

LCBO

LS-0103 – LCBO Code of Business Conduct

Owners:
Internal Audit Services
Legal Services

President & CEO Approval Date:
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LS-0103 – LCBO Code of Business Conduct

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LS-0103 – LCBO Code of Business Conduct

Section 1 Summary

The Liquor Control Board of Ontario (LCBO) Code of Business Conduct is based on our core values of engaging customer service, social responsibility, excellence, and integrity.

Building and maintaining trusted relationships with our customers, employees, partners, suppliers, and our owner - the government of Ontario on behalf of the people of Ontario - are crucial to our good reputation and success.

LCBO employees are responsible for familiarizing themselves with this Code of Business Conduct (the “Code”) and complying with its ethical and legal standards.

The LCBO’s aim is to set the standard for business conduct in the Ontario public sector.

Section 2 Our Commitment

The LCBO is committed to maintaining its reputation for ethical business conduct. With its unique role as an operational enterprise of the Government of Ontario in a retail environment, the LCBO must continue to aim for the highest standards throughout the organization.

The LCBO has adopted this Code as a tool to assist employees in carrying out LCBO business in an ethical manner. Ethical standards, together with our core values of engaging customer service, social responsibility, excellence, and integrity, reinforce our corporate culture and guide our behaviour at the LCBO.

The Code outlines the obligations that LCBO employees have to each other, customers, suppliers, and the government of Ontario on behalf of the people of Ontario.

Note: The Code may be modified from time to time. Employees will be advised of modifications and these will be published in the online Corporate Policy Manual and will be made available via the LCBO Portal.

Section 3 Applicability of The Code

The Code applies to all employees of the LCBO.

In addition to complying with the Code, as public servants, all employees must comply with the conflict of interest rules set out in Regulation 381/07 (the “Regulation”) under the *Public Service of Ontario Act, 2006* (“PSOA”). The provisions of the Code pertaining to conflict of interest are intended to be consistent with and to assist employees in implementing those rules. Where there is an inconsistency between the Code and the rules contained in the Regulation, the Regulation prevails. An inconsistency does not arise where a provision of the Code exceeds the degree of ethical conduct established by the Regulation.

For more information about the requirements of the Regulation, click on or refer to [LS-0109 – Conflict of Interest](#), in the Corporate Policy Manual.

It is the responsibility of all LCBO employees to become familiar with the Code, adhere to it, ask for guidance when necessary, and report violations.

The Code is not comprehensive. It cannot address every ethical consideration or situation that might arise. Rather, it is a tool to guide the actions of employees and to help them make the best possible choices

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when such situations arise.

All LCBO employees are expected to:

- abide by the Code and by LCBO policies and procedures;
- seek advice from a manager, Human Resources, Legal Services, or the Ethics Executive when an ethical issue arises;
- report violations of the Code, laws and regulations, and LCBO policies and procedures, or requests that might constitute violations, using the reporting procedures set out in the Code; (see Reporting Violations on Page 12 in this document);
- challenge business practice or behaviour that may undermine the principles of the Code; and
- cooperate with investigations.

Section 4 **Role of Senior Management**

Senior management must set the tone and demonstrate the highest standard of ethical behaviour in complying with and promoting the Code. Senior management has a responsibility to:

- create an atmosphere that promotes ethical behaviour and encourages employees to ask questions and raise concerns;
- make sure employees are aware of the Code;
- answer questions about the Code or direct employees to an appropriate source for information;
- demonstrate a commitment to the Code through word and action;
- use reasonable care to prevent and detect violations of the Code;
- report any compliance risks or Code violations and seek guidance from the Ethics Executive on how to implement appropriate remedial measures;
- handle all employee reporting of possible Code violations promptly, confidentially, and in a manner consistent with LCBO policy; and
- notify the Ethics Executive if an employee has personal interests in matters that have been brought to their attention and which could raise an issue under the conflict of interest rules applicable to that employee.

Section 5 **Contravention of The Code**

Violations of the Code will be treated seriously and may result in any number of disciplinary actions, up to and including termination of service.

Section 6 **Getting More Information**

Employees who have questions about the Code or how to apply it, should discuss them with their immediate supervisor or the appropriate department head. Employees with questions about how to interpret the Code, should contact the Legal Services department.

Section 7 **Annual Acknowledgement**

All employees are required to review the Code annually and acknowledge they have read and understood the Code (as well as the Conflict of Interest Policy LS-0109). LCBO holds electronic acknowledgement records on the Learning Management System for ongoing record keeping and audit purposes.

Note: Each LCBO employee is provided access to the LCBO Code of Business Conduct.

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Section 8 Principles of Business Conduct

In conducting its business, the LCBO follows certain principles. All LCBO employees must:

- promote a work environment of mutual respect, dignity and understanding of all individuals in full compliance with applicable human rights legislation;
- comply with applicable laws, regulations, LCBO operating policies and procedures, including the Code;
- avoid situations which could lead to an actual or potential conflict of interest or which may reasonably be perceived as giving rise to a conflict of interest
- conduct their duties and business relationships in an honest, fair, and responsible manner;
- sustain a culture in which ethical conduct is valued and recognized;
- foster a business environment that encourages open communication about Code obligations; and
- promptly report suspected violations of the Code and non-compliance with applicable laws, regulations, LCBO operating policies and procedures.

In addition to the principles set out in this Code, employees should also follow all LCBO operating policies relevant to their LCBO duties.

Section 9 Conflict of Interest

As public servants, all LCBO employees are subject to the conflict of interest rules set out in Regulation 381 / 07 under the *Public Service of Ontario Act (PSOA), 2006 (as amended from time to time)* and have an obligation to perform their duties with impartiality and to avoid situations that could create an actual or potential conflict of interest or which may be reasonably perceived as giving rise to a conflict of interest.

Note: Generally, a conflict of interest arises when an employee's personal interests conflict, appear to conflict, could reasonably be perceived to conflict, or could potentially conflict in any way with the interests of the LCBO.

These rules prohibit LCBO employees from:

- using or attempting to use their position to directly or indirectly benefit them, their spouse, their children or family;
- allowing the prospect of future employment to affect the performance of their duties;
- giving preferential treatment to any person or entity or creating the appearance of giving preferential treatment when performing their duties to the LCBO;
- hiring a member of their family (e.g., their spouse [which includes a person to whom they are married or with whom they live in a conjugal relationship outside marriage], their child [which includes a son, daughter, stepchild, ward, or person to whom they are a legal guardian], their mother, father, stepmother, stepfather, ward, legal guardian, sibling, stepbrother, stepsister, mother-in-law, father-in-law, brother-in-law, sister-in-law, daughter-in-law, son-in-law, grandparent, spouse's grandparent, grandchild, or niece, nephew, aunt, or uncle)
- agreeing to (entering into) a contract with a family member or with a person or entity in which a member of their family has a substantial interest; and
- participating in decision-making by the LCBO about a matter that they are able to influence and from which they could benefit (unless participation is approved in advance by the LCBO's President & CEO / Ethics Executive).

The rules also deal with gifts, engaging in business outside LCBO employment and confidential information as further described in this Code.

Note: In addition to the conflict of interest rules set out above, which reflect the rules in Regulation 381 / 07 under the PSOA, the LCBO also considers preferential treatment and/or an actual, potential, or

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perceived conflict of interest to exist where it arises from situations involving the hiring of an individual with whom that employee has a close personal relationship, including, without limitation, a romantic or social relationship. For more information, click on or refer to [HR-0116 - Employment of Relatives & Close Personal Contacts](#) in the Corporate Policy Manual.

Section 10 Guidelines for Avoiding Conflict of Interest

All LCBO employees are to:

- base business decisions on merit and strictly in the best interests of the LCBO;
- ensure that employees derive no personal benefit, whether direct or indirect, as a result of making business decisions on behalf of the LCBO;
- avoid situations that may create, appear to create, or could reasonably be perceived to create, a conflict of interest between their personal interests and those of the LCBO;
- avoid giving preferential treatment to any person or entity or creating the appearance of giving preferential treatment when performing their duties to the LCBO; and
- avoid taking part in, or in any way influencing, any decision related to the LCBO that might result in financial or other advantage for the employee, members of their family, or their friends.

Section 11 Gifts

Accepting a gift or other benefit may affect the employee's judgment or actions, or give the appearance of doing so, even if the employee believes the benefit will not affect their objectivity or impartiality.

As public servants, LCBO employees are subject to the rules governing the acceptance of gifts set out in Regulation 381 / 07 under the *Public Service of Ontario Act, 2006*, and Section 121 of the Criminal Code of Canada.

As a general rule, LCBO employees must not seek or accept gifts:

- from any person, group or entity that has dealings with or seeks to do business with the LCBO or the Government of Ontario,
- from any person, group, or entity to whom the employee provides services as part of their job, or
- from any person, group or entity that seeks to do business with the LCBO or any other Ministry or public body of the Government of Ontario (as defined in the PSOA), if a reasonable person might conclude that the gift could influence the employee in the performance of their duties.

The conflict rules set out in the Regulation under the PSOA require employees to notify their Ethics Executive if the employee receives such a gift.

Section 12 LCBO Guidelines on Gifts

LCBO employees may accept a gift of nominal value (generally not more than \$50) given as an expression of courtesy or hospitality if doing so is reasonable in the circumstances. In considering whether accepting the gift is reasonable in the circumstances, LCBO employees should consider all of the circumstances relating to the gift and the person, group or entity who is giving it, including matters such as:

- whether it could reasonably influence or appear to influence the employee's judgement or the performance of their duties to the LCBO;
- whether it creates or could create an obligation for the employee or for the LCBO;
- whether it would embarrass the employee or the LCBO if made public; or
- the frequency of such gifts from the same source and from other sources.

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Tickets or invitations to sports events, concerts, charitable or other similar events, or invitations to trade and industry-sponsored sports events, such as golf, tennis or curling events, cannot generally be considered to be of nominal value. The cost associated with sports events or concert tickets is often substantial, as are the fees associated with golf, etc.

LCBO employees may accept occasional invitations to lunch or dinner provided they qualify as “an expression of courtesy or hospitality” and that acceptance is reasonable in the circumstances. However, LCBO employees should consider the frequency and scale of the hospitality accepted from a particular person or group and whether the hospitality is reciprocal, in the sense that the LCBO employee sometimes reciprocates by paying the next meal expense. LCBO employees should always consider the business purpose for any meal.

Note: To monitor the appropriateness of this type of hospitality, LCBO employees must file Trade Function Reports [LCB 1662](#) and supervisors must review them carefully to identify possible conflict of interest issues.

For more information, including required reporting of gifts using Trade Function Reports, click on or refer to [LS-0109 – Conflict of Interest](#) policy in the Corporate Policy Manual and the Trade Function Report - Form LCB 1662.

Employees should not accept or solicit, in the LCBO’s name, donations, prizes or other contributions from persons, groups or entities that have dealings with or seek to do business with the LCBO (or with any part of the Ontario government), even if the donation or solicitation occurs in the context of a fundraising campaign for an organization (charitable or otherwise) which the LCBO is associated with or supports.

Section 13 Outside Activities/Employment

LCBO employees cannot become employed by or engage in a business or undertaking outside LCBO in any of the following circumstances:

- where outside duties could conflict with LCBO duties;
- where the outside employment or undertaking would interfere with the employee’s ability to perform their duties at the LCBO;
- where outside employment is in a professional capacity and likely to influence or detrimentally affect the employee’s ability to perform their duties at the LCBO;
- where the outside employment would constitute full-time employment for another person. This provision does not apply to part-time LCBO employees or to those on an authorized leave of absence from the LCBO, provided the employment is consistent with the terms of the leave of absence;
- if, in connection with the employment or undertaking, any person would derive a benefit from their employment with the LCBO; or
- where government or LCBO premises, equipment or supplies are used in the outside employment or undertaking.

If an employee is also employed outside the LCBO, the employment cannot be performed as representing or appearing to represent an LCBO position, opinion, or policy.

LCBO employees may not accept additional compensation for duties which they perform in the course of their LCBO work.

Section 14 Social Media/Online Dialogue

If an LCBO employee takes part in online dialogue through blogs, social networking sites or other electronic

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media, even on their own time, they must abide by the LCBO's confidentiality and proprietary policies on trade secrets, copyrights, and trademarks. LCBO employees may not use any LCBO logo in their personal blogs or social networking. For confidentiality or legal reasons, the LCBO may also require from time to time that LCBO employees not discuss certain topics.

If an LCBO employee reveals in an online medium that they are an LCBO employee, they must make it clear that any views that they express are theirs alone and do not represent the views of the LCBO. We recommend use of a corporate-specified disclaimer, such as: "The views expressed on this blog, podcast, wiki, and site are mine alone and do not reflect the views of my employer."

For more information, click on or refer to [CC-0106 – Employee Guidelines on Social Media Activity](#) in the Corporate Policy Manual.

Section 15 Confidential Information

LCBO's stakeholders and colleagues expect us to use and protect confidential information appropriately. Confidential information is defined in the Regulation as any information that is not available to the public and that could result in harm to the LCBO or could provide the person to whom it is disclosed an advantage.

LCBO employees must not:

- disclose confidential information obtained during the course of their employment by the LCBO to a person or entity unless authorized by the LCBO or by law;
- use confidential information in a business or undertaking outside the LCBO; or
- accept a gift directly or indirectly in exchange for disclosing confidential information.

LCBO employees may disclose confidential information to others at the LCBO only when it is required in the performance of their duties.

LCBO employees should also seek to prevent misusing or inadvertently disclosing confidential information. This includes:

- keeping electronic and paper documents and files containing confidential information in a safe place; or
- not discussing confidential matters where they may be overheard such as in hallways, elevators, restaurants, etc.

Section 16 Political Activity

The PSOA governs the political activities that LCBO employees may engage in. The PSOA defines political activity as:

- anything done in support of or in opposition to:
 - a federal or provincial political party; or
 - a candidate in a federal, provincial, or municipal election
- being or seeking to become a candidate in a federal, provincial, or municipal election;
- Making public comments regarding the positions or policies of a political party or candidate, except where those comments are in the normal scope of duties for an LCBO employee

As public servants, LCBO employees may engage in political activity, provided that they do not:

- Engage in political activity in the workplace;
- Engage in political activity while wearing a uniform associated with the LCBO;
- Use LCBO premises, equipment or supplies when engaging in political activity; and

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- Associate their position with political activity (except if the employee is a candidate or seeking to be a candidate, and only as necessary to identify their position and work experience for campaign purposes)

For more information about political activity rights and restrictions, click on or refer to [HR-0110 – Political Elections Activities](#) policy in the Corporate Policy Manual.

Section 17 Business Practices – Privacy

The LCBO protects the privacy of employees, customers and suppliers who share information with us. The LCBO has a responsibility to safeguard the privacy, confidentiality, and security of all personal information, in compliance with the Freedom of Information and Protection of Privacy Act.

LCBO employees must respect the personal information of others by:

- accessing personal information only when it is necessary for the performance of their job;
- understanding when collection, use and disclosure of information are permitted, when they are not permitted, and acting appropriately based on that knowledge; and
- understanding and applying security and privacy best practices to safeguard personal information that is in their custody or control. Maintaining the security of sensitive information is not just a best practice – it is an obligation.

LCBO employees must do their part to protect information held by the LCBO. LCBO employees must also pay close attention to any situation or incident that could result in the loss, theft or misuse of information held by the LCBO or entrusted to us by our customers and business partners and suppliers. When any doubt exists, LCBO employees should notify their manager.

For more information, click on or refer to [FOI-0103 - Freedom of Information and Protection of Privacy](#) in the Corporate Policy Manual.

Section 18 Communications/Public Statements

LCBO employees should not discuss prospective changes or developments with people outside the LCBO before an official announcement has been made.

LCBO employees should not answer inquiries from the Press or companies and organizations unless authorized to do so, and employees should refer all such inquiries to the Corporate Communications department.

For more information, click on or refer to [CC-0105 – Corporate Communications](#) in the Corporate Policy Manual.

Section 19 Sales & Customer Service

As part of its social responsibility mandate, the LCBO must adhere to the laws governing the sale of alcohol. Staff must refuse sales to minors or anyone who attempts to purchase for minors. Staff must check the identity of persons who appear to be minors and staff must refuse sales to anyone who is intoxicated, appears to be intoxicated or who attempts to purchase on behalf of such person.

All Retail staff are required to complete the LCBO's Check 25 -Challenge / Refusal training program and the Challenge & Refusal: It's Not Personal. It's The Law training program. For more information, click on

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or refer to [Challenge & Refusal: It's Not Personal. It's The Law](#).

Courteous, prompt, sensitive and professional service to the public is essential. Sensitivity to the needs of the public means that LCBO employees must be polite, even under difficult conditions or in times of personal stress. By staying calm, asking a customer to address complaints to the store manager or the Customer Service & Store Support Department, if need be, and focusing on trying to serve the customer well, LCBO employees show a professional attitude that demonstrates engaging customer service true to the LCBO's brand values.

Section 20 Accounts & Record Keeping

All transactions of the LCBO must be properly recorded and accounted for. This is essential to the integrity of LCBO's governance and financial reporting. All LCBO employees are responsible for ensuring that accurate account entries are made in the LCBO's accounting records.

If an LCBO employee's responsibilities include preparing and maintaining books and records, they should:

- adhere to all applicable accepted accounting standards and practices, rules, regulations, and controls;
- ensure the accurate and timely recording of costs, sales, shipments, time sheets, bills, payroll and benefit records, expense reports and other financial transactions in the proper accounts;
- retain books and records which reflect fairly, accurately and in appropriate detail the LCBO's transactions;
- sign only those documents that are accurate and truthful; and
- restrict access to sensitive or confidential information (such as financial records and customer information) to ensure the information is not accidentally or intentionally disclosed, modified, misused, or destroyed, other than in accordance with the LCBO's document retention policies.

Section 21 LCBO Property

As an enterprise of the Government of Ontario, the LCBO is obligated to conduct its affairs and use LCBO property and assets in a manner consistent with its core values and reputation.

LCBO employees must take all reasonable steps to protect LCBO property and assets from loss, theft, damage, and misuse. LCBO employees are responsible for:

- protecting and conserving LCBO property (retail staff must follow the "Play it Safe" policy regarding shop theft situations. Click on [Shop Theft – Play it Safe](#) RP-0204-01 – Shop Theft in Resource Protection Manual; or refer to [Shop Theft – Play it Safe](#) RP-0204-01 – Shop Theft in Resource Protection Manual;
- using LCBO property prudently and only for lawful business purposes; and
- returning all LCBO property in their custody when leaving the LCBO.

For more information, click on or refer to [Shop Theft – Play it Safe Store Operations & Support](#).

Section 22 Computer Access & Use of Electronic Media

To protect access to systems, applications and data on LCBO computer systems, LCBO employees must protect their password. They must not disclose their password or allow others to use their user IDs.

The LCBO may from time to time examine email, computer records, personal file directories and other information stored on or transmitted over LCBO facilities to ensure compliance with internal policies, to support the performance of internal or external investigations, and to help with the management of information systems. LCBO employees should be aware that all email is considered LCBO property; it is archived and can be retrieved for examination at any time, even after it has been deleted. Email or text

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messages which encourage the recipient to do business with the LCBO (i.e. the promotion, advertising, and marketing of LCBO stores, products, services or events) must also comply with the requirements of the LCBO's [Anti-Spam Policy](#).

For more information, click on or refer to [IT-0114 – Acceptable Use of Information Technology Resources](#) and [LS-0107 – Anti-Spam Policy](#) in the Corporate Policy Manual.

Section 23 Environmental

The LCBO is committed to complying with all applicable environmental laws.

LCBO employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. LCBO employees must promptly report to the Manager, Energy and Environmental or to their supervisor, any known or suspected violations of environmental laws, or any events that may result in a discharge or emission of hazardous materials.

Section 24 Health & Safety

Preventing workplace accidents is a top priority. The LCBO is committed to providing and maintaining healthy and safe workplaces and work practices for all employees in order to reduce and prevent work-related injuries and illness.

All LCBO employees must comply with the requirements of the Health and Safety policy, [HR-0102 – General Information](#) as follows:

- adhere to the spirit, principles, and requirements of the policy;
- comply with the Occupational Health and Safety Act, its regulations and the LCBO's health and safety policies and procedures;
- take responsibility and be accountable for working safely and reporting all actual or potential hazards or other workplace concerns to his or her manager or supervisor; and
- report to your manager any injury or illness immediately

LCBO employees are expected to conduct business in a way that protects the health and safety of all LCBO employees, contractors, and the public.

For more information, click on or refer to [HR-0102 – General Information](#) in the Corporate Policy Manual.in the Corporate Policy Manual.

Section 25 Workplace Violence

The LCBO values the safety of our employees and has a zero tolerance policy for acts or threats of violence in the workplace.

The LCBO will strive to take reasonable preventative measures to protect employees from “workplace violence” as defined under the Occupational Health & Safety Act(OHSA).

Workplace Violence, as per the OHSA, is defined as:

- a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to

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the worker; and

- c) a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

The policy entitled [HR-0103 – Workplace Violence Prevention](#) applies to any and all incidents of workplace violence in LCBO workplaces, committed by employees, contractors, customers, visitors, vendors or delivery persons. All LCBO employees must comply with the requirements of the Workplace Violence Prevention policy.

For more information, click on or refer to [HR-0103 – Workplace Violence Prevention](#) in the Corporate Policy Manual.

Section 26 Discrimination/Harassment

The LCBO values the background, experience, perspective, and talent of each individual, and regards those differences as positive. The LCBO strives to create a workforce that reflects the diverse populations of communities we serve.

The LCBO does not discriminate in hiring and employment on grounds prohibited by applicable laws; these include race, ancestry, colour, place of origin, gender, ethnic origin, age, marital or family status, disability, sexual orientation, gender identity, gender expression, creed, religion, and citizenship.

The LCBO's core values apply not only to its relationships with customers and suppliers and the outside world, but also with each other as colleagues.

LCBO employees must not participate in acts of discrimination or harassment towards any person with whom they have business relationships.

For more information, click on or refer to [HR-0129 – Respectful Workplace Policy](#) in the section on Human Rights / Workplace Harassment Prevention in the Corporate Policy Manual.

Section 27 Reporting Suspected Violations & Wrongdoing

LCBO is committed to the highest standards of conduct and takes violations of the Code and other types of wrongdoing seriously. LCBO will investigate alleged improper activities, keeping confidential all information reported and disclosed during the course of investigation to the extent reasonably practicable.

LCBO employees are encouraged to report promptly any situation or transaction which is or may be in conflict with the intent or spirit of this Code, or whether they know or suspect someone is violating the Code. LCBO employees can report:

- to their immediate supervisor, the Senior Vice President of the division in which they work, the [Chief Legal Officer](#) or the President and CEO (who is also the Ethics Executive under the PSOA); or
- through the LCBO ethics reporting program – ETHICSMATTER: *Let's speak up*. ETHICSMATTER allows employees to report wrongdoing in the workplace anonymously and confidentially, 24/7 through an independent third party service provider. Employees can submit a report through a secure website, toll-free telephone line or mail to a confidential post office box (for details, refer to [ETHICSMATTER](#)). Each report will be reviewed by the Senior Executives in the Internal Audit Services Department and Human Resources Division. The Chief Audit Executive and the [Chief People Officer](#) are responsible for updating the Ethics Executive (President & CEO) and the Governance Committee on the status of received reports.

LCBO employees must not conduct their own investigations of suspected violations of the Code as

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investigations may involve complex legal issues: their actions (even well intended) could compromise the integrity of an investigation and adversely affect them and the LCBO. LCBO employees must report a suspected violation and allow an investigation in accordance with this Policy.

Violations of the Code may also be considered “wrongdoing” within the meaning of the PSOA. As such, all reports of violation or suspected violation of the Code should be referred to the Chief Legal Officer for interpretation. Matters which are determined to be “wrongdoing” will be dealt with in accordance with the LCBO’s policy on Disclosure of Wrongdoing (click on or refer to [LS-0106 – Disclosure of Wrongdoing](#) in the Corporate Policy Manual).

Where an alleged violation is not determined to be a “wrongdoing” within the meaning of the PSOA, the matter will be investigated and LCBO Legal and Human Resources departments will become involved in the process as appropriate. The Human Resources department will become involved in questions involving the conduct of individual employees (in suspected cases of sexual harassment or other violations of the Human Rights Code, and in cases where the conduct in question might lead to disciplinary consequences for an individual employee).

Issues concerning suspected illegal actions, or LCBO policies, procedures, or practices that might contravene this Code, will be handled by the Legal Services department.

The LCBO will handle reports of suspected violations promptly, discreetly, and professionally. LCBO employees have a right to raise issues and will be respected for these views. LCBO employees are encouraged to identify themselves. The LCBO will make every effort to maintain, within the limits of the law and LCBO policy, the confidentiality of the identity of anyone who reports possible misconduct. LCBO employees may discuss any concerns under this Code without retribution, provided they are reporting the concern in good faith.

The LCBO will investigate anonymous reports of suspected violation of the Code but will take the following factors into account:

- the seriousness of the issue;
- the credibility of the concern; and
- the likelihood of confirming the allegation from a reliable source.

Section 28 Matters for Which The Code Provides No Specific Guidance

If an LCBO employee encounters a situation for which the Code does not provide specific guidance, the employee should contact their manager, the Senior Vice President of the division in which they work, the Chief Legal Officer or the President and CEO (who is also the Ethics Executive) for guidance.

LCBO employees should also ask themselves the following questions when deciding whether to report or seek advice on a matter:

- Is this fair and ethical?
- Is this legal and in compliance with the LCBO policies?
- Would I approve of this situation if I were a fellow employee, a customer, or a stakeholder?

Section 29 LCBO Code of Business Conduct Support

Ethics Executive - President & CEO

Legal Services - Chief Legal Officer

Human Resources - Chief People Officer

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Section 30 Sign-Off Requirements

All employees must sign off as having read the LCBO Code of Business Conduct policy and related cross-referenced policies within the Corporate Policy Manual and the Retail Operations Manual.

Section 31 Policy Revision/Review History

Approval Date	Update #	Requested By	Summary of Revision	Next Review Date
February 2, 2022	78-SR1	Legal Services	Revisions underlined	3 years from approval date or sooner

Approvers: Approved by the Core Team and President & CEO

Owner: Internal Audit Services, Legal Services