

Standards of Ethical Business Conduct for British Columbia Lottery Corporation Employees

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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 are a public sector organization and must therefore consider the public interest in our actions. Our actions are enabled by and subject to the *Gaming Control Act*, British Columbia, under which each BCLC employee must be registered.

Integrated in our Standards of Ethical Business Conduct is BCLC's social purpose to "generate win-wins for the greater good" and core values of:

Integrity: The games we offer and the ways we conduct business are fair, honest, transparent and trustworthy.

Community: We create a positive impact for people and the planet.

Respect: We treat all people with dignity and value diverse perspectives.

These standards reflect BCLC's values and beliefs, and we require every BCLC employee to fulfill 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 subject to 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. 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 [Safe Reporting 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.

Pat Davis
President & CEO
BCLC

Social Purpose and Values in Action

BCLC is a social purpose company: “We exist to generate win-wins for the greater good”. We seek to make every decision with the intention of positively contributing to society. Our social purpose requires you to continually consider the impacts of all activities and decisions on individuals, institutions, communities and the planet, to always seek win-wins to benefit the well-being of society. It also underscores our expectations that you uphold BCLC’s commitment to fostering effective, collaborative, and mutually beneficial stakeholder relationships. Our social purpose and core values of Respect, Integrity, and Community are integral to our day-to-day actions and success.

Our Shared Responsibilities

EVERY EMPLOYEE’S RESPONSIBILITY

As a BCLC employee, it is your responsibility to:

- contribute to BCLC’s social purpose to generate win-wins for the greater good by aligning your actions, behaviours, decisions and work to positively impact society;
- learn, understand and comply with these standards and all other BCLC policies, requirements and directives;
- annually acknowledge your understanding and commitment to comply with these standards, as a condition of your employment, by signing the Employee Declaration and Commitment form;
- successfully complete, to BCLC’s standard, any and all mandatory training as directed by BCLC. Mandatory training is outlined on BCLC’s Learning and Development intranet page;
- avoid any situation where you would directly or indirectly request, enable or encourage 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 other BCLC policy, requirements or directives.

If you have questions or concerns about the content of these standards, please discuss them with your Manager or your People and Culture Representative. 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. These standards are in addition to the terms and conditions of your employment agreement with BCLC and any applicable common law duties and, where such terms and conditions or duties include a greater obligation than is contained in these standards, those greater obligations will apply. In the event of a discrepancy between a BCLC policy and these standards, these standards shall prevail.

Gaming Worker Registration

BCLC shares the responsibility of maintaining the integrity and high standards of the gaming industry with the Gaming Policy and Enforcement Branch (GPEB). All BCLC employees are considered to be gaming workers under the *Gaming Control Act* and are required to be registered with GPEB. Maintaining this registration in good standing is a condition of your employment with BCLC.

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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](#).

Upholding the Law

You are expected to understand and comply with legal requirements in your areas of accountability. If you are ever in doubt of the application or interpretation of any law, refer the matter to your Manager or BCLC’s Legal department.

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 BCLC’s social purpose, values and 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;
- implement and document an appropriate mitigation strategy for all employees who have identified an Actual, Perceived or Potential Conflict of Interest as defined in the [Conflicts of Interest](#) section;
- notify Procurement of all employee Actual, Perceived or Potential Conflicts of Interest declared with a Vendor;
- ensure that employees who report to them have completed BCLC required mandatory training;
- destroy all electronic and hard copy Employee Declaration and Commitment forms once the original has been sent to People and Culture; and
- respond immediately to allegations or observations of any breach of these standards as outlined below under [Raising Concerns](#).

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EXEMPTIONS FROM THESE STANDARDS

An employee may request an exemption from a requirement in these standards. A request for exemption will only be considered where BCLC's President and Chief Executive Officer has, in their sole discretion, authorized the request to proceed to the Chair of BCLC's Board of Directors. People and Culture establishes internal procedures for employees to request authorization for an exemption to be considered. For further details on these internal procedures, contact your Manager or People and Culture Representative.

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 a breach of these standards. Conditions may be attached to an exemption as determined by the Board of Directors in its sole discretion.

This may include an exemption to allow the continuation of circumstances that would otherwise be considered an Actual Conflict of Interest, where it is not feasible to avoid the Actual Conflict of Interest as required under the Conflicts of Interest section or as otherwise determined by the Board of Directors in its sole discretion. If such an exemption is granted, the employee must refrain from participating in decision-making respecting the Actual Conflict of Interest except to the extent specifically authorized in the Board's decision granting the exemption.

The Board of Directors delegates authority to the Chief People Officer and Chief Operating Officer to approve an exemption from limitations on participation in gaming and loyalty programs, as specifically outlined in the Employee Participation in Gaming section of these standards. A request for exemption from limitations on participation in gaming and loyalty programs does not require authorization from the President and Chief Executive Officer, which is required for all other exemption requests as outlined above.

Making Ethical Decisions

BCLC is dedicated to the highest possible standards of honesty, integrity, respect, social responsibility, Cost Consciousness and Accountability. Your concern for what is right should form the basis of all of your business decisions. You are required to always act in accordance with laws, regulations, BCLC's policies, requirements, directives and these standards. If you have concerns about what course of action you should take in any given situation, you should use the ethical decision-making framework below, to guide you through the decision-making process and help you ask the right questions. If you are still uncertain about the right action to take, you must seek additional guidance from your Manager before proceeding.

When making ethical decisions you should ask yourself the following:

- Does your decision conflict with BCLC's social purpose and/or core values?
- Does your decision have the potential to harm or reduce benefits to others or society?
- Would you feel comfortable with your decision being published on the front page of the newspaper or a social media site?

Raising Concerns

You are encouraged to bring forward questions, concerns or reports directly to your Manager about behaviour that you suspect to be in breach of these standards, or any other BCLC policies, requirements or directives BCLC. If you have concerns that a BCLC employee, Service Provider, Retailer or Contractor may be engaged in unethical conduct in respect of BCLC, including a suspected breach of these standards, you are encouraged to discuss the matter with your Manager first. For matters involving health and safety, see BCLC's [Occupational and Psychological Health and Safety Policy](#).

Managers must respond immediately to all allegations or observations of any breach of these standards by:

- taking reasonable measures to resolve the issue if it is within their level of authority to do so;
- implementing preventive measures or corrective actions within their level of authority to reduce the risks arising from the breach as well as the risk of future breaches;
- providing written notification to their supervisor of the incident and the resolution or corrective action implemented, if it is determined that an employee engaged in unethical conduct;
- promptly escalating to a member of senior management in the affected division if the matter requires action above their level of authority; and
- taking the necessary steps to promote a safe environment for employees who report a breach of these standards.

If you believe a matter requires resolution and has not been reasonably resolved by your Manager, or if the matter is one which you feel unable to discuss with your Manager for whatever reason, then you may escalate the matter to a member of senior management in the affected division. Allegations of breaches of these standards will be considered for further investigation, when appropriate as determined by BCLC in its sole discretion.

BCLC recognizes that not everything can, or should, be resolved by the process described above. If you have concerns you feel cannot be resolved by the process above, for whatever reason, or that involve more serious matters, refer to the [Safe Reporting Policy](#) and [supporting references](#) below.

RESPECTFUL WORKPLACE

The [Respectful Workplace Policy](#) is the mechanism to report conduct that does not support an environment that is respectful, professional and free from discrimination, bullying and harassment as defined in that policy.

SAFE REPORTING

Refer to BCLC's [Safe Reporting Policy](#) and [Fraud Prevention Policy](#) for the mechanism to report serious matters such as:

- gross or systemic mismanagement, misappropriation or a serious misuse of BCLC funds or assets;
- deliberate and unauthorized manipulation of documents or records;

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- circumstances you suspect to be a substantial and specific danger to life, health or safety of persons or to the environment; or
- circumstances that involve Fraud or other illegal acts.

Examples of illegal acts include violations of laws or regulations, Bribery and Corruption, Fraud or abetting Fraud, unauthorized release or use of Personal Information or intellectual property, money laundering, or violations of labour or consumer protection laws.

BCLC's Safe Reporting Policy outlines how you may request advice and report Wrongdoing under the *Public Interest Disclosure Act* (PIDA), British Columbia, or other misconduct at BCLC. The Safe Reporting Policy also sets expectations for how BCLC will respond to reports of Wrongdoing or other misconduct at BCLC.

The Safe Reporting Policy will provide you with direction on how and where to report such concerns with the confidence that your disclosure or report will be acknowledged and taken seriously.

Nothing in these standards replaces any other legal rights a person may have, or that BCLC may have, to address the subject matter of a concern or report.

Protections from Reprisal

BCLC does not permit reprisal or retaliation of any kind against employees who, in good faith, bring forward concerns or reports of Wrongdoing or other misconduct that the employee suspects to be in breach of these standards or any other BCLC policy, requirement or directive. The Safe Reporting Policy is designed to eliminate any fear you may have about voicing bona fide concerns and provide assurance that persons doing so will be protected from possible reprisal or retaliation.

Anyone who engages in reprisal or retaliates against an employee for bringing forward a concern or report in good faith under these standards or any other BCLC policy, requirement or directive, will be subject to disciplinary action as per BCLC's Progressive Discipline Policy, up to and including termination of employment.

Confidentiality

All concerns brought to BCLC's attention under these standards or the Safe Reporting Policy will be regarded as confidential except as expressly set out in these standards or the Safe Reporting Policy or as otherwise required by law. You may make a disclosure or report anonymously as outlined under the Safe Reporting Policy.

Supporting References

Safe Reporting Policy

Fraud Prevention Policy

Respectful Workplace Policy

Acting with Care

PROMOTING RESPECT AND DIVERSITY

In alignment with BCLC's values and Respectful Workplace Policy, we all 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 bullying, harassment and discrimination and at all times operates in accordance with the *Workers Compensation Act* and *Human Rights Code*, British Columbia, and all other applicable laws. As such, you are expected to interact with all BCLC Stakeholders in a professional, respectful and courteous manner. This includes, but is not limited to, colleagues, players, customers, Service Providers, Retailers, and Contractors. Behaviour that is in breach of BCLC policies or will otherwise strain work relationships or contribute to a negative work environment will not be tolerated.

Supporting References

Respectful Workplace Policy

[Diversity, Inclusion and Belonging Policy](#)

SAFE AND HEALTHY WORKPLACE

BCLC is committed to fostering a culture of health and safety, which aligns with BCLC's social purpose and values. It begins with a commitment to, and demonstration of, healthy and safe behaviours by leadership and is expected from all employees across BCLC.

Occupational and psychological health and safety of the working environment is everyone's responsibility. Individuals are expected to understand their rights and responsibilities for occupational and psychological health and safety as defined in the *Workers Compensation Act* and *Occupational Health and Safety Regulation*, British Columbia, the Mental Health Commission of Canada's [National Standard for Psychological Health and Safety in the Workplace](#) and BCLC's [Occupational and Psychological Health and Safety Policy](#). All individuals at BCLC are accountable to uphold their safety and the safety of those around them. All hazards, accidents, near miss incidents and health and safety concerns must be reported as soon as possible. The health, safety, and wellbeing of those impacted must be prioritized in decision making across BCLC.

Supporting References

Occupational and Psychological Health and Safety Policy

MAINTAINING 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 must abide by this Agreement throughout and beyond your employment with BCLC. If you are in doubt about whether information is Confidential Information, you must assume that it is unless otherwise advised by your Manager.

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Confidential Information of another person or business must be held in confidence, subject to applicable laws. This includes Confidential Information that belongs to BCLC Vendors, Service Providers, Retailers, competitors or other Stakeholders. BCLC collects information from various bidders during the procurement process. You must not discuss bid proponents or their proposals except as authorized and required to properly perform your duties. Your compliance with BCLC's Procurement Protocol (Bid Process Communications Protocol) ensures that outside parties do not obtain information they are not entitled to receive.

As a BCLC employee, you must 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 give out information received through your position that is not available to the general public unless prior authorization is given for its release. When appropriate, you are expected to follow BCLC's procedure for entering into non-disclosure agreements with Service Providers or others and uphold BCLC's obligations under such agreements.

Do not discuss Confidential Information in public areas where you could be overheard, such as elevators, boarding lounges and aircraft, or over a mobile phone in a public place.

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.

Supporting References

Procurement Protocol

GATHERING COMPETITOR INFORMATION

It is common within BCLC to acquire information about other organizations from legitimate sources to evaluate the merits of BCLC products or marketing methods and to extend credit and evaluate Vendors. Information about competitors must be gathered legally, ethically and responsibly. If Confidential Information (e.g., a trade secret) is obtained by mistake or if you have questions about the legality or ethics of information gathering, you should immediately consult with your Manager or BCLC's Legal department. Do not gather, or ask someone else to gather, competitor information using unethical, illicit or illegal means.

PROTECTION OF PRIVACY AND FREEDOM OF INFORMATION

BCLC and its Service Providers collect Personal Information from many individuals in the course of normal business activity. BCLC is required to comply with protection of privacy and access to information requirements established in the *Freedom of Information and Protection of Privacy Act* (FIPPA), British Columbia.

You are required to safeguard all Personal Information in BCLC's custody and must comply with the provisions of FIPPA when collecting, securing, accessing, using, disclosing, and disposing of Personal Information as a BCLC employee. You may not disclose Personal Information without prior authorization. If you believe that Personal Information has been or may have been disclosed without authorization, you must report it immediately in accordance with BCLC's Privacy Management and Accountability Policy.

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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 Freedom of Information department, who will apply FIPPA in BCLC's response to the request.

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.

Supporting References

Privacy Management and Accountability Policy

Freedom of Information and Protection of Privacy

EXTERNAL COMMUNICATIONS

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 Customer Support Centre.

Media

It is not appropriate for BCLC's employees to answer questions or provide comments to the media regarding or on behalf of 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 External Communications and Government Relations department. This policy applies whether you are at work or not and regardless of the manner of inquiry. Keep in mind, as a BCLC employee you will be perceived to speak for the company regardless of your intention.

Lobbying

Communications with Indigenous government bodies and federal, municipal or provincial governments or government bodies, other than the B.C. Government or a B.C. provincial entity, aimed to influence the decision-making of the government or government body or governing body ("Lobbying"), may be subject to relevant lobbying legislation or rules.

Given the federal *Lobbying Act* and provincial lobbying legislation, you must contact the Legal department prior to engaging in any activity that could be considered Lobbying with federal government officials or provincial government officials in provinces other than British Columbia.

Prior to Lobbying municipalities or Indigenous governments in B.C., you must contact the department responsible for municipal relations, Indigenous relations and stakeholder engagement (the Engagement Department). The Engagement Department will determine whether there is applicable lobbying legislation or other rules that must be complied with prior to Lobbying these groups, and, if so, you must contact the Legal department prior to engaging in Lobbying to the applicable entity unless you have previously registered as a lobbyist with that entity and your registration is still current.

Supporting References

Media Relations Policy

PROTECTION OF COMPANY ASSETS AND BUILDINGS

Access to BCLC Facilities

To maintain the integrity of BCLC, a high degree of security is exercised in all BCLC corporate offices through electronic access control, video monitoring equipment and associated policies and procedures, including BCLC's Identification and Access Policy.

Each employee is required to use an individually issued access card and, when required, an associated biometric scanner, to access controlled entrances at BCLC corporate offices. The access card is the property of BCLC and must be immediately returned upon request.

BCLC employees are responsible for the access card issued to them and must keep and store their access card safely and securely, at all times, adhering to the security requirements as outlined in the Identification and Access Policy. Employees are accountable for all entries logged by the issued access card unless otherwise noted and/or reported in advance to Corporate Security and Asset Protection. Employees must immediately report lost, stolen or damaged access cards to Corporate Security and Asset Protection.

By accepting an access card, you agree that your personal information will be collected by BCLC in accordance with the *Freedom of Information and Protection of Privacy Act*, British Columbia, and will be accessed, used, and disclosed for the purposes of providing you with access to BCLC corporate facilities based on operational needs identified by your manager, and for purposes related to your security, conduct and actions in the course of your employment with BCLC which, for clarity, may include disciplinary measures. Your personal information includes your name, GPEB number, photograph, and biometric information. Specifically, your biometric information is used to verify your identity when operating BCLC security hand-scanners. Your biometric information is collected and stored directly in the access card issued to you. No biometric information is stored in any BCLC database and/or system.

If you have questions about the collection and use of your personal information, please contact Corporate Security at security@bclc.com.

Physical 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 expressly stated within BCLC's policies, and should not be removed from BCLC's premises without prior written authorization. Employees must follow corporate policy with respect to disposal of materials and equipment.

BCLC employees must immediately report any lost, stolen or damaged BCLC Physical Assets to their Manager and to BCLC Security. Managers are responsible to ensure incidents of a significant nature, or possible breaches of security that may compromise gaming or BCLC in any way, are escalated to BCLC Security as soon as possible.

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Any damage to, or theft of, Physical Assets including those involving the buildings, property, or assets in the building, such as desks, chairs, etc., must be immediately reported to your Manager and the Corporate Facilities team.

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

Information and Access to Information Technology Resources

BCLC information and Information Technology Resources are the property of BCLC. If you have access to BCLC's Information Technology Resources, you are expected to use them in a responsible manner for the benefit of BCLC and in accordance with the [Appropriate Use of Information and Information Technology Resources Policy](#).

Information transmitted through BCLC Information Technology 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 Information Technology Resources. This is especially true of the Internet, social media and when using BCLC's internal networks and systems.

BCLC may monitor and record use of Information Technology 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 Information Technology Resources, whether you are accessing them on site or from a remote location. BCLC reserves the right to monitor and review any information created, stored, sent, or received using BCLC Information Technology Resources in accordance with applicable law.

Information that is 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 must not be removed from BCLC premises or BCLC electronic devices without authorization. This includes safeguarding BCLC's intellectual property assets. For example, ideas, designs, software, trademarks, copyrights, patents and all other proprietary information made for BCLC or made by BCLC employees in the course of their employment with BCLC. All employees have a responsibility to protect BCLC intellectual property and respect the intellectual property rights of others. Any suspected infringements of BCLC intellectual property rights, including but not limited to copycat products or materials, should be reported.

You can report a violation of the Appropriate Use of Information and Information Technology Resources Policy, by submitting an information security incident ticket through ServiceNow or directly to Cyber Security as outlined in the policy. Violations of the Appropriate Use of Information and Information Technology Resources Policy may result in discipline per BCLC's Progressive Discipline Policy, up to and including termination of employment.

Supporting References

Appropriate Use of Information and Information Technology Resources Policy

Identification and Access Policy

[Obsolete Assets/Asset Disposal Policy](#)

Pool Fleet Vehicle Standards

Conduct in our Business Practices

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 familiar with GameSense programs so that you can appropriately respond to a player should a situation involving responsible gambling arise. GameSense is BCLC's brand associated with responsible gambling programs; and

promptly raise any issues or concerns you may have regarding the integrity and security of our games or their delivery to BCLC management.

This includes, but is not limited to, the wellbeing of BCLC's players. Everyone at BCLC shares a collective responsibility to make gambling safer for our players and your duty, as a BCLC employee, is to prioritize the wellbeing of the player in everything we do.

Supporting References

Gambling Products Standard

Advertising and Marketing Communications Standard

THIRD PARTY RELATIONSHIPS

BCLC leverages our procurement activities to advance our social purpose and improve the sustainability of our products and operations. We seek to work with Vendors who not only support our social purpose and core values but exemplify those purpose and values. Vendors are expected to meet the standards outlined in the Supplier Code of Conduct. Indigenous reconciliation, environmental, social and governance (ESG) considerations are factored into our procurement decision-making processes, and we intend to work with our Vendors to create a positive impact for people and the planet through BCLC's procurement activities. This includes, reducing barriers and seeking opportunities to work with traditionally under-represented groups.

We respect and adhere to human rights throughout our operations and expect our business partners to do the same, complying with or exceeding laws and international standards that promote safe working conditions and individual security, such as protections from modern slavery (including forced, compulsory or child labour). If you suspect behaviour that fails to meet the Supplier Code of Conduct you should notify your Manager and Procurement.

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When engaging with third parties you are expected to establish and maintain open, honest and fair partnerships, treating all third parties with fairness and integrity. Vendors are chosen based on objective and measurable criteria in accordance with the [Purchasing – Vendor Selection and Thresholds Policy](#) and the [Social Purpose and Sustainable Procurement Policy](#). All dealings with Vendors, Service Providers, Retailers, and Contractors must be approached objectively and in the best interests of BCLC.

Supporting References

Supplier Code of Conduct

Purchasing – Vendor Selection and Thresholds Policy

Social Purpose and Sustainable Procurement Policy

ENTERTAINMENT, GIFTS AND SERVICES

BCLC employees must not accept from, or offer to, a person, corporation or organization, a gift or other benefit (including, but not limited to, gratuities, entertainment, discounts or services), directly or indirectly, arising out of employment with BCLC unless:

- the acceptance or offer of the gift or other benefit occurs under the protocol or social obligations that normally accompany the duties or responsibilities of the employee's position. If you are unsure of the "protocol or social obligations that normally accompany the duties or responsibilities" for your position, you should consult with your Manager or People and Culture Representative; and
- the value of the gift or other benefit is less than \$100, aligning with BCLC's expectations for Cost Consciousness and Accountability. An exception is permitted from this requirement in the following circumstances:
 - a. Where the benefit offered is for hospitality provided for the purpose of building business relationships and is in accordance with BCLC's [Procurement Protocol](#) (e.g., hospitality provided to a BCLC employee during a business meeting with an existing Vendor, Service Provider, Retailer, Contractor, etc.). BCLC's [Conflict of Interest Guide](#) provides additional guidance on attending relationship building events.
 - b. For gifts to or from a member of a cultural or social group that traditionally offers gifts to express gratitude or to commemorate attendance or participation in an event, ceremony, conference or official visit. Gifts received under this exception will become the property of BCLC for public display, where possible. Such gifts must nonetheless be reported to your Manager.

BCLC employees are prohibited from accepting or offering any gift or other benefit in the form of cash, preferred loans, securities or hidden commissions. Any employee experiencing or becoming aware of such an offer must immediately report the incident to their Manager.

BCLC employees are expected to act with integrity and use good judgement before accepting or offering a gift or other benefit. Rules on the acceptance or giving of gifts and other benefits are in place to promote impartiality with Service Providers, Retailers, Vendors or other third parties and to avoid creating implied obligations. Compliance with guidance in the Procurement Protocol regarding interactions with Vendors (e.g., at conferences or sporting/social events) reduces the risk and appearance of BCLC employees having a bias toward one proponent over another.

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Under no circumstances may a BCLC employee offer or receive a gift or other benefit in exchange for preferential treatment of a third party including, but not limited to, Service Providers, Retailers, or Vendors.

BCLC does not tolerate any form of Bribery or Corruption. This includes Bribery under Canada's *Criminal Code* and the *Corruption of Foreign Public Officials Act*. Bribery and Corruption can take many forms including, but not limited to, solicitation or extortion of cash payments (this includes facilitation payments to secure or expedite the performance of a routine action by a public official), political contributions, charitable donations, sponsorships, gifts, hospitality, entertainment, expenses or travel.

Inappropriate gifts received by a BCLC employee must be reported to your Manager, returned and, if appropriate, should be accompanied by a copy of these standards. A violation of these standards may result in discipline as per BCLC's Progressive Discipline Policy, up to and including termination.

CONFLICTS OF INTEREST

Integrity, honesty, trust and Accountability are essential elements of BCLC's success, and all employees have a duty to make decisions that are in the best interest of BCLC.

As outlined below, there may be circumstances in which your private interests or personal activities or relationships are, or are perceived to be, incompatible with your role at BCLC:

Actual Conflict of Interest	Denotes a situation in which you have knowledge of a private interest that is sufficient to influence the exercise of your duties and responsibilities as an employee of BCLC.
Perceived Conflict of Interest	Exists where an employee's private interests would appear to a reasonable person to conflict with their job duties even though there may not be an actual conflict.
Potential Conflict of Interest	Exists where an employee has private interests such that, while no conflict has yet arisen, a conflict would arise were the employee to become involved in performing work-related responsibilities in the future that could be influenced by the private interest.

Actual, Perceived and Potential Conflicts of Interest must be avoided whenever possible. You must never allow your personal interests or personal activities or relationships to influence you actions on behalf of BCLC or result in Corruption. You are required to disclose Actual, Perceived and Potential Conflicts of Interest as detailed under the Disclosure section below and must act in accordance with the Conflict of Interest Rules and BCLC's Conflict of Interest Guide.

If you are in doubt whether a situation involves an Actual, Perceived or Potential Conflict of Interest, you must immediately seek the advice of your Manager. If your Manager is not available, contact your People and Culture Representative. Managers may request assistance from People and Culture if unsure whether an Actual, Perceived or Potential Conflict of Interest exists.

You should be cognizant that the potential for a conflict of interest may change upon accepting a new role or different position within BCLC or as a result of changes in your personal life.

Conflict of Interest Rules

Rules to avoid an Actual, Perceived or Potential Conflict of Interest are designed to protect the interests and reputation of BCLC and each employee. The principles underlying these 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 or will derive a personal benefit from a decision in which you are directly or indirectly involved. You should apply the following rules in considering if there is an Actual, Perceived or Potential Conflict of Interest that you must disclose and in addressing identified Actual, Perceived or Potential Conflicts of Interest:

- You must avoid any situation or decision-making in which there is an Actual Conflict of Interest or a reasonable apprehension of bias.
- You must consult with your Manager and if necessary, your People and Culture Representative, to discuss any situation that may result in a Perceived or Potential Conflict of Interest and required mitigation steps, if any.
- You must not use your position at BCLC to pursue or advance your personal interests, the interests of a Family Member, an Associate, a person to whom you owe an obligation, or any other person that you have a Personal Relationship with at work or outside of work.
- 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 the public.
- You must not use your position at BCLC to solicit clients for:
 - a business or partnership that you are personally involved with,
 - a business that is operated by a Family Member, Associate or any other person that you have a Personal Relationship with,
 - a corporation in which you or a Family Member has a controlling interest, or
 - a person or a person's business to whom you owe an obligation.

In addition to applying these rules to determine if there is an Actual, Perceived or Potential Conflict of Interest that you must declare, you must follow the specific directions in the Conflict of Interest Guide for disclosing business interests, board appointments, Personal Relationships, investments, interests in the gaming industry, and political activities and adhere to direction below for related party and Non-arm's Length dealings.

Related Party and Non-arm's Length Dealings

You must not be associated in any way with Contracts between BCLC and Vendors, Service Providers, Retailers, or Contractors in which you or a Family Member may have an interest, or that might result in a personal gain or benefit to you or a Family Member.

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In addition, you must not engage in decision-making relating to Vendors, Services Providers, Retailers, Contractors, players or other business relationships that may involve an Actual Conflict of Interest resulting in potential benefit to you or to any person with whom you have a Non-arm's Length relationship, including any of the following persons:

- a Family Member,
- Associate, or
- a person with whom you have a Personal Relationship.

For clarity, this restriction is not intended to prevent an employee from participating in decision-making where the employee has a pre-existing business relationship with a Vendor, Service Provider, Retailer Contractor, etc. but their involvement in the decision making does not create any potential for an Actual Conflict of Interest. In these situations, requirements for disclosing and mitigating Perceived or Potential Conflicts of Interest still apply.

Disclosure

You must disclose any circumstance(s) that could be an Actual, Perceived or Potential Conflict of Interest by completing the Declaration of Actual, Perceived or Potential Conflict of Interest form (the COI Declaration Form). Unless otherwise instructed, you and your Manager, or People and Culture Representative, must work together to immediately identify and implement a mitigation strategy with conditions to resolve Actual Conflicts of Interest and prevent Perceived or Potential Conflicts of Interest. The mitigation strategy and conditions must be documented on the COI Declaration Form.

You must return the completed COI Declaration Form to People and Culture within two weeks of the start of your employment. Your COI Declaration Form will be treated as confidential and retained in your employee file. Where an Actual, Perceived or Potential Conflict of Interest exists with a Vendor, Procurement will be notified by your Manager of the existence of the Actual, Perceived or Potential Conflict of Interest.

You must annually review and, if required, revise your COI Declaration Form so that you and your Manager can discuss and address conflict of interest issues and update your mitigation strategy, if any and as required.

In addition to the annual review, you must, upon becoming aware of an Actual, Perceived or Potential Conflict of Interest, immediately disclose the conflict to your Manager and complete a new COI Declaration Form. This requirement applies regardless of whether you become aware of the conflict before, during or after a transaction is complete.

Mitigation Strategies

Each employee's situation will be different, which means you and your Manager may need to devise a custom mitigation strategy and conditions. BCLC retains the discretion to devise and implement a mitigation strategy and conditions where an employee and their Manager are unable to agree upon an appropriate mitigation strategy and conditions. The Conflict of Interest Guide outlines potential conditions that may be imposed to resolve Actual Conflicts of Interest or to prevent Perceived or Potential Conflicts of Interest. BCLC has a specific mitigation strategy for conflicts of interest arising from hiring relatives, which is addressed in the Hiring of Relatives Policy.

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Failure to comply with conditions stated in your COI Declaration Form may lead to disciplinary action as per BCLC's Progressive Discipline Policy, which may include termination of your employment.

Supporting References

Hiring of Relatives Policy

COI Declaration Form

POST EMPLOYMENT RESTRICTION

For the period of 12 months following the effective date of termination or resignation from employment with BCLC, employees must not Lobby or otherwise make representations for any outside entity to BCLC or Government, regarding matters within the scope of BCLC's jurisdiction where the Lobbying or representation may result in the outside entity receiving any benefit not generally available to others. The President and Chief Executive Officer may, at their sole discretion, agree to reduce or waive the 12-month restriction.

BCLC's Executives are subject to further post employment restrictions as follows:

1. For 12 months following the effective date of a termination or resignation, Executives shall not 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 way 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 People Committee. Upon receipt of a request, the People Committee will review the individual circumstances and the degree of interaction with the entity during the Executive's employment with BCLC. The decision of the People Committee 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 whether or not their new position would be captured by this restriction and the possibility of obtaining an exemption or reduction.

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 these standards and any other applicable BCLC policies, requirements or directives. You are responsible for understanding and complying with these standards as it applies to your role with BCLC. Requests for clarification should be directed to your Manager or your People and Culture Representative before engaging in BCLC gaming. You should be cognizant that limitations on your gaming participation 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.

No Play at Work

You must not participate in any BCLC games or mobile apps (including accessing PlayNow games), while working or at any time from a BCLC computer or network, unless specifically authorized by BCLC to facilitate or carry out duties in the course of your employment. For example, you may be specifically authorized for testing and quality assurance purposes and certain key BCLC positions, for whom an exemption is approved under the Additional Limitations on Gaming Participation section, may require access to a PlayNow account and games. 'No Play at Work' restrictions apply to participation at BCLC offices and gaming facilities, while working remotely and to Lottery personnel who attend at locations that sell lottery products during their working hours.

If an employee is authorized by BCLC to access a PlayNow account during working time to carry out duties in the course of their employment, access to the PlayNow account that is established and authorized for work purposes, is subject to the following conditions:

- usage of the PlayNow account must not contravene any laws, regulations, these standards or any other BCLC policies, requirements or directives;
- the employee is not permitted to register for a PlayNow account for use as a BCLC employee unless directed to do so by BCLC and must only use the PlayNow account in the course of their duties as a BCLC employee;
- the employee is not entitled to any prizes or other benefits from their use of the PlayNow account;
- usage of the PlayNow account may be monitored by BCLC and inappropriate usage may be cause for disciplinary action as per BCLC's Progressive Discipline Policy, up to and including termination; and
- the employee is entitled to reimbursement for any expenses personally incurred in funding the PlayNow account as required in the course of their duties as a BCLC employee.

BCLC may, at its discretion, amend the conditions for authorizing employee access to a PlayNow account at any time and without employee consent by providing written notice to the applicable BCLC employees. The above conditions do not apply to an employee's use of their personal PlayNow account in compliance with these standards.

Additional Limitations to Gaming Participation

You are disqualified from participating in commercial contests, loyalty programs and promotions associated with BCLC and, for employees in specific positions, additional limitations apply to participation in certain BCLC games outside of work, as outlined below. BCLC may establish additional limitations for any role or position by written directive to the employee, with notification to the employee's Manager.

For key positions that require access to a loyalty account or a PlayNow account or games to carry out duties in the course of their employment. The Chief Operating Officer and Chief People Officer may approve an exemption from the limitations on participation in loyalty programs or PlayNow products, as per the authority granted under the Exemption section of these standards. Approval must be in writing.

Sports Products

Employees prohibited from participating in Proline and PlayNow sports games:

- employees in the department responsible for sports betting games/platforms; and
- all BCLC directors and above.

Casino, Community Gaming Centre and Commercial Bingo Gaming Products

Employees prohibited from participating in any games offered in a gambling venue operated by BCLC (casino, community gaming centre or commercial bingo facility):

- employees responsible for the management, implementation or analysis of casino, community gaming centre and bingo games or products;
- employees whose job function directly supports the technology required to operate games at BCLC casinos, community gaming centres and bingo halls;
- employees in any organizational unit in the Safer Play and Enterprise Integrity division other than Player Health; and
- all BCLC directors and above.

PlayNow Products

Employees prohibited from participating in PlayNow games including casino, sports, poker and bingo games (this does not apply to employee participation in lottery draws through PlayNow.com):

- employees in the Customer Support Centre;
- employees in the department responsible 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 or analysis of online game content;

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- employees in any organizational unit in the Safer Play and Enterprise Integrity division other than Player Health; and
- all BCLC directors and above.

ANTI-MONEY LAUNDERING (AML)

Money laundering is the process of concealing the origin of money obtained from criminal activity and converting it to appear as if it was acquired through legal means. Money laundering is a crime that affects multiple sectors of the economy. BCLC takes its role and responsibility seriously when it comes to reducing the threat of money laundering in BCLC operations. BCLC's AML Program includes policies, procedures, and processes put in place, in collaboration with law enforcement and regulators, to safeguard BCLC operations from financial crimes.

Employees have a responsibility to be familiar with BCLC's AML Program, understand AML reporting requirements, and to assist in keeping BCLC gaming operations safe from criminal activity. If during the course of your duties you observe something unusual or suspicious, you must report it to your Manager or BCLC facility staff as soon as possible.

ACCURATE RECORD KEEPING AND FINANCIAL REPORTING

Accurate record keeping and financial reporting is a responsibility shared by BCLC and all employees. You are accountable to record transactions with great care, honesty and transparency and in line with internal accounting and record keeping policies and processes.

Information created or received by BCLC in the course of business activity and documentation, records and other evidence of those activities is considered Government Information and must be managed in accordance with the *Information Management Act*, British Columbia, regardless of the form or medium. BCLC retains and disposes of information in accordance with approved information schedules that govern retention and disposition of Government Information. Any Government Information created by you is under the custody and control of BCLC and must be retained and disposed of in accordance with information schedules.

Financial decisions must be made responsibly, considering BCLC's commitments to Cost Consciousness and Accountability and ensuring that expenses and expenditures follow these standards and BCLC's policies, requirements and directives, and are reasonable, necessary and appropriate. Contracts or other formal arrangements with Service Providers, Retailers, Vendors and Contractors must only be entered into with the appropriate business, finance and legal approvals. The [Signing Authority Policy](#) sets the level of approval needed based on the amount of the expenditure or financial commitment.

Supporting references

[Records Management Policy](#)

[Travel and Expenses Policy](#)

[Signing Authority Policy](#)

Supporting our Communities

ADVANCING ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) PRACTICES

BCLC is committed to managing its operations in ways that are environmentally, socially and economically sustainable and encourages and expects its Vendors, Service Providers and Retailers to do the same. BCLC aims to generate positive social and environmental impacts and reduce negative effects in ways that consider fiscal responsibility, address risks and opportunities, and meet cost and quality requirements in compliance with applicable legal requirements.

BCLC seeks to conduct business in a way that benefits people and the planet. In your role, you are expected to incorporate the principles in BCLC's Environmental, Social and Governance Policy in your decision making and use your influence, to the extent possible, to create just, equitable and positive outcomes that enable our social and environmental systems to heal and thrive and advance BCLC's social purpose while creating long-term value for Stakeholders.

Indigenous Reconciliation

BCLC is committed to working towards lasting and meaningful reconciliation with Indigenous Peoples, in alignment with the [United Nations Declaration on the Rights of Indigenous Peoples](#). In support of this commitment, employees are expected, through their actions and decisions, to create opportunities to implement the Truth and Reconciliation Commission of Canada's 94 Calls to Action wherever possible and to identify and fully support opportunities for Indigenous Peoples to be full partners in the province we are building together.

Community

BCLC is committed to doing its part to contribute to strong communities and stronger communities help BCLC achieve its objectives. Employees are encouraged to participate in community outreach opportunities that BCLC is involved in and make a personal impact and be a social change agent in our communities in ways that build inclusion and connection and enhance local potential and resilience.

Supporting references

[Environmental, Social and Governance \(ESG\) Policy](#)

Definitions

In these standards:

Accountability	Means BCLC manages responsibilities transparently and in the best interests of the citizens of British Columbia, Indigenous Peoples and BCLC Stakeholders.
Assets	Means Physical Assets and intellectual property (including rights in information) owned or managed by BCLC.
Associate	Means a person with whom an employee is connected in some enterprise or business.

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BCLC	Means British Columbia Lottery Corporation.
Bribe(ery)	Means the offering, giving or receiving of anything of value with the intention of influencing the actions of a person or company.
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.
Contractor	Means an individual engaged to provide professional services for or on behalf of BCLC for extended periods, that has the same general access to BCLC systems and information as a BCLC employee, 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.
Corruption	Means the abuse or misuse of power for personal gain.
Cost Consciousness	Means BCLC is committed to continual improvements to our operational efficiency and effectiveness to optimize and manage the costs of our business.
ESG	<p>Means environment, social and governance as these terms are defined in the Environmental, Social and Governance Policy, being, as at the date of these standards:</p> <ul style="list-style-type: none"> • Environment – How BCLC impacts and improves the natural environment, and how environmental issues may impact the viability of BCLC and its Stakeholders over the long term. • Social – How BCLC upholds the rights, interests and health and well-being of all people and communities and builds their potential and how social issues may impact the viability of BCLC and its Stakeholders over the long term. • Governance – How BCLC governs the environmental and social aspects of its operations, influences its value chain, enhances Stakeholder trust and is respected for how it operates.
Executive	Means the persons who hold a Chief Officer and/or President or Vice President title(s).
Family Member	<p>Means a person who is:</p> <p>A spouse (including common law); or</p> <p>A parent or child; or</p> <p>Anyone who regularly resides with you.</p>
Fraud	Means any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.
Information Technology (IT) Resources	Means BCLC-owned or managed information and communications technologies that include but are not limited to information technology systems and related applications, infrastructure and networks.

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Lobby(ing)	Means communications with an Indigenous government body or a federal, provincial or municipal government or government body, that are aimed to influence the decision making of the government or government body, or Indigenous government body.
Manager	Means the person to whom you directly report.
Non-arm's Length	Means a person with whom an employee has an existing relationship (either personal or business) that could potentially influence the employee's decision-making or actions.
People and Culture Representative	Means the people and culture advisor or business enablement partner, as applicable, assigned to support the employee.
Personal Information	Has the meaning ascribed to it in FIPPA and as at the date of these standards means recorded information about an identifiable individual other than Contact Information. 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.
Personal Relationship	Includes familial connections, whether by birth, adoption, marriage or other such connection; sexual or romantic relations; and close friendships that include regular social contact outside of the workplace and work social functions.
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.
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.
Stakeholder	Means a person or entity that is affected by, or that affects, BCLC.
Vendor	Means a person (whether an individual, partnership, corporation or other incorporated or unincorporated entity) who supplies services or Assets via an arm's-length independent contract.
Wrongdoing	Has the meaning prescribed to it under section 7(1) of the <i>Public Interest Disclosure Act</i> , British Columbia, and, as at the date of these standards, means: <ul style="list-style-type: none"> a) a serious act or omission that, if proven, would constitute an offence under an enactment of British Columbia or Canada; b) an act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment, other than a danger that is inherent in the performance of an employee's duties or functions; c) a serious misuse of public funds or public assets; d) gross or systemic mismanagement; or e) knowingly directing or counselling a person to commit a wrongdoing described in paragraphs a) to d).

Standard Ownership

Contact Position	Manager, People Operations
Policy Owner	Chief People Officer
Approving Body	Board of Directors

Revision History

Version	Effective	Approved by	Amendment
12.0	Dec 26, 2024	Board of Directors	Revised to re-order content and add new sections for Making Ethical Decisions, Safe and Healthy Workplace, Third Party Relationships, AML and ESG. Major amendments to remove some restrictions on Limitations of Gaming Participation, move guidance on conflicts of interest to a supporting guide, and add direction on bribery, corruption, fraud, illegal acts and BCLC's Fraud Prevention and Safe Reporting Policies. Added definitions for bribery, corruption, fraud, ESG, lobbying, non-arm's length, stakeholder, vendor, P&C Representative and other housekeeping changes.
11.0	Sep 25, 2023	Board of Directors	Amendments to align with new <i>Public Interest Disclosure Act</i> . Updates to Appendix C to include new Public Interest Disclosure Act training and Indigenous Reconciliation training. Changes to Additional Limitations to Gaming Participation to remove restrictions on participating in lottery draws on PlayNow.com. New requirements added for Access to BCLC Facilities, including privacy notice for employee access cards. Clarifications to Post-Employment Restrictions for non-Executive employees and other housekeeping changes made throughout.
10.0	Jul 28, 2022	Board of Directors	Clarified requirements for actual, perceived or potential conflicts of interest involving political activities. Changes to Employee Participation in Gaming section providing BCLC's Chief Operating Officer with authority to request exemption from limitations on participation for loyalty programs or PlayNow/eGaming products for certain key positions, with approval from the Chief People Officer.
9.0	Oct 26, 2021	Board of Directors	Major amendments including changes to the threshold and requirements for Entertainment, Gifts and Services, a new post-employment restriction prohibiting employees from lobbying BCLC or the B.C. Government for a 12 month period following termination of employment and new requirements for Government Communications.

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Version	Effective	Approved by	Amendment
			Requirements were also added for employees who may be authorized by BCLC to access a PlayNow account for the purposes of carrying out their employment duties. Potential Conflicts of Interests have been added to conflict of interest disclosure requirements and clarifications were made throughout the Conflict of Interest Guidelines.
8.1	Oct 27, 2020	Corporate Secretary	Minor amendments to update People and Culture titles following OneBCLC organizational restructure.
8.0	Jan 26, 2017	Board of Directors	Major amendments 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, 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.
7.0	Nov 26, 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.
6.0	May 6, 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 leadership reflected on p. 5; and Revision History section added.
5.0	Feb 5, 2013	Vice President, Human Resources	Changes made to a few glossary terms, text added regarding mandatory training, and Appendix C added.
4.0	Jun 9, 2011	President and CEO	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.

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Version	Effective	Approved by	Amendment
3.0	Jun 3, 2009		(information not available)
2.0	Jun 1, 2008		(information not available)
1.0	Nov 27, 2007	Board of Directors	Inaugural document