

# CODE OF CONDUCT AND CONFLICT OF INTEREST POLICY CC 1

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**Responsible Party: General Counsel & Corporate Secretary**

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## 1 Application

- 1.1 This policy is binding on Alberta Innovates and its wholly owned subsidiary, InnoTech Alberta Inc. (defined below collectively as “the Corporation”). Unless otherwise specifically indicated, all references in this document to “Alberta Innovates” should be read as references to “Alberta Innovates and InnoTech Alberta Inc.”
- 1.2 This policy applies to the Board, Senior Leadership Team (SLT) and Employees.

## 2 Purpose

- 2.1 The people of Alberta expect and deserve transparent, accountable government. They must have confidence that people working with public bodies are trustworthy and focused on advancing the province’s interests. People working for public bodies must use their position to serve the public interest, rather than pursue private gain. This policy demonstrates Alberta Innovates’ commitment to these principles and to a high standard of ethical conduct that upholds the integrity and reputation of the Corporation.
- 2.2 The purpose of this policy is to provide a framework for ensuring ethical conduct within Alberta Innovates through the disclosure and effective management of conflicts of interest and by providing guidance on the conduct and exercise of diligence.
- 2.3 Alberta Innovates is a public agency to which the *Alberta Public Agencies Governance Act* applies (and the subsidiaries of the public agency). This policy has been sent to the Ethics Commissioner to ensure it follows the requirements of the *Conflicts of Interest Act*, RSA 2000, c C-23.

## 3 Definitions

- 3.1 In this policy,

“Board of Directors” or “Board” means the governing body of Alberta Innovates consisting of Directors accountable to the Minister who are responsible for the governance of Alberta Innovates and for overseeing the management of the Corporation’s business affairs.

“Bylaw” means the Bylaw(s) of Alberta Innovates.

“CEO” means the Chief Executive Officer of Alberta Innovates.

“Chair” means the person who has been duly appointed as the Chair of the Board.

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“Client” means an entity or person to whom Alberta Innovates provides goods and/or services under a written agreement; and includes other Departments within Alberta Innovates.

“Collective Agreement” means the written agreement between Local 60 of the Alberta Union of Provincial Employees (AUPE) and Alberta Innovates; and/or the written agreement between Local 60 of the Alberta Union of Provincial Employees (AUPE) and InnoTech Alberta Inc., both as amended from time to time.

“Committee” means a committee established by resolution of the Board to assist the Board in carrying on the business and affairs of Alberta Innovates.

“Conflict of Interest” means that an individual’s personal interests interfere or conflict with or could be perceived to interfere or to conflict with the interests of Alberta Innovates. A Conflict of Interest may adversely influence an individual’s objectivity, ability to perform Alberta Innovates’ work effectively, or the exercise of sound, ethical business judgements.

“Contractor” means a corporation, partnership, proprietorship, or person that is not an Employee and performs a service for Alberta Innovates under a written agreement.

“Corporate Secretary” means the person who has been duly appointed as the Corporate Secretary by the Board.

“Corporation” means Alberta Innovates and its wholly owned subsidiary InnoTech Alberta Inc.; “corporation” may also refer to any organization authorized by law to act as a single entity.

“Department” means a division within Alberta Innovates also referred to as a functional unit, business unit, business area, division, etc.

“Director” means a person who has been duly appointed as a Director on the Board of Directors.

“Employee” means a person who has permanent, temporary, or casual employment with Alberta Innovates. Employee includes members of the Senior Leadership Team (SLT) and the CEO.

“Individual” refers collectively to Individuals from the Board, Senior Leadership Team, Management, Employees, and Contractors of Alberta Innovates.

“Information” means data or knowledge in the custody, control, or owned by Alberta Innovates that an Employee or Contractor creates, receives or may acquire relating to the business activities of Alberta Innovates or Client, Innovation System Partner or vendor. Information includes public information, non-confidential information, confidential information and personal information.

“Innovation System Partner” means institutions in the innovation system that work with Alberta Innovates and which provide either funding or in-kind services

“Manager” means those Employees of Alberta Innovates who are accountable for managing a Department including managing the personnel, operations, and budget of the Department.

“Mandate” means the requirements for Alberta Innovates as set out in the *Mandate and Roles Document* issued by the Minister responsible for the *Alberta Research and Innovation Act*.

“Policy Instrument” refers collectively to the policies, standards, procedures, forms, and other related documents that govern Alberta Innovates.

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“Related Person” or “Family Member” means means a parent, step-parent, grandparent, spouse including common law relationship, former spouse, child, stepchild, grandchild, niece, nephew, cousin, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother or step-brother, sister or step-sister, brother-in-law, or sister-in-law, including adoptive relationships, of the Employee.

“Senior Leadership Team” or “SLT” means the executives who report to the Chief Executive Officer.

“Shareholder” means the Government of Alberta.

“Transaction” means an arrangement other than a gift under which Alberta Innovates and another entity agree to exchange value or service; or where Alberta Innovates confers a benefit on another entity; or where Alberta Innovates receives a benefit from another entity.

“We” refers collectively to the Board of Directors, Senior Management Team, Management, and Employees of Alberta Innovates.

### PART 1 – CODE OF CONDUCT

The following outlines the values, operating principles, and behavioral standards of Alberta Innovates:

#### 4 Values

We expect and require that Individuals act in ways that uphold and model Alberta Innovates’ core values.

##### 4.1 Respect

- 4.1.1 We treat everyone with respect, fairness and consideration.
- 4.1.2 We value differences of opinion and believe they lead to better decision making and innovative solutions.

##### 4.2 Integrity

- 4.2.1 We act ethically, with honesty and good faith to operate the business of Alberta Innovates.
- 4.2.2 We will be impartial and objective in our actions having regard to the best interests of Alberta Innovates and the Province of Alberta.

##### 4.3 Accountability

- 4.3.1 We deliver on our commitments.
- 4.3.2 We manage and utilize property and assets under Alberta Innovates’ stewardship in a responsible and transparent manner and in accordance with the expectations of our Clients, Innovation System Partners and Shareholder.

## 5 Operating Principles

- 5.1 We must comply with all applicable laws, which is core to safeguarding the trust placed in us by our Shareholder. Violations of applicable laws will damage Alberta Innovates' reputation and impede its ability to operate its business. For instance, our commitment to health and safety requires us to comply with all applicable provisions of Alberta's *Occupational Health and Safety Act*; and our commitment to openness and transparency requires us to facilitate disclosure of public records as required by Alberta's *Freedom of Information and Protection of Privacy Act*.
- 5.2 We strive to comply with any lawful direction properly received from our Shareholder which the Board determines to be in the best interest of Alberta Innovates.
- 5.3 The Board is responsible to ensure the CEO has in place appropriate Policy Instruments to enforce, monitor, regularly report on and audit legislative compliance by Individuals in the conduct of our business.
- 5.4 We expect and require that Individuals act in way that uphold and model Alberta Innovates' operating principles, which are as follows:
  - 5.4.1 The actions and decisions of Individuals are made to promote the public interest and to advance the Mandate and long-term interests of Alberta Innovates.
  - 5.4.2 We are responsible stewards of public resources. This is particularly important for Alberta Innovates given the trust placed in us to participate in the responsible management of the Government of Alberta's investment in innovation in the Province.
  - 5.4.3 To serve the public interest, we have a responsibility to uphold Alberta Innovates' Mandate.
  - 5.4.4 We have a responsibility to act in good faith and to place the interests of Alberta Innovates above private interests.
  - 5.4.5 We behave in a way that demonstrates that our behaviour and actions are fair and reasonable in the circumstance. This means we must conduct ourselves in an unbiased and neutral manner and treat all matters with impartiality and objectivity.
  - 5.4.6 We enjoy the same rights in our private dealings as any other Albertan, unless it is demonstrated that a restriction is necessary in the public interest.
  - 5.4.7 We know that when we become aware of an actual or perceived Conflict of Interest, we must at the first opportunity disclose this conflict utilizing the appropriate process.
  - 5.4.8 We understand that disclosure itself does not remove a Conflict of Interest.
  - 5.4.9 We require Employees to act fairly and ethically and know that they can raise concerns about a suspected wrongdoing by another without fear of reprisal through the Whistleblower Protection Standard.

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- 5.4.10 Individuals know that if they have any questions about this policy, or are not sure how to apply these principles, they should consult with their Manager.

## 6 Behavioral Standards

- 6.1 The Corporation expects and requires all Individuals to adhere to the following behavioral standards. Individuals will:
- 6.1.1 not engage in any criminal activity and will comply with all relevant laws, regulations, policies and procedures.
  - 6.1.2 not use their status or position to influence or gain a benefit or advantage for themselves or others; for instance by using their position to direct grant funding to an organization they or a friend / family member have a financial interest in.
  - 6.1.3 commit to providing a diverse, respectful and safe Workplace that is free from bullying, discrimination, harassment, intimidation or violence or threats thereof.
  - 6.1.4 not use drugs or alcohol in a way that affects their performance and safety or the performance and safety of other Employees, or that negatively impacts the reputation or operations of the Corporation.
  - 6.1.5 act in a way that is consistent with the Corporation's protocols on public comment; for instance by referring media requests to the Marketing & Communications Department; and by being mindful of our confidentiality obligations.
  - 6.1.6 take reasonable steps to avoid situations where they may be placed in an actual or perceived conflict between their private interests and the interests of Alberta Innovates.
  - 6.1.7 not act in self-interest and will not further their private interests by using their position or through the carrying out of their duties.

## 7 Information

- 7.1 Individuals must respect and protect Information and use it only for the work of Alberta Innovates. Information may not be used for personal gain. Individuals must comply with Alberta Innovates' Policy Instruments that guide the collection, storage, use, transmission and disclosure of Information.
- 7.2 Once an Individual leaves Alberta Innovates, they must not disclose Information that they became aware of during their time with Alberta Innovates and must not use their contacts with other Employees to gain an unfair advantage in their new employment.

## 8 Gifts and Gratuities

- 8.1 Individuals must not use their position with Alberta Innovates to solicit gifts, hospitality, or other benefits. However, Individuals may accept or receive gifts, gratuities, and hospitality in the following limited instances:
  - 8.1.1 within the course of the normal exchange of gifts between friends or business colleagues.
  - 8.1.2 tokens exchanged as part of protocol.
  - 8.1.3 hospitality that is incidental to a meeting such as a business lunch.
- 8.2 the normal presentation of gifts of nominal or no monetary value to people participating in public functions.
- 8.3 Any gift, hospitality or other benefits must not be of such a nature that could have a real, apparent, perceived, or potential influence on an Individual's objectivity and neutrality in performing their duties on behalf of Alberta Innovates.
- 8.4 Individuals must not solicit or receive cash or cash equivalents as gifts.
- 8.5 The value of a single tangible gift permitted under this section shall not exceed \$100. The total value of all tangible gifts received by an Individual in a calendar year from a single source shall not exceed \$200. Hospitality that is incidental to a meeting (such as a business lunch) is considered a tangible gift and subject to these limits.
- 8.6 The value of a single event invitation, inclusive of admission, travel fees, hospitality and accommodation, shall not exceed \$200. The total value of all event invitations received by an Individual in a calendar year from a single source shall not exceed \$400.
- 8.7 Individuals may accept paid conference passes to a conference organized by a Client or Innovation System Partner. The value of any single conference pass accepted, inclusive of admission, travel fees, and hospitality, shall not exceed \$1,000. The total value of all conference passes received from a single source in a calendar year shall not exceed \$2,000. Any conference pass exceeding these monetary limits may be accepted with prior written approval from the Corporate Secretary, whose permission shall be granted in writing, in accordance with the principles and provisions of this policy, and where it is evident that acceptance of the conference pass would not create a real or perceived Conflict of Interest.

## 9 Property

- 9.1 Individuals may have limited use of Alberta Innovates' premises and equipment for authorized incidental purposes providing such use involves minimal additional expense to Alberta Innovates, does not interfere with Alberta Innovates' Mandate and does not support a personal business. For instance, Individuals may print a small document for personal use but are not permitted to use the Corporation's equipment to print brochures for an outside business.

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## 10 Related Persons or Parties

- 10.1 Individuals must avoid dealing with others where the relationship between them might bring into question the impartiality of that Individual, for instance a close friend, business colleague, spouse or other family member. Refer to the Recruitment and Selection Procedure for a complete list of related individuals.

## PART 2 – CONFLICT OF INTEREST

### 11 New or Outside Employment

- 11.1 Individuals considering a new offer of appointment or employment must be aware of and manage any actual or perceived Conflict of Interest between their current position and their future circumstance and must remove themselves from any decisions that relate in any way to their new appointment or employment. Individuals may take supplementary outside employment, including self-employment, and participate in volunteer opportunities while working for Alberta Innovates but must disclose the outside employment on a Conflict of Interest Declaration Form as prescribed in section 14. Individuals should not accept any additional compensation for duties they already perform in the course of their public service employment with Alberta Innovates.
- 11.2 Outside employment or volunteer opportunities must not:
  - 11.2.1 result in any actual or perceived Conflict of Interest; for instance, working or volunteering for an outside company that Alberta Innovates directs funding to.
  - 11.2.2 interfere with the Individual's regular duties with Alberta Innovates.
  - 11.2.3 involve the use of Alberta Innovates' premises or equipment, unless such use is otherwise authorized.
- 11.3 Individuals are expected to behave in a way that aligns with this policy and to use common sense and good judgment in deciding whether an actual or perceived Conflict of Interest may exist.
- 11.4 Individuals may participate in political activities, including membership in a political party, supporting a candidate running for elected office, or running for elected office. They must not raise money for a political party. Any political activity must be separate from Alberta Innovates. These activities cannot be done while at work or using the Corporation's resources.
- 11.5 As this policy does not cover every specific scenario of an actual or perceived Conflict of Interest, Individuals should use the spirit and intent behind this policy. Where an Individual has concerns, the Individual is encouraged to consult with their Manager or the Corporate Secretary.

## 12 Duties of and Specific Provisions Related to Directors

- 12.1 Directors will be held to the highest ethical standards. Pursuant to Alberta Innovates' Bylaws, the affairs of Alberta Innovates are managed and directed by the Directors. The Directors, by virtue of their position of control over the affairs of Alberta Innovates, owe a fiduciary duty to Alberta Innovates. This means they have a legal obligation to act in the best interests of Alberta Innovates.
- 12.2 The Directors' obligations can be split into two categories: a duty of care and a duty of loyalty. The duty of care requires that Alberta Innovates' Directors perform their duties to a standard of care which is informed by such items as governing legislation, the Alberta *Research and Innovation Act*, and accompanying regulations, and Alberta Innovates' Bylaws. The duty of loyalty imposes an obligation of honesty, loyalty, and good faith in all dealings with Alberta Innovates.
- 12.3 Because of this unique relationship between the Directors and the Corporation, it is of specific importance that a Director must disclose, using the Conflict of Interest Declaration Form, any material interests they, or any related party not dealing at arm's length with the Director may have in an entity that may have a Transaction with Alberta Innovates. The disclosure of this interest is evaluated to determine whether the actual or perceived conflict may be managed or whether a proposed transaction with Alberta Innovates should not be allowed to proceed.
- 12.4 Alberta Innovates may enter into a Transaction with a Director or Related Person if
- 12.4.1 the affected director:
- declares a conflict of interest in respect of the proposed Transaction; and
  - discloses to the Board or Committee the full nature and extent of their interest in the proposed Transaction and, to the extent that he is able, the interest of any Related Person in the proposed Transaction.
- 12.4.2 it is established to the satisfaction of the Board or Committee that:
- the proposed Transaction is fair and reasonable to the Corporation and is valued the same as if the parties were unrelated.
  - the proposed Transaction would meet or exceed community expectations about the conduct of the Corporation.
- 12.4.3 the Board or Committee approves the proposed Transaction.
- 12.4.4 If the Director, or any person not dealing at arm's length with the Director, is related to a service provider that is providing services to an entity contemplating a Transaction with Alberta Innovates, the conflict will be reviewed with an attempt to manage the conflict if possible.
- 12.4.5 If the Director, or any person not dealing at arm's length with the Director, is an Employee of the entity contemplating a Transaction with Alberta Innovates, the conflict will be reviewed with an attempt to manage the conflict if possible.



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- 12.4.6 If the Director, or any person not dealing at arm's length with the Director, is a shareholder, lender, Director, joint venture partner or partner of the entity contemplating a Transaction with Alberta Innovates, the conflict will fall into three categories:
- i the Director's or related party's interest in the entity is not material to the overall interests of the Director;
  - ii the entity is publicly traded and the Director's or related party's interest in the entity does not exceed 5% of the issued and outstanding shares or a material loan or other financial support to the entity; and
  - iii the Director or related party is either a Director of the entity or has a material shareholding or financial interest in the entity.
- 12.4.7 In the case of sections 12.4.6 i and ii, the conflict will be reviewed with an attempt to manage the conflict if possible.
- 12.4.8 In the case of section 12.4.6 iii, any contemplated Transaction with Alberta Innovates will not be allowed to proceed. This course of action is recommended due to the perceived conflict and Alberta Innovates' status as a government owned entity that must maintain public confidence in order to properly discharge its functions.
- 12.4.9 The Board may review any decision made by a Committee to approve a Transaction.
- 12.4.10 When authorizing a Transaction, the Board may impose any conditions it deems necessary in the circumstances to protect Alberta Innovates or to safeguard public confidence in its undertakings.
- 12.4.11 The Director shall recuse himself/herself from discussions and shall not be part of the quorum making decisions relating to the proposed Transaction.
- 12.4.12 Where the Board approves a Transaction, an entry shall be made into the minutes of the meeting confirming the approval of the Transaction by the Board or Committee.

## 13 Duties of and Specific Provisions Related to Senior Officials and Designated Senior Officials

- 13.1 The *Conflicts of Interest Act* applies to Alberta Innovates. The definition of Senior Officials in the Act includes both the Board Chair and CEO of Alberta Innovates. The definition of Designated Senior Official includes the CEO of Alberta Innovates. Under the Act, Designated Senior Officials are specified by Order in Council and are subject to additional requirements. These additional requirements will form part of the terms of employment between Alberta Innovates and the CEO. All restrictions listed below apply to the CEO, except where noted.

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## 13.2 Restrictions on Office and Powers

Senior Officials and Designated Senior Officials:

- 13.2.1 must fully disclose all real or apparent conflicts of interest to the Ethics Commissioner (also applies to the Board Chair).
- 13.2.2 must not take part in a decision, use their office or powers to influence a decision, or communicate information gained through their office or powers which is not available to the public to further their private interests, their family's private interests, or the private interests of any other person (also applies to the Board Chair).
- 13.2.3 must not hold any other job or appointment unless approved in writing by the Ethics Commissioner.
- 13.2.4 The restrictions and requirements set out in sections 13.2.1 and 13.2.2 are in effect immediately for the Board Chair and CEO. The restrictions set out in section 13.2.3 come into effect for the current CEO on July 4, 2024, or when the current CEO's contract or appointment is renewed or extended, whichever occurs first. T

## 13.3 Financial and Disclosure Requirements

- 13.3.1 Senior Officials and Designated Senior Officials.
- 13.3.2 Must not hold publicly traded securities unless:
  - they are held in a financial arrangement (e.g. blind trust) approved by the Ethics Commissioner.
  - an approval or exemption has been provided in writing by the Ethics Commissioner.
- 13.3.3 Within 60 days of this Code of Conduct coming into force, the CEO must provide a direct associate return to the Ethics Commissioner which includes full financial disclosure of the CEO's assets, liabilities, investments, holdings, and other interests.
- 13.3.4 Must file a personal disclosure statement of the assets and liabilities, investments and holdings and other interests and returns for persons directly associated (e.g. spouse) as required by the Ethics Commissioner.
- 13.3.5 Must file an updated disclosure or return within 30 days of any changes to the previous disclosure or returns.
- 13.3.6 Must file a return within 30 days if no longer designated as a Designated Senior Official.

These restrictions come into effect on July 4, 2024 or when the CEO contract or appointment is renewed or extended, whichever occurs first.

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### 13.4 Post-Employment Restrictions

- 13.4.1 As required by s. 23.937 of the *Conflicts of Interest Act*, for 12 months after the last day that they hold their position as President and CEO, the President and CEO:
- i Must not lobby any public office holder, as defined in the *Lobbyists Act*;
  - ii Must not act on a commercial basis or make representations on behalf of any party in connection with any ongoing matter in connection with which the President and CEO directly acted for or advised a department or public agency;
  - iii Must not make representations with respect to or solicit or accept on his/her own behalf a contract or benefit from a department or public agency with which the President and CEO had a direct and significant official dealing; and
  - iv Must not accept employment with an individual, organization, board of directors, or equivalent body of an organization with which the President and CEO had direct and significant official dealing
- 13.4.2 The President and CEO may apply to the Ethics Commissioner for a waiver or reduction of the time period applicable to these restrictions.
- 13.4.3 These restrictions come into effect on July 4, 2024 or when CEO contract or appointment is renewed or extended, whichever occurs first.

## 14 Procedures for Disclosure of Actual or Perceived Conflict of Interest

### 14.1 Procedures

- 14.1.1 The following are the procedures for the disclosure of an actual or perceived Conflict of Interest by a Director, a member of the Senior Leadership Team, Management or an Employee:
- i The *Conflict of Interest Declaration Form* attached as Appendix “A” enables Alberta Innovates to understand, assess and manage conflicts of interest appropriately;
  - ii All Individuals will complete a Conflict of Interest Declaration Form in the following circumstances: (a) upon the commencement of employment/appointment; (b) on an annual basis thereafter; and (c) whenever significant change occurs (e.g. new outside employment, a new significant investment is made, etc.) during the course of employment/appointment; and
  - iii Where a Conflict of Interest is disclosed, we will manage the Conflict of Interest with the appropriate measures including potentially restricting or limiting access to information, temporarily modifying duties, or excluding Individuals from specific decisions as the circumstances may require.

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## 14.2 Reporting a Potential Breach

- 14.2.1 Individuals may report an actual or perceived Conflict of Interest in confidence to their immediate supervisor, or to any member of human resources.
- 14.2.2 In addition to the completion of the Conflict of Interest Declaration Form, Individuals are required to advise the Corporate Secretary in writing about any real or apparent breach of this Code.

## 14.3 Responding to Potential Breach

- 14.3.1 If a real or apparent breach is reported by an Individual, the Corporate Secretary will advise the Individual in writing. The identity of the Individual who reported the breach will be kept confidential, unless required by law. The Corporate Secretary, or an external investigator duly appointed by General Counsel or the Board, will investigate the matter, make a decision, and complete a written report.
- 14.3.2 The written report may include facts about the breach discovered by the Corporate Secretary. The Corporate Secretary will decide whether or not the Individual under investigation has breached this Code. The Corporate Secretary's report will also decide what type of breach it is and give any related recommendation or action. The written report will be given to the Individual under investigation and any other persons involved. The Individual can request all information related to the breach and has the right to respond to the report.

## 14.4 Consequences of a Breach

- 14.4.1 Individuals who have breached the standards of behaviour in this Code may be disciplined, up to and including termination.

## Disclosure of Criminal Charges

- 14.4.2 If an Individual is charged with an offence under the *Criminal Code of Canada*, as amended, and/or the *Controlled Drugs and Substances Act*, as amended; arising from their conduct while on duty and/or off duty, such Individual shall immediately report such charge to their Manager, Corporate Secretary, Chair or their designate, as applicable.
- 14.4.3 The Chair or their designate will determine if the charge has created a real or perceived Conflict of Interest which impacts Alberta Innovates' interest, and/or if the charge has seriously compromised the Individual's ability to continue to perform their role for Alberta Innovates.
- 14.4.4 Any subsequent use and disclosure of information provided to Alberta Innovates pursuant to this policy will be subject to the privacy provisions of Part 2 of the *Freedom of Information and Protection of Privacy Act*, as amended.

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## 15 Policy Compliance

- 15.1 To promote and support compliance of this policy, the Board encourages Individuals to report any identified misconduct or breach under this policy to the Corporate Secretary for resolution.
- 15.2 Failure to adhere to this policy may result in disciplinary action up to and including termination with cause, termination of contract or removal from the Board.
- 15.3 Where a conflict occurs between the terms of any applicable collective agreement and this policy, the applicable collective agreement will govern.
- 15.4 Upon appointment or employment, all Individuals except Contractors, will complete a Conflict of Interest Declaration Form attached as Appendix "A".
- 15.5 This policy will be reviewed at a minimum every two years by the Directors of Alberta Innovates.
- 15.6 Any changes to this policy will be made public to Individuals for 90 days before becoming effective.

## 16 Document History

- 16.1 All revisions to policies, standards, procedures and other related documents must be managed by the Office of the Corporate Secretary according to the Maintenance of Policy Instruments Standard and Maintenance of Policy Instruments Procedure. For more information, please contact [policycoordinator@albertainnovates.ca](mailto:policycoordinator@albertainnovates.ca)

Date	Revision #	Changes Made
Nov. 1, 2016	0	Effective Date
Sep 25, 2018	1	Changes as per Ethics Commissioner to comply with the <i>Conflicts of Interest Act</i> and confirmation that the Ethics Commissioner has reviewed and confirmed that the requirements of the Act have been met (correspondence addressed to Minister of EDT dated Oct. 4 2018).
July 1, 2021	2	Revised for consistency with other documents, minor wording changes, updated organizational titles, new numbering and format.
Feb 16, 2022	3	Corrected formatting issues including section references. Clarified the post-employment question on the Declaration applies to the CEO.
Apr 2, 2025	4	Revised to reflect recent changes to the Office of the Ethics Commissioner's policy for the review process of public agencies codes of conduct. The updated policy has been reviewed and approved by the Office of the Ethics Commissioner of Alberta.

Work Location (City, Province): \_\_\_\_\_

Name: \_\_\_\_\_

Email: \_\_\_\_\_

Position Title at the Corporation: \_\_\_\_\_

**Current Status:**

Please indicate the capacity in which you are completing this form.

You may select more than one:

- Current Director**
  - Potential Director**
  - Current Committee Member**
  - Potential Committee Member**
  - Current Employee**
  - Potential Employee**
  - Other (please specify)**
- 

Has there been a change in your personal situation or your official responsibilities?  Yes  No  
(If so, please specify)

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**Instructions**

- The Conflict of Interest Declaration Form is to help the Alberta Innovates (the “Corporation”) effectively manage a conflict of interest in accordance with the Code of Conduct and Conflict of Interest Policy.
- As an individual whether (i) joining the Corporation; ii) as part of a regular annual review or (iii) change in your personal situation or your official responsibilities, you must declare all interests, associations and activities that you are participating in outside of the Corporation in this Conflict of Interest Declaration Form.
- Generally, a conflict of interest means a situation where your duties to Alberta Innovates conflict or cannot be reconciled with a personal interest. You must not put yourself in a situation where your duty to Alberta Innovates conflicts with your personal interest or with a duty to others. The conflict can be real (ie immediately present), perceived (a reasonable observer would conclude there is a conflict even if there are mitigating factors) or potential (a conflict may arise if the interests collide). As a public body dispersing public funds it’s critical that Alberta Innovates maintains a social license to operate and does not lose the trust of its key stakeholders. As such it is imperative that we avoid conflicts of interest. Not all conflicts can be easily mitigated, which is why you must complete this form and abide by our Conflict of Interest Policy.
- Please print, read and complete this form with reference to the Code of Conduct and Conflict of Interest Policy. Please check the corresponding box(es) when you determine that a real, apparent or potential conflict of interest could exist between your official duties as a director or committee member and other interests. Please provide details and describe the nature of the matter in the space provided.

- Please provide the completed Conflict of Interest Declaration Form to Debbie Paulon, Assistant Corporate Secretary at the addressed indicated on the Conflict of Interest Declaration form.
- Upon submission of the Conflict of Interest Declaration Form, the Corporation will confirm whether or not the matters described below constitutes a real, apparent or potential conflict of interest. If a conflict is found to exist, the Corporation will manage the conflict of interest with appropriate measures as outlined in the Code of Conduct and Conflict of Interest Policy. The details in the Conflict of Interest Declaration Form may be disclosed to the *Boards* where determined appropriate to manage the conflict of interest.

## CONFLICT OF INTEREST DECLARATION FORM CC F1

<b>Assets and Liabilities</b> Do you possess or are you considering acquiring:	Yes	No
Any material interest in a transaction or agreement involving the Corporation?		
Any material interest in any person, entity or organization the Corporation funds or is expected to fund or does business or seeks or expects to do business with?		
Any material interest in any entity or organization with which the Corporation lends, to, borrow from or grants to?		
Any patents or royalty earning arrangements with any person, entity or organization the Corporation funds or is expected to fund or does business or seeks or expects to do business with?		
An estate or interest in Crown land?		

<b>Outside employment or activities</b> Do you participate or are you considering participating in any of the following:	Yes	No
Outside employment with organizations that have or may have business interests relevant to the Corporation's programs and services?		
Consulting or in any management capacity in an entity or organization with which <i>our organization</i> funds or expects to fund or does business or seeks or expects to do business with?		
Outside board positions including government or government-related boards (federal, provincial or municipal), political party or constituency boards (federal, provincial or municipal), business association boards, community boards, and any other material non-personal board positions that are not captured in the above questions. As an example of a personal board that would <u>not</u> be captured would be if you're on the board of your condo association.		
Directly soliciting contributions to a political party?		
Running as a candidate in a municipal, provincial or federal election?		
Knowingly competing with the Corporation or interfering with a business opportunity of the Corporation?		

<b>Benefits</b>	Yes	No
Have you accepted or been offered or solicited any gift (other than a gift of nominal amount), service, payment or other benefit from any person, entity organization the Corporation does business or seeks or expects to does business with?		
Have you been offered any professional awards/prizes in relation to your position with the Corporation, from non-government entities?		



## CONFLICT OF INTEREST DECLARATION FORM CC F1

Relationships	Yes	No
Have you or might you be engaged in any decision-making related to a staffing or procurement process in which a family member or a friend may be involved?		
Have you or might you be engaged in making recommendations or decisions that will result in an organization in which a family member or a friend is involved in, is being funded or expected to be funded by the Corporation?		
Have you a relative or close friend of someone who has a material interest in an organization with which the Corporation's funds or expects to fund or does business or seeks or expects to do business with or who could otherwise be personally affected by a decision of the Corporation?		
Have you or might you be engaged in any decision making including in any managerial or supervisory decisions relating to staffing or allocation of resources in which a family member, friend, or other individual with whom you have a close personal, sexual, financial or otherwise intimate relationship may also be impacted by your exercise of decision-making authority?		

Post-Employment*	Yes	No
Have you or might you receive offers of employment or proposed activities for your post-employment limitation period outside the Corporation that could place you in a real, apparent or potential conflict of interest with your employment?		

*\*Only applies to a Designated Senior Officer under the Conflicts of Interest Act, RSA 2000, c C-23, which currently only applies to the CEO*

If you answered "YES" to any of the above questions, please specify section and describe the situation(s):

Other	Yes	No
Do you have anything else to declare that is not addressed in this form?		
If yes, please specify:		

# CONFLICT OF INTEREST DECLARATION FORM CC F1

The personal information on this form is collected pursuant to the *Freedom of Information and Protection of Privacy Act* and will be used for payment of travel claims. If you have any questions regarding the collection and disclosure of information on this form, please direct your inquiries to Sean Astle, FOIP Coordinator, 250 Karl Clark Road, Edmonton Alberta, T6N 1E4 (780) 450-5180.

## Declaration – Privacy Act Statement

The information you provide in this Conflict of Interest Declaration Form is collected under *Freedom of Information and Protection of Privacy Act (Alberta)*, as amended (“FOIP”). Any use or disclosure of information provided in this Conflict of Interest Declaration Form will be subject to the provisions under FOIP for the purpose of effectively manage a conflict of interest in accordance with the Code of Conduct and Conflict of Interest Policy, as amended, maintaining information about real or potential conflict of interest situations.

By signing below, I, \_\_\_\_\_, legally represent that all information contained in this *Conflict of Interest Declaration Form* is true and accurate and acknowledge and consent to collection of this information for the purpose of effectively managing a conflict of interest in accordance with the *Code of Conduct and Conflict of Interest Policy*, as amended.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

### PLEASE SUBMIT COMPLETED FORM TO:

**Debbie Paulon, Assistant Corporate Secretary**

**#1500, 10104 – 103 Avenue NW, Edmonton, Alberta T5J 0H8**

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## REVIEWED

\_\_\_\_\_  
Corporate Secretary

\_\_\_\_\_  
Date

\_\_\_\_\_  
Chair, Governance & Human Resources Committee  
*\*For Board of Directors only*

\_\_\_\_\_  
Date