

TOWN OF THREE RIVERS

Code Of Conduct Policy

Policy Number: TRHR-10

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Approved By: Council

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INTEGRITY

The affairs of the Town of Three Rivers are to be conducted with complete integrity at all times. Integrity encompasses honesty, fairness, discretion, good judgement and accountability in all undertakings.

COMPETENCE

Employees are expected to conduct their work in a conscientious, diligent and efficient manner. They should ensure that they are competent to undertake the tasks entrusted to them. Through continuing education and professional development, they should strive to maintain their professional skills at the highest possible level.

PROPRIETARY OR CONFIDENTIAL INFORMATION

Disclosure

Employees have a duty to hold in confidence all information concerning the affairs of the Town of Three Rivers acquired in the course of their employment and must not disclose such information without the express consent of the CAO or as required by law.

These are some examples of information which must be held in confidence unless and until it is officially released by the Town of Three Rivers:

- information concerning the status or progress of projects in which the Corporation is involved;
- data concerning competitive quotations;
- prices the Corporation paid or received for property, goods and services;
- salary, wage and benefit information;

- major changes in the Corporation's organizational structure.

Although this principle does not apply to facts that are public knowledge, employees should avoid participating in or commenting upon speculation concerning Municipal business.

All requests from the media for comments or information should be referred without comment to the Corporation's senior management.

Use

Employees must not use their position, or any confidential or proprietary information gained from employment to derive a benefit for themselves, their families, or others.

Employees have a duty not to appropriate to themselves or divert to others any business opportunity in which they know as a result of their employ with the Corporation.

INSIDER AND OTHER TRADING

Employees who through their employment acquire information that has not been publicly disclosed and could reasonably be expected to affect the value of securities of any other corporation or of any property must not for themselves, family, friends or others, on the basis of the undisclosed information, purchase or sell such securities or property or recommend that others do so.

CONFLICTS OF INTEREST

Employees must not, without adequate disclosure to and the consent of the Corporation, participate or continue to participate in any business, financial or other relationship where there is or is likely to be a real, potential or apparent conflict of interest. A conflicting interest is one that would be likely to affect an employee's judgement or actions on behalf of or loyalty to the Corporation.

Employees have a duty to act at all times with the utmost good faith in the best interests of their employer. Employees must guard against allowing their independent judgement to be influenced by self-interest or by the interest of persons closely related to or associated with them. Even the appearance of impropriety must be avoided.

The following are some examples of relationships likely to involve a conflict of interest:

- acting as a consultant to, or as an agent, representative or employee of a competitor, supplier, contractor or subcontractor of the Corporation;

- deriving any remuneration such as commissions, share of profits or other benefit from any person or firm which does or seeks to do business with the Corporation;
- ownership by the employee or a member of his or her immediate family of a financial interest in a supplier, contractor or subcontractor (other than non-material investment in publicly traded companies). "Immediate family" includes the employee, his or her spouse, their children and their parents, brothers, sisters, and any person living in the employee's home;
- acting as a director, officer or partner of a competitor, supplier, contractor or subcontractor;
- conducting business on behalf of the Corporation with a supplier, contractor or subcontractor of which a member of the employee's immediate family is an employee, agent, director, officer or partner;
- accepting gratuities from a supplier or customer (except as permitted herein);
- using or communicating inside information for personal gain.

Any employee who believes that a conflict of interest exists or might exist should immediately stop the activity in question and disclose it at the earliest opportunity to the CAO of the Town of Three Rivers who will determine if there is a conflict and whether or not the employee can resume that activity.

OUTSIDE INTERESTS

Employees who engage in another profession, business, occupation or other activity concurrently with their employment with the Corporation must not allow those interests to interfere with their Municipal job responsibilities or to compromise their professional integrity, independence or competence.

GRATUITIES

Employees shall neither give nor receive gratuities designed or that may be perceived by others as designed to influence a business decision. Gratuities include gifts, services, favours, meals, pleasure or vacation trips, entertainment or anything else of value or benefit to the recipient.

Employees may give and accept meals, refreshments and entertainment if reasonable, provided in the proper course of business and not of such a nature that they might reasonably be perceived by others as improper inducements. Employees may give and accept advertising items and other minor gifts or favours

that are customary in the proper course of business if unsolicited and of nominal value. The offer or acceptance of a gift in cash or cash equivalent in any amount is strictly prohibited.

Certain employees in particular should take special care to avoid any possible appearance of having offered or received an improper inducement. These include employees involved in:

- placing purchase orders with suppliers, contractors or subcontractors;
- selecting, recommending or approving suppliers;
- receiving, testing, inspection or quality assurance functions;
- evaluating vendor proposals, paying vendor invoices or collecting money from customers;
- the management of contracts or the settlement of disputes or claims.

EQUAL OPPORTUNITY

The Town of Three Rivers is an equal opportunity employer. Employees are expected to treat one another with dignity and respect, irrespective of age, race, colour, marital or family status, sex, religion, and nationality, place of origin, ancestry or disability. All employees are to promote a fair and respectful work environment, free from discrimination and harassment.

MUNICIPAL PROPERTY AND INTERESTS

Employees are trusted to exercise due care when using the property of the Corporation and others and to observe all applicable laws and Corporation policies respecting the protection of that property.

Employees are expected to respect Corporation facilities, equipment and supplies, including computer time, software and long-distance telephone service. Such property should not be used for other than Corporation business without management approval.

Expense reports must be prepared honestly, accurately and completely and should only include proper expenditures incurred in performing Corporation business.

Employees have a duty to protect the interests and reputation of the Town of Three Rivers and to refrain from doing anything that would cause loss or damage to the Corporation or attract adverse comment from others.

SECURITY

Every employee should be aware of and comply with all security procedures applicable to the secrecy, protection and handling of information and material produced or controlled by or in the possession of the Corporation to which the employee has access.

Employees should act promptly to remedy any situation that might compromise the Corporation's ability to safeguard the Corporation or third-party information.

INTERPRETATION OF THIS CODE

If any employee is unsure about whether something is prohibited or required by this Code, he or she should seek advice from senior management.

REPORTING VIOLATIONS

Departures from proper conduct by an individual reflect adversely on the integrity of the Corporation as a whole. Evidence of minor transgressions may, on investigation, reveal a more serious situation or indicate the beginning of a course of conduct that could lead to more serious violations in the future.

It is therefore proper for, and indeed an obligation of, Municipal employees to report violations of this Code to senior management. The identity of the person making the report will not be revealed except as required to investigate the matter as required by law. Any such report made in bad faith or with malice or ulterior motive will result in prompt and appropriate disciplinary action. Any employee who retaliates against another for reporting a violation or suspected violation will be subject to disciplinary action.

DISCIPLINARY ACTION

Any violation of the principles contained in this Code or any conduct that reflects adversely on the Town of Three Rivers or on the employee's integrity or professional competence may result in disciplinary action.