



EMPLOYEE CODE OF ETHICS AND CONDUCT

Policy Number:	14.126.01 2026PO
Policy Review:	Every 2 Years or upon Legislative Change
Policy Owner (Dept.):	Human Resources
Reference(s):	The Police Act, The Peace Officers Act, The Municipal Government Act

1. PURPOSE OF POLICY

- 1.1. To affirm the City of Lacombe’s commitment to its core values and clearly outline expectations for employee conduct. This policy provides a framework to guide behaviour that upholds the City’s integrity, protects its reputation, and serves the public interest. Adherence to the policy helps ensure responsible use of City resources and maintains public trust.
- 1.2. To define what constitutes a Conflict of Interest and outline the procedures for identifying, disclosing and addressing such situations. The City is committed to conducting its activities with integrity and in accordance with high ethical standards. Actual or perceived conflicts of interest can undermine the credibility of individual employees and the City as a whole. It is the shared responsibility of both the City and its employees to prevent and manage conflicts of interest that could compromise their duties or the reputation of the City.

2. POLICY STATEMENT

- 2.1. The City of Lacombe commits to fostering a workplace culture grounded in collaboration, fiscal responsibility, innovation, integrity and respect. Employees are expected to conduct themselves in a manner that upholds public trust, reflects positively on the City and aligns with its mission, values and legal obligations. Ethical behaviour, respectful communication, responsible use of resources and avoidance of conflicts of interest are fundamental to maintaining the City’s reputation and delivering high-quality public service.

3. APPLICABILITY

- 3.1. This Policy applies to all City employees inclusive of Lacombe Police Service civilian staff, the Lacombe Police Service and the Lacombe Fire Department.
- 3.2. Where a conflict arises between The Police Act for Lacombe Police members or The Peace Officers Act, for Community Peace Officers and this Policy, the applicable legislation shall prevail.
- 3.3. This Policy comes into effect upon approval of Council.

4. DEFINITIONS AND ABBREVIATIONS

- 4.1. **Conflict of Interest** – a matter that could affect the private interests of a Councillor, an employee, or their employer, or where they know or should know it affects the interests of their family. It also includes situations where personal or outside activities conflict with City business, creating an actual or perceived bias.
- 4.2. **Outside Employment** – any paid or unpaid work undertaken by an employee outside the scope of their official duties with the City, including self-employment, consulting, or work for another organization, which may give rise to a reasonable apprehension of conflict or bias
- 4.3. **Pecuniary interest** - refers to a financial or monetary interest in a matter that could monetarily affect an employee, their spouse or adult interdependent partner, children, parents or the parents of their spouse (in other words, the employee’s immediate family), or a business which employs the employee or in which they have an interest.

Pecuniary interest means an interest in a matter which could monetarily affect:

- 4.3.1. a person directly;
 - 4.3.2. a corporation, other than a distributing corporation, in which you are a shareholder, director or officer;
 - 4.3.3. a distributing corporation in which you; beneficially own voting shares carrying at least 10% of the voting rights attached to the voting shares of the corporation or of which you are a director or officer; and/or
 - 4.3.4. a partnership or firm of which you are a member
- 4.4. **Reasonable Apprehension of Conflict** – a situation where a well-informed member of the public might reasonably perceive that a councillor or administration’s judgment or actions could be influenced by personal interests.
 - 4.5. **Confidential Information** – Any information related to Council, staff, or members of the public, and any information available to an employee that would not otherwise be accessible except through their employment with the City.

5. ROLES AND RESPONSIBILITIES

- 5.1. City Council
 - 5.1.1. To approve this Policy.
 - 5.1.2. To hold final decision-making authority on matters related to breaches of this policy concerning the Chief Administrative Officer.
- 5.2. Chief Administrative Officer

- 5.2.1. To disclose any potential real or perceived breaches of this policy for the role of Chief Administrative Officer to Council.
- 5.2.2. To hold final decision-making authority on matters related to breaches of this policy for City of Lacombe employees, or volunteers.
- 5.2.3. To ensure accountability, any violations of this policy may result in disciplinary action in accordance with the City's Discipline Policy. Where dismissal occurs due to a breach of this Code, the CAO may report the individual to their relevant professional designation body (e.g., CPA, P. Eng, PCP or CPHR) for further review and action as deemed appropriate by that body.
- 5.2.4. To ensure staff compliance with this Policy.

6. POLICY DETAILS

- 6.1. As the entity responsible for delivering local government, the City recognizes that the citizens of Lacombe have a right to service conducted with impartiality and integrity. It is this special obligation that demands there not be, nor seem to be, any conflict between the private interests of employees and their duty to the public. At the same time, it is recognized that employees should enjoy the same rights in their private dealings as any other citizen of Lacombe unless it can be demonstrated that a restriction is essential to the public interest.
- 6.2. All employees are responsible for understanding and adhering to the policy and are accountable for their actions both within and outside of the workplace when acting in a professional capacity. Leadership at all levels is expected to model these standards and support a culture of ethical decision-making.
- 6.3. City employees are accountable to each other, the Community, City Council and the City for every decision they make. Therefore, decision-making processes must be transparent.
- 6.4. **Managing Conflicts of Interest** - Employees must avoid situations where personal interests conflict or appear to conflict with their official duties. This includes:
 - 6.4.1. Outside Employment - Any paid or unpaid work undertaken outside the scope of official City duties including self-employment, consulting, or work for another organization must be disclosed if it could create a reasonable apprehension of bias or conflict. Employees must seek prior approval where required and ensure such activities do not interfere with their City responsibilities.
 - 6.4.2. Pecuniary Interest - Employees must not participate in decisions where they, their spouse, or dependents have a financial interest. If you have a pecuniary interest:
 - 6.3.2.1 you are to disclose the interest and its general nature
 - 6.3.2.2 you are to abstain from discussion and voting

6.3.2.3 you are to leave the room until the matter is resolved and ensure their abstention is recorded in the minutes

6.4.3. Conflict of Interest - If an employee believes they may have a conflict of interest or a perceived conflict of interest in a matter before council, a committee, or any other body to which they are appointed, the same procedural requirements outlined in Section 6.4.2 (Pecuniary Interest) apply.

Examples of conflicts of interest include owning shares in a company providing services to the City; having a family member employed by a municipal contractor; holding property affected by a City project; awarding contracts to a business owned by a family member; participating in decisions that benefit personal investments; and using City resources for personal gain.

6.5. The Code is based on the following key principles:

6.5.1. Collaboration - The City promotes open communication, mutual respect, and teamwork across all levels of the organization. Employees are expected to work cooperatively with colleagues, leaders, and stakeholders, sharing knowledge and supporting one another to achieve common goals. By fostering a collaborative environment, the organization strengthens its effectiveness, builds trust, and ensures better outcomes for the community it serves.

6.5.2. Fiscal Responsibility - Because the City is a level of government and is publicly funded, employees are expected to be free from undue influence and not act, or appear to act, in order to gain financial or other benefits for themselves, family, friends or business interests.

6.5.3. Innovation - The City encourages creativity, continuous improvement, and forward-thinking in the workplace. Employees are expected to embrace new ideas, challenge the status quo, and seek better ways to deliver services and solve problems. By fostering a culture of innovation, the organization remains adaptable, efficient, and responsive to the evolving needs of the community.

6.5.4. Integrity - Because the City is a level of government and is publicly funded, employees are expected to make decisions that are in the best interest of the City; make decisions that benefit the City and the Community; and act lawfully and within the authorities of applicable legislation.

6.5.5. Respect - City employees must conduct public business efficiently, with decorum and with proper attention to the community's diversity. Employees must always treat each other with respect. A respectful workplace is one in which others are treated with courtesy and differences of opinion are openly encouraged.

6.6. **Reporting Violations** - Employees who report suspected violations of this policy in good faith will be protected from retaliation. The City is committed to maintaining a safe and respectful environment for those who raise concerns.

COUNCIL POLICY



- 6.7. **Use of Social Media** - Employees must exercise discretion and professionalism when using social media, particularly when referencing their role or the City. Personal opinions should not be presented as official City positions.
- 6.8. **Gifts and Hospitality** - Employees must not accept gifts, favours, or hospitality that could influence – or appear to influence – their professional judgment. Any offers must be disclosed and assessed according to City policy.
- 6.9. **Confidentiality and Privacy** - Employees must protect confidential information obtained through their work and must not disclose it unless authorized or legally obligated to do so.
- 6.10. **Training and Acknowledgement** - All employees must complete Employee Code of Ethics and Conduct training and sign an acknowledgement confirming their understanding and commitment to the policy.

7. END OF POLICY

Original Signed
Signature of Mayor

Original Signed
Signature of CAO

Adopted by Council January 26, 2026
Date

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Date

POLICY RECORD

Approval and Amendment History

Date of Council Meeting	Council Motion Number	Description
March 26, 2018		Approval of Policy 14.126.01.18 PO – Employee Code of Ethics and Conduct

Review History

Date of Policy Owner’s Review	Description/Action Taken or Required
October 21, 2025	Replaces Policy 14.126.01.18 PO – Employee Code of Ethics and Conduct. Key revisions include enhanced definitions, clearer guidance on conflict of interest and outside employment, and updated formatting consistent with the City’s current policy template.