 <b>Great Lakes Pilotage Authority</b> Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

### POLICY APPROVAL AND REVISION RECORD


Document Number:	Title:
<b>POL-HR-001E</b>	CODE OF CONDUCT FOR VALUES AND ETHICS

### APPROVAL

Original Date of Approval (dd/mm/yyyy):	Approved by:
18/08/2015	Members of the GLPA

### REVISION RECORD

REVISION #	SECTION(S)	REVIEW/REVISION HISTORY	DATE DD/MM/YYYY	PREPARED BY :	AUTHORIZED BY :	EFFECTIVE DATE DD/MM/YYYY
1			24/05/2017	S. Bissonnette	Members of the GLPA	24/05/2017
2			22/11/2018	S. Bissonnette	Members of the GLPA	22/11/2018
3	All sections	Directives are now referred to Policy. Changed document number. Renumbered all sections.	01/12/2021	D. Couture	M. Bergevin	
4	All sections	Revised to reflect strategic planning exercise conducted in 2022	06/02/2023	P. Martel	M. Bergevin	Approved by the Members of the GLPA on 02/03/2023

 <b>Great Lakes Pilotage Authority</b>	<b>Administration de pilotage des Grands Lacs</b>	Document number : POL-HR-001E	Number of pages : 11
		Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4


POLICY			
CODE OF CONDUCT FOR VALUES AND ETHICS			
Supersedes Document / Revision No. :	Directive HR-001 / Rev. 3	Revision date :	22/11/2018

## 1.0 INTRODUCTION

- 1.1 The Great Lakes Pilotage Authority's (GLPA) long term success is dependent on many factors including strategic vision, a customer centric approach and industry leading services. The *Code of Conduct for Values and Ethics* is an essential component of Strategic Planning as the GLPA is firmly committed to conducting business in compliance with the letter and spirit of the law and other accepted standards of business conduct reflected in corporate and company policies. Such a commitment inspires confidence in our customers and stakeholders and builds trust in the business relationships that we depend on.
- 1.2 The *Code of Conduct for Values and Ethics* supports the GLPA's strategic vision which is to be a leader in marine pilotage services that ensures the safe, efficient, sustainable, and reliable movement of goods through the Great Lakes Region.
- 1.3 Laws and standards for business conduct are more demanding than ever. Failing to meet these standards could expose the GLPA to very serious harm. Moreover, it is wrong. While there are no substitutes found for sound business and personal judgement, the principals outlined in the *Code of Conduct for Values and Ethics* should guide Board members and employees on their efforts on behalf of the GLPA.
- 1.4 The GLPA's *Code of Conduct for Values and Ethics* provides an introduction to important laws and policies that everyone working for the GLPA must follow. This policy builds on the *Values and Ethics Code for the Public Service* which set out the expectations for behaviour governing the behaviour of Board members and employees while fulfilling the GLPA's mandate. The Code is designed to help each employee:
  - Understand and follow the basic Compliance and Integrity rules that apply to their jobs; and
  - Know when and where to ask for advice.

## 2.0 PURPOSE

- 2.1 The policy outlines the values and expected behaviours that guide all GLPA Board members and employees in all activities related to their professional duties. By committing to these values and adhering to the expected behaviours, Board members and employees strengthen the ethical culture of the public sector and contribute to public confidence in the integrity of the GLPA.

 Great Lakes Pilotage Authority    Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

- 2.2 All GLPA Board members and employees are required to adhere to the values and expected standards of behaviour articulated in this policy as a condition of employment. Management must ensure that this policy has been provided and available to all employees. It is the responsibility of every employee to be aware of the contents of this code.
- 2.3 This policy provides direction and measures to assist employees in effectively dealing with real, potential and apparent conflict of interest situations which may arise during employment with the GLPA.
- 2.4 This policy should be read in context of the duties and responsibilities set out in the *Value and Ethics Code for the Public Sector*.

### 3.0 DEFINITIONS

- 3.1 For the purpose of this policy,

*Close relative* includes a spouse, parents, stepparents, children, stepchildren, siblings, nephews, nieces, aunts, uncles, grandparents, grandchildren, in-laws and a same or opposite sex domestic partner.

*Conflict of Interest* arises in a situation in which the Board member or the employee has private interests that could improperly influence the performance of his or her official duties and responsibilities or in which he or she uses his or her office for personal gain.

*Real* conflict of interest exists at the present time, an *apparent* conflict of interest could be perceived by a reasonable observer to exist, whether or not it is the case, and a *potential* conflict of interest could reasonably be foreseen to exist in the future.


*Integrity* means upholding the highest ethical standards as to conserve and enhance public confidence in the honesty, fairness and impartiality of the GLPA.

*Organizational Excellence* means the designing and delivery of policies, programs and services with competence, efficiency, objectivity and impartiality.

*Respect for Democracy* means helping Ministers, under law, to serve the public interest.

*Respect for People* means treating people with respect, dignity and fairness which contributes to a safe and healthy work environment as well as promotes engagement, openness and transparency.

*Stewardship* means the responsibility entrusted to use and care for resources, for both the short term and long term.

 Great Lakes Pilotage Authority Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

*Wrongdoing* relates to serious violations that goes against the public interest or those of the GLPA, such as:

- The contravention of any federal or provincial law or related regulation;
- The misuse of public funds or public assets;
- The gross mismanagement;
- An act or omission that endangers the life, health and safety of persons or the environment;
- A serious breach of the GLPA's code of conduct; or
- Directing or counselling someone to commit a wrongdoing.

## 4.0 STATEMENT OF VALUES

- 4.1 The GLPA's mission is to proactively deliver quality marine pilotage services by collaborating with our stakeholders, leveraging technology, and recruiting proficient pilots and staff. With consideration for the GLPA's legislated mandate, mission, and the elements of strategic planning, the GLPA has established values that express the principals which serve to guide business objectives. The GLPA's values are listed below:

Service excellence: The GLPA is committed to being an agile organization that delivers safe, high-quality services to our stakeholders.


Solutions-focused: GLPA employees are collaborative and transparent in addressing opportunities and challenges to create value for our stakeholders.

Care for our people: The GLPA is an organization that is diverse, inclusive and creates opportunities for the professional growth of our employees.

Care for the environment: The GLPA is an organization that values and strives to be environmentally responsive.

## 5.0 VALUES AND ETHICS CODE FOR THE PUBLIC SECTOR

- 5.1 Board members and employees are expected to conduct themselves in accordance with the *Values and Ethics Code for the Public Sector*, which forms part of this policy. Respect for democracy, respect for people, integrity, stewardship and excellence are the values the GLPA Board members and employees are expected to integrate into their decisions, actions, policies, processes and systems. These values are not to be considered in isolation from each other as they will often overlap. Similarly, Board members and employees can expect the GLPA to treat them in accordance with these values.

 Great Lakes Pilotage Authority Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

## 5.2 Respect for Democracy

The system of Canadian parliamentary democracy and its institutions are fundamental to serving the public interest. The GLPA recognizes that elected officials are accountable to parliament, and ultimately to the Canadian people, and that a non-partisan public sector is essential to our democratic system. GLPA Board members and employees shall uphold the Canadian parliamentary democracy and its institutions by:

- 5.2.1 Respecting the rules of law and carrying out their duties in accordance with legislation, policies and directives in a non-partisan and impartial manner.
- 5.2.2 Loyally implementing the lawful decisions of their leaders and supporting ministers in their accountability to Parliament and Canadians.
- 5.2.3 Providing decision makers with all the information, analysis and advice they need, always striving to be open, candid and impartial.


## 5.3 Respect for People

Treating all people with respect, dignity and fairness is fundamental to the GLPA's relationship with the Canadian public and it contributes to a safe and healthy work environment that promotes engagement, openness and transparency. The diversity of people and the ideas they generate are a source of innovation. GLPA Board members and employees shall respect human dignity and the value of every person by:

- 5.3.1 Treating every person with respect and fairness.
- 5.3.2 Valuing diversity and benefit of combining the unique qualities and strengths inherent in a diverse workforce.
- 5.3.3 Helping in creating and maintaining safe and healthy workplaces that are free from harassment and discrimination.
- 5.3.4 Working together in a spirit of openness, honesty and transparency that encourages engagement, collaboration and respectful communication.

At the GLPA, Respect for People also means:

- 5.3.7 We respect human dignity
- 5.3.8 We respect the need for an appropriate balance between work and personal lives.
- 5.3.9 We carefully consider the impact of our words and actions on others.
- 5.3.10 We adopt behaviour, appearance and language that promote pride in, and respect for the GLPA and its corporate reputation.

 Great Lakes Pilotage Authority Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

#### 5.4 Integrity

Integrity is the cornerstone of good governance and democracy. By upholding the highest ethical standards, GLPA Board members and employees conserve and enhance public confidence in honesty, fairness and impartiality. GLPA Board members and employees shall serve the public interest by:

- 5.4.1 Acting at all times with integrity and in a manner that will bear the closest public scrutiny, an obligation that may not be fully satisfied by simply acting within the law.
- 5.4.2 Never using their official roles to inappropriately obtain an advantage for themselves or to advantage or disadvantage others.
- 5.4.3 Performing their duties and arrange their private affairs so that public confidence and trust in the integrity, objectivity and impartiality of the GLPA are conserved and enhanced.
- 5.4.4 Taking all possible steps to prevent and resolve any real, apparent or potential conflict of interest between their official responsibilities and their private affairs in favour of the public interest.
- 5.4.5 Acting in such a way as to maintain the GLPA's trust.


At the GLPA, Integrity also means:

- 5.4.6 How results are achieved is as important as the achievements themselves.
- 5.4.7 Accepting responsibility for our actions and reporting inappropriate conduct to management in order to build and maintain trust and accountability.
- 5.4.8 Living up to our commitments within the workplace and with stakeholders.

#### 5.5 Stewardship

GLPA Board members and employees are entrusted to use care for the organization's resources responsibly, for both short term and long term. GLPA Board members and employees shall use resources responsibly by:

- 5.5.1 Effectively and efficiently using the GLPA's money, property and resources managed by them.
- 5.5.2 Considering the present and long-term effects that their actions have on people and the environment.
- 5.5.3 Acquiring, preserving and sharing knowledge and information as appropriate.

 Great Lakes Pilotage Authority Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

- 5.5.4 Striving to ensure that transparency in the GLPA is upheld while respecting their duties of confidentiality under the law.

At the GLPA, Stewardship also mean:

- 5.5.5 Transactions, including purchasing, contracting and travel, can withstand scrutiny at all times.

## 5.6 Organizational Excellence

- 5.6.1 Excellence in the design and the delivery of services, policies and programs is beneficial to all GLPA stakeholders. Engagement and collaboration, effective teamwork and professional development are essential to a high-performing organization. GLPA Board member and employees shall demonstrate professional excellence by:

- 5.6.2 Providing fair, timely, efficient and effective services that respect Canada's official languages.

- 5.6.3 Continually improving the quality of services, policies and programs they provide.

- 5.6.4 Fostering a work environment that promotes teamwork, learning and innovation.

At the GLPA, Organizational Excellence also means:


- 5.6.5 Ensuring that all Board members and employees work to their fullest potential

- 5.6.6 Favour collaboration with internal and external stakeholders.

- 5.6.7 Actions respect the commitment to workplace health, safety and security.

## 6.0 RESPONSIBILITIES AND ACCOUNTABILITIES

- 6.1 All employees who work for the GLPA as well as its Board members must adhere to the standards contained in this Disclosure and should consult this policy for guidance when acting on behalf of the GLPA. Where questions arise about its application, please refer to policy POL-HR-013E – *Whistleblowing*.
- 6.2 This policy represents a commitment to doing what is right. By working for the GLPA, an employee is agreeing to uphold this commitment. Employees must understand the standards of this policy and the policies that apply to their job – and always follow them. Those who fail to follow these standards put themselves, their colleagues and the GLPA at risk. No matter what position an individual holds within the organization, they must model their behaviour according to this policy

 Great Lakes Pilotage Authority Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

as ethics in the workplace is a shared responsibility. All Board members and employees are expected to:

- Always strive to do the right thing;
- Exemplify our organizational values in our decision making and actions;
- Maintain open, positive communications and working relationships;
- Discuss our ethical concerns;
- Report illegal activities and wrongdoing;
- Disclose and resolve possible conflict of interest situations in which we find ourselves;
- Be prepared to cooperate in investigations regarding violations of this policy.

6.3 In addition to the stipulations outlined in this policy, Board members and employees are also required to observe any specific conduct requirements contained in the statutes governing their particular department (Transport Canada, Infrastructure and Communities) and their profession, where applicable. They are also required to observe the relevant provisions of more general applications including the following:


- *Access to Information Act*
- *Criminal Code of Canada*
- *Financial Administration Act*
- *Canada Labour Code*
- *Official Languages Act and Regulations*
- *Privacy Act*

6.4 Further, employees who engage vendors and consultants must monitor their work for the GLPA so that they act in a manner consistent with the principles in this policy and policy POL-FI-002E – *Supply Chain Code of Ethics*. Those dealing with vendors and consultants should contact their supervisor for guidance.

6.5 Board members and employees are responsible for ensuring that they comply with the policy and that they exemplify, in all their actions and behaviours, the values of the GLPA. In particular they have the following obligation:

- a) report within 60 days of their employment, all outside activities, assets and direct and contingent liabilities that might give rise to a conflict of interest with respect to their official duties, to this end, a Confidential Report with the Integrity Officer, the Chief Financial Officer (CFO);
- b) every time an important change occurs in the personal affairs or official duties, they must review their obligations under this policy. If a real, apparent or potential conflict of interest exists, they must file a new Confidential report with the CFO;
- c) when negotiating financial arrangements with outside parties, they must assure compliance with the Conflict of Interest and Post-Employment Measures in accordance with policies on this matter. When in doubt, he/she



 Great Lakes Pilotage Authority    Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4


must immediately report the situation to the CFO in order to seek advice or direction on how to proceed.

6.6 When faced with an ethical dilemma, Board members and employees are encouraged to use the opportunities and mechanisms established to raise, discuss and resolve issues of concern related to this policy.

#### 6.7 Senior Management

6.7.1 Senior managers have a particular responsibility to exemplify, in their actions and behaviour, the values of the GLPA. They have a duty to infuse these values into all aspects of their work. They are expected to take special care to ensure that they comply at all times with both the spirit and the specific requirements of this policy. In particular they have the following obligation:

- a) to ensure that the letter of offer, for an initial appointment, includes the following: "You will find enclosed a copy of the policy POL-HR-001E – *Code of Conduct for Values and Ethics*. This policy is a key policy for the management of human resources and is part of your conditions of employment." Senior management must ensure that Board members and employees are provided with a copy of the policy on any subsequent appointment. They must ensure that Board members and employees are informed of the requirements of this policy on an annual basis;
- b) to encourage and maintain an ongoing dialogue on the GLPA's values and ethics within their department, in a manner that is relevant to the specific issues and challenges encountered by their departments;
- c) to ensure that mechanisms and assistance are in place to help Board members and employees raise, discuss and resolve issues of concern related to this policy. The Director of Human Resources is the designated senior official to assist Board members and employees to resolve issues arising from the application of the policy;
- d) to ensure that the personal information in confidential reports is secured in a central repository and treated in complete confidence, in accordance with the *Privacy Act*.
- e) Acting with transparency, fairness and objectivity in all transactions and work activities, including staffing, contracting, etc;
- f) Exemplifying our values included in this code and integrating them into policies, programs, and work practices;
- g) Fostering a climate of trust and respect, which expects and supports ethical behaviour and in which concerns may be raised without fear of reprisal through open dialogue;
- h) Recognizing and reconciling competing values;
- i) Making commitments that are reasonable, achievable and following through on these commitments;

 Great Lakes Pilotage Authority Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

- j) Being alert and dealing with undesirable conduct properly in a timely fashion;
- k) Promoting and recognizing excellence and ethical conduct, and encouraging personal and professional development in a learning environment;
- l) Promoting, exemplifying and recognizing best practices that contribute to a healthier workplace; and
- m) Protecting employees from reprisal who disclose any serious breach of this policy in good faith.

## 6.8 Board Members


6.8.1 Board members have a particular responsibility to exemplify, in their actions and behaviours, the values of the GLPA. They have a duty to infuse these values into all aspects of their duties as a Board member. They are expected to take special care to ensure that they comply at all times with both the spirit and the specific requirements of this policy. In particular they have the following obligation:

- a) to exercise the director's fiduciary duty. Specifically, to always act honestly, in good faith, and with a preference of the GLPA's best interests to those of any other person or organization;
- b) to exercise the director's duty of confidentiality. Specifically, to protect information about the GLPA which is confidential or proprietary to the GLPA; and
- c) to exercise the director's duty to disclose. Specifically, to disclose information to the GLPA that may affect a vital aspect of its business, which the Board member has by virtue of another relationship.

## 6.9 Examples of behaviours to avoid

The expected behaviours listed in this policy help define each of our organizational values. On occasion, individuals may stray from our values, and it is important to be able to recognize unacceptable behaviours. These behaviours harm the workplace atmosphere and have a direct impact on employee well-being and productivity. Below is a list of what to avoid;

- Attempting to cover up mistakes;
- Hiding information from management;
- Showing disrespect for diverse opinions or beliefs;
- Mistreating others;
- Abusing power;
- Tolerating abusive behaviour by others;
- Being cynical or aggressive;
- Showing favouritism, bias, or preferential treatment;

 Great Lakes Pilotage Authority Administration de pilotage des Grands Lacs	Document number : POL-HR-001E	Number of pages : 11
	Effective date : (dd/mm/yyyy) 02/03/2023	Revision number : 4

- Placing personal goals ahead of GLPA or Transport Canada objectives;
- Allowing emotions to sway judgment;
- Participating in gossip;
- Bullying of any kind.

## 7.0 FAILURE TO COMPLY

- 7.1 A Board member or employee who does not comply with the requirements of this policy may be subject to disciplinary measures, up to and including termination of employment.

## 8.0 RESOURCES AND CONTACTS

- 8.1 Any questions related to this policy can be discussed with the Director of Human Resources. If a Board member or employee believe that any part of this policy has been breached, they should refer to policy POL-HR-013E Whistleblowing. Any Board member or employee who reports a violation of this policy in good faith will be protected from retaliation. The GLPA assures that all reports will be treated in strict confidentiality and will promptly be investigated. Reports can be made anonymously if desired.

Board members and employees can report any wrongdoings to the GLPA's ethics reporting service provider (Xpera HR Services) by web at <https://glpa-apgl.confidenceline.com/Great-Lakes-Pilotage-Authority> or by phone at 1-877-556-8495.

### Employee and Family Assistance Program (EFAP)

The GLPA has contracted Lifeworks as the Employee and Family Assistance Program (EFAP) provider. The EFAP program is a confidential service available to employees and dependant family members which may help individuals deal with challenging personal circumstances which may affect personal and professional relationships. The GLPA's EFPA program may be reached by phone at 1-844-880-9142 or on the web at [workhealthlife.com](http://workhealthlife.com).

  
Secretary

June 23, 2023  
Date