate under the circumstances.

### Think about this...

If a gift, invitation, or other benefit is offered, with the expectation of influencing an employee in duties performed or decision made, then it is considered a bribe, not a gift.

## 7. Safeguard Our Assets

### 7.1 Using City Property Responsibly

The things used at the City or created for the City, belong to the City. Employees must ensure that the City's Property—physical, intellectual and technological—are used properly and reflect a balance between the obligations to the City and to employees.

- Employees are responsible to protect and secure any City Property from theft, fraud, harm, loss, misuse, especially those that are in an employee's custody or control, and are their responsibility.
- In general, employees should not use City Property, technology, employees or other resources for activities other than the business of the City.
- Where personal use of City Property occurs, it must never result in direct expenses being paid for by the City, or impede conducting business for the City.
- Employees must never use City Property for illegal activity or for any purpose that might be considered offensive.

### Defining 'City Property':

**Physical property** – means vehicles, furniture, tools and equipment, etc.

**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 City—it may be legally protected by a copyright, patent, trademark, etc. (e.g. logos, presentations, audios / videos, etc.)

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

### Find more information in:

[MD2018-024 Information Systems Management Directive](#)

### 7.2 Managing Expenses Responsibly

As stewards of City 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.

Employees are required to comply with the requirements set out in the City's expense policies, including claiming only reasonable expenses actually incurred for City business.

- Employees are accountable to follow authorization limits when authorizing expense commitments, transactions, or employee claims for reimbursement.
- Employees must not use a corporate purchasing card for any purpose other than for proper City business expenses and must manage the card in accordance with applicable policies and procedures.

Ethical purchasing practices are required in a public corporation and must be administered by everyone who has purchasing responsibilities.

- Employees are accountable to the City's Purchasing Policy, Management Directives and associated standard operating procedures. When questions or challenges arise, contact the Purchasing division for assistance.

#### **Find more information in:**

[MD2016-001 Employee Expense Management Directive](#)

[MD2021-002 Purchasing Management Directive](#)

### **7.3 Managing Risk**

Employees may encounter situations where they are expected to act or make difficult decisions under uncertain circumstances. To challenge this, employees will continuously strive to innovate and develop solutions to identify and mitigate risk more effectively—that is, limiting the impact of risk, so that if it does occur, the problem it creates is smaller and easier to fix.

- To help minimize actual risks—employees are responsible for identifying, assessing and presenting potential risks to leaders for recommended actions
- Leaders are responsible for consulting with others including the Department Director or Chief, the Chief Administrative Officer, legal counsel and the division of Insurance and Risk when assessing risk to the organization

## **8. Administration of the Code**

### **8.1 Acknowledgments and Renewals**

As a condition of employment, and at the time of hiring, employees will sign an Acknowledgment certifying that they have read, and that they understand the code and their associated responsibilities as a result.

Each term of Council, employees will complete an Acknowledgment certifying that they have re-read and continue to understand their responsibilities arising from the Code.

Employees have the ability to ask questions at any time they are unsure of the Code, an interpretation or their responsibilities.

### **8.2 Code Interpretation**

If there is any need for interpretation under the Code of Conduct, the head of Human Resources is responsible for rendering a decision.

### 8.3 Review and Approval

The Code is reviewed regularly at least every four (4) years and approved by senior leadership and Council.

#### Revision History:

Proposed Date of Review:

| Revision | Date | Description of Changes | Requested By |
|----------|------|------------------------|--------------|
|          |      |                        |              |