



Ethics Code

All WCB clients, stakeholders, employees and contractors have the right to be treated with dignity and respect. WCB's Ethics Code ("Code") applies to all WCB employees ("Employees") and members of WCB's board of directors ("Members") and requires that all WCB business be conducted with impartiality and integrity. The Code requirements adhere to the relevant provisions of the *Conflict of Interest Act*.

Further to the above, requirements include:

- Restrictions on acting in self-interest or furthering private interests by virtue of one's position or carrying out their duties;
- Disclosure of real and apparent conflicts of interest;
- Restriction on gifts received;
- Limitations on concurrent employment/other offices;
- Restrictions on using influence;
- Disclosure to the Government of Alberta Ethics Commissioner as required; and
- Adherence to all applicable laws.

Employees and Members are required to show that their actions and decisions are ethical, impartial and independent. Employees and Members must not place their interests ahead of WCB's and must not act in self-interest or further their or others' private interests using their position when carrying out their duties.

The Code and related guidelines are reviewed every two years to ensure they remain current and relevant and all Employees and Members will be required to annually reaffirm their understanding of the Code.

Administration of the Code will be managed by the Secretary and General Counsel who will report regularly to the Strategic Management Council ("SMC") and the Human Resources and Governance Committee of the board of directors regarding any Code matters.

Ethics Code

1. Definitions

Employees – includes all individuals hired by WCB regardless of position classification (part-time, temporary, permanent, full-time, bargaining and non-bargaining positions). Members of the Executive are also considered Employees.

Members – includes all individuals serving on WCB's board of directors as appointed by an Order in Council through the Government of Alberta.

Chair – the position of chair of WCB’s board of directors as appointed by an Order in Council through the Government of Alberta.

Senior Official – the Chair and the President and CEO.

Executive – all positions that form part of the SMC, which includes: Chief Financial Officer; Senior Vice President, Operations & Innovation; Secretary & General Counsel; Vice President, Employee and Corporate Services; Vice President, Millard Health & Special Care Services; Chief Technology Officer; and the President and CEO.

Code Administrator – is the person who administers and implements the provisions of the Code. The Code Administrator for each Member or Employee is as follows:

- The Ethics Commissioner for the Chair of the Board of Directors;
- The Chair of the Board of Directors for Members and for the President and CEO;
- The President and CEO for any member of the Executive other than the President and CEO; and
- The Employee’s supervisor for all other Employees.

A supervisor may refer any issue or situation covered by the Code to the Secretary and General Counsel. The Secretary and General Counsel may refer any issue or situation covered by the Code to the Ethics Commissioner.

2. Core Values

WCB’s core values are **service, care, excellence, trust** and **fairness**.

These values are fundamental to the organization, the service provided to clients, and how workers, employers, health care providers and WCB work together on a worker’s timely recovery and safe return to work.

Service: We contribute to each other’s well-being and provide the support people need, when they need it.

Care: We are eager to help others. Our clients and staff are people with families, hopes, dreams and dignity. We all have unique needs worthy of empathy and understanding.

Excellence: We strive to excel in every aspect of our business, but excellence doesn’t mean we’re perfect. We’re constantly learning, growing and improving.

Trust: We are consistent, fair and reliable. We deliver on our commitments and own our mistakes so we can build trust in our system – one interaction at a time. We extend trust to our customers and to each other.

Fairness: We’re guided by balance and impartiality. We achieve this through open and honest communication, listening to our customers (and each other) and treating each other with dignity and respect.

3. WCB Ethics

WCB Employees and Members work in accordance with legislation and professional practice standards and are expected to conduct business in a professional and ethical manner at all times. Ethics are guidelines for individual and corporate behaviour. They are grounded in three principles:

- Respect for the law;
- Recognition of the rights and dignity of others; and
- Personal and organizational integrity.

4. Behavioral Standards

(a) Applicable laws

Employees and Members must not take part in any criminal activity and must comply with all applicable laws.

(b) Impartiality

Employees and Members must act impartially and independently in carrying out their duties under the *Workers' Compensation Act*.

(c) Confidentiality of information

Employees and Members must respect and protect confidential information. They must use it only for the work specific to their position and responsibilities at the WCB and never for personal reasons or advantage. Employees and Members must follow the *Freedom of Information and Protection of Privacy Act*. Confidential information includes personal information and information about WCB.

(d) Communication

Employees and Members must not comment publicly to the media about WCB or its work without first consulting with the Director, Engagement & Development. All media requests must be forwarded to WCB Engagement & Development to be actioned. The Chair is the official spokesperson for WCB's board of directors.

(e) Disclosure of criminal charges

If an Employee or Member is charged with an offence under the Criminal Code arising from conduct whether while working or not working, the Employee or Member must immediately report the charge to the Code Administrator.

(f) Use of WCB assets

WCB is primarily a place of business. Although normal social interaction between individuals is expected, the primary activity within the workplace and the primary concern of WCB Employees and Members must be the advancement of WCB's business interests. As such, corporate resources must be respected. They are primarily intended for business use. Use of corporate resources such as tables, display space, meeting rooms, email and telephone for non-business purposes must be done reasonably and with restraint.

Internet and email access is provided to Employees and Members for business purposes and WCB trusts Employees and Members to use corporate facilities in a professional and productive manner. Use of corporate email, Internet and social networking sites for personal use must be conducted on the Employee or Member's own time or during personal breaks within business hours.

All use of corporate facilities must conform to the "Statement of Ethics", "Computing Systems Access Agreement," "Internet Acceptable Use Standards," "External/Internal Email Usage Guidelines," and the "Use of Social Networking Sites Guidelines." The review of and adherence to these guidelines and standards are a condition of employment. All Employees and Members must complete and sign a Computing Systems Access Agreement and confirm annually their acknowledgement of this agreement.

As the Internet is a public forum, WCB may be held accountable for the inappropriate or unethical use of the network from company facilities. Therefore, WCB reserves the right to monitor all use of WCB information technology assets to ensure compliance with these acceptable use standards. WCB has facilities that allow tracking of all Internet access from within WCB's corporate network. This data is gathered for audit purposes only and is only used when a situation of potential misuse is identified. Therefore, Employees and Members should not assume that their use of WCB information technology assets is private.

As noted in the *Freedom of Information and Protection of Privacy Act*, email has the same implications as a written or typed document and is a permanent part of WCB's records. The use of e-mail to transmit one's personal views is considered inappropriate since it may be perceived to represent a WCB point of view. Employees and Members are responsible for all email messages that originate from their access ID.

(g) Harassment

WCB is committed to providing a healthy, harassment-free work environment supportive of the dignity, self-esteem and productivity of every employee. This commitment also extends to all who interact with WCB: our stakeholders, clients, contractors, volunteers, visitors, and the general public.

Harassment occurs when someone is subjected to unwelcome verbal or physical behaviour. It may include sexual conduct that creates a hostile work environment for an employee or receiving/demanding sexual favors from a subordinate in exchange for career advancement or reward. Harassment is a form of discrimination prohibited by law and will not be tolerated within WCB.

Any act of harassment or inappropriate behaviour committed by an Employee or Member against another employee or against a client, or a member of the general public while engaged in company business will be considered employee misconduct. Retaliation against a complainant or witnesses in a complaint is an offense and will be considered misconduct. WCB will also take steps to respond to issues of harassment of Employees or Members by outside parties in connection with WCB business.

Harassment does not have to only occur on company premises. It can occur anywhere there are work-related implications or consequences. This includes off-site work-related settings such as conferences, meetings or training sessions, otherwise known as the "extended workplace." It includes behaviour at client, vendor or other business contact premises. It also includes business-related social events or at home (i.e., contacting to press for dates, making threats or promises).

Instances of alleged harassment are investigated and dealt with by WCB's Human Resources Department. It is WCB's policy to impose discipline relative to the seriousness of the offense, up to and including dismissal. Employees and Members may follow WCB's internal appeal process if they are not satisfied with the outcome. If the complaint is not resolved to the Employee or Member's satisfaction, they may advance it to the Alberta Human Rights Commission within one year of the date of the incident.

(h) Prohibition from acting in self interest

Employees and Members must not act in self-interest or further their own private interests by virtue of their position with WCB, or in carrying out their duties under the *Workers' Compensation Act*, or otherwise act in a conflict of interest.

(i) Disclosure of conflicts of interest

Employees and Members must disclose, to the Code Administrator, all matters which would create a reasonable apprehension of bias in the performance of their duties under the *Workers' Compensation Act*, including any real or apparent conflict of interest.

(j) Restrictions to avoid conflicts of interest

(i) Gifts

Employees and Members must not use their position to solicit gifts, hospitality or other benefits. Employees and Members 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 from any individual or organization, other than in the following limited instances:

- within the course of the normal exchange of gifts, hospitality or other benefits between persons doing business together;
- tokens exchanged as part of protocol; or
- 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 Employee's or Member's objectivity and impartiality in performing their duties on behalf of WCB.

Employees and Members must not solicit or accept cash or cash equivalents as gifts.

The value of a gift or benefit permitted shall not exceed \$100 in value from any one source per calendar year. Hospitality that is incidental to a 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 admission, travel fees, hospitality and accommodation, shall not exceed \$200. The total value of all event invitations received by an Employee or Member in a calendar year from a single source shall not exceed \$400.

Employees and Members may accept paid conference passes to a conference. The value of any single conference pass accepted (inclusive of admission, travel fees, accommodation, 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 Code Administrator, whose permission shall only be granted in writing, in accordance with the principles and provisions of this Code, and where acceptance of the conference pass would not create a real or apparent conflict of interest.

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 Employee or Member could be called upon to make. Employees and Members should also consider whether accepting a gift from a particular donor would, or would appear, to place the Employee, Member or WCB under an actual, or perceived, obligation. If so, regardless of dollar value, the gift should not be accepted.

(ii) Business / concurrent employment

Employees may participate in a supplementary appointment, business, undertaking or employment, including self-employment, unless it:

- causes a real or apparent conflict of interest;
- is performed in such a way as to appear to be an official act of WCB, or to represent WCB's opinion or policy;
- interferes through telephone calls, email, or otherwise with regular duties or has an impact on the Employee's performance or impartiality with WCB; or

- involves the use of insider knowledge or of WCB's premises, equipment, supplies or proprietary knowledge.

Prior to accepting any supplementary employment or appointment, Employees must notify the Code Administrator in writing about the nature of such supplementary employment or appointment. The Code Administrator must review the proposed employment or appointment for real or apparent conflicts of interest. If there is no real or apparent conflict of interest, the Code Administrator may approve the employment or appointment in writing. If there is a real or apparent conflict of interest, the Code Administrator must then, in writing, deny the employment or appointment, or allow the employment or appointment and put procedures in place to manage the real or apparent conflict of interest.

Members are required to disclose all concurrent employment/board appointments for review by the Code Administrator, pursuant to the obligations set out in WCB's Corporate Governance Policy Manual.

(iii) Political activities

Employees and Members may participate in political activities, including membership in a political party, supporting a candidate for elected office, or running for elected office. However, Employees and Members must not raise money for a political party.

Any political activity must be conducted separate and apart from WCB. Political activities cannot be done while at work or using WCB resources.

(iv) Anticipated future employment or appointment

Employees and Members must not allow their performance with WCB to be influenced by existing or anticipated offers of future employment or appointment.

(v) When Employees or Members leave WCB

After an Employee or Member leaves WCB, they must not disclose confidential information and must not use contacts with former colleagues to their personal advantage. Employees or Members leaving WCB must not be involved in matters or cases on which they worked while in the employ of WCB. Former Executives or Members cannot represent parties before the WCB for 12 months after leaving WCB. Employees or Members may represent parties before the WCB immediately after leaving WCB where the representation is undertaken as a term of their employment with the Advisor Office for Alberta Workers' Compensation.

(vi) Direct relationships

Employees and Members must avoid dealing with individuals with whom they have a direct relationship when conducting the work for WCB (e.g., with a spouse, relative, etc.).

5. Specific obligations of the Chair and the President and CEO

(a) Private interests, influence and insider information

The Chair and the President and CEO must:

- Not take part in a decision in the course of carrying out their office or powers knowing that the decision might further a private interest of the Senior Official, a person directly associated with the Senior Official or the Senior Official's minor or adult child;
- Not use their office or powers to influence or to 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 Senior Official, a person directly associated with the Senior Official or the Senior Official's minor child or to improperly further any other person's private interest;

- Not use or communicate information not available to the general public that was gained by the Senior Official in the course of carrying out their office or powers to further or seek to further a private interest of the Senior Official or any other person's private interest; and
- Appropriately and adequately disclose a real or apparent conflict of interest.

(b) Concurrent employment

The President and CEO must not be involved in any appointment, business, undertaking or employment, including self-employment, other than the appointment, business, undertaking or employment of the WCB (“Concurrent Employment”), unless the President and CEO applies to the Ethics Commissioner for approval in writing to engage in the Concurrent Employment.

(c) Restrictions on holdings

The President and CEO must not hold publicly-traded securities unless:

- They are held in a financial arrangement (e.g., blind trust) approved by the Ethics Commissioner; or
- An approval or exemption has been provided in writing by the Ethics Commissioner.

(d) Disclosure statements and returns

The President and CEO must file a personal disclosure statement and returns for persons directly associated (e.g., spouse) as required by the Ethics Commissioner.

The President and CEO must file an updated disclosure or return within 30 days of any changes to the previous disclosure or returns.

The President and CEO must file a return within 30 days if no longer designated as a designated senior official.

(e) Post-employment restrictions

For a period of 12 months after the last day the President and CEO was considered a designated senior official, he or she must not:

- Lobby any public office holder;
- Act on a commercial basis or make representations on any matter that he or she was directly involved in relating to a government department or public agency;
- Request or accept a contract or benefit from any department or public agency with which they had a direct and significant official dealing; or
- Accept employment or an appointment with an individual, organization or board of directors with which they had a direct and significant official dealing,

unless a waiver or reduction of the 12-month time period has been approved in writing by the Ethics Commissioner.

6. Complaints

Employees and Members are expected to identify any conflict of interest or breach of the Code that has taken place and shall advise the Code Administrator of such a breach. Employees and Members are also encouraged to report any conflict of interest or breach of the Code as it relates to other Employees or Members for investigation.

If a conflict or breach is reported, the Code Administrator is advised and a formal reporting process will commence.

The impacted Employee's or Member's identity will be kept confidential, unless required to be disclosed by law. A formal investigation will be completed and a decision made by the Code Administrator on whether a provision of the Code was breached. A written investigation will be shared with the impacted Employee or Member and they will have the right to respond.

Employees and Members who have breached the Code may be disciplined, up to and including termination.

A real or apparent conflict of interest situation may, in the case of an Employee, be shared by the Code Administrator with WCB's Human Resources department and SMC, and in the case of a Member, be shared by the Code Administrator with the Governance Committee of the Board of Directors.

Documentation associated with each review will be filed on the impacted Employee's Human Resources file and archived as per WCB's records management file retention schedule.

Employees and Members can ask in writing for the Ethics Commissioner to review a decision made by the Code Administrator about a breach of the Code.

7. Notice

Overall administration of the Code will be managed by the Secretary and General Counsel who will report regularly to SMC and the Human Resources and Governance Committee on any Code matters.

The Code is effective April 4, 2023 and is posted online on WCB's website.

[I have read the terms above and agree to them.](#)