



Code of  
Conduct  
and Ethics

OUR PURPOSE

Working together,  
we grow and sustain  
the agriculture  
industry in Alberta.

OUR VALUES

PEOPLE ARE  
OUR FOUNDATION

We are successful  
because of our  
team members.

CLIENTS ARE  
OUR FOCUS

We are driven to  
support their success.

EXCELLENCE IS  
OUR ASPIRATION

We are determined  
in our pursuit to  
improve.

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# CODE OF CONDUCT AND ETHICS PURPOSE

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The Code of Conduct and Ethics (the “Code”) is our rulebook. It’s there to make sure everything we do at AFSC is legal and done with honesty and integrity.

This Code is important because it sets the foundation for us to always act ethically, no matter what. It combines our corporate values and lays out the ethical rules we all need to follow, as we represent AFSC.





# APPLICATION AND SCOPE

Our Code applies to AFSC Board of Directors and all AFSC employees. These requirements apply alongside any laws and AFSC policies in place while we're working here, even if we're on parental, disability, or personal leave. To keep things simple, unless otherwise noted, all parties bound by the Code are called AFSC Member(s).



## Acknowledgement

Our Code is something we take seriously. When you become an AFSC Member, you need to confirm that you understand the Code and agree to follow it completely. Make sure to do this within five business days from your start date.

Every year, you need to confirm that you're still following the Code and acknowledge that you're committed to continuing to do so. It's a requirement for being employed here or being on the Board. We all do it to make sure we're on the same page and doing things the right way.

## Where to Get Advice

Take the time to read our Code thoroughly, and let it guide you in everything you do each day. If you ever feel unsure about what to do or have questions about any part of the Code, reach out to your leader, our Chief People Officer, or the Chief Compliance Officer. They are here to help and provide guidance.

We rely on our values and behaviours framework to clearly define the expected behaviour for all of us. It guides how we collaborate and support each other, fostering a culture where everyone feels valued, heard, and empowered to make positive contributions to the success of AFSC.

Our Code might not cover every single situation. It's important for all of us to think about the overall spirit of the Code when making decisions and approach every interaction with the best intentions.

## Definitions

For purposes of the Code, unless the context states otherwise:

### AFSC

Agriculture Financial Services Corporation

### AFSC Members

Everyone covered by our Code - AFSC Board of Directors, and all AFSC employees, which includes permanent, term, contract, casual, and internships.

### Associated Person

People with whom you have relationships. Specifically:

- Your relative;
- A company that you either own or have a stake in by owning shares; or
- A partnership where:
  - You are a partner; or
  - One of the partners is a corporation linked to you through ownership of shares or a similar partnership.



This Code applies to AFSC Board of Directors and all AFSC employees. Consultants and third-party vendors are governed by our Supplier Code of Conduct.



Relative refers to a spouse or adult interdependent partner; child, stepchild, foster child, legal dependent, parent, sibling, in-law, grandparent, grandchild, niece, nephew, aunt, uncle and a first cousin or the adult interdependent partner of any of them.

### Chief Compliance Officer

The employee, designated by the CEO, holding the position of Senior Manager, Risk, Legal and Compliance.

### Concurrent Employment

Outside business activities such as holding jobs outside AFSC, being self-employed (including farming), and serving on boards.

### Conflict of Interest

A situation where your AFSC responsibilities might clash or seem to clash with your Private Interests.

- An **Actual** Conflict of Interest exists when your Private Interests are big enough to affect how you do your job and could undermine the trust people have in AFSC or your ability to fulfill your job responsibilities.
- A **Perceived** Conflict of Interest exists when a reasonable person might think that your Private Interests could wrongly influence the performance of your job responsibilities.
- A **Potential** Conflict of Interest exists when a conflict between your job responsibilities and Private Interests could arise in the future.

### Private Interest

A scenario where you or an Associated Person to you has a personal interest in an action or deal. This doesn't only involve financial transactions or gaining economic benefits. However, it does not include an interest that is:

- Trivial (insignificant);
- Applicable to the general public;
- Affects you or an Associated Person to you by way of being part of a broad class of the general public; or
- Your remuneration and benefits as an AFSC Member.



Owning a \$50 share in an organization affected by an AFSC decision is considered a trivial interest. However, if the decision were to have a significant impact on share price or the share amount were significant, your interest may no longer be considered trivial and could be a Conflict of Interest.



A broad class of the general public relates to a demographic of the general population such as Albertans, parents, specific age groups, etc.



# OUR RESPONSIBILITIES

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Violating our Code is serious. Each violation damages the trust we have with our clients, colleagues, and other stakeholders. Even though it can be tough, we speak up when we see something wrong.



## AFSC Members

As an AFSC Member, you are responsible for:

- Reading, understanding, and acknowledging your commitment and compliance with our Code when you start working and every year after that;
- Seeking guidance and clarification if you are unsure about what you should do or if a specific action or decision is appropriate;
- Following all relevant laws, regulations, our Code, and all other AFSC policies, standards and procedures that apply to you;
- Behaving ethically, no matter the situation;
- Making decisions impartially and free from conflicts of interest;
- Using and safeguarding corporate assets responsibly;
- Fostering a safe, inclusive, and respectful workplace; and
- Fulfilling your responsibilities regarding Code violations.

If you have other AFSC Members reporting directly to you, you are also responsible for:

- Staying informed about the Code, policies, and legal requirements that relate to your area of responsibility ensuring there are suitable measures in place to comply with these requirements;
- Responding to questions from AFSC Members who report to you, with support if required;
- Reviewing and actioning all Code related disclosures brought to your attention by your direct reports; and
- Quickly dealing with or escalating any real, suspected, or potential Code violation that your direct reports bring to your attention.



## Chief Executive Officer (CEO)

In addition to the responsibilities as an AFSC Member, the CEO is also responsible for:

- The following responsibilities related to being our Code Administrator:
  - Regularly advocating for and promoting our Code;
  - Ensuring that the AFSC Members you administer are aware of the expectations outlined in our Code;
  - Managing exceptions to the Code;
  - Addressing and resolving Code violations; and
- Following the additional requirements as the Designated Senior Official under the *Conflicts of Interest* Act – see the appendix for details.



## Chief Compliance Officer

In addition to the responsibilities as an AFSC Member, the Chief Compliance Officer is also responsible for:

- Offering explanations of our Code and providing information and advice on how it works, as well as helping with ethical challenges;
- Monitoring that all disclosures and information related to the Code provided by AFSC Members are properly reviewed, kept safe, protected, and addressed as needed;
- Recommending updates or additions to policies related to ethical behaviours;
- Sharing Code compliance information with leadership and our Board of Directors; and
- Reviewing and looking into complaints and instances of Code violations.



## Board of Directors

In addition to your responsibilities as an AFSC Member, the Board Director is also responsible for:

- Reviewing and approving the Code;
- Stating in writing, any Conflicts of Interest upon appointment, and every year thereafter; and
- Complying with all Board and Committee Terms of Reference.

## Chief People Officer

In addition to the responsibilities as an AFSC Member, the Chief People Officer is also responsible for:

- Offering explanations of our Code and providing information and advice on how it works, as well as helping with ethical challenges;
- Monitoring that all disclosures and information related to the Code provided by AFSC Members are properly reviewed, kept safe, protected, and addressed as needed;
- Recommending updates or additions to policies related to ethical behaviours;
- Sharing Code compliance information with leadership and our Board of Directors;
- Organizing and gathering Code acknowledgments from AFSC Members;
- Developing and delivering training on our Code for AFSC Members; and
- Determining and applying appropriate disciplinary action for Code violations according to established Code administration authorities.

## Chair of the Board of Directors

In addition to the responsibilities as an AFSC Member and Board Director, the Chair of the Board is also responsible for:

- The responsibilities related to being our Code Administrator for the Board of Directors and CEO, including:
  - Regularly advocating for and promoting our Code;
  - Ensuring that the AFSC Members you administer are aware of the expectations outlined in our Code;
  - Managing exceptions to the Code;
  - Addressing and resolving Code violations; and
- Following the additional requirements as the Senior Official under the *Conflicts of Interest Act* – see the appendix for details.

# OUR COMMITMENT, PRINCIPLES AND STANDARDS OF ETHICAL CONDUCT

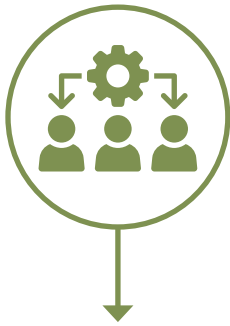




## Our Commitment to Behaving Ethically, No Matter the Situation

We show our commitment to doing the right thing through the established principles and standards set out in our Code and reinforced through our comprehensive policy framework, which informs and supports us on how to perform our activities in accordance with legal requirements and in alignment with our purpose, values, and strategic priorities.

We use the following three types of questions<sup>1</sup> to help us make ethical decisions when we are faced with choices that are not covered by our Code or policy framework:



### Is it equitable?

Is it equitable to all parties involved, both in the short-term and the long-term?

Would the decision be seen as honest and honourable, or are any parties being treated without consideration and respect?

Are some parties gaining an advantage that others are not?

Would my actions reflect our corporate values?



### Is it permitted?

Does it comply with laws?

Does it comply with government directives?

Is it allowed under the contracts we've agreed to?



### How does it make you feel?

Do you have a bad gut feeling about the decision?

How would people react if they saw it reported in the news?

Would I view someone to be acting unethically if they behaved in this way?

How will I feel after?

<sup>1</sup> Adapted from the Blanchard-Peale Ethical Framework.

If your responses to any of the questions make you feel uneasy, then, from an ethical perspective, the related behaviour is also a concern.

The next section of our Code is structured around our ethical principles, outlining the standards we commit to uphold within each of them.

## Our Principles of Ethical Conduct



We make decisions impartially and free from Conflicts of Interest



We use and safeguard corporate assets responsibly



We foster a safe, inclusive, and respectful workplace



We fulfill our responsibilities regarding Code violations

Let's delve deeper into our ethical principles and their associated standards under each of their respective headings.

### WE MAKE DECISIONS IMPARTIALLY AND FREE FROM CONFLICTS OF INTERESTS

As AFSC Members, we all have a responsibility to act impartially (without bias) and in the best interests of AFSC. We don't use our position or perform our duties to benefit our Private Interests, or those of an Associated Person.

It's okay if we find ourselves in a situation where our Private Interests might not align perfectly with our responsibilities at AFSC. It doesn't automatically mean we're doing something wrong. But to make sure everything is handled the right way; we need to disclose the circumstances in writing to our leader and/or the Chief Compliance Officer. This way, we can work together to address any conflicts and make sure everyone is on the same page.

#### Dealings with Others

We make sure to treat everyone fairly, without playing favourites, whether they're family, friends, or people we have personal or business connections with. If we come across any business dealings involving an Associated Person to us, we take a step back, and consult with our leader and/or Chief Compliance Officer on how to best handle the situation.

In emergency situations, we act without bias and let our leader and/or Chief Compliance Officer know right away after using our best judgement.

### Examples of conflicts in our dealings with Associated Person(s)



Providing lending, insurance or other program administration services



Negotiating contracts for products and services on behalf of AFSC



Hiring AFSC Members



Managing AFSC Member performance



Determining salaries or promotions



## Participation in AFSC Programs

Many of us may also engage in agriculture. It's crucial to steer clear of situations where our Private Interests could seem to conflict with our roles and responsibilities at AFSC. We can participate in public programs offered by AFSC, as long as:

- We don't get special benefits that others can't get in similar situations.
- We step back from any role in the transaction for AFSC, including making decisions.

## Engaging in Outside Business Activities

We recognize and support investing time and making a positive impact in charitable, community, political, and similar organizations. However, there are limits on engaging in outside activities that clash with AFSC's interests and business. We're free to pursue outside business activities unless doing so could harm AFSC's interests, reputation, or our ability to fully perform our job with AFSC. Specifically:

- We don't engage in outside business activities that:
  - Create an unmanaged Conflict of Interest;
  - Reduce our ability to fully do our job with AFSC;
  - Appear to be on behalf of AFSC or represent AFSC's opinion or policy; or
  - Use AFSC premises, equipment, or supplies, unless it's approved.
- We don't accept extra payment from any other source for the work we do as part of our job with AFSC.
- We don't let the possibility of future employment with another employer affect how we perform our official duties at AFSC.
- We follow the process below before taking on or engaging in Concurrent Employment:
  - We seek approval from our leader by requesting, in writing, the details of the additional role and its related activities;
  - Our leader carefully examines the information and follows a standard review process to make their decision. In all situations where a Conflict of Interest is possible, the leader consults the Chief Compliance Officer to jointly determine if there is a conflict and whether reasonable measures can be put in place to manage it; and
  - Our leader provides written approval or denial of our request.



**Concurrent Employment includes holding jobs outside AFSC, being self-employed (including farming), and serving on boards.**



**Upon joining AFSC, we notify our leader in writing about any Concurrent Employment we are already engaged in, and it goes through the approval process.**

## Political Activity

As an organization, AFSC must stay neutral when offering programs and services. Therefore, it is not allowed to promote or make contributions to any political party, candidate, union, or union representative.

We as AFSC Members are welcome to participate in political activities but when we do:

- We make sure it's clear that we are expressing and acting on our own personal views and not those of AFSC;
- We don't do it while carrying out our job duties for AFSC;
- We don't use any AFSC facilities, equipment or resources; and
- We don't use our position with AFSC to ask for donations for a political party or activity from current or potential clients or organizations associated with AFSC.

If we intend to run as a candidate in a political election, we must first obtain approval from our leader and Chief Compliance Officer to ensure AFSC remains neutral and to determine the appropriate time and duration for the required leave of absence.

## Gifts and Other Benefits

We don't ask for gifts or benefits and carefully think about how others might see the gifts we give or get from clients, partners, vendors or other third parties. There could be legal and reputation issues if we give or accept gifts from people outside AFSC. We have a strict policy against any form of bribery or corruption, as it can lead to criminal consequences and harm our business relationships.

We use good judgement when giving or receiving gifts and other benefits, making sure they don't influence or perceive to influence our behaviour or the behaviour of others involved in the exchange. We acknowledge that individual differences may exist in what influences behaviour and therefore ask ourselves what a neutral observer might reasonably think of the exchange. Specifically:

- We do not offer, give or accept gifts and other benefits, regardless of value, that:
  - Is cash or readily convertible to cash;
  - May make others expect special or preferential treatment from the exchange;
  - May reasonably be perceived as lavish;
  - May be considered inappropriate or could potentially harm the reputation of AFSC;
  - Is for travel unless we or the person we are offering to is a guest speaker or panelist at a public conference. In all cases, prior approval from our Executive leader is required, or in the case of Executives, from our CEO, and in the case of our CEO, from our Board Chair; or



We don't wear or display any political promotional items at work or during work events.

Political activity involves supporting or opposing a political party and candidates before or during elections. Being a candidate during an election period is also considered political activity, as it's about participating in the political process and expressing your views on government operations and direction.



Gifts and other benefits can be things you can touch, like items or prizes, or experiences like entertainment and hospitality. Essentially, anything that the public or the law might see as a gift or advantage falls into this category.

We avoid giving or accepting gifts that seem lavish, too personal, offensive, or controversial, no matter their value. If ever unsure about giving or receiving a gift, we check the "Where to get Advice" resources in this Code"



- Would be an exchange between vendors and AFSC Members involved in our procurement process, including competitive bids.

The amounts outlined in the table below set the dollar value limits for gifts and other benefits given to an AFSC Member by third parties associated with AFSC, such as industry partners, clients, vendors, subcontractors, and consultants. These limits apply to the total value of gifts and other benefits you receive from the same source at one time and throughout the fiscal year (from April 1 to March 31).

- We can accept gifts and benefits within the following dollar value limits per person, as long as they are not specifically disallowed or otherwise create a Conflict of Interest:

Dollar Value Limit		
	Single Source at One Time	Total Value from a Single Source Within a Fiscal Year
Hosted Event	\$250	\$500
Gift Cards		\$50
All other Gifts and Benefits		\$200

- We are personally responsible for ensuring that the gifts we receive follow the rules in our Code. This means using good judgment and tracking and making sure the value of the gifts doesn't go beyond the set dollar value limits, unless it has been properly approved through the exception process.
- Dollar value limits are not applicable to gifts and other benefits received as part of a group package. However, the leader of the group that receives the gift or other benefit must ensure that it follows the principles and requirements outlined in our Code.
- We do not apply dollar value limits to gifts and other benefits given to third parties. Instead, we depend on our existing purchasing and expense processes to ensure appropriateness and to prevent Conflicts of Interest.
- In the event that you win a prize draw at a conference or event where AFSC covers the cost of attendance:
  - You may keep a prize valued within the dollar value limits set out in the table; or
  - You may keep a prize of any value if the prize was the result of a draw where you personally paid for the ticket drawn, even if admittance to the event was paid by AFSC.



Gifts and other benefits apply to AFSC Members exchanging gifts with third parties and as such do not apply to internal promotional items or AFSC Member rewards and recognition.



Hosted event includes invitations for events where the host is physically present, encompassing activities such as meals, sporting events, entertainment, or cultural events.

## Conflicts of Interest Exceptions

We understand that unique situations may arise in which following the rules exactly might not be the best approach. Our exception process allows AFSC to handle specific cases that are different from the usual.

In every situation, we need to get approval jointly from our leader and our Chief Compliance Officer for any exceptions. Seeking this approval protects us individually and AFSC as an organization, ensuring that there is no perception that the activity wasn't addressed and approved beforehand.



### Additional Reference(s)

- *AFSC Dealings with Associated Person(s) Procedure*
- *Participation in AFSC Program(s) Procedure*
- *Concurrent Employment Procedure*
- *Gifts and Other Benefits Procedure*
- *General Conflict of Interest Procedure*
- *Corporate Policy Exception Procedure*

## WE USE AND SAFEGUARD CORPORATE ASSETS RESPONSIBLY

We have safety measures in place to protect AFSC including the proper functioning, protection, and responsible use of AFSC's assets. These measures include our policies, procedures, plans and other governing documents that we actively apply in carrying out our job responsibilities. We know what we're supposed to do to maintain these safeguards, and we look for opportunities to strengthen them. We pay close attention and make sure to appropriately document our actions to demonstrate our commitment to following these measures.

Key standards of safeguarding assets:

- We actively seek, stay informed about, and adhere to the safety measures in place;
- We never try to get around a safety measure, no matter what the situation is;
- We use assets wisely and make sure they are kept safe;
- We use assets solely for our job responsibilities, unless given permission otherwise;
- When we are no longer an AFSC Member, we do not use, access, or share AFSC property, and quickly return all such property to AFSC;
- Any product or technology we create while doing our job at AFSC belongs to AFSC and stays that way even after our employment ends. We aren't allowed to sell, trade, market, reproduce, or distribute these products or technologies;
- We keep information confidential, making sure it's not shared with anyone who shouldn't have access, whether directly or indirectly;
- We never use or share information gained in carrying out our job duties that isn't public knowledge ("insider information") to advance a Private Interest;
- When interacting with individuals outside of AFSC, including public officials, we uphold the integrity and protect the reputation of both AFSC and the external parties, whether they are individuals, businesses, or government entities; and
- We don't make statements on public issues that others might think represent an official action, opinion, or policy of AFSC unless we have the necessary permission.



### Did you know?

AFSC's assets go beyond what's listed in our financial statements and include anything valuable in the custody of AFSC.

This includes highly valued things that you can't physically touch, like AFSC's good reputation, data, information, and records.



## WE FOSTER A SAFE, INCLUSIVE, AND RESPECTFUL WORKPLACE

We are dedicated to ensuring a physically and psychologically safe and healthy work environment. We collaborate and actively work together to protect the health and safety of everyone. If there are accidents, disrespectful behaviours, potential hazards, or other physical or psychological concerns in our workplace, we promptly report them to our leader or People Services.

Our commitment to inclusivity and respect extends to every facet of our organization. We are all about making everyone feel welcome and valued. Whether it's our everyday interactions or big projects, we treat each other with respect. We celebrate our differences because we know that's what makes us strong. Our goal is to create a workplace where everyone feels like they belong and can do their best work. We stand against bullying, harassment, and discrimination in any form. We appreciate each person's unique background, experiences, and perspective. Together, we create a workplace where everyone feels a sense of belonging and can thrive.

## WE FULFILL OUR RESPONSIBILITIES REGARDING CODE VIOLATIONS

At AFSC, we take our Code seriously to maintain a workplace that reflects our values and principles. Violating our Code can have serious consequences, affecting us individually and the organization as a whole.

### Individual Consequences

- **Disciplinary Action:** Violations may result in disciplinary actions, ranging from verbal warnings to written reprimands, suspension, or, in severe cases, termination.
- **Professional Reputation:** Code violations can tarnish our professional reputation, affecting our current and future career opportunities.
- **Legal implications:** Certain violations may have legal implications, leading to legal actions or financial penalties against you, as an individual.

### Organizational Consequences

- **Damage to Reputation:** Code violations can harm AFSC's reputation, breaking trust with clients, stakeholders, and the public.
- **Workplace Culture:** Code violations can negatively impact our workplace culture, affecting morale and productivity.
- **Legal Consequences:** AFSC may face legal consequences such as fines or lawsuits.



Responsible operation of an automobile. All AFSC Members who operate a Company Vehicle or use a personal vehicle for business purposes will abide by AFSC Company Vehicle Use Policy and Driver Safety Guidelines.



### Additional Reference(s)

- *Accommodation Guideline*
- *Diversity, Equity, and Inclusion Policy*
- *AFSC Health and Safety Policy*
- *AFSC Respectful Workplace and Violence Prevention Policy*
- *AFSC Company Vehicle Use Policy*

## Reporting and Resolution

We foster a secure and supportive environment, ensuring open communication without fear of retaliation. Committed to Code compliance, we fairly report, assess, and respond to reports of observed and suspected Code violations.

Code Violation Reporting and Resolution Process:

- We formally report observed or suspected Code violations in writing to:
  - Our leader; or
  - Our Chief Compliance Officer.
- Our Chief Compliance Officer carefully examines the details and context of the report, taking measures to maintain confidentiality to the greatest extent possible, and applies a standard review process to determine the proper course of action(s), and ultimately provides a written report of their findings to our Chief People Officer.
- Based on the report, our Chief People Officer determines appropriate disciplinary action, if required, and provides a written decision to the AFSC Member that is the subject of the report and other parties as necessary.
- The AFSC Member that was the subject of the report may make an appeal in writing:
  - through our internal appeal process; or
  - to the Office of the Alberta Ethics Commissioner.

AFSC employs a fair and thorough violation review process managed by trained AFSC Members. Upon reporting a violation, we trust in a careful, confidential, and diligent handling of the process and stay safe by:

- Not confronting potential wrongdoers ourselves;
- Never intimidating or retaliating against a person that reported a violation complaint, conducting or participating in an investigation; and
- Maintaining the privacy of all information. Information sharing could compromise the process or could lead to retaliation against the potential wrongdoer by others.

Full truthfulness, confidentiality and cooperation throughout the review are essential, and failure to do so may result in disciplinary action, up to and including termination.



We can seek advice before making a formal report by reaching out informally to our leader, Chief People Officer or Chief Compliance Officer.

We can seek advice or report violations anonymously by contacting ClearView Connects™ (24 hours per day, 365 days per year) at 1.877.685.9317 or by visiting [clearviewconnects.com](https://clearviewconnects.com)



Our identity will not be disclosed when reporting a breach or potential breach unless required by law or we consent to such disclosure.



### Additional Reference(s)

- *Compliance Policy*
- *Fraud Prevention Policy*
- *Whistleblower Protection Policy*



As AFSC Members, we work together to bring our Code to life. We actively communicate, reaching out whenever questions or concerns arise, fostering trust that AFSC is committed to consistently doing what is right. By upholding our Code, we contribute to a positive and ethical work environment that benefits everyone associated with AFSC.

## Fraud or Other Criminal Charges

If we are charged on or off duty under the *Criminal Code* of Canada or the *Canada Controlled Drugs and Substances Act*, we have a responsibility to notify our leader and Chief People Officer right away. In the case of the CEO, such disclosure shall be made in writing to the Board Chair and the Office of the Alberta Ethics Commissioner.

## LEGISLATIVE AUTHORITY

Legislative authority refers to the power or permission given by laws to make decisions, create rules, and enforce regulations. This policy follows the requirements set out in:

- *Alberta Agriculture Financial Services Act*
- *Alberta Conflicts of Interest Act*
- *Alberta Government Organization Act*
- *Alberta Freedom of Information and Protection of Privacy Act*
- *Alberta Human Rights Act*
- *Alberta Occupational Health and Safety Act*
- *Alberta Public Interest Disclosure Act*
- *Alberta Public Agencies Governance Act*
- *Canada Employment Equity Act*



A man with glasses, wearing a purple checkered shirt and a dark vest, is seated in a black leather armchair. He is gesturing with his hands as if in conversation. A woman with long, wavy brown hair, wearing a grey t-shirt and blue jeans, stands with her arms crossed, smiling at him. The setting is a bright, modern office lobby with large windows, a dark door, and a framed painting of a landscape on the wall.

## REVIEW, APPROVAL AND ADMINISTRATION OF OUR CODE

## Review

Our Board of Directors are in charge of establishing and reviewing our Code and overseeing its implementation by management.

They make sure to review our Code every year. This helps keep it up-to-date and relevant. To demonstrate that we are being transparent and accountable, we have made the Code accessible to everyone on our external website.

## Approval

Our current Code received approval from our Board of Directors and the Alberta Ethics Commissioner.

- Approved by our Board of Directors on February 22, 2024;
- Approved by the Alberta Ethics Commissioner on March 15, 2024; and
- Published on May 28, 2024 and effective as of September 3, 2024.

## Administration

The roles in charge of promoting, managing, explaining, and enforcing our Code are known as our Code administrators. Our Code administrators include:

- The Board Chair, as the Code administrator for our Board of Directors and Chief Executive Officer (“CEO”); and
- The CEO, as the Code administrator for AFSC Members other than the Board of Directors and themselves.

### Questions? Concerns?

The Code helps manage day-to-day ethical concerns but can't cover every situation. Questions about our Code or concerns regarding the conduct of AFSC Members who may be in violation of our Code, can be directed to the AFSC Compliance Office:

E-mail: [compliance@afsc.ca](mailto:compliance@afsc.ca)

AFSC  
Attention: Compliance Office  
5718 56 Ave  
Lacombe, AB T4L 1B1

You can also contact our anonymous reporting hotline, ClearviewConnects 24 hours a day, seven days a week by calling 1.877.685.9317 or by visiting [clearviewconnects.com](https://clearviewconnects.com).

Our related policies, procedures, standards and guidelines are available for AFSC Members on our internal Homestead intranet.



Under the *Alberta Conflicts of Interest Act*, our Code needs the thumbs up from the Alberta Ethics Commissioner.



The Ethics Commissioner has the responsibility and authority to apply our Code in circumstances involving our Board Chair.

# APPENDIX

## Additional Requirements Under the *Conflicts of Interest Act* That Applies to AFSC's Board Chair and Chief Executive Officer:

### ADDITIONAL RULES FOR OUR BOARD CHAIR AND CEO

- You must not take part in a decision in the course of carrying out your roles knowing that the decision might further your Private Interest(s) or those of an Associated Person to you;
- You must not use your roles 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 your Private Interest(s), those of an Associated Person, or to improperly further any other person's Private Interest(s);
- You must not use or communicate information not available to the general public ("insider information") gained in your roles to further or seek to further your Private Interest(s), or any other person's Private Interest(s); and
- You must appropriately and adequately disclose an actual or perceived Conflict of Interest.

### ADDITIONAL RULE FOR OUR BOARD CHAIR

- You may not be involved in other appointment, business, undertaking or employment, including self-employment, if it creates an Actual or Perceived Conflict of Interest, without the approval of the Ethics Commissioner.

### ADDITIONAL RULES FOR OUR CEO

- You may not be involved in any other appointment, business, undertaking or employment, including self-employment, without the approval of the Ethics Commissioner;
- You may not own or have a beneficial interest in publicly-traded securities, without the approval of the Ethics Commissioner;
- You must file disclosure statements with the Ethics Commissioner in accordance with the *Conflicts of Interest Act*;
- You must file returns with the Ethics Commissioner relating to persons directly associated with you in accordance with the *Conflicts of Interest Act*;
- You may not, for a period of 12 months from the last day of your employment with AFSC, lobby any public office holder or act on a commercial basis or make representations on your own behalf or on behalf of any other person in connection with any ongoing matter in connection with which you directly acted for or advised a department or public agency involved in the matter;
- You may not, for a period of 12 months from the last day you had a direct and significant official dealing with a department or public agency, make representations with respect to a contract with or benefit from that department or agency or solicit or accept on your own behalf a contract or benefit from that department or public agency; and
- You may not, for a period of 12 months from the last day you had a direct and significant official dealing with an individual, organization, board of directors or equivalent body of an organization, accept employment with that individual or organization or an appointment to the board of directors or equivalent body.