



OVERVIEW

The Gwich'in Tribal Council (GTC) is committed to fostering an environment that promotes efficiency and professional success for employees. The achievement of such success is dependent on an atmosphere of mutual respect, collegiality, fairness, and trust and an environment free of behaviours which can undermine the important missions of our institution. The GTC is committed to establishing and implementing a standard of excellence in every aspect of our business (including Gwich'in Councils and Renewable Resource Councils (RRCs)) while promoting and ensuring the ethical and responsible conduct in all of our operations, with the utmost respect for the rights of all individuals and for the environment. Therefore, this Code of Conduct policy (the 'Policy') has been developed to confirm the expectations of the organization.

PRINCIPLES

Our employees contribute to the success of our organization and that of Gwich'in Participants. The GTC fully endorses that all employees have a right to a respectful, collaborative, healthy, and productive workplace and are not deprived of their basic human rights. Furthermore, our employees have an obligation to the GTC, Gwich'in Participants, and themselves to observe high standards of integrity and fair dealing.

The Gwich'in Tribal Council strictly forbids discrimination or harassment of any kind whether based on race, colour, national origin, religion, creed, sex, age, physical, mental or developmental disability, marital status, sexual orientation, political ideology, or any other reason. Harassment may include unsolicited or unwelcome remarks, gestures, or physical contact as well as the display or circulation of inappropriate or derogatory written materials or pictures. These behaviours are expressly prohibited by this Policy.

APPLICATION

The Policy applies to all employees, including that of the Gwich'in Councils and RRCs, and provides the framework of principles for conducting business, dealing with other employees, clients, and the members of the public. The Policy does not replace Territorial and/or Federal legislation and if there is any conflict, then applicable legislation takes precedence.

This Policy is based on the following principles that employees are bound to follow.

1. Act and maintain a high standard of integrity and professionalism.
2. Be responsible, diligent, and practical in the proper use of the organization's information, funds, equipment, and facilities.
3. Be considerate and respectful of the environment and of others.
4. Exercise fairness, equality, courtesy, consideration, and sensitivity in dealing with other employees, Participants, and members of the public.

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5. Promptly disclosing any potential conflict of interest, real or perceived, to a Manager, Officer, or Executive Team member and requesting permission to participate in that activity.
6. Promote the interests of the Gwich'in Tribal Council.
7. Perform duties with skill, honesty, care, and due diligence.
8. Abide by policies, procedures, and lawful direction that relate to their employment.
9. Avoid the perception that any business transaction may be influenced by offering or accepting gifts.

Any employee, who in good faith, raises a complaint or discloses an alleged breach of the Policy, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports and requests will be dealt with in a timely and confidential manner.

GTC expects co-operation from all employees in conducting themselves in a professional, ethical, and socially acceptable manner. Any employee in breach of this Policy may be subject to disciplinary action, up to and including termination.

Should an employee have doubts about any aspect of the Policy, they must seek clarification from the GTC Human Resources Department or their Manager, Officer, or Executive Team member.

This Policy will be regularly reviewed by the GTC and any necessary changes will be coordinated by the Human Resources and Corporate Services Department.

ELEMENTS

Central to the approach of the GTC to management is the sound execution and adherence of its Code of Conduct. The elements of the Policy are as follows:

- a) All actions undertaken by the GTC, the Gwich'in Councils and RRCs must be performed with the highest standards of ethics and integrity.
- b) Decisions are made available for public review and scrutiny as may be required.
- c) Financial accountability and transparency for all expenditures is a baseline expectation.
- d) Protecting information that requires discretion in its use and dissemination is utilized in such a manner as to respect the wishes of the individual or organization/agency providing it, subject to legislation.
- e) Care is taken to ensure that the private activities of Gwich'in Participants or employees do not interfere, or are likely to be perceived as interfering, with objectives and activities of the GTC.
- f) No financial rewards, other than those provided by salary and benefit policies of the organization are to be accepted by employees. Expressly, no



- gifts or any offerings that could be perceived as influencing activities or decisions of the GTC, the Gwich'in Councils or RRCs are to be accepted.
- g) Proper due diligence is exhibited in carrying out responsibilities. This includes explicitly adhering to a sober workplace free of drugs and alcohol.
 - h) Respect is shown for each other within the organization and for those with whom we deal with externally.
 - i) Every effort is taken to be fair and helpful to those who require our service.
 - j) Maintaining a positive and pleasant work environment that is characterized by respect and support for one another, flexibility, a participative management style and opportunities for professional growth.
 - k) We offer a casual dress environment for employees. Employees are expected to use good judgment and to show courtesy to their co-workers by dressing in a manner that is presentable and appropriate.
 - l) Employees should use items of fragrance or scent such as perfumes, cologne and creme in moderation such that it does not create occupational hazards for other employees.
 - m) Employees should use moderation in decorating their workspaces to accentuate a professional and pleasant work environment without inhibiting or disrupting its intended use. Furthermore, employees must be respectful of others' beliefs and customs when choosing and displaying seasonal decorations.
 - n) When speaking in public, an employee does not at any time express an opinion, personal or otherwise, concerning an issue that is currently being dealt with by the Board or which is contrary to existing decisions and policies of the GTC.

CONTRAVENTIONS

The GTC reviews complaints relevant to its activities and conduct of its employees. The Chief Executive Officer or if in conflict, the GTC Executive, may, at his or her discretion, refer any matters deemed to be in contravention of the Policy to an Ad-hoc Committee of three (3) members.

The Ad-hoc Committee will prepare a report of the complaint(s). The report of such Ad-hoc Committee will be acted upon by the CEO or GTC Executive if appropriate, referred to the GTC Board of Directors for final discretion. In the case of employees, any such complaint directed against an employee or member will be promptly and fairly investigated in a confidential manner before action is taken.

Employees must also be aware that certain actions in contravention of the Policy may also be in contravention of Federal or Territorial statutes, or a combination thereof.



GAMBLING

The GTC does not allow employees to engage in any form of gambling on office premises or on company systems and equipment. Examples of gambling include but are not limited to:

- a. Fundraising “lotteries” that require team members to purchase a ticket to participate;
- b. Any kind of game, contest, lottery, or raffle where proceeds from donations are used to fund or purchase a prize (like a sports pool, fantasy sports league, or a non-profit organization raffle).
- c. Any kind of online gambling activity.

Exceptions to this Policy are lotteries and raffles for a specific fundraising purpose(s) that are approved by:

- the GTC Executive, if on GTC premises in Inuvik; or,
- the Gwich'in Council President, if in the Gwich'in Council office.

OUTSIDE ACTIVITIES

Employees take part in a wide range of activities outside of employment with the GTC, the Gwich'in Council or RRC including part-time employment, self-employment, service (with or without remuneration) on boards, councils or committees and volunteer activities. The impartiality and integrity of the GTC must be adhered to at all times.

CONFLICT OF INTEREST

Conflict of interest exists where there is an actual or perceived incompatibility between an employee's duties and responsibilities of office and the private interests of the employee or an Immediate Family member which can include but is not limited to:

- monetary interests including investments and business involvements; or,
- outside employment, service, whether voluntary or otherwise, on a board, council or committee or other organization.

CONFLICT OF INTEREST GUIDELINES

- 1) Employees must perform official duties and arrange private affairs so public trust in the integrity and objectivity of the GTC is preserved.
- 2) Where employees engage in outside employment, service or volunteer activities, employees must ensure outside activities do not:
 - a. cause a conflict of interest;
 - b. be performed in such a way as to appear to be an official act on the behalf of the GTC, the Gwich'in Council or RRC, or to represent a GTC, Gwich'in Council or RRC opinion or policy;
 - c. interfere with regular duties;

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- d. involve the use of the GTC's or Gwich'in Council premises, equipment or supplies without Supervisor approval; or
 - e. place the employee in a position where the employee has confidential knowledge or information that the employee can exploit for personal gain.
- 3) A GTC Executive team member's approval in writing is required before employees start any outside activities that may create a real or perceived conflict of interest. Employees should also notify their Supervisor if their outside activity changes (i.e. different employment or volunteer for another organization) or when previous approval is more than three (3) years old.
 - 4) Employees shall disclose and discuss with their Supervisor any situation which may be or could be perceived as a conflict of interest.
 - 5) Complaints from the public about the employees' conflicts (i.e. outside activities) will be referred to the appropriate Supervisor.

An employee who is determined to have contravened any section of the Policy may be subject to disciplinary action up to and including dismissal.

PROCEDURE

1. All employees shall receive a copy of the Policy when hired.
2. When an employee wishes to carry on any outside employment, service or volunteer activities outside of Standard Hours of Work, the employee shall notify their Supervisor in writing of the nature of such outside activity and request approval on the *Outside Activities Form*. The Supervisor shall forward the *Outside Activities Form* to a member of the GTC Executive team for final approval.
3. When a GTC Executive team member makes a determination to prohibit or places conditions on an employee's engagement in an outside activity due to a possible conflict of interest, the employee shall be notified in writing together with the reason for withholding such permission. A copy of this information is placed on the employee's personnel file.

DEFINITIONS

For definitions not specifically defined in this Policy, please refer to the GTC Human Resources Policy and Procedure Manual dated December 2021.

POLICY OWNER

For any questions or required clarifications, please contact the *Manager, Human Resources and Corporate Services*.

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I hereby acknowledge that I have read and agree to the Policy and agree to abide by its contents.

Employee Signature

Date

Print Name