



## **AFNWA Employee Code of Conduct and Conflict of Interest Policy**

### **Introduction**

This *Code of Conduct and Conflict of Interest Policy* forms part of the conditions of employment for AFNWA. At the time of signing their letter of offer, all AFNWA employees shall formally sign a form acknowledging their acceptance of the Employee Code of Conduct and Conflict of Interest Policy.

1. Each employee shall sign a form acknowledging their acceptance of the Code of Conduct and Conflict of Interest Policy at the start of employment with the AFNWA.
2. All AFNWA employees are responsible for ensuring that they comply with this Code of Conduct and Conflict of Interest Policy.

### **Guiding Principles**

1. AFNWA employees shall demonstrate respect, fairness, and courtesy in their dealings with fellow AFNWA employees, contractors, community members, and members of the public.
2. AFNWA employees shall demonstrate respect for human dignity and the value of every person.
3. All AFNWA employees shall perform their duties and arrange their private affairs so that the integrity, objectivity, and impartiality of the organization is conserved and enhanced
4. AFNWA employees shall act, always, in a manner that recognizes that their position within the organization is subject to close public scrutiny, whether they are publicly representing the organization or not.
5. All AFNWA employees shall make every effort to identify potential conflicts of interest, and to avoid potential conflicts. If a conflict does arise with the private interests of the membership that AFNWA serves, then the conflict shall be resolved in favor of AFNWA.

### **Employee Code of Conduct Policy**

#### **CEO and Senior Management Team**

1. The CEO and the AFNWA Senior Management Team all have the responsibility to exemplify, in their actions and behaviors, the values of AFNWA. They have a duty to infuse these values into all aspects of the work of

the organization. They are expected to take special care to ensure that they comply, at all times, with the spirit, intent and specific requirements of this Code of Conduct and the Human Resources Policy.

2. The AFNWA expects the CEO and Senior team to delegate duties to their team members considering their competencies and workload. Likewise, employees are expected to follow supervisors' instructions and complete their duties with skill and in a timely manner.

### **Duties of the CEO**

1. The CEO shall ensure that the letter of offer to employees includes the AFNWA Code of Conduct and Conflict of Interest Policy, and the Human Resources Policy. These policies are key documents for the management of human resources and a part of the conditions for employment.
2. The CEO shall encourage and maintain an ongoing dialogue on AFNWA values and ethics within the organization in a manner that is appropriate to the specific issues and challenges encountered by the organization.
3. The CEO shall encourage the Senior Managers to assist other employees in raising, discussing, and resolving issues arising from the application of this Code of Conduct and Conflict of Interest Policy.

### **Responsible Performance of Duties**

1. AFNWA employees are required to conduct themselves in a professional manner which consistently reflects a positive image for the AFNWA.
2. Each employee shall strive to complete each task to the best of their ability and in a reasonable timeframe.
3. AFNWA employees shall make it a practice to devote themselves to their work during work hours.
4. AFNWA employees are required to follow instructions from the CEO, Senior Management member or Supervisor in charge of specific or relevant files and projects.
5. AFNWA employees should always contribute to a positive work environment which is collaborative, conducive to productivity, and is not viewed as being otherwise disruptive to colleagues.

### **Conduct**

1. AFNWA employees shall be punctual and on time for work every day.
2. Employees will not at any time engage in public criticism of other Employees, Management Team, Board, or the approved actions and policies of AFNWA.
3. Employees will not participate in or allow any behavior that is intended to degrade, humiliate, intimidate, or cause fear to any community member, client, volunteer, or other employee. Violation may lead to discipline up to and including dismissal. For additional direction on employee conduct, please refer to Article 37 of the AFNWA Human Resource Policy: Respectful Workplace Procedures.

4. Employees should recognize that there is a potential for damage to be caused (either directly or indirectly) to AFNWA in certain circumstances through personal use of social media when you can be identified as a AFNWA employee. Accordingly, you should comply with this policy to ensure that the risk of such damage is minimized. Employees are personally responsible for the content you publish in a personal capacity on any social media platform.
5. AFNWA employees shall ensure that equipment, property or supplies that are designated AFNWA property are used solely for AFNWA work. AFNWA employees shall not accept money from any person or organization in relation to AFNWA work. Gifts are permitted if part of a traditional ceremony, or under \$200.00 in value.
6. AFNWA employees shall act, always, in accordance with the Enterprise Risk Management Policy, with commitment to risk identification and continuous improvement.
7. In general, the dress code for employees is business casual unless tasks and interactions with the public require otherwise. All staff must take care to embrace a tidy appearance, practicing good hygiene and choosing dress that embraces modesty and professionalism. However, operations and engineering staff that work in the field are permitted to wear more casual attire but should avoid wearing anything that may be viewed as offensive such as a shirt printed with profane or derogatory statements.
8. AFNWA employees may not take advantage of or use to their benefit, any information not generally available to the public that is obtained in the course of their official duties for the AFNWA, or disclose such information to a partner, business associate or a close family member. Similarly, employees may not disclose confidential information obtained through their course of duties and responsibilities. without proper authorization.

### **Protection and Sharing of Information**

1. Every AFNWA employee shall understand and acknowledge that information gathered or obtained during their work shall be always kept confidential and not used for any other purpose than that for which it was acquired. Any violation of this directive may result in disciplinary action. Refer to Appendix A: Oath of Confidentiality.

## **Employee Conflict of Interest Policy**

The objective of this conflict-of-interest policy is to minimize the possibility of conflicts arising between private interests and AFNWA interests and the duties of AFNWA employees. These measures serve to uphold the AFNWA Code of Conduct Policy. As such, impartiality and objectivity are the primary means by which AFNWA employees maintain First Nations and other stakeholders' confidence.

1. AFNWA employees shall, wherever possible, avoid and prevent situations that could give rise to a conflict of interest, or the appearance of a conflict of interest. These measures are adopted both to protect the AFNWA and its employees from conflict-of-interest allegations and to help them to avoid situations of risk.
2. A conflict of interest exists where you, a partner, a business associate, or a close family member:
  - a) are a party to a material contract or a proposed material contract with the AFNWA.
  - b) are a director or officer of an organization or have a material interest in any company or person who is a party to a material contract or proposed material contract with the AFNWA.
  - c) are directly involved in an issue under discussion, or associated with an issue under discussion in a substantive way and stand to benefit or personally gain from the decision made, or
  - d) assist a third party in its dealings with the AFNWA, where such assistance could result in favorable or preferential treatment being accorded to that third party by the AFNWA.
3. It is impossible to prescribe a remedy for every situation that could give rise to a real, apparent or potential conflict. When in doubt, AFNWA employees should seek guidance from the CEO or a Senior Management member.
4. AFNWA employees have the following overall responsibilities:
  - a) Bearing in mind their official duties, AFNWA employees shall, wherever possible, arrange their private affairs in a manner that will prevent real, apparent or potential conflicts of interest from arising.
  - b) If a conflict does arise between an employee's private interests and the official duties of AFNWA, the employee should immediately report the conflict to the CEO or a Senior Management member, who will determine how best to manage the conflict to preserve the objectives of the AFNWA. The conflict shall be resolved in favor of the AFNWA, which may require the employee to remove themselves from one or both sides of the situation.
  - c) The resolution of the conflict of interest may require that you withdraw from a discussion or a meeting, or that you remove or terminate the conflict or potential conflict by whatever means is necessary, including relinquishment of your position with the AFNWA.
  - d) Provided that the conflict of interest is disclosed as soon as possible, no material contract entered into, or action taken by the AFNWA with knowledge of the conflict of interest is void or voidable.
  - e) If a conflict of interest is discovered after a decision is made that might have been affected by knowledge of that conflict, the decision is not void or voidable, provided that the decision was made fairly and on reasonable grounds.
  - f) Where a conflict of interest is disclosed in a timely manner and in accordance with this policy, a material contract may be entered, a decision made, or an action taken by the AFNWA that allows the

conflict of interest (or potential conflict of interest) to continue. For example, AFNWA may hire or contract to family members provided such conflict of interest has been disclosed by the affected employee.

- g) If an employee knowingly fails to disclose a conflict of interest, the AFNWA reserves all rights to have any contract entered or any action taken set aside, revoked, or rescinded.
- h) AFNWA employees shall not step outside their duties, or assist individuals or private entities in their dealings with AFNWA, in a way that would result in preferential treatment to the person or private entity.
- i) AFNWA employees may not solicit or accept gifts in the exchange for future considerations. Employees shall not accept gifts other than incidental gifts, customary hospitality, or other benefits over \$150, without the approval of the Chief Executive Officer.

5. Regarding outside employment or activities, AFNWA employees shall abide by the following rules:

- a) With the provision of prior notice to the CEO, AFNWA employees may engage in employment outside the AFNWA, unless that employment is likely to give rise to a conflict of interest or in any way interferes with the operation of the AFNWA.
- b) AFNWA employees may engage in outside activities unless those outside activities are likely to give rise to a conflict of interest or in any way interferes with the operation of the AFNWA.
- c) Where outside activities or employment may subject AFNWA employees to demands incompatible with their work duties or cast doubt on their ability to perform their AFNWA duties, they shall speak to the CEO, who will make the final decision as to the appropriateness of the outside activity or employment.

**Violations of the Code of Conduct and Conflict of Interest Policy**

- 1. Where the CEO and/or Personnel Committee determines an AFNWA employee has violated the Code of Conduct, discipline, up to and including termination, may follow.

**Employee Signature** \_\_\_\_\_

**Date:** \_\_\_\_\_

## Annex A: Oath of Confidentiality

**Oath for Personnel:** Each employee, as a condition of employment, takes the Oath of Confidentiality, as noted below.

AFNWA strives to protect and respect the personal information of its clients, employees, and business partners in accordance with all applicable provincial and federal laws. All employees must abide by AFNWA procedures and practices when handling personal information as well as the requirements under the Freedom of Information and Protection of Privacy Act. (FOIPOP). Consent occurs and is obtained when an individual signs an application or other forms containing personal information, thereby authorizing AFNWA to collect, use, and disclose the individual's personal information for the purposes stated on the form. Explicit notice to the individual is required. This information must be kept confidential. Divulging confidential information could result in immediate discipline up to and including termination of employment. All employees, including students completing work terms/ placements, term positions or volunteer work, are required to sign this Oath of Confidentiality. If any employee receives a request for the release of confidential information, the employee should discuss the request with their immediate Manager or the Chief Executive Officer. All personnel working on behalf of AFNWA will not speak of or divulge any information to the media regarding AFNWA business unless instructed by the Chief Executive Officer or Board Chair (or designate) as approved in writing. This Oath of Confidentiality survives any termination of employment, whether initiated by the Employee or Employer.

**Employee Signature** \_\_\_\_\_

**Date:** \_\_\_\_\_