

Standards of Ethical Business Conduct for British Columbia Lottery Corporation Employees

Version 11.0 September 2023

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Glossary of Terms

In these Standards:

Accountability	Means BCLC manages responsibilities 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	Means BCLC is committed to continual improvements to our operational efficiency and effectiveness to optimize and manage the costs of our business.
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 Chief Executive Officer, 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.
GPEB	Means Gaming Policy and Enforcement Branch.
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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Manager	Means the person to whom you directly report.
People and Culture	Means a member of the People and Culture team, such as a People and Culture Advisor allocated to support an employee's division, or the Manager, People Operations.
People and Culture Advisor	Means a member of the People and Culture team allocated to support an employee's division.
Personal Information	Means recorded information about an identifiable individual other than Contact Information.
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.
Whistleblower Policy	Means BCLC's corporate policy that establishes expectations and protections for reporting concerns related to misconduct in a safe, confidential manner.
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 this Procedure, 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; ore) knowingly directing or counselling a person to commit a wrongdoing described in paragraphs a) to d).

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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 represent government in our actions. Our actions are subject to the *Gaming Control Act*, British Columbia, under which each employee is registered.

Our Standards of Ethical Business Conduct embeds our 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 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.

Pat Davis
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 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, refer the matter to your Manager or BCLC 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.

EVERY EMPLOYEE’S RESPONSIBILITY

As a BCLC employee, it is your responsibility to uphold BCLC’s social purpose and 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. Mandatory training as at the date of these Standards is outlined 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. In the event of a discrepancy between a BCLC policy and these Standards, these Standards shall prevail.

MANAGEMENT'S RESPONSIBILITY

Executives, directors and managers play a leadership role in upholding BCLC's social purpose 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 (using [Appendix B](#)) for all employees who have identified an Actual, Perceived or Potential Conflict of Interest as defined within the [Conflict of Interest Guidelines](#);
- notify Procurement of all employee Actual, Perceived or Potential Conflicts of Interest declared with a vendor;
- destroy all electronic and hard copy declaration 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 Questions or Concerns.

RAISING QUESTIONS OR CONCERNS

BCLC does not permit reprisal or retaliation of any kind against employees who, in good faith, bring forward allegations and you are encouraged to bring forward questions, concerns or reports about behaviour that you suspect to be in breach of these Standards. 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 people and culture advisor. If you have questions or concerns about the conduct of any BCLC employee, including a suspected breach of these Standards, or the conduct of a BCLC Service Provider, Retailer or Contractor that may be unethical or fraudulent in respect of BCLC, you are encouraged to discuss the matter with your Manager first.

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 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 violation of these Standards.

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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. If you have concerns you feel will not be kept in confidence and for more serious matters, including a matter you feel cannot be resolved by the process described above or that you suspect is illegal, fraudulent, unethical, unsafe or a significant danger to the environment, see BCLC's [Public Interest Disclosure Procedure](#) and [Whistleblower Policy](#).

Whistleblower and Public Interest Disclosure

BCLC is dedicated to the highest possible standards of honesty, integrity, respect, social responsibility, Cost Consciousness and Accountability. BCLC's [Public Interest Disclosure Procedure](#) outlines how you may request advice and report Wrongdoing at BCLC under the *Public Interest Disclosure Act* (PIDA), British Columbia, and expectations for how BCLC will respond to disclosures of Wrongdoing. BCLC's [Whistleblower Policy](#) sets out a process to report concerns that do not meet the threshold of Wrongdoing under PIDA.

The Public Interest Disclosure Procedure and Whistleblower 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. Most importantly, the Public Interest Disclosure Procedure and Whistleblower Policy are 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.

CONFIDENTIALITY

All concerns brought to BCLC's attention under the Public Interest Disclosure Procedure or Whistleblower Policy will be regarded as confidential. You may make a disclosure or report anonymously as outlined under the procedure or policy.

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 Conflict of Interest as defined within the [Conflict of Interest Guidelines](#) 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 Conflict of Interest, the employee must refrain from participating, in any manner, in 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.

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BCLC's President and Chief Executive Officer must authorize requests for exemptions 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.

Employee Conduct

WORKPLACE

As part of BCLC's social purpose, 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 harassment and at all times operates in accordance with the *Human Rights Code*, British Columbia, 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, standards 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 department responsible for consumer services.

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 department responsible for media and issues management.

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.

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GOVERNMENT COMMUNICATIONS

Communications with federal, municipal, provincial governments or government bodies, other than the B.C. Government or a B.C. government body, or communications with First Nation governing bodies, that attempt to influence the decision-making of the government, government body or governing body, may be subject to requirements under relevant lobbying legislation or bylaws. You must contact the Legal Services department prior to engaging in this type of communication with a federal, municipal, provincial government or government body or First Nation governing body. This does not apply to communications with the B.C. Government or a B.C. government body.

SUPPORTING REFERENCES

[Respectful Workplace Policy](#)

[Occupational Health and Safety Policy](#)

[Travel and Expenses Policy](#)

[Purchasing – Vendor Selection and Thresholds Policy](#)

[Signing Authority Policy](#)

[Media Relations Policy](#)

Player's 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 persons 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 Purpose

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 social purpose to “generate win-wins for the greater good”.

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 more and greater win-wins to benefit the well-being of all involved.

This includes, but is not limited to, the well being 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 well-being of the player in everything we do.

SUPPORTING REFERENCES

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

[Gaming Policy and Enforcement Branch - Responsible Gambling Standards for Internet Gambling Conducted by BCLC](#)

[Gaming Policy and Enforcement Branch - Responsible Gambling Standards for the BC Gambling Industry Advertising and Marketing Standards for Gambling in British Columbia](#)

Conflict of Interest Guidelines

Integrity, honesty, trust and Accountability 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 may give rise to an Actual, Perceived or Potential Conflict of Interest:

- An 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.
- A 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.
- A 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 workplace responsibilities in the future that could be influenced by the private interest.

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You are required to disclose Actual, Perceived and Potential Conflicts of Interest as detailed below and must act in accordance with these conflict of interest 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.

DISCLOSURE

You must disclose any circumstance(s) that could be an Actual, Perceived or Potential Conflict of Interest by completing [Appendix B - Declaration of Actual, Perceived or Potential Conflict of Interest form](#) (the Declaration Form) and return it to People and Culture 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, if required, revise your Declaration Form so that you and your Manager can discuss and address conflict of interest issues.

In addition to the annual review, you must, immediately upon becoming aware of an Actual, Perceived or Potential Conflict of Interest, disclose the conflict to your Manager and complete a new Declaration Form. This requirement exists even if you do not become aware of the conflict before, during or after a transaction is complete.

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 advisor.

Unless otherwise instructed, you and your Manager (or people and culture advisor) must immediately identify and implement steps to resolve Actual Conflicts of Interest and prevent Perceived or Potential Conflicts of Interest. Conditions that may be implemented are identified below, under [Mitigation Strategies](#). Managers may request assistance from People and Culture if unsure whether a conflict exists. Where a conflict exists with a vendor, Procurement will be notified by your leader of the existence of a conflict.

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

In addition to applying the General Guidelines to determine if there is an Actual, Perceived or Potential Conflict of Interest that you must declare, you must follow the specific directions for disclosing business interests, board appointments, Personal Relationships, investments, interests in the gaming industry and political activities, as outlined below.

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, Perceived or Potential Conflict of Interest that you must disclose:

- 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 Conflict of Interest or an apprehension of bias.
- You must consult with your Manager (and if necessary, People and Culture) to discuss any situations that may result in a Perceived or Potential Conflict of Interest and any mitigation steps required.
- You must not use your position at BCLC to pursue or advance your personal interests, the interests of a Family Member, an Associate, the interests of 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.

COMMON CONFLICT OF INTEREST SITUATIONS

There are several situations that could give rise to an Actual, Perceived or Potential Conflict of Interest. The most common involve:

- accepting gifts, favours or financial benefits from a vendor,
- the existence of a Personal Relationship, with a vendor(s),
- the existence of a new, consensual and undisclosed Personal Relationship with a colleague at work. Please note that coercive relationships or abuse of positional power to create relationships at work are subject to BCLC's Respectful Workplace and Whistleblower policies, or
- inappropriate disclosure or use of Confidential Information.

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The following are examples of conflict of interest situations:

- Influencing BCLC to lease equipment from a business owned by an Associate, Family Member or any other person that you have a Personal Relationship with.
- Influencing BCLC to make its travel arrangements through a travel agency owned by an Associate, Family Member or any other person you have a Personal Relationship with.
- 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, Associate or any other person you have a Personal Relationship with, could personally benefit from your influence in BCLC decisions, such as through investments, loans, purchases, sales, contracts, policy, grants 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 financial, business or Personal Relationship.
- Having authority to approve performance reviews or wage/salary adjustments for a colleague that you have developed a new, consensual and undisclosed Personal Relationship with.
- Serving as a volunteer, board member or owner of an organization that is lobbying or seeking to influence the actions or decisions of BCLC.

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 an Actual 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.

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BOARD APPOINTMENTS

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

Board appointments must adhere to the following requirement:

- you must not serve on the board of an organization that is a BCLC competitor or vendor;

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 people and culture 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 resource decisions or activities, such as hiring, performance evaluation, promotion or establishment of terms and conditions of employment may present an Actual, Perceived or Potential Conflict of Interest.

You must disclose to your Manager, or people and culture 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. Your Manager will identify if an Actual, Perceived or Potential Conflict of Interest exists and, if so, immediately implement steps to resolve Actual Conflicts of Interest and prevent Perceived or Potential Conflicts of Interest. Managers may request assistance from People and Culture if unsure whether an Actual, Perceived or Potential Conflict of Interest 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 an Actual, Perceived or Potential 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, investment 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.

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If you have any direct or indirect investments that are an Actual, Perceived or Potential 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 activities (e.g., membership in a political party, supporting a candidate for elected office, etc.). However, political activities must be clearly separate from activities related to your duties with BCLC and you must not engage in political activities during working hours or use BCLC facilities, equipment or resources in support of these activities. Political activity such as canvassing or soliciting funds on behalf of any political party is not permitted in the workplace.

You may run as a candidate in a federal, provincial or local government election provided you can ensure that the interests or activities of the campaign or political office do not conflict with the interests of BCLC. BCLC may need to place constraints on your employment to ensure there are no Actual Conflicts of Interest or to prevent Perceived or Potential Conflicts of Interest. Such constraints must be recorded in Section II of your Declaration Form.

In circumstances where the activities of the campaign or political office conflict with BCLC's interests, you may request an unpaid leave of absence from BCLC. Leave must be approved by the Chief People Officer and 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.

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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 Actual Conflicts of Interest or to prevent Perceived or Potential Conflicts of Interest. Such constraints must be recorded in Section II of your Declaration Form.

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 Actual Conflicts of Interest or to prevent Perceived or Potential Conflicts of Interest.

Employees may be required to:

- declare certain details of their 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 their 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;
- decline from participating in part or the entirety of specific processes, functions or roles (e.g., risk management, audit review, legal consultation or proceedings, policymaking, procurement, staffing and human resource decisions, etc.);
- limit their 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 their 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 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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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, Perceived or Potential Conflict of Interest

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 to 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 (consisting of Vice-Presidents and the President and Chief Executive Officer) are subject to further post employment restrictions as follows. 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 People Committee. Upon receipt of a request, the People Committee will review the individual circumstance 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.

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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.

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 value of the gift or other benefit is less than \$100; and
- 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.

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. BCLC employees are expected to act with integrity and use good judgement before accepting or offering a gift or other benefit. 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 advisor.

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 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.

Inappropriate gifts received by a BCLC employee must be returned and, if appropriate, should be accompanied by a copy of these Standards.

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 people and culture 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.

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NO PLAY AT WORK

You must not participate in any BCLC games or mobile apps, including accessing PlayNow games, while working, or from a BCLC computer or network, unless specifically authorized by BCLC 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 and certain key BCLC positions, for whom an exemption is approved as outlined within the Additional Limitations on Gaming section below, may also require access to a PlayNow account and games. This applies to participation at BCLC offices, any BCLC gaming facility, while working remotely and to Lottery personnel who call on locations that sell lottery products during their working hours.

In circumstances where an employee is authorized by BCLC to access a PlayNow account for the purposes of carrying out duties in the course of their employment during working time, including, but not limited to, testing and quality assurance of PlayNow.com, access to the PlayNow account is subject to the following conditions (these conditions only apply to the PlayNow.com account that is established for work purposes. They do not apply to an employee's personal PlayNow.com account):

- usage of the PlayNow account must not contravene any laws, regulations, BCLC policies, standards or procedures;
- the employee is not permitted to register for a PlayNow account 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 up to and including dismissal; and
- the employee is entitled to reimbursement for any expenses personally incurred in funding the PlayNow account.

BCLC may, at its discretion, amend the conditions for authorizing employee access to PlayNow.com at any time and without employee consent by providing written notice to the applicable BCLC employees.

ADDITIONAL LIMITATIONS TO GAMING PARTICIPATION

You are disqualified from participating in commercial contests, loyalty programs and promotions associated with BCLC.

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 with notification to the employee's Manager.

The Chief Operating Officer may request exemption from the limitations on participation for loyalty programs or PlayNow Products defined below, for key positions that require access to a loyalty or PlayNow account or games to carry out their duties in the course of employment. All exemption requests require approval by the Chief People Officer, in writing.

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Sports Products

Employees prohibited from participating in Sports Action games:

- employees in the department responsible for sports betting games;
- employees in the department responsible for Sports Action games;
- members of the Odds Setting Advisory group; 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 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 the Legal, Compliance, Security division; and
- all BCLC directors and above.

PlayNow Products

Employees prohibited from participating in PlayNow 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;
- employees in the Legal, Compliance, Security division; and
- All BCLC directors and above.

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 required to comply with the information access and protection of privacy requirements established in the *Freedom of Information and Protection of Privacy Act* (FIPPA), British Columbia. 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 Freedom of Information 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, securing, accessing, using, disclosing, and disposing of Personal Information.

You are required to safeguard any Personal Information in BCLC's custody in accordance with FIPPA requirements. You may not disclose Personal Information to third parties 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](#) and procedures.

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VENDOR, 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 vendors. 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 (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

Privacy Management and Accountability Policy

Procurement Protocol

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 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 to Corporate Security and Asset Protection. Employees must immediately report lost, stolen or damaged access cards to Corporate Security and Asset Protection.

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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 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 stated within BCLC's policies, and should not be removed from BCLC's premises without authorization.

All BCLC employees have the responsibility to immediately report any lost, stolen or damaged BCLC Physical Assets to their Manager and BCLC Security. Any damage to, or theft of, Physical Assets (e.g., the buildings, property, or assets in the building, such as desks, chairs, etc.) must be reported by the employee to their Manager and to the Corporate Facilities team. 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 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 and BCLC's internal networks and systems.

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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 to conduct BCLC business, 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 must not be removed from BCLC premises without authorization.

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

RETENTION OF INFORMATION

Information created or received by BCLC in the course of business activity and maintained 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 information created by you is under the custody and control of BCLC and must be retained and disposed of in accordance with information schedules.

SUPPORTING REFERENCES

Pool Fleet Vehicle Standards

Appropriate Use of Information and Information Technology Resources Policy

[Obsolete Assets/Asset Disposal Policy](#)

[Records Management Policy](#)

Identification and Access Policy

Standard Ownership

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

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Revision History

Version	Effective	Approved by	Amendment
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. 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.

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Version	Effective	Approved by	Amendment
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.
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

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Appendix A – Employee Declaration and Commitment

Last Name: _____ First Name: _____

Employee Number (Completed by existing employees only): _____

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, Perceived or Potential 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, Perceived or Potential Conflict of Interest apart from those stated in Appendix B.

I agree to report any new information that may present an Actual, Perceived or Potential Conflict of Interest as soon as I become aware of it.

I understand that if I have concealed any known Actual, Perceived or Potential 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: _____

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

Completed forms must be forwarded to People and Culture. 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 people and culture advisor or your Manager.

Appendix B – Declaration of Actual, Perceived or Potential Conflict of Interest

Employee Name: _____ Employee Number (Completed by existing employees only): _____

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.)
- 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 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. 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 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.)
- 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.)

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

Signatures: Employee: _____ Date : _____

Manager: _____ Date : _____

Executive/V.P.: _____ Date: _____

(V.P. to sign only if actual, perceived or potential conflict of interest is declared).

Completed forms must be forwarded to People and Culture. 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.



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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 people and culture advisor or your Manager.

SECTION II: Conditions to be imposed to mitigate or eliminate any Actual, Perceived or Potential Conflict of Interest situation. Leaders are required to notify Procurement of all employee declared conflicts related to a vendor relationship. **This section is to be completed only if actual, perceived, or potential conflict of interest is declared in Section I.**

(Use separate page and attach if additional space required)

Signatures: Employee: _____ Date: _____
 Manager : _____ Date: _____
 Executive/V.P.: _____ Date: _____
(All parties to sign only if actual, perceived or potential conflict of interest is declared)

Completed forms must be forwarded to People and Culture. A copy of this form will be kept in your employee file.



Appendix C – Mandatory Training for Employees

Training	Owner	Recertification Requirement	Notes
All Employees and Managers			
Anti-Money Laundering (AML) for Employees	Legal, Compliance, Security	Yes – every 2 years	New Employees – to be completed within 30 days of hire.
Emergency Safety and Preparedness	Finance and Corporate Services	Yes – annually	New Employees – to be completed within 2 weeks of hire.
Fit for Work Policy Attestation	People and Culture	No	New Employees – to be completed within 30 days of hire.
Indigenous Reconciliation Training	People and Culture	No	New Employees – to be completed within 30 days of hire.
Information Management	Legal, Compliance, Security	Yes – every 2 years	New Employees – to be completed within 30 days of hire.
Information Security Training	Legal, Compliance, Security	Yes – annually	New employees – to be completed within 30 days of hire.
Introduction to Player Health	Social Purpose and Player Experience	No	New employees – to be completed within 30 days of hire.
New Employee Orientation	People and Culture	No	New employees – to be completed within 30 days of hire.
Playing it Right at BCLC	Social Purpose and Player Experience	No	New Employees – to be completed within 30 days of hire.
Public Interest Disclosure Act Training	People and Culture	No	New Employees – to be completed within 30 days of hire.

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Training	Owner	Recertification Requirement	Notes
Respectful Workplace Matters for Employees	People and Culture	Yes – annually	New Employees – to be completed within 30 days of hire.
Standard of Ethical Business Conduct for Employees Declarations and Assessment	People and Culture	Yes – annually	New Employees – to be completed within 2 weeks of hire.
Travel and Expenses Course	Finance and Corporate Services	No	New Employees – to be completed within 30 days of hire.
Site Level Employees Only			
Appropriate Response Training (ART) Level 1	Social Purpose and Player Experience	Yes, every 3 years	
Appropriate Response Training (ART) Level 2	Social Purpose and Player Experience	No	All player-facing employees
People Managers Only			
Orientation for People Managers	People and Culture	No	New People Managers – to be completed within 30 days of hire.
Respectful Workplace for People Managers	People and Culture	Yes – annually	New People Managers – to be completed within 30 days of hire.