

Employee Code of Conduct

Policy Number:

HR-002

Date in Effect:

September 2, 2025

POLICY STATEMENT

1 It is the policy of the Town of Canmore ("Town") that Employees adhere to a Code of Conduct that supports the Town's values of wellness, respect, integrity, service and teamwork. Town Employees are accountable to the Town, Council and residents of Canmore, and are responsible for the assets entrusted to them. Employees must demonstrate the highest of standards of ethical business and personal behaviour.

176-2021; 240-2025

PURPOSE

2 This Code of Conduct applies to all Employees of the Town.

176-2021; 240-2025

- This Code of Conduct outlines the Town's expectations regarding Employee conduct and behaviour, and addresses risk areas that an Employee may encounter in their work for the Town.

 240-2025
- 4 This policy does not answer every question or situation that may arise. It is intended to promote ethical decision making and behaviour and to make Employees think about how ethics and integrity must guide them in performing their work for the Town.

240-2025

DEFINITIONS

"Conflict of Interest" means when the interests of an Employee conflict or compete, or appear to conflict or compete, with the interests of the Town. A Conflict of Interest may make it difficult for the Employee to fulfill their duties impartially, or may appear to make it difficult for the Employee to fulfill their duties impartially.

240-2025

5.1 "Consent" means a voluntary, reasonably informed, and written agreement given by an Employee to the occurrence of a specific act or activity.

240-2025

6 "Employee" means any individual who performs work for the Town in exchange for salary or wages and does not include councillors or members of council committees who are not councillors.

240-2025

6.1 "Leader" means managers, supervisors, team leads, coordinators, and others responsible for directing, defining, coordinating, overseeing, and/or supervising the work of others.

240-2025

6.2 "Recorded" or "Recording" means the act of capturing audio, video, or both, through any electronic device or medium, including but not limited to smartphones, tablets, computers, cameras, and Recording devices. This definition encompasses all forms of Recording, whether digital or analog, and includes live streaming, as well as storage and dissemination of Recorded content.

240-2025

- 7 Repealed 176-2021
- 8 "Relative" means a spouse, child, sibling, aunt, uncle, cousin, nephew, niece, parent or grandparent of the Employee, or any person who is related by marriage, and includes in-laws, or those whose relationship with the Employee is similar to that of persons who are family members or who are related by marriage.
- 8.1 "Workplace" means any location, whether physical or virtual, that Town work-related activities occur, such as but not limited to Town facilities, parks, trails, vehicles, conferences, training locations, meeting locations, events, on the telephone, during social functions, on the internet and on social media.

240-2025

PERSONAL CONDUCT

- 9 Employees will perform their duties with honesty and integrity, and in a manner that is helpful, respectful and courteous, and that honours the dignity and diversity of colleagues and the public.

 176-2021
- 10 Employees may comment on public issues but must not engage in any activity or speak publicly where this could be perceived as an official act or representation (unless authorized to do so).
 - a) Employees must not jeopardize the perception of impartiality in the performance of their duties through making public comments or entering into public debate regarding Town policies and operations.
 - b) Employees must not use their position in government to lend weight to the public expression of their personal opinions.

176-2021

10.1 Employees who hold a professional designation must also abide by the specific ethical standards set by the certifying organization and/or professional regulatory bodies. Compliance with these professional ethics is in addition to the expectations outlined in this policy.

240-2025

TOWN TIME AND ASSETS

11 Employees are required to care for Town assets, which includes all property, equipment, software, information, and time. Town assets may only be used for Town purposes, or as approved by the Employee's supervisor.

176-2021

USE, COLLECTION, AND DISCLOSURE OF PERSONAL INFORMATION

12 Employees will use, collect, and disclose information only for purposes consistent with the use for which it was collected, and in accordance with the *Access to Information Act (ATIA)* and the *Protection of Privacy Act (POPA)*.

176-2021; 240-2025



12.1 Employees have the right to know when they are being Recorded at work. As such, Employees are strictly prohibited from capturing audio and/or video Recordings of any conversations, meetings, or activities within the Workplace that involve other Town of Canmore Employees or third parties, unless Consent is obtained from all parties involved, or the Recording activity is required as part of the Employee's regular assigned work duties and responsibilities. Consent must be obtained prior to the commencement of any Recording and must be documented in a manner that clearly identifies the Consenting individuals and the Recording activity for which Consent is being granted.

240-2025

Exceptions to the requirement for written Consent include:

240-2025

- i) Recordings required by law or for legal proceedings.
- ii) Recordings made for safety, security, or emergency purposes, such as but not limited to; surveillance and body cameras in public areas, Recordings of physical hazards in the Workplace, and Recordings of incidents of violence, harassment and other unlawful activities.
- Recordings for training and development purposes, including phone calls, webinars and digital training sessions.
- iv) All public Council Meetings, Town Halls, General Assemblies, conference presentations, and other open sessions intended to provide transparency and to disseminate information, which are Recorded and distributed to the public.
- Photos, including selfies, individual, and group photos at Town events and activities, where it is clear that photos are being taken and where Employees have reasonable opportunity to decline to have their photo taken.
- Recordings made by business application and/or AI applications for the purpose of creating meeting minutes and/or meeting summaries that are shared with meeting attendees during the normal course of work.
- Except for item 12.1(v), any and all Employee Recordings are and will at all times remain the property of the Town and may only be distributed in accordance with work responsibilities and/or Town policies and procedures.

240-2025

PERSONAL GAIN, BENEFITS, OR FAVOURITISM

Employees must remove themselves from any decision process that may result in personal gain, favouritism, benefit, or a situation in which a matter could monetarily affect them or their Relative. Where Employees have access to confidential information relating to any competition open to the public, they are ineligible to compete.

POLITICAL ACTIVITY

14 Repealed 176-2021



15 Employees are entitled to exercise their right to support and to be involved in a political campaign, provided they do so on personal time and do not utilize Town resources or Town property.

176-2021

GIFTS AND GRATUITIES

16 Employees will not accept or provide any gift (including cash or like cash), benefit, or favour in exchange for special consideration or influence, or where it may be perceived to be in exchange for special treatment.

176-2021

- 17 Employees may accept a token or gift that is:
 - a) Part of the normal exchange of hospitality among persons doing business such as a lunch or event ticket.
 - b) A small gift showing appreciation (e.g., coffee, cookies, chocolates);
 - c) Advertising material (e.g., calendars, note pads, pens, caps);
 - d) A corporate discount available to all Employees;

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- e) A protocol item (e.g., symbolic or ceremonial gifts);
- f) A conference door prize.
- 18 Repealed 176-2021

OTHER EMPLOYMENT

- 19 Employees shall not engage in any outside employment, business, or undertaking for the Employee's direct or indirect personal gain:
 - a) While on duty for the Town;
 - b) Where it will, or is likely to, interrupt or interfere with the performance of their employment duties;
 - c) Where the Employee derives some form of benefit by virtue of their employment with the Town;
 - d) That will, or is likely to, influence, affect, or impair the manner in which the Employee carries out their duties with the Town;
 - e) In such a manner, or in such a way, as to appear to be acting on behalf of the Town; or
 - f) That may create a Conflict of Interest.

176-2021; 240-2025

WORKPLACE RELATIONSHIPS

- A romantic or sexual relationship between an Employee who is a Leader and an Employee who reports directly or indirectly to that person may create a Conflict of Interest. If such a relationship occurs, the Employees must report the existence of their relationship to the senior Employee's direct supervisor, or the Town's CAO if no such supervisor is available or exists. Upon being notified of the relationship, an effort will be made by the Town to arrange a transfer of one of the Employees to an acceptable alternative position in order to mitigate that Workplace relationship Conflict of Interest. The person transferred will not necessarily be the more junior Employee. 176-2021; 240-2025
- 20.1 It is prohibited for an Employee who is a Leader to have a Relative report to them directly or indirectly, as such a relationship may create a Conflict of Interest. If such a relationship occurs, the Employees must report the existence of their relationship to the senior Employee's direct supervisor, or the Town's CAO if no such supervisor is available or exists. Upon being notified of the relationship, an effort will be made by the Town to arrange a transfer of one of the Employees to an acceptable alternative position in order to mitigate that Workplace relationship Conflict of Interest. The person transferred will not necessarily be the more junior Employee.

MEDIA RELATIONS

Media inquiries should be directed to the Communications department or the department manager. Employees will not respond to media requests unless instructed to do so.

176-2021

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- Repealed 176-2021
- 22.1 Employees shall not post, share, or distribute material on social media or through other public channels that discloses confidential or proprietary information belonging to the Town, or is knowingly false or intentionally defamatory toward the Town, its current or former Employees, or members of Council. This is not intended to restrict protected speech, or lawful union activity.

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CONSEQUENCES OF NON-COMPLIANCE

Any violations of this policy, including but not limited to failure to report a Conflict of Interest or potential violation of this Code of Conduct may result in disciplinary action, up to and including dismissal.

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RESPONSIBILITIES

- 24 It is the responsibility of the Employee to:
 - a) Review this Code of Conduct and sign the acknowledgement;
 - Direct questions concerning the application, interpretation or disclosure of this Code of Conduct to their Leader; and

240-2025

Fully and promptly report to their Leader any situation where they may be in, or aware of a violation or potential violation of this Code of Conduct.

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Repealed 176-2021



26 It is the responsibility of Town Leaders to:

240-2025

a) Ensure each Employee receives, reviews, and signs the acknowledgement to this Code of Conduct;

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- b) Repealed 176-2021
- c) Notify the Town's Manager of Human Resources of any possible violations of the Code of Conduct.
- 27 It is the responsibility of the Manager of Human Resources to:
 - a) Assist Employees with the interpretation and application of this Code of Conduct;
 - b) When reported, review possible violations of this Code of Conduct with Town Leaders;

240-2025

- c) Ensure a written record of the Employee's declaration of the Conflict of Interest, the decision of the Town's Manager of Human Resources, and written instructions to the Employee with respect to the Conflict of Interest are maintained in the Employee's personnel file.
- 28 Repealed 240-2025

POLICY REVIEW

29 This policy will be reviewed by Council at least once in every term of Council.

240-2025

RELATED DOCUMENTS

Respectful Workplace Policy Alberta Human Rights Act Protection of Privacy Act Access to Information Act

240-2025

ATTACHMENTS

None.

REPEALS POLICY: Employee Code of Conduct 406-2010

AUTHORIZATION:

Sean Krausert Mayor Cheryl Hyde Manager, Municipal Clerk's Office

REVISION HISTORY

Action	Date	Council Motion	Notes		
Approved	1990-04-24	207-90	Code of Ethics Policy		
Repealed	2010-10-05	406-2010	F-		
Approved	2010-10-05	406-2010	Employee Code of Conduct		
Repealed	2017-06-27	208-2017			
Approved	2017-06-27	208-2017	Code of Conduct Policy HR-002		
Amended	2021-07-06	176-2021	Remove independent contractors; address personal views; remove requirements		
			regarding running for office		
Amended	2025-09-02	240-2025	Name Change: Employee Code of Conduct		
			Policy HR-002		
			Add prohibition, with exceptions, for		
			Workplace Recordings without Consent.		
			Add new definitions. Expand inclusions for		
			Workplace Relationships		

Policy approved by 17

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