

# CODE OF CONDUCT

Available in alternate formats upon request.



**Enrich the Lives  
of Manitobans**

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Contact: For questions on this Code, contact Corporate Communication

[www.mbll.ca](http://www.mbll.ca)

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## President & CEO Statement of Intent

As a Crown corporation, Manitoba Liquor & Lotteries must always adhere to the highest standards while we strive to deliver our products and services in an ethical and socially responsible manner. MBL has an excellent reputation and we have rightfully earned the trust Manitobans have placed upon us. However, to maintain that takes a concerted effort on our part.

Our reputation is continuously reflected in our business practices, our relationships with stakeholders and in the actions of every employee. It is our responsibility to always conduct ourselves in the most professional manner, so we can build on and protect our reputation in everything we do.

When interacting with our colleagues, customers, and business partners, our conduct must always be aligned to both our core values, also known as our 5Cs (caring, committed, collaborative, creative, customer focused), and the Code of Conduct.

The Code of Conduct serves as a reliable compass for employees to follow, which helps to mitigate the risk of damaging valued relationships, breaching our respectful workplace policy, or harming our corporate reputation.

Regardless of your role at Manitoba Liquor & Lotteries, you are required to comply with the Code of Conduct policies, applicable procedures, laws, and regulatory requirements. Please take the time to familiarize yourself with the Code of Conduct and understand how it may help guide you in your role.

I am immensely proud of our employees' ongoing dedication and valuable contributions that ultimately enrich the lives of all Manitobans.

*Sincerely,*  
**GERRY SUL**  
*President & Chief Executive Officer*

# Our Values

We aspire to live these values in all that we do to enrich the lives of Manitobans.



**CARING**  
Everyone Matters – We care about each other, our communities and the environment by being genuine, responsible and considerate.



**CREATIVE**  
Courage to Explore – We foster an environment of idea sharing, continuous learning and improvement, and push beyond what we have today to what is possible tomorrow.



**COLLABORATIVE**  
Better Together – We work together in an open, respectful way to produce and deliver outstanding results.



**COMMITTED**  
Keep Promises – We take pride and ownership in making and meeting our commitments.



**CUSTOMER FOCUSED**  
Great Experiences – We listen to our internal and external customers so we can anticipate, understand and respond to their needs.

## Scope

The Manitoba Liquor and Lotteries Corporation’s (the Corporation) Code of Conduct (the “Code”) sets behaviour expectations and principals for conducting business with our customers, business partners, communities and team members with dignity and respect. Our approach is:

- operating responsibly
- making significant economic contributions
- strengthening local communities
- focusing on customer well-being
- being good business partners
- reducing our environmental footprint
- being a great place to work

## Who does the code apply to

The Code applies to all the Corporation’s employees, including the Board of Directors and executives. The Code sets forth general principles to guide employees in making ethical decisions. It takes into consideration applicable laws, regulatory requirements, agreements and provides overarching guidance. The Code is supported by underlying policies, such as the *Whistleblower Protection, Conflict of Interest, Employee Gaming and Confidential Business Information*.

## What we aim to do

### BUSINESS ETHICS AND INTEGRITY

- maintain high standards of honesty, integrity and impartiality.
- conduct business and personal activities in a positive manner.
- support and comply with corporate social responsibility commitments and practices.

### HUMAN RIGHTS

- recognize, respect and support the protection of human rights including applicable internationally proclaimed human rights. In particular, the understanding that Indigenous Peoples have unique rights in Canada. We will continue to do better with reconciliation and implementing Canada’s Truth and Reconciliation Commission Calls to Action and the United Nations Declaration of the Rights of Indigenous Peoples.
- ensure employees are not complicit in human rights abuses.

### LABOUR STANDARDS

- effectively recognize the right to collective bargaining and the freedom of association.
- eliminate all forms of forced and compulsory labour.
- effectively assure no involvement in child labour practices.
- eliminate discrimination in respect of employment and occupation.

### ENVIRONMENT

- anticipate, prevent and/or mitigate the environmental impacts associated with business decisions and actions.
- undertake initiatives to promote greater environmental responsibility.
- encourage and assist in the research, development and promotion of environmentally friendly technologies.

### ANTI-CORRUPTION

- work against corruption in all its forms, including extortion, bribery and money laundering.



# Our Responsibilities

## FAIRNESS AND RESPECT

The Corporation and its employees demonstrate fairness and respect toward customers, employees and suppliers; values diversity and inclusion in our workplace, and is committed to operating with high standards for customer and employee safety, integrity and consistency of service delivery.

No employee will take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair business dealings.

The corporation is committed to maintaining a respectful workplace for all and will maintain zero tolerance for all conduct that is harassing, discriminatory, abusive or offensive against our employees, customers and suppliers.

Employees have the right to file a complaint with the Manitoba Human Rights Commission if they believe they have been discriminated against or harassed. Employees are encouraged to go through Human Resources first to try and have the issue addressed.

## PRIVACY AND CONFIDENTIALITY

The Corporation is committed to protecting the personal information and personal health information that comes under its responsibility or control and will protect such information and ensure compliance with applicable laws and fair information practices.

The Corporation and all employees must ensure the right to privacy and confidentiality for all staff, business partners, suppliers, and customers and avoid unintentional disclosure by keeping business data and personal data obtained in the course of business secure.

Employees must not disclose information, directly or indirectly, or use it for any purposes except as required in the course of our employment.

## CONFLICT OF INTEREST

Conflict of interest refers to a situation where personal interests may be, or may appear to be, in conflict with the Corporation's best interests. Conflict of interest includes using an employee's position, confidential information or corporate time, material or facilities for private gain or advancement or the expectation of private gain or advancement.

Employees may not accept gifts, sums of money, discounts, entertainment privileges, loans, favours or services in return that are intended to influence, or may appear to influence, a decision by the employee on behalf of the corporation.

When in doubt about a conflict of interest situation you should ask yourself:

- Could my personal interest affect a decision I might have to make at the Corporation?

- Could my actions or conduct undermine the public's confidence in my ability to do my work or compromise the trust that the public places on the Corporation?
- Can I, my family or friends gain anything through my dealings with a third-party doing business with the Corporation?
- Do I feel obligated to a third-party due to my relationship with them?

In rare and extreme cases, conflict of interest may be applied to an employee's off duty behaviour when the Corporation's interests and reputation is jeopardized.

## LAWFUL CONDUCT

The Corporation will conduct business in accordance with all applicable laws, rules and regulations and everyone is responsible for complying with such laws.

Due to the nature of the business, the Corporation is vulnerable to theft, fraud, misappropriation of funds or property, and other similar irregularities. Management is responsible for being aware of the various types of fraud that can occur within their areas of responsibility and for maintaining internal controls to protect the assets, revenues and expenditures of the corporation. Internal Audit's role is to provide an independent review of the effectiveness of these internal controls.

Employees have a responsibility to refrain from and report any suspected theft, fraud or misappropriation of funds or property whether involving themselves, other employees, customers and others. All fraudulent activities should be reported to the employee's immediate supervisor or management.

The Corporation and all employees licensed by the Liquor, Gaming and Cannabis Authority of Manitoba (LGCA) will comply with the terms and conditions with respect to employee licensing and any related LGCA policies.

The Corporation has an obligation to report to the LGCA all investigations involving the honesty and integrity of the employee including investigations into fraud, theft or misappropriation of funds or property. Employees are reminded that registration by LGCA is a condition of employment for Manitoba Liquor & Lotteries employees, unless exempt through regulation.

Suspected theft, fraud or misappropriation involving employees may result in a criminal investigation, an administrative investigation or both. The Corporation will actively pursue all avenues in the investigation of fraud, theft or employee misappropriation.

## ALCOHOL CONSUMPTION, DRUGS AND OTHER SUBSTANCES

The Corporation recognizes that alcoholism and drug addiction are illnesses and provides assistance through a referral to the Employee and Family Assistance Program or the Addictions Foundation of Manitoba for medical therapy and treatment.

The Corporation does not tolerate the use of illegal drugs in the workplace. It is also the Corporation's policy to prohibit the performance of duties when the employee is adversely affected by alcohol or the abuse of any other substance.

Employees attending a corporation sponsored social function and representing the Corporation at a social function hosted by a business partner where alcohol is served, even if this is outside of normal working hours or off site, are expected to remain professional and fit for work at all times during those events.

Employees are expected to consume in a socially responsible manner while representing the Corporation and are encouraged to embrace socially responsible consumption.

Due to their role/position in the Corporation, employees are sometimes placed in the position of consuming alcoholic beverages during circumstances such as participation in product selection tasting sessions and product evaluations.

Any employee who consumes alcohol as part of their position, must comply with the following:

- Employees will take all reasonable steps to avoid becoming impaired or intoxicated while performing duties related to their job.
- In situations where consumption of alcohol is required or expected as part of work-related duties, employees are expected to take all necessary measures to avoid excessive consumption, including but not limited to using dump buckets during tasting sessions, controlling the amount of product consumed to limit its effect, and withdrawing from situations where consumption is leading to intoxication.

If management identifies employees who they perceive are intoxicated or impaired in spite of any measures that have been taken, it is management's responsibility to remove that employee from the situation immediately.

Any employee who has become intoxicated or impaired by alcohol or other substances must not attempt to operate motor vehicles or machinery. The Corporation will provide alternative transportation for the employee, or make other arrangements to ensure that the employee is not exposed to undue risk as a result of the situation.

## SAFETY AND HEALTH

The Corporation recognizes that a safe and clean work environment is important to the well-being of all employees, customers and business partners. The Corporation will comply with all applicable safety and health regulations and ensure that effective policies and practices are in place to protect the health and safety of our employees, customers, and business partners.

Employees have a right to work in an environment free from violence and harassment. The Corporation will not tolerate acts of physical, verbal or written aggression by one employee against another, or by an employee against any other person while carrying out his or her responsibilities whether on or off the Corporation's premises.

## GAMBLING, CONTESTS AND VOLUNTEER PARTICIPATION

The Corporation has an *Employee Gaming* policy intended to manage security, integrity and perception issues with respect to employees participating in gambling conducted, managed or operated by the Corporation.

It is illegal for employees of the Corporation to participate, either as employees or customers, in illegal gambling as they are committing an offence under the *Criminal Code* (Canada).

Immediate family members of the employee may be disqualified from participating in contests and promotions associated with the Corporation as set out in the conditions and rules of each contest.

All employees who are not prohibited from gambling in the Province of Manitoba and choose to play are strongly encouraged to play responsibly. Playing responsibly includes knowing your limits for both time and money, and playing within it.

## CORPORATE ASSETS AND RESOURCES

All employees have a responsibility to safeguard the Corporation's assets which include funds, records and property.

Employees must not abuse the use of the Corporation's equipment, supplies, financial, human resources, or business resources for activities not associated with their work. Employees are expected to protect the company's assets and ensure their efficient use.

The Corporation will maintain internal controls to protect the assets, revenues and property from theft, fraud and other irregularities and employees must comply with these controls.

Employees must follow corporate information technology policies regarding the appropriate use of internal or external e-mail or Internet privileges.

### EMPLOYEES:

- Read, understand and comply with the Code of Conduct and all other policies, standards, procedures and guiding principles issued by the Corporation.
- Have the courage to speak up when things are not right. Report all violations of the Code.
- If a violation meets the definition of wrongdoing according to The Public Interest Disclosure (Whistleblower Protection) Act, an employee may report the violation to the Corporation's designated officer or contact the provincial Ombudsman through the website: [www.ombudsman.mb.ca](http://www.ombudsman.mb.ca).
- Strive to maintain high standards of professional conduct and work performance and always reflect a commitment to honesty and integrity.

### LEADERS:

- Create and maintain a work environment that encourages ethical behaviour.
- Ensure all employees have access to the Code of Conduct, corporate policies and procedures.
- Ensure all employees have reviewed and signed off on the Code of Conduct.
- Provide employees with the information, instruction, training and supervision necessary to perform their jobs safely and effectively.
- Foster an environment of open communication in which problems may be raised and discussed without fear of reprisal.
- Ensure that reported violations are addressed, documented and passed on appropriately to Human Resources management.
- Provide employees with feedback to support satisfactory performance and initiate corrective action.

# Standards of Personal Conduct

The following is intended to provide examples only. An employee's conduct is not excused because the behaviour is not specifically listed as objectionable conduct.

## UNACCEPTABLE CONDUCT (OFFENSES)

Unacceptable Conduct (Offenses) – Workplace behaviour that will result in corrective discipline, including but are not limited to:

1. Insubordination. The deliberate refusal to follow a reasonable order that relates to an employee's job function – either an expressed refusal to follow a proper order or a deliberate failure to carry out an order.
2. Willful violation or disregard of corporate policies, procedures, rules or regulations.
3. Willful violation of safety rules or common safety practices.
4. Unauthorized use, or misuse, of any Corporation property or records.
5. Failure to report to work as scheduled without proper notice, as set out in the Attendance Management Program.
6. Abuse of work time; such as unauthorized time away from the work area, use of company time for personal business, and abuse of sick leave.
7. Use of obscene or abusive language.
8. Discourteous treatment of customers.
9. Being in an unfit condition to perform the duties of the job (e.g., under the influence, sleeping on the job).
10. Use of another's computer User ID and password – or providing another person with an individual's User ID and password – to gain unauthorized access to confidential or privileged information.
11. Suggesting that a tip, token or gift is expected or required for any service.
12. Failing to maintain adequate standards of job performance.
13. Disorderly conduct while on duty, or off duty but on corporate premises.
14. Dishonesty – making false statements.
15. Knowingly mislead or encourage customers in excessive participation of gambling or overconsumption of liquor products.



GROSS MISCONDUCT

Gross Misconduct – On-duty conduct of such a serious nature that it may result in immediate termination of employment without prior discipline and include but are not limited to:

1. Racism and discrimination: targeting an identifiable group of people (or members of that group) with hateful or abusive comments. This includes generalizations about people based on (but not limited to) attributes such as race, nationality, ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics or disability.
2. Inciting hate in any way towards another person or group.
3. Absence for three consecutive working days without notification to the Corporation or without acceptable reason.
4. Possession or use of firearms, weapons, or explosives on corporate property.
5. Unauthorized use of recording devices or cameras.
6. Engaging in activities relating to outside employment during hours working for the Corporation.
7. Harassment of another employee or customer in any form and at any time, including but not limited to sexual advances, requests for sexual favors, or other unwelcome verbal or physical contact.
8. A supervisor/manager who fails to take action regarding an incident of harassment that they see or know about.

9. Fraud, theft or misappropriation of corporate or customer funds or property. Falsifying any records, financial documents, logs or work-related notebooks.
10. Uttering, publishing or distributing false, profane or malicious statements to or about another employee, customer or corporate location.
11. Significant discourteous treatment of customers.
12. Threatening or making threatening actions toward another employee or customer.
13. Knowingly making false statements, including material omission, on personnel or other MBLL records.
14. Willfully or negligently damaging or defacing corporate records, corporate property or property of other persons (including, but not limited to, employees, customers and visitors).
15. Soliciting, procuring or engaging in any unethical conduct.
16. Violation of the Employee Gaming Policy.
17. Fraudulent behavior, including collusion with other employees or customers in order to commit an illegal offence.
18. Violation of the Drug, Alcohol and Substance Misuse Policy.
19. Fighting or using physical force against another person, except in the line of duty.
20. Knowingly failing to comply with all applicable laws and legislative requirements.

Where to turn for help

There are many avenues available to get help to best understand the applicability of the Code, and the one that’s most appropriate to the situation should be selected. Examples of where to go to get help include:

- Supervisor/manager.
- Human Resources.
- Designated Officer. The Vice President, Legal and Corporate Secretary serves as the Corporation’s designated officer to manage whistleblower and ethical complaints.
- The Manitoba Ombudsman:
  - Website: [www.ombudsman.mb.ca](http://www.ombudsman.mb.ca)
  - E-mail: [ombudsman@ombudsman.mb.ca](mailto:ombudsman@ombudsman.mb.ca)

Approval

Original signed by  
**GERRY SUL**  
President &  
Chief Executive Officer

November 17, 2023



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