Purpose: This document is the Code of Conduct for Portage College. It applies to all Board Members, all Employees and contractors of Portage College and anyone doing business on behalf of the College. As a public Post-Secondary Institution of Alberta, the College is bound by the jurisdiction of the Office of the Ethics Commissioner.

Portage College values a culture of impartiality and integrity. The College must have transparent expectations with respect to conduct in order to ensure that there not be any conflict between the private interests of Employees and their duty to serve the public and students of Portage College.

The purpose of this document is to establish rules governing the conduct of Board Members, employees, contractors and anyone doing business on behalf of the College, and to ensure transparency and accountability in how Portage College carries out its public mandate.

This document also exists to ensure the private interests of Employees and others Members of the College community do not conflict or appear to conflict with their duties and responsibilities at the College both for the protection of the Employee or Member of the College community and the College. In order to protect both the Employee and Member of the College community and the College from a conflict of interest some activities must be avoided.

As a public Post-Secondary institution, Portage College will ensure it reinforces an ethical culture by making Employees aware of expectations and by swiftly dealing with any incidents of noncompliance with codes of conduct. Employees and other Members of the College community must agree at the start of employment and annually thereafter to follow this code.

Responsibility: President & CEO and Vice President, People and Culture

Definitions:

For the purposes of these Guideline and Procedures:

a. "**COIA**" means the *Conflicts of Interest Act* (Alberta).

b. **"Member(s)"** means an individual, including members of the Board of Governors of Portage College, Managers, Staff, Faculty and Excluded staff members, who is engaged to work for the College under an employment contract. This includes a person who is engaged by Portage College to perform a service in accordance with existing terms and conditions of employment, employment contracts or collective agreements, and includes the President & CEO and the Board Chair.

c. **"the Code"** refers to the Code of Conduct and otherwise this guideline and procedures.

Guidelines:

1. **Code of Conduct**
   This Code of Conduct applies to all Members as defined above or anyone acting on behalf of Portage College.

   All Members must be informed on a regular basis of the Code of Conduct. All Members shall exemplify standards of professional commitment and create an atmosphere that respects the dignity of students and all members of the College community. Members of Portage College must act with impartiality in carrying out their duties.

   It is important to understand that this Code does not cover all situations; as such Members agree to use its principles, values and meaning to guide their behaviour.

   These principles shall guide the behavior of Board Members, Management, Faculty, Staff and Excluded Employees:

ETHICAL CONDUCT, PRACTICES AND PERFORMANCE

- Members support the College mission, mandate and values.
- Members shall endeavor to uphold policies and guidelines of the College.
- Personal attitudes and opinions shall be clearly distinguished from College policy.
- Members shall act in a manner, which maintains the honour and dignity of the profession and will not engage in activities which adversely affect the quality of service.

CONDUCT TOWARDS COLLEAGUES

- Members shall be fair and objective in dealings with colleagues.
- Members will act with integrity in dealing with criticism or questions of confidence with regard to colleagues.

CONDUCT TOWARDS STUDENTS

- Members shall act in a manner that respects the dignity and rights of all students without prejudice.
- Members shall not engage in conduct with students that will undermine the student-manager professional relationship.
- Members shall hold in confidence information acquired in the course of employment regarding the College, its students and business. However, the manager may divulge information if it is in the best interest of the student or College or is required by law.

CONDUCT TOWARDS COMMUNITY

- Members shall act as ambassadors of the College.
- Members shall manifest a positive role in College-community relations.

Members are prohibited from acting in self-interest or furthering their private interest by virtue of their position or through carrying out their duties.

Members must respect and protect confidential information. Information they are subject to must only be used for the work specific to their position and responsibilities at the College and never for personal advantage. Confidential information includes personal information, information regarding students and information about Portage College and its members.

A Member must not use his or her office or power to influence or seek to influence a decision to be made by, or on behalf, of the Government of Alberta or Portage College to further a private interest of their own or their spouse, partner, child, relative or associate's interest. The President & CEO and Board Chair are subject to all the provisions above.

The President & CEO and the Board Chair should not gain personal financial benefit directly or indirectly (through a spouse, partner, child, relative or associate) by use of their position at the College or from information obtained in the course of their employment at the College.

Conflicts between the private interests of Members and their duty to the public not specifically addressed must be dealt with according to the principles and intent of the Code of Conduct.

Members are expected to abide by the Code of Conduct as they conduct themselves on College business and in the eye of the public, including online.

2. Conflicts of Interest and Secondary Employment

A conflict of interest arises when a Member's personal interests conflicts with the interest of the College. The test of a conflict of interest is not just a case of whether the individual is actually improperly influenced by his/her personal interest; the pivotal issue is whether the circumstances lend themselves to such a possibility.

Members shall disclose, in writing, at the earliest possible opportunity any real and apparent conflicts of interest to the Director, Human Resources & Compliance. When a Member is uncertain over whether a particular activity may constitute a real or apparent conflict, they should disclose that activity to the Director, Human Resources & Compliance to determine whether a real or apparent conflict of interest exists.

Members may participate in secondary employment except where it interferes with their duties, availability, or performance to the College. Members must declare their secondary employment to the Director, Human Resources & Compliance in writing. The Director, Human Resources & Compliance will then review this declaration for conflicts of interest, and in writing either approve, deny, or put procedures in place to manage any conflicts of interest. The disclosure and response will be documented and placed in the Member's employment file.

Members shall not accept additional compensation for any duties which they perform in the course of their duties with Portage College.

A President & CEO, must seek approval in writing from the Board of Governors of Portage College and from the Ethics Commissioner to engage in an appointment, business, undertaking or employment, including self-employment, other than their role with Portage College. Approval will be documented and placed in the employment file.

A Member may be in a conflict of interest if he/she:

- is involved in a business that is in direct competition with the College;
- sits on a board or committee where decisions would have financial implications for the College;
- is engaged in outside employment or committee/volunteer work which interferes with their duties and responsibilities at the College;
- uses his/her position at the College to derive personal gain;
- uses College resources or facilities, including physical facilities, equipment, vehicles, computers, materials and supplies, for private use; and
- provides preferential treatment to relatives or friends or to a business or organization in which his/her relatives have an interest.

3. Political Involvement

Where a Member is seeking political involvement, Members are required to consult with the Director, Human Resources & Compliance to clarify the terms and conditions of their employment before seeking or holding an elected or appointed position in public office. Members shall be expected to take a leave of absence during the election. Should the Employee become elected to a municipal, provincial or federal office they will be expected to resign from their employment, contract or position with Portage College.

4. Gifts from Third Parties and Events

Members must not accept or grant any gift, perk, benefit, or other favour which may be intended or would reasonably be perceived as being provided in exchange for a favour or advantage to a third-party carrying on business with the College.

Subject to the monetary limits detailed below, Members may accept gifts in the following circumstances:

- The normal exchange of hospitality between persons doing business together;
- Tokens exchanged as part of protocol; or

- The normal presentation of gifts to persons participating in public functions, awards, speeches, lecture, presentations, or seminars.

Members must not accept cash or cash equivalents as gifts.

If valuation of gifts is in dispute, the Director, Human Resources & Compliance will determine the value of the gift.

Members must not accept a single tangible gift with a value of more than $100.

Members must not accept more than $200 worth of tangible gifts from a single source in a calendar year. If a Member accepts a tangible gift in excess of the monetary limits, the tangible gift will become property of Portage College.

Members must not accept a single event invitation with a value of more than $200.

Members must not accept more than $400 worth of event invitations from a single source in a calendar year.

The Board Chair, President & CEO, and other executives may accept event invitations worth no more than $1,000 from donors and friends of the institution. The Board Chair, President & CEO, and other executives must not accept more than $1,500 worth of event invitations from a single donor or friend of the institution in a calendar year.

For conferences, symposiums and professional development workshops where admission and accommodation is paid, Members may accept a gift of airfare, fees, and accommodation worth up to $1,000. An invitation exceeding that amount may be accepted with written permission from the Director, Human Resources & Compliance.

5. Requirements Specific to the Board Chair and the President & CEO of Portage College

Decisions Furthering Private Interests

Pursuant to s.23.925 of the *Conflicts of Interests Act,* the Board Chair and the President & CEO are subject to additional restrictions:

a) The Board Chair and the President & CEO must not take part in a decision in the course of carrying out his/her office or powers knowing that the decision might further a private interest of the Board Chair or the President & CEO, a person directly associated with the Board Chair or the President & CEO, or the Board Chair or the President & CEO's minor or adult child;

b) The Board Chair and the President & CEO must not use his/her office or powers of influence or seek to influence a decision made by or on behalf of the Crown or a public agency to further a private interest of the Board Chair or the President & CEO, or to improperly further any other person's private interests;

c) The Board Chair and the President & CEO must not use or communicate information not available to the general public that was gained by the Board Chair or the President & CEO in the course of carrying out his/her office or powers to further or seek to further a private interest of the Board Chair or the President & CEO or any other person's private interests; and

d) The Board Chair and the President & CEO must appropriately and adequately disclose a real or apparent conflict of interest.

Requirements Specific to the President & CEO of Portage College

Restrictions on Concurrent Employment

The President & CEO shall not be involved in any appointment, business, undertaking or employment, including self-employment, other than the President & CEO's appointment, business, undertaking or employment with Portage College, unless the President & CEO applies for and receives approval in writing from the Ethics Commissioner, and the President & CEO complies with any conditions that the Ethics Commissioner places on that approval. Before applying to the Ethics Commissioner for approval, the President & CEO must obtain approval from the Portage College Board of Governors for the concurrent employment.

6. Responsibilities:

Should a Member have any questions or concerns whether an activity, interest, job or appointment creates a real or apparent conflict of interest, the Director, Human Resources & Compliance or designee will investigate and report to the Member in writing. If the report finds there is a real or apparent conflict, the Director, Human Resources & Compliance or designee's report will include steps the Member must take to manage the conflict. The conflict must be managed as instructed by the Director, Human Resources & Compliance or designee, including giving up the activity, interest, job or appointment.

Members who are made aware of alleged violations by a co-worker, supervisor or subordinate are responsible to bring their concerns to the Director, Human Resources & Compliance. The Director, Human Resources & Compliance is responsible to investigate all violations and ensure appropriate levels of discipline are actioned within an appropriate timeline.

Should the issue/violation involve the Director, Human Resources & Compliance, the concern should be referred to the Vice President, People and Culture, President & CEO or Board Chair. Should the issue/violation involve the President, the concern should be referred to the Board Chair. Should the issue/violation involve the Board Chair, the concern should be referred to the Deputy Chairs of the Board of Governors.

Procedures:

Inquiries:

The Director, Human Resources & Compliance or designee ensures that any real or apparent conflicts of interest are avoided or managed. The Director, Human Resources & Compliance gives advice and manages all concerns about breaches of the code. Inquiries may be directed to the Human Resources office or hr@portagecollege.ca.

Members who have concerns with a situation should ask themselves the following basic questions:

- Am I following this Code's principles?
- Have I thought about whether or not my behavior aligns with a policy or procedure of Portage College?
- Do my personal interests or relationships affect my thinking?
- Does my secondary employment breach the code?
- Could my decisions or actions be seen as a way for me to gain something?
- Could my decisions or actions be seen as giving or getting special treatment?

Ongoing Disclosure of Relationships and Conflicts:

Members have a continuing obligation to disclose in writing any real and apparent conflicts of interest to the Director, Human Resources & Compliance. This may include any existing business, employment, and personal relationships which could affect the member's work at Portage College, as well as any changes to those relationships which may affect their work. If the disclosed conflict of interest cannot be avoided, Members must manage the conflict in cooperation with Human Resources.

Reporting a Potential Breach:

Any Member who has reason to believe that he/she has become aware of a possible breach, must report those facts in writing to the Director, Human Resources & Compliance. The written description should include a brief description of the possible breach, including relevant dates, locations, individuals involved or affected and any other relevant information.

Responding to Potential Breach:

1. Within five (5) working days of receipt of the complaint, the Director, Human Resources & Compliance or designee will acknowledge receipt of breach to the Member, if self-identified.
2. If a real and apparent breach is reported on another Member in good faith and with reasonable grounds, the reporting person will be protected from reprisal. The identity of the Member who reported the breach will be kept confidential unless required by law, or if they consent to disclosure.
3. Within ten (10) days of receipt of the complaint an investigation will commence. The investigation may be delegated by the Director, Human Resources & Compliance designee to an investigation team. An external investigator may be consulted or retained. The Member will be made aware of the allegations and will be given the opportunity to respond to the allegations and provide any other relevant information before a decision is made.
4. The investigator(s) will consider:
    a. Whether a breach of the Code has occurred;
    b. The ability for objectivity and lack of bias in the investigation;
    c. The ability to maintain confidentiality at all times; and
    d. Knowledge of the legal and compliance requirements of the core nature /subject matter of the allegation.
5. The Director, Human Resources & Compliance will investigate the matter, make recommendations and write a final report. The Director, Human Resources & Compliance may during the investigation consult with the Ethics Commissioner about the breach. The Director, Human Resources & Compliance will provide recommendations to the President & CEO for a final decision on whether a breach has occurred.
6. The written report may have facts about the breach. The recommendations will outline whether or not the Member under the investigation has breached this Code. The written report will be given to the Member under investigation. The Member can request all information related to the breach and has the right to respond to the report.
7. Members who have breached the standards of behaviour in this Code may be disciplined, up to and including termination. A sanction as identified in the Human Resources Guidelines and Procedures and Collective Agreements will be suggested by the investigator and approved by the President & CEO.
8. Members can ask in writing for the President & CEO to review a decision made by the Director, Human Resources & Compliance about a breach of this Code. Members can ask in writing for the Board of Governors to review a decision made by the President and CEO about a breach of this Code.

Annual Review:

1. Human Resources will provide all Members with a copy of the Code of Conduct upon commencement. The Member will sign and initial each page of the Code.
2. Supervisors will ensure that all Members review the relevant Code of Conduct annually.

3. Members will be asked to affirm their review and understanding of the Code of Conduct annually. This will be facilitated through an annual campaign during which employees will be prompted to review the Code of Conduct and confirm their understanding and agreement upon signing into the network. Acknowledgment will be recorded electronically.

4. The Code of Conduct for Portage College was introduced on October 17, 2018 and is reviewed every 24 months by the Executive Committee to ensure it is relevant and up to date.

   Any changes to this document will be given to the Ethics Commissioner for review and approval. Once they are approved, changes to the Code will be made public for ninety (90) days before becoming effective.

Signature of Acceptance:

By signing below, you agree as a Member of Portage College, that you have read and understand the Code of Conduct and this Guideline and Procedures and agree to abide by it.

Member signature	Print Name	Date

Approved by the Office of the Ethics Commissioner: October 17, 2018
Amendments Approved by the Office of the Ethics Commissioner: November 25, 2020
Amendments Approved by the Office of the Ethics Commissioner: Aug. 6, 2025

Approved by Executive Committee

President	August 26, 2025 Approved Date	August 26, 2025 Effective Date