

# CODE OF CONDUCT

## Buffalo Lake Management Team

### I. Preamble

The Code of Conduct (Code) for the Buffalo Lake Management Team (the Team) applies to all members. The Code reflects a commitment to the Team's values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of the Team. Members must behave in a way that aligns with this Code. They understand that this Code does not cover every specific scenario. Therefore, they use the spirit and intent behind this Code to guide their conduct, and exercise care and diligence in the course of their work with the Team.

To demonstrate commitment to transparency and accountability, this Code is available to the public on the Team's website.

Government employees assigned to the Team, supporting the work of the Team are subject to the Alberta Public Service Code of Conduct.

### II. Definitions

- "Member or Members" is term used to identify the persons appointed to the Team.
- "Code Administrator" means the Chair of the Team, or the Vice-chair if the Chair is unavailable or involved in a Code violation.
- "Private Interest" means an interest in either the subject matter, or a relationship with parties before the Team that impair the impartiality, real or perceived, expected for each member and includes the exemptions in section 1(g) of the *Conflicts of Interest Act*.

### III. Core Values

- a. Members shall act with impartiality and integrity.
- b. Members shall demonstrate respect and accountability.
- c. Members do not create any apprehension of conflict between their private interests and duty of impartiality to the public.

### IV. Guiding Principles

These principles guide the behaviour and decisions of members:

- a. The actions and decisions of members shall be made to promote the public interest and to advance the mandate and long-term interests of the Team.
- b. Members are responsible stewards of public resources.
- c. To serve the public interest, members shall uphold the Team's mandate.
- d. Members shall act in good faith and to place the interests of the Team above their own private interests.

- e. Members shall behave in a way that demonstrates that their behaviour and actions are fair and reasonable in the circumstance.
- f. Members enjoy the same rights in their private dealings as any other Albertan, unless it is demonstrated that a restriction is necessary in the public interest.
- g. When a member, as an individual, is subject to more than one Code of Conduct, the member must consider the expectations in all. Members understand that this Code is not intended to conflict with other Codes of Conduct and will discuss any potential conflicts with the Code Administrator.
- h. The Code applies to all members unless a specific exemption is granted by the Code Administrator.
- i. Members have an obligation to disclose all real or apparent conflicts of interest. Members must at the first opportunity make full, written disclosure of any potential, perceived or real conflicts in interest to the Code Administrator.
- j. Members must understand that disclosure itself does not remove a conflict of interest.
- k. Members shall encourage their colleagues to act fairly and ethically and know that they are able to raise concerns about a suspected breach by another to the Code Administrator without fear of reprisal.
- l. Members know that breaches of this Code may result in disciplinary action, up to and including removal of the member.
- m. Members shall take any questions about the Code, including how to apply these principles, to the Code Administrator.
- n. Each member must confirm their understanding of, and commitment to the Code. This includes a signed acknowledgment to abide by the Code.

## **V. Application of Code**

- a. This Code applies to all members as defined above.
- b. Conflicts between the private interests of the members and their duty to the public not specially addressed in this Code must be dealt with according to the principles and intent of the Code. Members are expected to recuse themselves if a conflict of interest arises in carrying out their obligations.

## **VI. Behavioural Standards**

Behavioural standards help members make appropriate decisions when the issues they face involve ethical considerations. Behavioural standards cannot cover all scenarios but provide guidance in support of day-to-day decisions. All members must adhere to the following standards:

- a. Members must not engage in any criminal activity and comply with all relevant laws, regulations, policies and procedures.

- b. Members must not use their status or position with the Team to influence or gain a benefit or advantage for themselves, their families, their business associates or others with whom they have a significant personal or business relationship.
- c. Member conduct shall contribute to a safe and healthy workplace that is free from discrimination, harassment or violence.
- d. Members must not use drugs or alcohol in a way that affects their performance and safety or the performance and safety of their colleagues, or that negatively impacts the reputation or operations of the Team.
- e. Members must not comment publicly about the Team or its work without first consulting with the Chair. Members must promptly notify the Chair of any media requests for comment and the Chair will deal with them.
- f. Members of the Team must not act in self-interest or further their private interests by virtue of their position as a Member of the Team, or through the carrying out of their duties as a Member of the Team. Members must take reasonable steps to avoid situations where they may be placed in a real or apparent conflict between their private interests and the interests of the Team. In other words, actions or decisions that members take on behalf of the Team must not provide them with an opportunity to further the private interests of themselves, their families, their business associates or others with whom they have a significant personal or business relationship.

1. Confidential Information

Members must respect and protect confidential information, use it only for the work of the Team and do not use it for personal gain. Members must comply with protocols that guide the collection, storage, use, transmission and disclosure of information.

2. Gifts and Gratuities

Members must not accept fees, gifts, or other benefits that are connected directly or indirectly with the performance of their duties from any individual, organization, or corporation other than

- 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, lectures, presentations, or seminars.

The total value of the fees, gifts, and benefits given from the same source in any calendar year cannot exceed \$100.

3. Outside Activities

Members must avoid participating in outside activities that conflict with the interests and work of the Team. For example:

- i. Business Interests, investments and management of private assets:  
Members must not hold interests in a business, investment or manage a

private asset directly or indirectly through a relative or friend that could benefit from, or influence, the decisions of the Team.

- ii. **Employment:** Members may take employment, including self-employment, unless such pursuits cause an actual or perceived conflict of interest. Prior to accepting any employment member must notify the Code Administrator in writing. The Code Administrator must then review the employment for conflicts of interest and provide a response to the member in writing.
- iii. **Political Activity:** Members may participate in political activities including holding membership in a political party, supporting a candidate for elected office or seeking elected office. However, they must not use their position with the Team to seek contributions for a political party or activity from current or future clients or entities doing business with the Team. In addition, any political activity must be clearly separated from activities related to the work for the Team, must not be done while carrying out the work of the Team and must not make use of Team facilities, equipment or resources in support of these activities. If a member is planning to seek an elected municipal, provincial or federal office, they must disclose their intention in writing as soon as possible to the Code Administrator for guidance relating to their duties within the Team.
- iv. **Volunteer Activity:** If members are involved in volunteer work, the activity must not influence or conflict with decisions relating to the Team.

4. Pre-Separation

Members considering a new offer of appointment or employment must be aware of and manage any potential conflicts of interest between their current position and their future circumstance and must remove themselves from any decisions affecting their new appointment or employment.

5. Post-Separation

Once a member has left the Team, the member must not disclose confidential information, including information pertaining to Team's processes, of which he or she became aware of while a member, and he or she must not use contacts with former colleagues to gain an unfair advantage for his or her current circumstance. To avoid conflict, former members of the Team may not appear as representatives before the Team or provide advice to others appearing before the Team for twelve (12) months after the termination of their appointment.

6. Property

Members may have limited use of the Team's premises and equipment for authorized incidental purposes providing such use involves minimal additional expense to the Team, must not be performed on the member's work time, must not interfere with the mission of the Team and must not support a personal, private business.

7. Dealings with Related Persons or Parties

Members must disqualify themselves from activities with others if the relationship between them may bring their impartiality into question. Members

must disclose to the Chair all situations that may be or may appear to be conflicts of interest under this section.

8. Devotion of sufficient time.

Members must devote sufficient time and attention to their official duties to ensure they are making informed fair and balanced decisions that are adequately documented.

**VII. Team Chair Obligations and Restrictions**

Prohibition from furthering private interests and restrictions on using influence and insider information (s.23.922(2)(b) *Conflicts of Interest Act*).

- i. The Chair 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 Chair, a person directly associated with the Chair, or the Chair's minor or adult child;
- ii. The Chair must not use his/her office or powers to influence or seek to influence a decision to be made by or on behalf of the Crown or a public agency to further a private interest of the Chair, a person directly associated with the Chair or to improperly further any other person's private interest;
- iii. The Chair must not use or communicate information not available to the general public that was gained by the Chair in the course of carrying out his/her office or powers to further or seek to further a private interest of the Chair or any other person's private interest; and
- iv. The Chair must appropriately and adequately disclose a real or apparent conflict of interest.

**VIII. Administrative Processes**

Administrative processes help members manage ethical dilemmas, including any real or perceived conflict of interest concerns.

a. Administration

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

The Code Administrator for members is the Chair of the Buffalo Lake Management Team.

The Code Administrator for the Chair is the Vice-chair, who will receive disclosures from the Chair and respond to an allegation that the Chair has breached this Code.

b. Disclosure

It is the responsibility of each member to declare in writing to the Code Administrator those private interests and relationships that they think could be seen to impact the decisions or actions they take on behalf of the Team. When there is a change in their responsibilities within the Team or in their personal circumstance, members shall disclose in writing any relevant new or additional information about those interests as soon as possible. Where a real or apparent conflict of interest cannot be avoided, members must take the appropriate steps to manage the conflict.

Members disclose these real or apparent conflicts of interest so that the Code Administrator is aware of situations that could be seen as influencing the decisions or actions they are making on behalf of the Team. This provides members, following a review by the Code Administrator, an opportunity to take action to minimize or remove the conflict. To actively manage a conflict of interest, options include:

- removing themselves from matters in which the conflict exists or is perceived to exist;
- giving up the particular private interest causing the conflict; and,
- in rare circumstances, resigning their position with the Team.

c. Reporting a Potential Breach by Another

Members are encouraged to report in writing a potential breach of this Code by another to the Code Administrator. When reporting a potential breach in good faith and with reasonable grounds, members are protected from retaliation for such reporting. Investigations by the Code Administrator regarding complaints will take place in private and take into account the privacy of the person that is the subject of the complaint.

d. Responding to Potential Breach

Once a potential breach has been reported, the Team's procedures for responding to and managing a potential breach will be promptly initiated. The Code Administrator will review the circumstance and details of the potential breach and will notify the alleged member. The alleged member has the right to complete information and the right to respond fully to the potential breach. The identity of the reporter will not be disclosed unless required by law or in a legal proceeding. The Code Administrator makes a decision and completes a report of the review in a timely manner. The decision may range from finding no potential breach to one that reveals suspected criminal conduct.

e. Consequences of a Breach

Members who do not comply with the standards of behaviour identified in this Code, including taking part in a decision or action that furthers their private interests, may be subject to disciplinary action up to and including removal of the member.

**IX. Other Resources**

a. Where to Get Advice

When members require advice and guidance in determining whether misconduct or a conflict exists, or need clarification, they may discuss their issue with the Code Administrator.

b. Questions to Consider

When members are faced with a difficult situation, the following questions may help them decide the right course of action:

- Have I reflected on or consulted with the Code Administrator about whether I am compromising the Code's values, principles or behavioural standards?
- Have I considered the issue from a legal perspective?
- Have I investigated whether my behaviour aligns with the by-laws, applicable legislation or a policy or procedure of the Team?
- Could my private interests or relationships be viewed as impairing my objectivity?
- Could my decision or action be viewed as resulting in personal gain, financial or otherwise?
- Could my decisions or actions be perceived as granting or receiving preferential treatment?

**X. Coming into Force**

This Code shall come into force Feb 27, 2026 and once in force replace any previous Code of the Team.

**XI. Affirmation**

The Code of Conduct was reviewed in February 4, 2026 and is to be affirmed by the members by Feb 27, 2026 and any new members joining after this date. The committee will review the Code of Conduct every three years to ensure it remains current and relevant.

I understand and agree to adhere to the Code of Conduct as presented in this document.

\_\_\_\_\_  
Member name

\_\_\_\_\_  
Member Signature

\_\_\_\_\_  
Date

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### Buffalo Lake Management Team

#### XI. Affirmation (ADDENDUM)

The Code of Conduct was reviewed in February 4, 2026 and is to be affirmed by the members by Feb 27, 2026 and any new members joining after this date. The committee will review the Code of Conduct every three years to ensure it remains current and relevant.

I understand and agree to adhere to the Code of Conduct as presented in this document.

ROBERT (PUD) STEVENSON      [Signature]      FEB 4-2026  
Member name      Member Signature      Date

Don Hill      [Signature]      FEB 4 2026  
Member name      Member Signature      Date

Brenda Knight      Brenda Knight      Feb 4 2026  
Member name      Member Signature      Date

Tanice Besuian      Tanice Besuian      Feb 4, 2026  
Member name      Member Signature      Date

Justin Stevens      [Signature]      Feb 4, 26  
Member name      Member Signature      Date

Don G Sproule      [Signature]      Feb 4, 2026  
Member name      Member Signature      Date

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