

Standards of Ethical Business Conduct for British Columbia Lottery Corporation Employees

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Glossary of Terms

In these Standards:

Accountability

Means BCLC manages responsibilities according to a set of common public sector principles transparently and in the best interests of the citizens of British Columbia.

Assets

Means physical and intellectual property (including rights in information) managed by BCLC.

Associate

Means a person with whom an employee is connected in some enterprise or business.

BCLC

Means British Columbia Lottery Corporation.

Confidential Information

Means any information whether in oral, written, graphic, electronic or other form, including Personal Information and/or business information, that ought to be treated as confidential, whether or not that information is marked as confidential.

Contact Information

Means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual.

Contractor

Means an individual engaged to provide professional services at BCLC's premises for extended periods, and is either supplied by a third-party agency based on a required skillset or retained directly by BCLC under an executed commercial contract for services.

Cost Consciousness

BCLC is committed to continual improvements to our operational efficiency and effectiveness to optimize and manage the costs of our business.

Corporate Computing Resources

Means BCLC-owned or managed assets, including information technology systems and related applications, data equipment, buildings, offices and paper files.

Crown corporation

Means a corporation operating as an agent of the government of British Columbia.

Declaration Form

Means the Declaration of Actual or Perceived Conflict of Interest form in Appendix B of these Standards.

Executive

Means the persons who hold the title(s) of President and CEO, Chief Financial Officer, Chief Information Officer or Vice President.

Family Member

Means a person who is:

- A spouse (including common law); or
- A parent or child; or
- Anyone who regularly resides with you.

GameSense

Means BCLC's brand associated with responsible gambling programs.

GCA

Means the *Gaming Control Act* (British Columbia).

GPEB

Means Gaming Policy and Enforcement Branch.

Manager

Means the person to whom you directly report.

Personal Information

Means recorded information about an identifiable individual other than Contact Information.

Physical Assets

Means tangible property including but not limited to buildings, offices, furniture, office supplies, gaming equipment and products, computer hardware, peripherals, computer software and communications devices owned or managed by BCLC.

Player Facing Employee

Means an employee whose job responsibilities include direct delivery of customer services to patrons/customers or has a reasonably high potential for patron/customer interaction.

Retailer

Means a BCLC lottery retailer and includes its employees and volunteers who are authorized to operate a lottery terminal or are involved in the handling, selling and/or validation of lottery products.

Service Provider

Means a contracted supplier of operational services to BCLC at gaming facilities.

Understanding Our Ethical Promise

At BCLC we depend on public confidence in the security of the systems and the people involved in providing our products and services. We therefore need to conduct our business with the highest level of honesty and integrity.

As a Crown corporation, we represent government in our actions. Our actions are subject to British Columbia's *Gaming Control Act* under which each employee is registered.

Our Standards of Ethical Business Conduct embeds our core values of:

- Integrity: The games we offer and the ways we conduct business are fair, honest, transparent and trustworthy.
- Social Responsibility: Everything we do is done with consideration of its impact on and for the people and communities of British Columbia.
- Respect: We value and respect our players, partners and our people.

These Standards reflect BCLC's values and beliefs and we require every BCLC employee to fulfil our ethical promise to conduct our business with professionalism, honesty and integrity at all times.

We recognize that business situations are, at times, complex and that the right decision or action may not always be clear. These Standards form a framework that is designed to assist employees in making the right decision. You are responsible to find out or ask for direction from your Manager if you are unsure whether an action may be unethical, in breach of these Standards, or if you have concerns or questions with respect to these Standards.

These Standards apply to all BCLC full-time, part-time, temporary and on-call employees. It is expected that the spirit and intent of these Standards will be adhered to by those who enforce it and those who are guided by it. They are being shared with every employee and each of you is asked to confirm your understanding and commitment to these Standards on a regular basis. You should feel it is your duty to BCLC and your fellow employees to report any situation where you believe these Standards are breached. Through these Standards and its [Whistleblower Policy](#), BCLC provides direction and assurance of a safe environment for you to do so.

Underpinning BCLC's commitment to responsible corporate citizenship, these Standards set guiding principles on integrity and ethics in business conduct. They govern BCLC's business decisions and actions and apply equally to corporate actions and to the behaviour of individual employees in conducting BCLC's business.

These Standards, which have been adopted and approved by BCLC's Board of Directors, are reviewed on a regular basis and revised as necessary.

I am confident that these Standards of Ethical Business Conduct will help each of us to fulfil our ethical promise.

Jim Lightbody
President & CEO
BCLC

Our Shared Responsibilities

IT'S THE LAW

BCLC shares the responsibility of maintaining the integrity and high standards of the gaming industry with Gaming Policy and Enforcement Branch (GPEB). All employees are required to be gaming workers registered with GPEB and maintaining this registration is a condition of employment with BCLC.

Your obligations as a registered gaming worker include, but are not limited to, the requirement to promptly report to GPEB and your Manager in writing if:

- your name has changed;
- you are under criminal investigation or are charged or have charges pending in relation to a criminal matter; or
- a civil suit involving allegations of fraud, theft, deceit, misrepresentation or similar conduct is commenced against you.

How to report is explained in the “Conditions of Registration” section of [GPEB’s registration form](#).

You are not expected to have detailed knowledge of all laws and regulations that apply to BCLC; you are expected to comply with the basic legal requirements in your areas of accountability. If you are ever in doubt of the application or interpretation of any law, please refer the matter to your Manager or Legal Services.

Although BCLC conducts its business in British Columbia, there are instances where the laws and regulations of other jurisdictions will apply to our activities. In these cases, employees are expected to abide by the national and local laws of host nations and communities.

MANAGEMENT’S RESPONSIBILITY

Executives, directors and managers play a leadership role in upholding these Standards at all times and must:

- ensure that all employees who report to them have received and reviewed these Standards;
- create and maintain a workplace where ethical conduct is supported and employees are able to comply with these Standards;
- ensure an appropriate mitigation strategy has been implemented and documented (using Appendix B) for all employees who have identified an actual or perceived conflict;
- notify Procurement of all employee actual or perceived conflict of interests declared with a vendor;
- all electronic and hard copy declaration forms should be destroyed once the original has been sent to Human Resources;
- respond immediately to allegations or observations of any breach of these Standards by:
 - taking reasonable measures to resolve the issue if it is within his or her level of authority to do so;
 - implementing preventive measures or corrective actions within his or her level of authority in order to reduce the risk of future breaches;

- providing written notification to his or her supervisor of the incident and the resolution or corrective action implemented, if it is determined that an employee engaged in unethical conduct;
- promptly following the appropriate escalation process set out under “Raising Questions or Concerns” below if the matter requires action above his or her level of authority; and
- taking the necessary steps to promote a safe environment for employees who report a violation of these Standards.

EVERY EMPLOYEE’S RESPONSIBILITY

As a BCLC employee, it is your responsibility to:

- learn, understand and comply with these Standards, and BCLC policies, requirements and directives;
- successfully complete to BCLC’s standard any and all mandatory training as directed by BCLC in [Appendix C](#) to these Standards;
- avoid any situation where you would request or enable another BCLC employee to violate these Standards or any BCLC policy, requirement or directive; and
- cooperate truthfully and fully with any inquiry into a violation of these Standards or any BCLC policy, standard, guideline, directive or other requirement.

Failure to comply with these Standards may lead to disciplinary action as per BCLC’s [Progressive Discipline Policy](#), which may include termination of your employment.

Note: In the event of a discrepancy between a BCLC policy and these Standards, these Standards shall prevail.

RAISING QUESTIONS OR CONCERNS

BCLC does not permit retaliation of any kind against employees who, in good faith, bring forward allegations of a breach. You are encouraged to bring forward questions, concerns or reports about behaviour that you suspect to be in breach of these Standards or that you suspect is illegal, unethical, unsafe, a significant danger to the environment, or fraudulent. All allegations of breaches of the Standards will be considered for further investigation.

If you have questions or concerns about the content of these Standards, please discuss them with your Manager or your Human Resources Advisor.

If you have questions or concerns about the conduct of any BCLC employee, including any suspected breach of these Standards, you are encouraged to discuss the matter with your Manager first.

If you have questions or concerns about the conduct of any BCLC Service Provider, Retailer or Contractor, including behaving unethically or fraudulently in respect of BCLC, you are encouraged to discuss the matter with your Manager first.

If you believe a matter requires a resolution and it has not been reasonably resolved by your Manager, or if the matter is one which you feel unable to discuss with your Manager, then you may escalate the matter to a member of senior management in the affected division.

However, it is recognized that not everything can, or should, be resolved by the process described above. For more serious matters, including those you feel cannot be resolved by the process described above, please see BCLC's [Whistleblower Policy](#).

Whistleblower Policy

BCLC is dedicated to the highest possible standards of honesty, integrity and accountability. BCLC's [Whistleblower Policy](#) is designed to protect the interests of BCLC and its employees. It sets out a process to report concerns where:

- you believe something is seriously wrong at BCLC, such as unethical or unlawful activities;
- you feel that a member of the BCLC Executive may be involved in unethical or fraudulent activity; or
- you have concerns you feel will not be kept in confidence.

This policy will provide you with direction on how and where to report such concerns with the confidence that your report will be acknowledged and taken seriously. Most importantly, this policy is designed to eliminate any fear you may have about voicing *bona fide* concerns. The policy also provides assurance that persons doing so will be protected from possible victimization.

CONFIDENTIALITY

All concerns brought to BCLC's attention under the Whistleblower Policy will be regarded as confidential. Anonymity cannot be guaranteed, but where requested the employee's identity would only be disclosed if absolutely necessary.

Exemptions from these Standards

An employee may request an exemption from a requirement in these Standards.

In extraordinary circumstances and where it is clearly in the best interests of BCLC to do so, the Board of Directors may grant an employee an exemption from the requirements of these Standards to allow the continuation of circumstances that would otherwise be considered an Actual or Perceived conflict of interest under these Standards or that would be considered a breach of these Standards. Conditions may be attached to an exemption.

If an employee is exempted from a requirement of these Standards for the continuation of circumstances that would otherwise be considered an Actual or Perceived conflict of interest, the employee must refrain from participating in any way in any decision-making respecting the subject matter of the conflict of interest or breach of these Standards, except to the extent specifically authorized in the decision granting the exemption.

BCLC's President and CEO must authorize requests for exemptions to proceed to the Chair of BCLC's Board of Directors. Human Resources establishes internal procedures for employees to request authorization for an exemption.

Employee Conduct

WORKPLACE

We share the responsibility of creating a safe and healthy work environment where everyone is treated with dignity and respect.

BCLC is committed to providing a workplace that is free from harassment and at all times operates in accordance with the Human Rights Code and similar legislation. As such, you are expected to interact with colleagues, players and customers, as well as, Service Providers, Retailers, and Contractors in a professional, respectful and courteous manner. Behaviour that will strain work relationships or contribute to a negative work environment will not be tolerated.

Your concern for what is right should form the basis of all of your business decisions. Always act in accordance with laws, regulations, BCLC's policies and procedures and these Standards.

Dealings with Service Providers, Retailers, and Contractors should be made objectively and in the best interests of BCLC.

Contracts or other formal arrangements with Service Providers, Retailers and Contractors must only be entered into with the appropriate business, finance and legal approvals.

INQUIRIES, COMMENTS OR COMPLAINTS FROM THE PUBLIC

Whether at work or not, you must not respond to a formal inquiry, comment or complaint from a third party regarding BCLC unless it is within the scope of your position to do so.

If you feel it is appropriate, refer the individual to BCLC's Consumer Services department.

MEDIA

It is not appropriate for BCLC's employees to answer questions or provide comments to the media regarding BCLC unless you are authorized to do so. If you receive an inquiry from the media and you are not authorized to respond, you should refer the media to BCLC's Media and Issues Management department.

This policy applies whether at work or not. Keep in mind, as a BCLC employee you are perceived to speak for the company regardless of your intention.

SUPPORTING REFERENCES

[Harassment Policy](#)

[Occupational Health and Safety Policy](#)

[Travel & Expenses Policy](#)

[Purchasing - Bid Process, Thresholds & Policy](#)

[Signing and Spending Authority Policy](#)

[Media Relations Policy for BCLC Employees](#)

Players' Trust

It is critical to BCLC that its players have trust and confidence in the integrity and security of its games and all those involved in them, including BCLC's Service Providers, Retailers and Contractors. Accordingly, BCLC is committed to secure technology, policies and processes to maintain security and integrity.

As an employee of BCLC, it is your duty to:

- be aware of BCLC's initiatives to make certain that all those involved in our games, including Service Providers, Retailers and Contractors treat players fairly and honestly;
- be familiar with GameSense programs so that you can appropriately respond to a player should the situation arise; and
- promptly raise any issues or concerns you may have regarding the integrity and security of our games or their delivery to BCLC management.

Social Responsibility

BCLC has a strong commitment to doing “the right thing” for its employees, its players, the communities in which it operates and the environment. This commitment is reflected in BCLC’s [Corporate Social Responsibility Charter](#) (the CSRC).

The core activity of the CSRC is our commitment to minimizing risks associated with gambling while recognizing the choice to gamble is a personal one.

If your job directly affects delivery of BCLC’s gaming to players, your duty, as a BCLC employee, is to support the development and delivery of BCLC’s products in a socially responsible manner.

SUPPORTING REFERENCES

[Corporate Social Responsibility Charter](#)

[Gaming Policy and Enforcement Branch - Responsible Gambling Standards for the BC Gambling Industry](#)

[British Columbia Partnership for Responsible Gambling](#)

[Corporate Social Responsibility: Playing it Right](#)

Conflict of Interest Guidelines

Integrity, honesty and trust are essential elements of BCLC's success, and BCLC is determined to act and to be perceived as an ethical organization.

There are circumstances in which your private interests may be incompatible with your role at BCLC. These guidelines provide examples of the types of activities or interests that you are required to disclose. Each BCLC employee must complete the Declaration Form and act in accordance with these guidelines.

You should be cognizant that the potential for a conflict of interest may change upon accepting a new role or different position within BCLC.

GENERAL GUIDELINES

Guidelines and rules to avoid conflicts of interest are designed to protect the interests and reputation of BCLC and each employee. You should apply the following guidelines in considering if there is an Actual or Perceived conflict of interest that you may need to disclose:

- An Actual conflict of interest denotes a situation in which you have knowledge of a private economic interest that is sufficient to influence the exercise of your duties and responsibilities as an employee of BCLC.
- A Perceived conflict of interest exists when there is a reasonable apprehension, which reasonable well-informed persons could properly have, that a conflict of interest exists. This applies even when no conflict is actually found to exist.
- The principles underlying conflict of interest rules are impartiality and integrity. As a BCLC employee, you cannot be perceived by the public as being impartial and acting with integrity if you could derive a personal benefit from a decision.
- You must avoid any situation or decision-making in which there is an Actual or Perceived conflict of interest or an apprehension of bias.
- You must not use your position at BCLC to pursue or advance your personal interests, the interest of a family member or an Associate, or the interest of a person to whom you owe an obligation.
- You must not directly or indirectly benefit from a transaction with BCLC over which you can directly or indirectly influence a decision relating to the transaction. You must not take personal advantage of an opportunity available to BCLC unless BCLC has clearly and irrevocably decided against pursuing the opportunity and the opportunity is also available to other employees or the public.
- You must not use your position at BCLC to solicit clients for a business or partnership you are personally involved with, or for a business operated by a family member, close friend, Associate, a corporation in which you or a family member has a controlling interest, or for a person or a person's business to whom you owe an obligation.
- You must disclose any circumstances that could be an Actual or an Perceived conflict of interest.

COMMON SITUATIONS

There are several situations that could give rise to an Actual or Perceived conflict of interest. The most common are accepting gifts, favours or financial benefits from suppliers, close or family relationships

with suppliers, disclosing confidential information or using confidential information inappropriately. The following are examples of these types of situations:

- Influencing BCLC to lease equipment from a business owned by an Associate, close friend or family member.
- Influencing BCLC to make its travel arrangements through a travel agency owned by an Associate, close friend, or family member.
- Acting as a Service Provider or Retailer.
- Situations where you or someone you know would personally benefit from unauthorized disclosure or inappropriate use of information acquired through your employment with BCLC.
- Situations in which you, a family member, close friend or Associate could personally benefit from your influence in BCLC decisions, such as through investments, loans, purchases, sales, contracts, policy, grants and regulatory or discretionary approvals and appointments. This may include:
 - participating or influencing discussions or decisions that directly or indirectly impact a Retailer, Service Provider, Contractor, or investments; or
 - participating or influencing the evaluation, selection or contracting of a Retailer, Service Provider or Contractor.
- Providing oversight of, influencing negotiations with, assessing risk, or performing audits of a Retailer, Service Provider or Contractor with which you have an identified personal, financial or business relationship.

In addition to applying the guidelines outlined above to determine if there is an Actual or Perceived conflict of interest that you should declare, there are specific circumstances in which BCLC requires you to disclose business interests, personal relationships and political activities.

OUTSIDE EMPLOYMENT, BUSINESS INTERESTS AND OTHER ACTIVITIES

You may have alternate employment, participate in a business, or receive funds for personal activities outside your employment at BCLC, provided it does not result in a conflict of interest or negatively impact your work performance at BCLC.

However, you may not hold a significant financial interest, either directly or through a family member or Associate, or hold or accept a position as an officer or director in an organization that has a relationship with BCLC, unless that interest has been fully disclosed and addressed to BCLC's satisfaction. A "significant financial interest" in this context is any interest substantial enough to be perceived to influence the decisions of BCLC or be perceived to result in personal gain for you.

Any significant financial interest circumstances must be disclosed in Section I of your Declaration Form by checking box #2 (if the interest is personal or through an Associate) or box #5 (if the interest is through a family member) and recording the details. Details of any conditions imposed by BCLC must be recorded in Section II of your Declaration Form.

BOARD APPOINTMENTS

We encourage you to participate in your community. However, serving on a board of a 'for-profit' organization or certain societies may be, or perceived to be, a conflict of interest.

You must disclose any such new or existing board appointments by checking box # 6 and recording the details in Section I on your Declaration Form. Through discussion with your Manager and, if necessary, your Human Resources Advisor, it will be determined if there is a conflict of interest with your position. This determination is recorded on your Declaration Form. The details of any conditions imposed by BCLC must also be recorded on your Declaration Form in Section II.

Your board appointment(s) will be evaluated annually with your Manager as part of the annual review of these Standards to either reconfirm there is no conflict or determine if conditions imposed remain appropriate and adequate.

PERSONAL RELATIONSHIPS

Personal relationships outside of work could compromise objectivity or the perception of objectivity. For example, having reporting relationships involving you and another BCLC employee or participating in or being in a position to influence human resources decisions or activities, such as hiring, performance evaluation, promotion or establishment of terms and conditions of employment may present an Actual or Perceived conflict of interest.

You must disclose to your Manager or Human Resources Advisor any personal relationship with a person who is a BCLC employee or Contractor, or is an employee of a Retailer, Service Provider or Contractor if there is an Actual or Perceived conflict of interest. Your Manager will identify if a conflict exists and, if so, immediately implement steps to resolve the conflict or remove the perception that it could exist. Managers may request assistance from Human Resources if unsure whether a conflict exists. Such conflict of interest must be disclosed in Section I on your Declaration Form by checking box #3 and recording applicable details that identify the conflict of interest. Any conditions imposed by BCLC must also be recorded on your Declaration Form in Section II.

If it is determined that your relationship is not a conflict of interest or is not likely to be perceived to be a conflict of interest and does not hinder your ability to act in BCLC's best interests, your disclosure will be acknowledged and recorded in your personnel file.

INVESTMENTS

Through your employment at BCLC you may be a party to, or have influence over decisions or you may be aware of information that is not available to the public. You must always ensure that you are not providing, or being perceived to be providing, a unique investment advantage for yourself or anyone you know based on your access to BCLC information or decisions.

If you have any direct or indirect business relations or direct or indirect investments that are, or could be perceived to be, a conflict of interest, you are required to disclose this information by checking box #1, 2 or 5, as appropriate, and recording the details in Section I of your Declaration Form. Any conditions imposed by BCLC must be recorded in Section II of your Declaration Form.

INTEREST IN THE GAMING INDUSTRY

If you or any family member (as defined below) has any previous or current involvement, financial or otherwise, in the gaming industry in any capacity, you must disclose this by checking box #4 and

adding the details in Section I of your Declaration Form. Any conditions imposed by BCLC must be recorded in Section II of your Declaration Form.

As part of your GPEB registration you are required to disclose to GPEB if:

- your spouse, a parent, sibling or child of you or your spouse, or any relative of you or your spouse residing in your residence is involved in the gaming or horseracing industry in any capacity; or
- you or your spouse, or a parent, sibling or child of you or your spouse, or any relative of you or your spouse residing in your residence has any direct or indirect interest, financial or otherwise, in a gaming service provider.

POLITICAL ACTIVITY

You may engage in political activity in federal, provincial and municipal elections. However, political activity such as canvassing or soliciting funds on behalf of any political party is not permitted in the workplace.

If you run as a candidate in a federal, provincial or any local government election, you must be on an unpaid leave of absence from BCLC, approved by the Vice President, Human Resources. Leave approval is at BCLC's discretion.

If you are elected to either a provincial or federal position, you must immediately resign your position at BCLC. If you are elected to a municipal position, you must disclose this by checking box #7 and adding the details in Section I of your Declaration Form. A leave of absence may not be necessary provided you can ensure that the interests or activities of this political office do not conflict with the interests of BCLC. BCLC may need to place constraints on your employment to ensure there are no conflicts of interest or perception of a conflict of interest. Such constraints must be recorded in Section II of your Declaration Form.

If you have a family member who holds or is elected to a federal, provincial or municipal position, you are required to disclose these details by checking box #7 and adding the details in Section I of your Declaration Form. BCLC may need to place constraints on your employment to ensure there are no conflicts of interest or perception of a conflict of interest. Such constraints must be recorded in Section II of your Declaration Form.

POST EMPLOYMENT RESTRICTION

BCLC's Executives (consisting of Vice-Presidents and the President and CEO) are subject to post employment restrictions. For 12 months following the effective date of a termination or resignation, Executives shall not:

1. Enter into a contract for employment or services either individual or through a sole proprietorship, partnership or corporation with any entity:
 - a. That has a contractual relationship, either direct or indirect, with BCLC in any form of Operational Services Agreement;
 - b. With whom the Executive directly had substantial dealings in the final year of their employment, where such activity would be a direct conflict with the interests of BCLC unless

- the Executive is able to satisfy BCLC that the Executive will not participate in any manner on any matter involving BCLC. For these purposes, “substantial dealings” means that the Executive has had ongoing involvement with that entity in the course of performing their duties for BCLC, or the Executive has been involved in a decision-making role for a work assignment or project for BCLC that impacted the interests of that entity; or
- c. Where their new position would require them to act for the entity in connection with any matter regarding, relating to or involving BCLC.

Other than 1(a) as above, these restrictions apply only to work performed in the Province of British Columbia for an entity operating primarily in the Province of British Columbia.

Executives may seek an exemption from or a reduction in the 12 month restriction by submitting a request to BCLC’s HR&C committee. Upon receipt of a request, HR&C will review the individual circumstance and the degree of interaction with the entity during the Executive’s employment with BCLC. The decision of HR&C will be communicated to the Executive in writing and will be final.

Executives will have access to a third-party resource that will provide free, confidential consultations to executives who are contemplating leaving BCLC and wish to obtain an opinion on:

- a. whether or not their new position would be captured by this restriction; and
- b. the possibility of obtaining an exemption or reduction.

DISCLOSURE

Whether or not a conflict of interest exists, you must complete a Declaration Form and return it to Human Resources within two weeks of the start of your employment. Your Declaration Form will be treated with confidentiality and will be held in your personnel file.

You must annually review and revise if necessary your Declaration Form so that you and your Manager can discuss and address any potential conflict of interest issues. This procedure is part of your performance review.

In addition to the annual review, you must, immediately upon becoming aware of an Actual or Perceived conflict of interest, disclose the conflict to your Manager. This requirement exists even if you do not become aware of the conflict until after a transaction is complete. An updated or new Declaration Form may be necessary.

If you are in doubt whether a situation involves a conflict, you must immediately seek the advice of your Manager. If your Manager is not available, contact your Human Resources Advisor.

Unless otherwise instructed, you and your Manager (or Human Resources Advisor) must immediately identify and implement steps to resolve the conflict or remove the perception that it could exist. Conditions that may be implemented are identified below, under Mitigation Strategies. Managers may request assistance from Human Resources if unsure whether a conflict exists.

Failure to comply with conditions stated in your Declaration Form may lead to disciplinary action, which may include termination of your employment.

MITIGATION STRATEGIES

Each employee's situation will be different, which means you and your Manager may need to devise a custom mitigation strategy. The following strategies are presented to assist BCLC employees and Managers in identifying one or more appropriate conditions that may be imposed to resolve a conflict or remove the perception that one could exist. Employees may be required to:

- declare certain details of his or her conflict of interest and/or mitigation strategy to other BCLC employees, such as Managers of impacted business areas;
- abstain from communicating specific information to another employee, family member, Retailer, Service Provider or Contractor;
- abstain from receiving or accessing specific information;
- seek his or her Manager's prior approval and/or limit use of BCLC's information, time or resources;
- abstain from voting on specific questions or otherwise influencing specific decisions;
- excuse themselves from participating in part or the entirety of specific discussions, meetings, activities, initiatives or projects;
- disqualify themselves from participating in part or the entirety of specific processes, functions or roles (e.g., risk management, audit review, legal consultation or proceedings, policy-making, procurement, staffing and human resource decisions, etc.),
- limit his or her authority to negotiate, approve, spend or sign in specific situations,
- seek Manager's prior approval of outside employment, business interests and other activities;
- limit or discontinue his or her engagement in outside employment, financial or business interests and other activities;
- cease contact or dealings with specific individuals or outside organizations;
- seek legal advice in specific situations;
- avoid competing or accepting specific employment opportunities within BCLC; and/or
- take precautions so they are not perceived as speaking on behalf of BCLC while performing non-BCLC related duties.

BCLC also has a specific mitigation strategy for conflicts of interest arising from hiring relatives, which is addressed in its [Hiring of Relatives Policy](#).

Where a conflict exists with a vendor, Procurement will be notified by your leader of the existence of a conflict.

This is not an exhaustive or complete list of possible mitigation strategies. Mitigation strategies should be tailored to an employee's specific conflict, which may involve imposing other types of conditions not listed above. If you are unsure of what mitigation strategy is appropriate, you should consult with Legal Services.

SUPPORTING REFERENCES

[Hiring of Relatives Policy](#)

[Appendix B: Declaration of Actual or Perceived Conflict of Interest](#)

Entertainment, Gifts and Services

To promote impartiality with Service Providers, Retailers, suppliers or other third parties and to avoid creating implied obligations, BCLC employees may not accept or offer gifts, gratuities, entertainment or services unless they are each less than \$200 in value and are normal and customary given the business circumstances. If you are unsure of what is “normal and customary,” you should consult with your Manager or Human Resources Advisor.

The acceptable total value of entertainment, gifts and services may vary depending on your position with BCLC. Normally the total value would be expected not to exceed \$1,000 annually.

Under no circumstances may a BCLC employee offer or receive cash, preferred loans, securities or hidden commissions in exchange for preferential treatment of a Service Provider, Retailer or supplier. Any employee experiencing or becoming aware of such an offer must immediately report the incident to his or her Manager.

Inappropriate gifts received by a BCLC employee should be returned and, if appropriate, may be accompanied by a copy of the Conflict of Interest Guidelines.

Employee Participation in Gaming

BCLC's policy on employee participation in gaming is intended to manage security, integrity and perception issues with respect to employees participating in gaming conducted, managed or operated by BCLC. This policy does not apply to contests and gaming offered directly and expressly to employees as part of internal BCLC fundraising or promotions.

You are permitted to participate in BCLC gaming within the guidelines of this policy. You are responsible for understanding and complying with this policy as it applies to your role. Requests for clarification should be directed to your Manager or your Human Resources Advisor. You should be cognizant that your gaming participation limitations may change upon accepting a new role or different position within BCLC.

All employees who are eligible to play BCLC games are strongly encouraged to play responsibly. Playing responsibly includes playing in reasonable amounts.

NO PLAY AT WORK

You must not participate in any BCLC games or mobile apps, including accessing PlayNow games, while at work, or from a BCLC computer or network unless specifically authorized in order to facilitate or carry out your duties in the course of your employment. For example, you may be specifically authorized for testing and quality assurance purposes. This applies to participation at BCLC offices and any BCLC gaming facility, and to Lottery personnel who call on locations that sell lottery products during their working hours.

ADDITIONAL LIMITATIONS TO GAMING PARTICIPATION

You and anyone residing with you are disqualified from participating in commercial contests, loyalty programs and promotions associated with BCLC as set out in each contest's conditions.

Below are additional limitations on participating in certain BCLC games outside of work for employees in specific positions. BCLC may also limit any role or position by written directive to the employee's Manager.

Lottery

Employees prohibited from participating in Sports Action games:

- Employees of the Enterprise Sport department;
- Employees of the Sports Action department;
- Members of the Odds Setting Advisory Group; and
- All Directors and above.

Casino, Community Gaming Centre and Commercial Bingo Gaming

Employees prohibited from participating in any games offered in a BCLC casino, community gaming centre or commercial bingo facility:

- Employees working in the Casino and Community Gaming Division;

- Employees whose job function directly supports the technology required to operate games at BCLC casinos, community gaming centres and bingo halls;
- Employees of Corporate Security and Compliance Division; and
- All Directors and above.

PlayNow/eGaming

Employees prohibited from participating in PlayNow games and draws:

- Employees in the Customer Support Centre;
- Employees in the Enterprise Sports Center (for sports betting games);
- Employees whose job function directly supports the technology required to operate the PlayNow site;
- Employees who have player account administrator or adjustment privileges to PlayNow;
- Employees responsible for the management, implementation and analysis of online game content;
- Employees in the Corporate Security and Compliance Division; and
- All Directors and above.

If you are prohibited from participating in PlayNow games and draws, but have been authorized to have access to PlayNow in order to facilitate or carry out your duties in the course of your employment, you will be required to sign a written agreement that amends the PlayNow.com Player Agreement. This agreement must be signed prior to being given an active player account.

BCLC may, at its discretion, amend the conditions for authorizing access at any time and without employee consent by providing written notice through BCLC's intranet website.

Confidentiality

In the course of your duties you will have access to Confidential Information. Protecting Confidential Information is a crucial business practice. That is why you signed a Confidentiality Agreement when you began your employment and are expected to abide by this Agreement throughout and beyond your employment with BCLC.

If you are in doubt about whether information is Confidential Information, you should assume that it is unless otherwise advised by your Manager.

As a BCLC employee, you should safeguard Confidential Information by keeping such information secure and limiting access to only those who 'need to know' in order to do their job. Do not discuss Confidential Information in public areas such as elevators, boarding lounges and aircraft or over mobile phones in public places where you could be overheard.

Do not give out information received through your position that is not available to the general public unless prior authorization is given for its release.

BREACH OF CONFIDENTIALITY

A breach of confidentiality, whether unintended or deliberate, may result in disciplinary action against you as per BCLC's Progressive Discipline Policy, up to and including immediate termination of your employment from BCLC.

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY

BCLC is also required to comply with the information access and protection of privacy requirements established in B.C.'s Freedom of Information and Protection of Privacy Act (FIPPA). FIPPA grants the Office of the Information and Privacy Commissioner the power to audit or investigate BCLC's freedom of information and privacy protection practices and to order changes where there are findings of non-compliance.

Records created by you may be subject to an access to information request and if requested, you are required to provide them to BCLC's Information and Privacy department, who will apply *FIPPA* in BCLC's response to the request.

BCLC and its Service Providers collect Personal Information from many individuals in the course of normal business activity. *FIPPA* outlines the requirements that all B.C. public bodies, including BCLC, must apply to protect Personal Information. BCLC must comply with the provisions of *FIPPA* when collecting, accessing, using, disclosing, storing and disposing of Personal Information.

You are required to safeguard any Personal Information in the custody of BCLC in accordance with the requirements outlined in *FIPPA*. You may not disclose Personal Information to third parties without prior authorization. If you believe that Personal Information may have been disclosed without authorization you must report it immediately in accordance with [BCLC's privacy policy and procedures](#).

FIPPA affords you Whistleblower protection if you report an unauthorized disclosure of personal information.

SUPPLIER, COMPETITOR OR BUSINESS INFORMATION

It is common within BCLC to acquire information about other organizations, including BCLC's competitors. In fact, BCLC often gathers a variety of information from legitimate sources to evaluate the merits of its products, marketing methods and to extend credit and evaluate suppliers. This is ethical business activity.

BCLC collects information from various bidders during the procurement process. All such information relating to proponents and their proposals shall be held in confidence, subject to applicable laws. BCLC employees should not discuss proponents or their proposals with outside parties. Your compliance with BCLC's [Procurement Protocol #1 \(Communications Protocol\)](#) ensures that outside parties do not obtain information they are not entitled to receive. It also reduces the risk of BCLC employees appearing to have a bias toward one proponent over another. You should consider the list of scenarios within the Protocol when engaging in discussions with potential bidders. Any questions relating to the Protocol should be directed to the Director, Corporate Procurement.

It is not ethical to use illegal means to acquire a competitor's trade secrets or other confidential information. If information is obtained by mistake that may constitute a trade secret or confidential information of another person or business, or if you have questions about the legality of information gathering, you should immediately consult with your Manager or Legal Services.

You are expected to follow BCLC's procedure for entering into non-disclosure agreements with Service Providers or others when appropriate and uphold BCLC's obligations under such agreements.

SUPPORTING REFERENCES

[Freedom of Information and Protection of Privacy](#)

[BCLC's Privacy Policy and Procedures](#)

[Procurement Protocol #1](#)

Protection of Company Assets

BCLC Assets are entrusted to employees for their use while conducting business on behalf of BCLC. As a BCLC employee, you are responsible for the appropriate care and protection of all BCLC Assets associated with your duties, including exercising reasonable safeguards to prevent theft or damage. BCLC's Assets may only be used for BCLC business, unless otherwise stated within BCLC's policies, and should not be removed from BCLC's premises without authorization.

PHYSICAL ASSETS

All BCLC employees have the responsibility to immediately report any lost, stolen or damaged BCLC Physical Assets to their Manager and BCLC Security. Managers have the responsibility to ensure such incidents that are of a significant nature, possible breach of security or have the possibility of compromising gaming or BCLC in any way are escalated to BCLC Security as soon as possible.

Employees must meet eligibility criteria in order to drive a BCLC fleet vehicle. BCLC fleet vehicles must be driven in a safe, responsible manner at all times. Additional terms and conditions for use are stated in BCLC's [Pool Fleet Vehicle Standards](#), which should be read prior to using a vehicle.

Employees must follow corporate policy with respect to disposal of materials and equipment.

INFORMATION AND ACCESS TO CORPORATE COMPUTING RESOURCES

BCLC information and Corporate Computing Resources are the property of BCLC. If you have access to BCLC's computing and communication devices, you are expected to use them in a responsible manner for the benefit of BCLC and in accordance with appropriate use policies.

Information transmitted through BCLC Corporate Computing Resources, including emails, implies affiliation with BCLC. Professionalism should therefore always be foremost in your mind when deciding whether to communicate and share information through BCLC's computing and communication devices and systems. This is especially true of the Internet and BCLC's internal networks and systems.

BCLC is able to monitor and record all use of Corporate Computing Resources in accordance with applicable law, including email, Internet use and files stored in private areas of our network. You should at no time expect privacy when using BCLC's computing resources, whether you are accessing them on site or from a remote location.

Information related to BCLC's business in any way remains the property of BCLC throughout and beyond your employment with BCLC. It must be safeguarded and should not be removed from BCLC premises without authorization.

BCLC reserves the right to monitor and review any information created, stored, sent, or received using Corporate Computing Resources.

RETENTION OF INFORMATION

Information created or received by BCLC is considered government information and must be managed in accordance with B.C.'s *Information Management Act* regardless of the form or medium. BCLC retains and disposes of information in accordance with approved retention and disposition schedules. Any information created by you is under the custody and control of BCLC and must be retained in accordance with the retention and disposition schedules.

SUPPORTING REFERENCES

[Pool Fleet Vehicle Standards](#)

[Obsolete Assets/Asset Disposal Policy](#)

[Information Security General Policy](#)

[Records Management Policy](#)

Standard Ownership

Standard Owner Position: Vice President, Human Resources

Approving Body: Board of Directors

Revision History

Version Number	Approval Date	Approved by	Amendment
8.0	Jan 26, 2017	Board of Directors	Major amendments made to the Employee Participation in Gaming and Protection of Company Assets sections. New direction included relating to the completion of employee declaration forms and changes made to the glossary terms: Assets, Confidential Information and Personal Information. Two policy documents were superseded by this version: 20.19 BCLC Employees Playing eLottery and 9.2 Corporation Property.
7.1	Jan 29 th , 2015	Vice President, Corporate Security and Compliance	Minor amendment to footer text. This document was re-classified from 'Internal' to 'Public' in order to comply with a directive from the Public Sector Employers' Council. An exemption to policy approval requirements was made due to exceptional circumstances.
7	Nov 26 th , 2014	Board of Directors	Major revisions made to content relating to conflict of interest and escalation of concerns. Additional changes made to align with the provincial government's Standards of Conduct Guidelines for the B.C. Public Sector (July 2014) and Taxpayer Accountability Principles (June 2014) as well as a few minor house-keeping issues.
6	May 6 th , 2014	Vice President, Human Resources	Minor updates made: broken hyperlinks fixed; formatting errors fixed; references to recently revised policy documents corrected; word changed on p. 25 regarding personal use of IT resources; change in

Version Number	Approval Date	Approved by	Amendment
			leadership reflected on p. 5; and Revision History section added.
5	Feb 5 th , 2013	Vice President, Human Resources	Changes made to a few glossary terms, text added regarding mandatory training, and Appendix C added.
4	Jun 9 th , 2011	CEO & President	Updates made to several sections to reflect changes in the business. Four policy documents were superseded by this version: Employee Participation in Gaming FAQ, Conflict of Interest Policy, Confidentiality Policy, and Entertainment and Gifts Policy.
3	Jun 3 rd , 2009		(information not available)
2	Jun 1 st , 2008		(information not available)
1	Nov 27 th , 2007	Board of Directors	Inaugural document

Appendix A - Employee Declaration and Commitment

Last Name: _____ First Name: _____

Employee Number: _____

Declaration:

I, the undersigned, declare that I have read and understood the Standards of Ethical Business Conduct for BCLC employees and all related policies. I agree to comply with these Standards, any amendments thereto, provided such amendments have been brought to my attention.

I declare that I have completed and submitted the Appendix B Declaration of Actual or Perceived Conflict of Interest and have informed my Manager of any known or potential conflicts of interest involving me.

I declare to the best of my knowledge and belief that I have no other Actual or Perceived conflict of interest apart from those stated in Appendix B.

I agree to report any new information that may present an Actual or Perceived conflict of interest as soon as I become aware of it.

I understand that if I have concealed any known Actual or Perceived conflicts of interest, I may be subject to disciplinary action, as per BCLC's Progressive Disciplinary policy, up to and including termination of my employment from BCLC.

Signatures: Employee _____ Date _____

Electronic sign-off of this form will be facilitated through a mandatory online course.

Completed forms must be forwarded to Human Resources. A copy of this form will be kept in your employee file. Finance and/or Audit Services may require conflict of interest information in aggregate to comply with related party disclosure requirements. You and your Manager are required to report vendor related conflict of interest situations directly to Procurement.

Your personal information is collected in accordance with the Freedom of Information and Protection of Privacy Act, British Columbia, and will be collected, used, accessed, disclosed and stored by BCLC for ensuring compliance with the Standards of Ethical Business Conduct. If you have any questions about the collection or use of your personal information, please contact your Human Resources Advisor or your Manager.

Appendix B - Declaration of Actual or Perceived Conflict of Interest

Employee Name: _____ Employee Number: _____

SECTION I: Please check the appropriate box:

- | | |
|---|--|
| <p>1. I am directly or indirectly involved in another enterprise or occupation that is or could be perceived as being in conflict with the interests of BCLC. (Fill in 'Details' section below.) <input type="checkbox"/></p> | <p>5. A family member whose circumstance places me or could be perceived as placing me in conflict with the interests of BCLC. (Fill in 'Details' section below.) <input type="checkbox"/></p> |
| <p>2. I have direct or indirect investments or business relations that are or could be perceived as being in conflict with the interests of BCLC. (Fill in 'Details' section below.) <input type="checkbox"/></p> | <p>6. I currently hold, or have been offered, a board appointment for a "for profit" organization or for a society that is or could be perceived as being in conflict with the interests of BCLC (Fill in 'Details' section below.) <input type="checkbox"/></p> |
| <p>3. I have a personal relationship that is or could be perceived as being in conflict with the interests of BCLC. (Fill in 'Details' section below.) <input type="checkbox"/></p> | <p>7. I have been elected to a municipal political position and/or I have a family member who has been elected to a federal, provincial or municipal position (Fill in 'Details' section below.) <input type="checkbox"/></p> |
| <p>4. I have and/or a family member has a previous or current involvement, financial or otherwise in the gaming industry in any capacity. (Fill in 'Details' section below.) <input type="checkbox"/></p> | <p>8. Other. (Fill in 'Details' section below.) <input type="checkbox"/></p> |
| | <p>9. To the best of my knowledge and belief I do not have an Actual or Perceived conflict of interest. (<i>This box should only be checked if none of the other boxes have been marked.</i>) <input type="checkbox"/></p> |

Details: (Use separate page and attach if additional space required)

Signatures: Employee: _____ Date _____
 Manager : _____ Date _____
 V.P. _____ Date _____
 (V.P. to sign on first declaration by an employee and any change to declared conflicts of interest)

Completed forms must be forwarded to Human Resources. A copy of this form will be kept in your employee file. Finance and/or Audit Services may require conflict of interest information in aggregate to comply with related party disclosure requirements. You and your Manager are required to report vendor related conflict of interest situations directly to Procurement.

Your personal information is collected in accordance with the *Freedom of Information and Protection of Privacy Act*, British Columbia, and will be collected, used, accessed, disclosed and stored by BCLC for ensuring compliance with the Standards of Ethical Business Conduct. If you have any questions about the collection or use of your personal information, please contact your Human Resources Advisor or your Manager.

SECTION II: Conditions to be imposed to mitigate or eliminate any Actual or Perceived conflict of interest situation. Leaders are required to notify Procurement of all employee declared conflicts related to a vendor relationship.

(Use separate page and attach if additional space required)

Signatures: Employee: _____ Date _____
 Manager : _____ Date _____
 V.P. _____ Date _____
(V.P. to sign on first declaration by an employee and any change to declared conflicts of interest)

Completed forms must be forwarded to Human Resources. A copy of this form will be kept in the employee's file.

Appendix C – Mandatory Training for Employees

Training	Business Unit Owner	Recertification Requirement	Notes
All Employees and Managers			
Anti-Money Laundering	Corporate Security & Compliance	Yes – every 2 years	New Employees – to be completed within 30 days of hire.
Orientation for Employees	Human Resources	No	New Employees – to be completed within 30 days of hire.
Information Management	Corporate Security & Compliance	Yes – every 2 years	New Employees – to be completed within 30 days of hire.
Playing It Right	Social Responsibility & Communications	No	New Employees – to be completed within 30 days of hire.
Respectful Workplace for Employees	Human Resources	Yes – annually	New Employees – to be completed within 30 days of hire.
Safety Orientation	Human Resources	Yes – annually	New Employees – to be completed within 30 days of hire.
Standard of Ethical Business Conduct for Employees	Human Resources	Yes – annually	New Employees – to be completed within 2 weeks of hire.*
System Security Course	Corporate Security & Compliance	Yes - annually	New Employees – to be completed within 30 days of hire.
Travel & Expense Course	Finance & Corporate Services	No	New Employees – to be completed within 30 days of hire.
Where's Your GameSense Course	Social Responsibility & Communications	No	Site-level BCLC employees are exempt as they are required to take ART-I
Site Level Employees Only			
Appropriate Response Training (ART) Level 1	Social Responsibility & Communications	Yes, every 3 years	
Appropriate Response Training (ART) Level 2	Social Responsibility & Communications	No	All player-facing employees.

People Managers Only			
Orientation for People Managers	Human Resources	No	New People Managers – to be completed within 30 days of hire.
Respectful Workplace for People Managers	Human Resources	Yes - annually	New People Managers – to be completed within 30 days of hire.