



# CODE OF CONDUCT

Version 1.0

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## RESPONSIBILITIES

### 1. INTRODUCTION

- 1.1. This Code of Conduct (“Code”) applies to directors, board members, officers, employees, contractors, external advisors, and consultants related to the Canadian Centre of Recovery Excellence (“CoRE”), an Alberta crown corporation. The purpose of the Code is to establish the rules governing the business and ethical conduct for those serving or directing CoRE. The Code reflects a commitment to the values of accountability, integrity and respect and provides a framework to guide ethical conduct.

### 2. DEFINITIONS

- 2.1. **“Affiliation”** includes being a member, employee, volunteer, owner, shareholder, creditor, director, elected representative, appointee, or trustee of an Entity or having any type of legal or equitable interest in an Entity.
- 2.2. **“Administrator”** means:
  - a) where this Code governs any Covered Individual(s) other than the individuals covered under subsection (b) below, the CEO or Designated Legal Officer; and
  - b) where this Code governs a director of CoRE, the CEO, or the Board Chair of CoRE, the Designated Legal Officer.
- 2.3. **“Business Interests”** include any interests arising as a result of a current, former, or prospective Affiliation with any for profit, not-for-profit, or charitable Entity.
- 2.4. **“Closely Associated Persons”** are persons with whom there is a substantial relationship and include a spouse, adult interdependent partner, child or other relative, a close friend, an employer, a business associate, and a client.
- 2.5. **“CoRE Act”** means Alberta’s Canadian Centre of Recovery Excellence Act.
- 2.6. **“Benefit”** means a direct or indirect pecuniary or non-pecuniary advantage and includes the avoidance of a detriment.
- 2.7. **“Board”** means the Board of Directors of CoRE.
- 2.8. **“Board Chair” or “Chair”** means the director designated as the chair of the Board pursuant to the CoRE Act.
- 2.9. **“Board Vice-Chair” or “Vice Chair”** means the director designated as the vice-chair of the Board pursuant to the Bylaws.
- 2.10. **“Bylaws”** means the bylaws of CoRE, as amended from time to time.
- 2.11. **“CEO”** means the Chief Executive Officer or, if no individual has an office with that title, the highest-ranking executive who is responsible for managing the day-to-day operations of CoRE, regardless of title.
- 2.12. **“Committee”** means a committee of directors.
- 2.13. **“Conflict of Interest”** may include actions or decisions that Covered Individuals take on behalf of CoRE that provide, appear to provide, or have the potential to provide them with an opportunity to further the Private Interests of themselves or Closely Associated Persons.

- 2.14. **“Covered Individual(s)”** means any of the directors, the CEO, other employees, contractors, external advisors and consultants who provide services to CoRE of a recurring or regular nature;
- 2.15. **“Designated Legal Officer”** means CoRE’s legal counsel who is responsible for administering this Policy, regardless of title and who may be an employee of CoRE or externally retained.
- 2.16. **“Designated Alternate Officer”** means a person, external retained to provide impartial review and whose retainer may be arranged, facilitated, and managed by the Designated Legal Officer.
- 2.17. **“Director”** means a director of the Board.
- 2.18. **“Employee”** means a person employed by CoRE.
- 2.19. **“Entity”** includes a corporation, partnership, sole proprietorship, firm, franchise, association, organization, holding company, joint venture, trust, society, post-secondary institute and research institute.
- 2.20. **“Governance Committee”** means the governance committee of the Board;
- 2.21. **“Offence”** means an offence under the *Criminal Code of Canada, Controlled Drugs and Substances Act* or applicable securities legislation.
- 2.22. **“Private Interest”** includes a personal obligation, financial interest, Business Interest or an interest of a Closely Associated Person. A private interest does not include an interest:
  - a) in a matter that is of general application;
  - b) that affects a person as one of a broad class of the public; or
  - c) that is trivial.

### 3. BACKGROUND AND SCOPE

- 3.1. CoRE’s mandate includes finding and communicating effective ways to support recovery. With evidence-based objectivity and a commitment to real-world impact, CoRE guides government, healthcare communities, and global leaders toward effective recovery-focused health and addiction services. CoRE’s mission is empowering decision-making with data and evidence to support people in their pursuit of recovery.
- 3.2. This Code applies to Covered Individuals. It governs for as long as the Covered Individuals serve, direct or otherwise are engaged in CoRE’s mandate, including during approved leaves of absence. Individuals who provide services to CoRE but who are not a Covered Individual are still expected to adhere to the principles and values set out in the Code.
- 3.3. The requirements of this Code are in addition to requirements of CoRE’s policies and procedures.

### 4. CODE ADMINISTRATION

- 4.1. The Administrator will:
  - a) administer the Code for CoRE, and will issue instructions as necessary to implement the Code;
  - b) promote the Code and any amendments or supplements to it on a regular basis to ensure that Covered Individuals are aware of their obligations;
  - c) implement, manage, promote, and exercise powers contained in the Code, including any matters incidental to that authority;

- d) receive and ensure the confidentiality of all disclosures and ensure that any real or apparent conflict of interest is avoided or effectively managed; and
- e) be responsible for providing advice and managing all concerns and complaints concerning potential breaches of the Code, including conflicts of interest.

## 5. DISCLOSURE

- 5.1. Covered Individuals are required to disclose to the Administrator, in writing, any situation which is a conflict or an apparent conflict of interest between their duties and their personal interests and/or relationships. Covered Individuals shall disclose to the Administrator as soon as they are aware of any business transaction CoRE proposes to enter which the Covered Individual, or a relative of the Covered Individual, may be an affected party.
- 5.2. Covered Individuals must report any breach of this Code to the Administrator, including any activities by another Covered Individual that may constitute:
  - a) accounting irregularities, hiding or underestimating liabilities or any action to mislead or improperly influence auditors (including the Office of the Auditor General of Alberta) or their partners, directors, officers, employees and agents;
  - b) Conflict of Interest or other unethical business conduct, including conflicts and other conduct restricted under CoRE's Conflict of Interest Policy;
  - c) theft or fraud;
  - d) an Offence;
  - e) violation of applicable professional standards or internal policies;
  - f) a risk to health and safety;
  - g) risk to the environment;
  - h) harassment or discrimination;
  - i) workplace violence; or
  - j) any other matter of concern that is a breach of this Code.

With respect to reporting under items (a) and (c) above (concerning accounting matters, theft and fraud), the Administrator receiving a report shall disclose the report to the Board Chair

- 5.3. The Administrator will act to minimize or remove any real or apparent conflicts of interest. To manage a conflict of interest, the Administrator may:
  - a) remove the Covered Individual from matters in which the conflict exists or is perceived to exist, including any decision-making role;
  - b) require the Covered Individual to give up the particular private interest causing the conflict; or
  - c) in rare circumstances, require the Covered Individual who is not a Director or the CEO to resign their position from CoRE, or, where the Covered Individual is a Director or the CEO, refer the matter to the Board for a determination as to whether the Chair (or the Vice-Chair if the Chair is the Covered Individual in question) is to recommend to the appropriate Minister of the Government of Alberta to remove the Covered Individual as a Director or the CEO, as applicable.

- 5.4. Covered Individuals who voluntarily report their own possible errors rather than attempting to cover them up will be recognized for making the appropriate decision.

## 6. IMPARTIALITY

- 6.1. Covered Individuals are required at all time to conduct their duties and exercise their powers with impartiality at all times.

## 7. CONFIDENTIALITY

- 7.1. Covered Individuals shall handle confidential information with the utmost care and integrity and shall not disclose, release or transmit confidential information except as specifically authorized or required by applicable law. The responsibility for maintaining the confidentiality of information includes the responsibility of ensuring that the information is not directly or indirectly made available to unauthorized persons.
- 7.2. For the collection, use, and disclosure, as well as the managing of access and correction rights (together Information Handling Practices/IHPs), about:
  - a) personal information of Covered Individuals or about general records of CoRE, Covered Individual will follow Alberta's *Freedom of Information and Protection of Privacy Act*. and CoRE's; and
  - b) health information, Covered Individual will follow Alberta's Health Information Act (Alberta).
- 7.3. Every Covered Individual will also follow and ensure continued awareness of CoRE's privacy policies and in any event protect an individual's privacy by ensuring that personal information and health information is properly handled.

## 8. MEDIA, SOCIAL MEDIA, AND PUBLIC RELATIONS

- 8.1. Covered Individuals (other than the Chair, CEO and Chief Scientific Officer) must not comment publicly to the media or on social media about CoRE or its work without first consulting with the Administrator. Covered Individuals (other than the Chair, Chief Scientific Officer, and the CEO) must promptly notify the Administrator of any media requests for comment, and the Administrator will deal with them accordingly.
- 8.2. The responsibility for maintaining the confidentiality of information or documents includes the responsibility for ensuring that such information or documents are not directly or indirectly made available to unauthorized persons.
- 8.3. Covered Individuals must avoid using CoRE's communication materials for personal reasons as this may potentially lead to a misunderstanding and possibly damage CoRE's reputation

## COMMITMENT TO ACTING ETHICALLY

### 9. FURTHERING PRIVATE INTERESTS

- 9.1. The Code restricts Covered Individuals from acting in self-interest or furthering private interests by

virtue of their position with CoRE or carrying out their duties on behalf of CoRE. Covered Individuals are in conflict of interest and in violation of this Code if they:

- a) take part in a decision in the course of carrying out their duties on behalf of CoRE, knowing that the decision might further their private interest or the private interests of their spouse or any of their or their spouse's parents, siblings or children;
- b) use their role with CoRE to influence or seek to influence a government decision, which could further their private interest or the private interests of their spouses or any of their or their spouse's parents, siblings or children; or
- c) use or communicate information not available to the general public that was gained by the Covered Individual in the course of carrying out their duties on behalf of CoRE, to further or seek to further a private interest of the Covered Individual or the private interests of their spouses or any of their or their spouse's parents, siblings or children.

9.2. In addition, the Conflicts of Interest Act requires that the Board Chair and CEO:

- a) not take part in a decision in the course of carrying out their office or powers knowing the decision might further a private interest of the officer, a Person directly associated, as provided in the Act, with the officer, or the officer's minor or adult child;
- b) not use their office or powers of influence or seek to influence a decision to be made by or on behalf of the Crown or a public agency to further a private interest of the officer, a Person directly associated, as provided in the Act, with the officer, or the officer's minor child, or improperly further any other Person's private interest;
- c) not use or communicate information not available to the general public that was gained by the officer in the course of carrying out their office with CoRE or powers on behalf of CoRE to further or seek to further a private interest of the officer or any other Person's private interest; and
- d) appropriately and adequately disclose a real or apparent conflict of interest.

## 10. INVESTMENT AND MANAGEMENT PRIVATE ASSETS

10.1. Where an actual or proposed business or financial interest of a Covered Individual, or of the Covered Individual's spouse or any of their respective parents, siblings and children, is affected, appears to be affected, or may be affected by actions taken, or decisions made, in which the Covered Individual participates in the course of their appointment or employment, the Covered Individual shall disclose the business or financial interest to the Administrator.

10.2. If an actual or apparent conflict of interest situation exists under this section, the Administrator shall determine the method of resolution of the situation, except in the case of a Covered Individual who is a Designated Senior Official where the Ethics Commissioner shall determine the method of resolution

10.3. Options for resolution include requiring the use of a blind trust, divestment of the asset, or employment action ranging from transferring the Covered Individual to termination of employment or other contractual relationship between the Covered Individual and CoRE.

10.4. The Administrator may require financial disclosure by Covered Individuals in specific positions

where, in the opinion of the Administrator, conflict could likely occur. The Administrator shall maintain information that is disclosed under this section on a confidential basis.

## 11. DISCLOSURE STATEMENTS AND RETURNS

- 11.1. Covered Individuals who could be placed in a Conflict of Interest situation due to the nature of their duties and responsibilities will be required to disclose their outside business interests and financial holdings, on an annual basis, in writing on a form approved by the Administrator.

## 12. ACCEPTANCE OF GIFTS

- 12.1. Covered Individuals must not use their position with CoRE to solicit gifts, hospitality, or other benefits.
- 12.2. Covered Individuals shall not accept gifts, hospitality or other benefits that are or may be perceived as being connected directly or indirectly with the performance of their duties on behalf of CoRE from any individual or organization, other than in the following limited instances:
- a) within the course of the normal exchange of gifts, hospitality or other benefits between persons doing business together;
  - b) the normal presentation of gifts, hospitality or other benefits to people participating in public functions, provided, in all instances, that such gifts, hospitality or other benefits must not be of such a nature that could have a real, apparent, or potential influence on the Covered Individual's objectivity and effectiveness in performing their duties on behalf of CoRE; and
  - c) family and friends.
- 12.3. Covered Individuals must not solicit or accept cash or cash equivalents as gifts. The value of a single gift or benefit permitted shall not exceed \$500 from one source in any calendar year. Hospitality that is incidental to meeting (such as a business lunch or dinner) is considered a tangible gift and subject to this limit. The value of a single event invitation, inclusive of ticket, admission, travel fees, hospitality and accommodation, shall not exceed this amount.
- 12.4. Covered Individuals may accept paid conference passes to a conference. The value of any conference pass accepted (inclusive of admission, travel fees, accommodation, and hospitality) shall not exceed \$2,000 from a single source in a calendar year. Any conference pass exceeding these monetary limits may be accepted with prior written approval from the CEO, or, in the case of the CEO seeking to receive a conference pass exceeding \$2000 from a single source in a calendar year, with prior written approval from the Designated Legal Officer.
- 12.5. Acceptance of any allowable gift, regardless of value, should be reviewed to consider whether the gift is being offered by someone whose interests could be affected by a decision the Covered Individual could be called upon to make. Covered Individuals should also consider whether accepting a gift from a particular donor would, or would appear, to place the Covered Individual or CoRE under an actual, or perceived, obligation. If so, regardless of dollar value the gift should not be accepted.



### 13. OUTSIDE ACTIVITIES AND VOLUNTEER ACTIVITIES

- 13.1. Covered Individuals may participate in a supplementary appointment, business, undertaking or employment, including self-employment, unless it:
- causes a real or apparent conflict of interest with their duties on behalf of CoRE;
  - is performed in such a way as to appear to be an official act of CoRE, or to represent a government or CoRE opinion or policy;
  - interferes with regular duties (through telephone calls, email or otherwise) or has an impact on the Covered Individual's performance or impartiality with CoRE; or
  - involves the use of insider knowledge or of CoRE premises, equipment, property, information or supplies, or proprietary knowledge.
- 13.2. Prior to accepting or engaging in supplementary employment or appointment activities, directors, officers and employees of CoRE must notify the Administrator, in writing, about the nature of such supplementary employment or appointment. The Administrator will then review such supplementary employment or appointment for real or apparent conflicts of interests, and in writing, either approve the supplementary employment or appointment activity, deny it, or establish procedures to manage any conflicts of interests.
- 13.3. Covered Individuals shall not accept additional compensation for duties that they perform in the course of their work with CoRE.
- 13.4. Covered Individuals shall not allow the performance of their official duties on behalf of CoRE to be influenced by offers of future employment or appointments, or the anticipation of offers of employment or appointments.

### 14. POLITICAL ACTIVITIES

- 14.1. Covered Individuals can participate in political activities, including membership in a political party, supporting a candidate running for elected office, or running for elected office, subject to the following:
- Covered Individuals must not participate directly in soliciting contributions for a political party or candidate(s).
  - the Chair and CEO may not seek nomination as a candidate in an election to a federal, provincial, municipal or First Nations governmental position, nor hold office in a political party or constituency association without the prior approval of the Administrator or Executive Council, as appropriate.
  - Covered Individuals who run as candidates in an election to a federal, provincial, municipal or First Nations governmental position must take a leave of absence without pay commencing on the day after the writ for the election is issued or on the day that their candidacy is publicly announced, whichever is later. The restriction of soliciting contributions shall not apply to such Covered Individuals once the leave of absence commences.
  - Covered Individuals who are elected to federal, provincial, municipal or First Nations office shall resign their appointment or employment effective the day of the election.

- e) Covered Individuals who seek election and are not elected, are entitled to return to the same or similar employment, effective the day after the earlier of the election and the withdrawal of their candidacy
  - f) Covered Individuals engaged in political activities must not use CoRE's premises, information, property, equipment or supplies, or work time for such purposes.
- 14.2. If a Covered Individual seeks an elected municipal, provincial, federal office, he or she must disclose to the Administrator their intentions in writing as soon as possible for further instructions relating to his or her duties with CoRE.

## 15. TRADE KNOWLEDGE AND INTELLECTUAL PROPERTY

- 15.1. Any product or technology developed by Covered Individuals in the course of their employment with CoRE is the property of CoRE.
- 15.2. A Covered Individual shall not sell, trade, market, or distribute any such product or technology unless otherwise authorized by the CEO or designate.

## PROCEDURES

### 16. ADMINISTRATION

- 16.1. The Administrator receives and ensures the confidentiality of all disclosures and ensures that any real or apparent conflict of interest is avoided or effectively managed.
- 16.2. The Administrator is also responsible for providing advice and managing concerns and complaints concerning potential breaches of the Code, including conflicts of interest within CoRE. Even though CoRE may have a delegated process for responding to and managing concerns, the Administrator is responsible for ensuring procedural fairness to the extent the process is to be managed within CoRE.

### 17. REPORTING A POTENTIAL BREACH

- 17.1. Covered Individuals are responsible to be aware of those who may attempt to abuse the services or products of CoRE to further their personal interests. Covered Individuals shall report actual, potential or perceived breaches of the Code, any laws, rules, regulations or CoRE policies to the Administrator, who shall arrange to have the matter investigated.
- 17.2. All complaints will be investigated with diligence and discretion. The Administrator will
  - a) Respect the confidentiality of the individual and information provided by individuals when concerns are requested to be treated anonymously; and
  - b) keep any such reports confidential to the extent possible, consistent with the need to conduct a thorough investigation.
- 17.3. A report or complaint found to be made in bad faith will be viewed as a violation of this Code and may result in disciplinary action, up to and including termination of employment or Board membership, as applicable.

## 18. RESPONDING TO A POTENTIAL BREACH

- 18.1. Once a potential breach has been reported, the Administrator will review the circumstances and details of the potential breach and will notify the Covered Individual.
- 18.2. The Covered Individual alleged to have breached this Code has the right to sufficient information to answer and to respond to the potential breach. The identity of the person who made the report or complaint will not be disclosed unless required by law or in a legal proceeding.
- 18.3. The Administrator will make a decision and complete a report of the review in a timely manner. The report must include reasons or the factors considered in making the decision and a copy of the report must be provided to the Covered Individual alleged to have breached this Code. The report, at the Administrator's discretion, may be provided to the Minister of Mental Health and Addiction (or delegate).

## 19. CONSEQUENCE OF A BREACH AND DISCLOSURE OF OFFENCE(S)

- 19.1. Each Covered Individual is responsible to comply with the Code. If Covered Individuals do not comply with the standards of behaviour identified in the Code, including taking part in a decision or action that furthers private interests, the Covered Individual may be subject to disciplinary action up to and including termination of employment or Board membership, as applicable. CoRE may also pursue other remedies for any damages or harm resulting from a breach.
- 19.2. All copies of written complaints, findings, warnings, reprimands or notices of disciplinary action regarding a breach of the Code by a Covered Individual will be added to that individual's file. Failing to cooperate or providing false information will result in disciplinary action up to and including termination of employment or Board membership, as applicable.
- 19.3. If a Covered Individual is charged with an Offence, the Covered Individual must immediately report the charge to the Administrator.

## 20. COMING INTO FORCE

- 20.1. The Code comes into force 30 days after being made public

### Guidance Questions for Covered Individuals Applying this Code

- Have I reflected on, or consulted with the Code Administrator about, whether I am compromising my responsibilities under the Code?
- Have I considered the issues from a legal perspective?
- Have I investigated whether my behaviour aligns with a policy or procedure of CoRE?
- Could my private interests or relationships be viewed as impairing my objectivity?
- Could my decision or action be viewed as resulting in personal gain, financial or otherwise?
- Could my decision or action be viewed as furthering the private interests of someone with whom I have a significant personal or business relationship?
- Could my decisions or actions be perceived as granting or receiving preferential treatment?