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F 250 828 5631

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Vancouver, BC V5M 0A6

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www.bclc.com

VIA EMAIL

January 11, 2022

[applicant information]

Re: Request for Records: BCLC File 22-054

British Columbia Lottery Corporation (BCLC) writes further to your December 15, 2022 request under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and BCLC's letter dated December 15, 2022.

You requested:

"Regarding BCLC chair Greg Moore, I seek...copies of all versions of his disclosure of real or apparent or potential conflicts of interest and a copy of his most-recent Gaming Policy and Enforcement Branch registration application and GPEB-issued licence/registration/permit."

BCLC is providing seven records (consisting of 11 pages) in response to your request.

Some information has been withheld from disclosure under sections 15 and 22 of FIPPA.

Below are the reasons for withholding information under each of the exceptions to disclosure noted.

Section 15 (harm to law enforcement)

The information withheld under this section consists of a specific GPEB registration number. Disclosure of this information would be harmful to law enforcement because the GPEB registration number could be used to facilitate fraud or some other type of offence.

Section 22 (harm to personal privacy)

The information withheld under this section consists of personal information of Greg Moore and other third parties. Disclosure of this information would constitute an unreasonable invasion of their personal privacy, including because it could result in identity fraud.

BCLC notes that one of the records it is providing you is a signed version of Appendix A and Appendix B of BCLC's Standards of Ethical Business Conduct (SOEBC). The templated version of SOEBC to which these appendices are appended is available online at the following link:

<https://corporate.bclc.com/content/dam/bclccorporate/reports/policies-and-procedures/no-date/SOEBC-for-employees.pdf>

BCLC also notes that GPEB applications are submitted online at [Gaming Worker Registration - Preparing to Apply \(gov.bc.ca\)](http://gaming-worker-registration-preparing-to-apply.gov.bc.ca). Therefore, BCLC does not have a copy of the application.

The full text of sections 15 and 22 can be found at:

http://www.bclaws.ca/Recon/document/ID/freeside/96165_00

These records may be published a minimum of five business days after release at:

<https://corporate.bcl.com/who-we-are/corporate-reports/reports-disclosures.html>

If you have any questions or concerns regarding BCLC's processing of your request, please contact me at ksimcoe@bcl.com, via mail or at (250) 852-5228.

Additionally, under section 52 of FIPPA, you may ask the Information and Privacy Commissioner to review this reply to your request for information. You have 30 business days from the receipt of this notice to request a review by writing to:

Office of the Information and Privacy Commissioner for British Columbia
P.O. Box 9038, Station Provincial Government
Victoria, BC V8W 9A4

T (250) 387-5629 F (250) 387-1696
Email info@oipc.bc.ca Online www.oipc.bc.ca

Sincerely,
[original signed by]

Kevin Simcoe
Senior Freedom of Information Analyst

Enclosures



**BOARD OF DIRECTORS
DISCLOSURE OF REAL OR APPARENT
OR POTENTIAL CONFLICTS OF INTEREST**

Name: GREG MOORE

SECTION I – Please check the appropriate boxes:

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.)
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.)
3. ☐ I have a personal relationship with a BCLC or Service Provider employee that is or could be perceived as being in conflict with the interests of BCLC. (Fill in 'Details' section below.)
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.)
5. ☐ I have 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.)
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.)
7. ☐ I have been elected to a federal, provincial or 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.)
8. ☐ Other. (Fill in 'Details' section below.)

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

- OR -

9. ☒ To the best of my knowledge and belief I do not have an actual, perceived or potential conflict of interest.

Signature:

s 22

Board Member

Date: DEC 12/18



**BOARD OF DIRECTORS
DISCLOSURE OF REAL OR APPARENT
OR POTENTIAL CONFLICTS OF INTEREST**

SECTION II – Conditions set out by the Board Chair and/or Governance Committee to mitigate or eliminate any disclosed potential or perceived conflict of interest situation: (Use separate page and attach if additional space required)

Signatures:

s 22

Board Member
s 22

Date: Dec 12/18

Board Chair
s 22

Date: 12/12/18

Governance Committee Chair

Date: 12/12/2018

Disclosure forms must be completed semi-annually and provided to the Board Chair. The Disclosure Forms will be filed with the Corporate Secretary



**BOARD OF DIRECTORS
DISCLOSURE OF REAL OR APPARENT
OR POTENTIAL CONFLICTS OF INTEREST**

Name: Greg Moore

SECTION I – Please check the appropriate boxes:

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.)
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.)
3. ☐ I have a personal relationship with a BCLC or Service Provider employee that is or could be perceived as being in conflict with the interests of BCLC. (Fill in 'Details' section below.)
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.)
5. ☐ I have 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.)
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.)
7. ☐ I have been elected to a federal, provincial or 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.)
8. ☐ Other. (Fill in 'Details' section below.)

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

- OR -

9. ☒ To the best of my knowledge and belief I do not have an actual, perceived or potential conflict of interest.

Signature:

s 22

Board Member J
s 22

Date: May 15, 2019



**BOARD OF DIRECTORS
DISCLOSURE OF REAL OR APPARENT
OR POTENTIAL CONFLICTS OF INTEREST**

SECTION II – Conditions set out by the Board Chair and/or Governance Committee to mitigate or eliminate any disclosed potential or perceived conflict of interest situation: (Use separate page and attach if additional space required)

Signatures:

s 22

Board Member
s 22

Date: MAY 15, 2019

Board Chair
s 22

Date: 24 July 2019

Governance Committee Chair

Date: 24 July 2019

Disclosure forms must be completed semi-annually and provided to the Board Chair. The Disclosure Forms will be filed with the Corporate Secretary



BOARD OF DIRECTORS
DISCLOSURE OF REAL OR APPARENT
OR POTENTIAL CONFLICTS OF INTEREST

Name: GREG MOORE

SECTION I – Please check the appropriate boxes:

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.)
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.)
3. ☐ I have a personal relationship with a BCLC or Service Provider employee that is or could be perceived as being in conflict with the interests of BCLC. (Fill in 'Details' section below.)
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.)
5. ☐ I have 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.)
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.)
7. ☐ I have been elected to a federal, provincial or 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.)
8. ☒ Other. (Fill in 'Details' section below.)

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

- OR -

9. ☐ To the best of my knowledge and belief I do not have an actual, perceived or potential conflict of interest.

Signature:

s 22

Board Member s 22
s 22

Date: JULY 28, 2021



BOARD OF DIRECTORS
DISCLOSURE OF REAL OR APPARENT
OR POTENTIAL CONFLICTS OF INTEREST

SECTION II – Conditions set out by the Board Chair and/or Governance Committee to mitigate or eliminate any disclosed potential or perceived conflict of interest situation: (Use separate page and attach if additional space required)

- IN MY CAPACITY OF CEO OF ICOWA HOLDING INC, I REQUESTED LISA ETHANS JOIN THE ICOWA ADVISORY BOARD. I ALSO ENGAGED LISA ETHANS IN A CONSULTING CAPACITY TO CONDUCT SOME BUSINESS PLANNING. I UNDERSTAND THAT THIS MAY BE A POTENTIAL PERCEIVED CONFLICT OF INTEREST.
- I AM A SHAREHOLDER OF A HOLDING COMPANY. THIS COMPANY IS A SHAREHOLDER OF A COMPANY THAT HAS A MINOR SHAREHOLDER WHOSE WIFE WORKS FOR BCLC. IT IS EXTREMELY UNLIKELY THAT MY ROLE OF BOARD CHAIR WILL HAVE ANY FORMAL DEALINGS WITH THIS EMPLOYEE OF BCLC.

Signatures:

s 22

No conditions are required at this time. This will be reviewed annually with mitigation strategies to be put in place, if required, due to changing circumstances.

Out of an abundance of caution, the potential perceived conflict of interest was disclosed to the BCLC Board of Directors on 3 June 2021 and this record will be retained on file.

Audit Committee Chair

Date: Dec 19, 2022

s 22

Board Chair, s 22
s 22

Date: JULY 28, 2021

Governance Committee Chair

Date: _____

Disclosure forms must be completed semi-annually and provided to the Board Chair. The Disclosure Forms will be filed with the Corporate Secretary



BOARD OF DIRECTORS
DISCLOSURE OF REAL OR APPARENT
OR POTENTIAL CONFLICTS OF INTEREST

SECTION II – Conditions set out by the Board Chair and/or Governance Committee to mitigate or eliminate any disclosed potential or perceived conflict of interest situation: (Use separate page and attach if additional space required)

- IN MY CAPACITY OF CEO OF ICONA HOLDING INC, I REQUESTED LISA ETHANS JOIN THE ICONA ADVISORY BOARD. I ALSO ENGAGED LISA ETHANS IN A CONSULTING CAPACITY TO CONDUCT SOME BUSINESS PLANNING. I UNDERSTAND THAT THIS MAY BE A POTENTIAL PERCEIVED CONFLICT OF INTEREST.
- I AM A SHAREHOLDER OF A HOLDING COMPANY. THIS COMPANY IS A SHAREHOLDER OF A COMPANY THAT HAS A MINOR SHAREHOLDER WHOSE WIFE WORKS FOR BCLC. IT IS EXTREMELY UNLIKELY THAT MY ROLE OF BOARD CHAIR WILL HAVE ANY FORMAL DEALINGS WITH THIS EMPLOYEE OF BCLC.

No conditions are required at this time. This will be reviewed annually with mitigation strategies to be put in place, if required, due to changing circumstances.

Out of an abundance of caution, the potential perceived conflict of interest was disclosed to the BCLC Board of Directors on 3 June 2021 and this record will be retained on file.

Audit Committee Chair

s 22

Date: _____

Board Chair s 22
s 22

Date: JULY 28, 2021

Governance Committee Chair

Date: Dec 20 / 2022

Disclosure forms must be completed semi-annually and provided to the Board Chair. The Disclosure Forms will be filed with the Corporate Secretary

Appendix A - Employee Declaration and Commitment

Last Name: MOORE First Name: GREG

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.

s 22

Signatures: Employee Date 26 August 2019
s 22

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: GREG MOORE Employee Number: _____

SECTION I: Please check the appropriate box:

- | | |
|--|---|
| 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"/> | 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"/> |
| 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"/> | 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"/> |
| 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"/> | 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"/> |
| 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"/> | 8. Other. (Fill in 'Details' section below.) <input type="checkbox"/> |
| | 9. To the best of my knowledge and belief I do not have an Actual or Perceived conflict of interest. (This box should only be checked if none of the other boxes have been marked.) <input checked="" type="checkbox"/> |

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

s 22

Signatures: Employee: _____ Date 26 August 2019
 Manager: _____ Date _____
 V.P. _____ Date 16 September 2019
(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.



Gaming Worker Registration

This is to certify that

Gregory Moore

BOARD OF DIRECTORS

BCLC

is registered pursuant to the Gaming Control Act

for the period

25-May-2021 to 24-May-2026

Registration Staff,
Delegated by General Manager

Registrar

s 15(1), s 22

GAMW#:

[Home](#) > [Sports, Recreation, Arts & Culture](#) > [Gambling & Fundraising](#) > [Online Service](#) >

Gambling Establishment Module (GEM)

Gaming Worker Found

Name: s 22

Moore, Gregory

GW Reg No.:

s 15(1), s 22

s 22

Gambling Worker ID Card Name:

ID Tag No:

Birth Date (YYYY-MM-DD):

s 22

ID Tag Template:

[GW IDTag - fillable PDF](#)

Expiry Date:

2026-05-24