



Canadian Dairy  
Commission

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## **Code of ethics Canadian Dairy Commission**

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Approved by SMT on September 25, 2019

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## INTRODUCTION

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The Canadian Dairy Commission (CDC) provides policies, programs, facilitation and expertise to stakeholders of the dairy industry and to other levels of government to enhance the vitality of the Canadian dairy industry for the benefit of Canadians.

The CDC reports to Parliament and Canadians through the Minister of Agriculture and Agri-Food.

As public servants, all CDC employees share a commitment to faithfully and honestly fulfil our duties in accordance with law. It is important to serve Canadians with integrity and in a non-biased, professional manner. A professional Public Service is crucial to good government and in imparting trust to Canadians. Our work is essential to Canada's well-being and to a democratic system. We must all uphold the public's trust.

The CDC's Code of ethics (referred to as the Code) has been developed with two objectives in mind:

- to advance the goal of preserving public trust and confidence in the corporation as it serves Canadians; and
- to assist employees in applying the corporation's core values in the completion of their work.

The principles set out in the Code guide the work we do. Values and ethics are embedded in every decision that we make – be it personal decisions, professional decisions, or decisions made as part of a larger Canadian society. As you read through these pages, you will see that the CDC's Code of ethics does not provide all the answers, but instead acts as a touchstone for questions, and reminds us of how our public-sector core values can be applied in various situations.

Canadians can have great confidence in the CDC, in the important work we do, and, equally important, in the way in which we do it. The CDC's Code of ethics will further strengthen the public's trust in our work and help us work together to achieve the corporation's goals.

## EFFECTIVE DATE

The CDC Code of ethics was revised on June 26, 2019.

## WHY HAVE A CODE?

The Code outlines the values and behaviours that are expected of employees. It also supports and complements the broader Values and Ethics Code for the Public Sector developed by the Treasury Board Secretariat (TBS).

When we adopt these values and expected behaviours, we help strengthen the public's trust and confidence in our work, and the work of the entire public service.

## CONTEXT

This Code should be read in conjunction with the [Values and Ethics Code for the Public Sector](#) and the TBS [Policy on Conflict of Interest and Post-Employment](#)

## TO WHOM DOES THE CODE APPLY?

This Code applies to all term and indeterminate employees at the CDC regardless of position or level.

The Code also applies to consultants, casuals, students, temporary help personnel, employees on any form of leave, including leave without pay as well as employees on secondment.

## ROLES AND RESPONSIBILITIES

### WHAT IS EXPECTED OF ME?

We are all accountable for:

- reading and understanding this Code and how it applies to us;
- demonstrating values and ethics through our personal and professional behaviours;
- adhering to this Code as a condition of employment; and
- seeking guidance from our directors/managers when we have questions or uncertainty with respect to this Code.

All individuals working at the CDC are expected to report to work and be able to perform their duties safely. They shall not be impaired by the effects of alcohol, opioids, cannabis or any other legal or illegal drug.

A breach of the CDC's Code may result in administrative or disciplinary measures being taken, up to and including termination of employment or contract.

## WHAT IS EXPECTED OF ME IF I AM A MANAGER, DIRECTOR OR AN EXECUTIVE?

As leaders and models for others, we have the added responsibility of helping others understand and abide by the Code, as well as promoting a safe, healthy and respectful workplace. This means making sure that all employees under our responsibility:

- receive a copy of, or have electronic access to this Code;
- understand the Code;
- have the opportunity to address questions or discuss concerns about this Code and understand the process for seeking guidance; and
- act in ways that reflect the Code's values and expected behaviours.

## WHAT IS EXPECTED FROM THE CHIEF EXECUTIVE OFFICER (CEO)

The CEO has specific responsibilities under the *Public Service Disclosure Protection Act* (PSDPA), including establishing a code of ethics for the CDC and an overall responsibility for fostering a positive culture of values and ethics at the CDC. The CEO must ensure that employees are aware of their obligations under this Code, and that employees can obtain appropriate advice within their organization on ethical issues, including possible conflicts of interest.

The CEO must also ensure that employees are aware that the organization declared an exception from having internal disclosure procedures and from designating a Senior Officer for any disclosures of wrongdoing under the PSDPA. Employees must be made aware that should they wish to report any wrongdoing, they must contact the Public Sector Integrity Commissioner (PSIC) directly.

The CEO is responsible for ensuring the non-partisan provision of programs and services by the CDC.

The CEO is subject to this Code and to the *Conflict of Interest Act*.

## WHAT IS EXPECTED FROM THE TREASURY BOARD OF CANADA SECRETARIAT (TBS)

In support of the Treasury Board President's responsibilities under section 4 of the PSDPA, the Office of the Chief Human Resources Officer (OCHRO) is responsible for promoting ethical practices in the public sector. The OCHRO will work with all relevant partner organizations to implement and promote the Values and Ethics Code for the Public Sector and will provide advice to chief executives and designated departmental officials with respect to its interpretation.

The Chief Human Resources Officer may issue directives, standards and guidelines related to the Values and Ethics Code for the Public Sector.

OCHRO will monitor the implementation of the *Code of ethics of the CDC*, with a view to assessing whether the stated objectives have been achieved.

## OUR SHARED VALUES

These values are like a compass. They guide us in everything we do and define how we are expected to interact and behave. The CDC integrates these values into all of its decisions and actions, policies, processes and systems.

### 1. RESPECT FOR DEMOCRACY

Canada's parliamentary democracy and its institutions exist to serve the public interest. We recognize that:

- elected officials are accountable to Parliament, and ultimately to the Canadian people; and
- a non-partisan public sector is essential to our democratic system.

#### **What we do to support this value:**

- respect the rule of law and carry out our duties according to the legislation, policies and directives that apply, in a non-partisan and impartial manner;
- provide decision-makers with all the information, analysis and advice they need, always striving to be open, candid and impartial;
- loyally carry out the lawful decisions of our leaders and support ministers in their accountability to Parliament and Canadians; and
- align our efforts, energy and expertise with government and departmental priorities in the public interest.

#### **What we don't do:**

- misrepresent yourself as a spokesperson for the department or the Government of Canada;
- publicly criticize the department;
- speak negatively about government policies or lawfully taken government decisions to outside entities (i.e. stakeholders, the public, the media);
- falsify/withhold data or information provided to decision-makers; and
- engage in any political activity that impairs or could be perceived by others as impairing your ability to perform your duties in a politically impartial manner.

### 2. RESPECT FOR PEOPLE

Treating all people with respect, dignity and fairness should define our relationship with each other and the Canadian public. Respecting the diversity of our people and the ideas they generate helps create a safe and healthy work environment, keeps us all engaged in our work and promotes new ideas and ways of working.

#### **What we do to support this value:**

- value diversity and the unique qualities and strengths it brings to our workforce;
- encourage the use of both official languages;
- treat every person with respect and fairness and help create and maintain a workplace that is free from violence, harassment and discrimination; and
- work with others in a spirit of openness, honesty and transparency that encourages engagement, collaboration and respectful communication.

**What we don't do:**

- tolerate or fail to take action in an abusive work environment;
- demoralize or offend others through cynicism, aggression or lack of respect; and
- harass/discriminate against others.

**3. INTEGRITY**

Integrity is the cornerstone of good governance and democracy. When we work and live by the highest ethical standards, we protect and raise public confidence in the honesty, fairness and impartiality of the federal public service.

**What we do to support this value:**

- always act honestly and fairly, and in a way that will bear the closest public scrutiny;
- take all possible steps to prevent and/or resolve any real, apparent or potential conflicts of interest between our official responsibilities and our private affairs in favour of the public interest;
- act in a way that earns and keeps the trust and respect of our employer and the public; and
- conduct ourselves, during and outside working hours, in a way that protects and maintains the reputation of the CDC, its employees, and the Government of Canada.

**What we don't do:**

- attempt to cover up mistakes;
- use our official roles to get an unfair advantage for ourselves or to advantage or disadvantage others;
- place personal goals ahead of organizational or Government of Canada objectives;
- solicit or accept inappropriate gifts and hospitality; and
- fail to disclose possible conflict of interests through a "Confidential Report" detailing assets, liabilities or participation in outside activities.

**4. STEWARDSHIP**

As federal public servants and CDC employees, we need to use and care for public resources responsibly.

**What we do to support this value:**

- use public money, property and resources effectively and efficiently and for official purposes only;
- consider the present and long-term effects that our actions have on people, on our workplace, and on the environment;
- acquire, preserve and share knowledge and information as appropriate by respecting legal and policy requirements; and
- resolve a potential conflict between our private interest and our official duties as a public servant in the public interest.



**What we don't do:**

- use government property for personal gain and use;
- inappropriate withholding or disclosure of information;
- use a Government of Canada credit card for personal purchase;
- claim hospitality and travel expenses for costs that were either not incurred or are ineligible; and
- access unlawful, or inappropriate internet sites or other inappropriate use of CDC's electronic network.

## 5. EXCELLENCE

Excellent design and delivery of public sector policy, programs and services benefit every aspect of Canadian public life. Engagement, collaboration, effective teamwork and professional development are all essential to a high-performing organization.

**What we do to support this value:**

- foster effective working relationships between provinces, territories, municipalities, stakeholders and partners; (dairy industry)
- provide fair, timely, efficient and effective services that respect Canada's official languages;
- always work to improve the quality of policies, programs and services we provide; and
- foster a work environment that promotes teamwork, learning and innovation.

**What we don't do:**

- refuse to communicate in the official language that is requested;
- refuse to participate in a meaningful collaboration;
- fail to support a colleague;
- disregard service standards;
- fail to show appropriate collaboration, transparency and respect in dealings with outside stakeholders; and
- allow emotions to sway ethical judgement.

## 6. LEADERSHIP

Employees are aware of the trends and events that will affect the organization and the industry. They exercise good judgment in implementing necessary changes. New ideas are embraced, and team work is deemed essential. CDC directors/managers lead by example.

**What we do to support this value:**

- stay on top of events that affect the CDC and the dairy industry
- look for the best solution for all stakeholders
- explain our decisions to those who are affected
- admit our mistakes and correct them promptly
- consult and listen
- look ahead

### What we don't do:

- favour one stakeholder at the expense of the others
- keep information from our team
- avoid making decisions
- ignore changes and trends

## CONFLICT OF INTEREST AND POST-EMPLOYMENT DEFINITIONS

Conflict of Interest exists when a public servant:

- has private interests that could improperly influence how he or she performs his or her official duties and responsibilities; and/or
- uses his or her office for personal gain and/or gain for friends or family members.

Conflict of Interest can be:

- **Real:** It exists at the present time.
- **Apparent:** Present situation could lead a reasonable person to believe conflict of interest exists, whether or not it is the case.
- **Potential:** When present situation could lead a reasonable person to foresee conflict of interest to exist in the future.

Conflict of Duties exists when a public servant:

- has many or competing official responsibilities. For example, these roles could include his or her full-time work in the public service and responsibilities in an outside role that forms part of his or her official duties, such as serving on a board of directors, or as part of a municipal, community or professional advisory committee.

Third party is considered to be:

- an individual, group, or organization external to the Government of Canada, such as a private individual, a business, a society, an association, or a university.

## PREVENTING CONFLICT OF INTEREST

As a CDC employee, you are expected to avoid situations that could give the appearance of a conflict of interest, result in a potential for a conflict of interest, or result in an actual conflict of interest.

While financial honesty is essential, it is not the sole reason for conflict of interest. And while it is not possible to foresee everything that could result in conflict of interest, this document covers many areas and includes guidelines of which you should be aware.

You can also seek guidance from:

- your director/ manager;
- HR section; and/or
- Values & Ethics Champion

Along with the requirements outlined below, you must meet any specific conduct requirements related to your professional designation.

As a CDC employee, you are required to:

- report in writing through the Conflict of Interest Disclosure form all outside activities, including assets and interests, that might give rise to conflict of interest with your job to the Values and Ethics Champion. You must submit this report within 60 days of reporting for your first position at the CDC
- review the CDC Code of ethics at least every three years and/or every time a major change occurs in your personal affairs or career. If you discover any real, apparent or potential conflict of interest, you must complete a Conflict of Interest Disclosure form right away;
- unless otherwise permitted by this Code, refrain from having private interests, which would be unduly affected by government actions in which you participate, or of which you have knowledge or information;
- not knowingly take advantage of, or benefit from, information that is obtained in the course of your duties that is not available to the public;
- refrain from the direct or indirect use of, or allow the direct or indirect use of government property of any kind, including property leased to the government, for anything other than officially approved activities or activities permitted by the CDC Policy on Information Technology;
- not assist private entities or persons in their dealings with the government where this would result in preferential treatment of the entities or persons;
- not interfere in the dealings of private entities or persons with the government in order to inappropriately influence the outcome;
- maintain the impartiality of the public service and not engage in any outside or political activities that impair or could be seen to impair your ability to perform your duties in an objective or impartial manner; and
- comply with the requirements listed in this policy as well as other directives or policies issued by the Treasury Board Secretariat related to negotiating financial arrangements with outside parties.

When in doubt, report the situation to your director/ manager to seek advice or direction.

## **REQUIREMENTS FOR PREVENTING AND DEALING WITH SITUATIONS OF CONFLICT OF INTEREST DURING YOUR EMPLOYMENT AT THE CDC**

Following are the conflict of interest and post-employment requirements that are a condition of employment for public servants in all organizations subject to the Treasury Board policy. These requirements serve to uphold the values contained in the *Values and Ethics Code for the Public Sector* and the CDC's *Code of ethics*. By upholding these ethical standards, public servants conserve and enhance public confidence in the honesty, fairness and integrity of the public service.

## **TRAVEL / GOVERNMENT OF CANADA CREDIT CARDS**

If you hold a government travel card, use it for official CDC travel only. You are responsible for its use and for paying the travel expenses charged to the travel card. Goods and services purchased with a Government of Canada acquisition card must be of official CDC purposes as well.

## **IDENTIFICATION CARDS**

As a CDC employee, you must:

- use your official identification only for the purposes for which it was issued, and in the best interests of the CDC;
- display your official identification when asked to identify yourself as a government representative;
- report the loss or theft of, or damage to, your official identification to your director/ manager and to the employee responsible for issuing identification cards;
- return your official identification to your director/manager if you are temporarily or permanently reassigned outside of the department and your new functions do not require its use.

## **CARE AND USE OF INFORMATION (CONFIDENTIALITY)**

As a CDC employee, you must:

- comply with all legislation, directives and procedures related to collecting, using, sharing, storing, disclosing, distributing and disposing of any personal or commercial information;
- not remove, hide, change, mutilate, copy or destroy any official information; and
- not release classified information about CDC's stakeholders and all other official information (includes information about policies, programs, practices and procedures) that is not public. You may disclose this type of information to clients or designated representatives only if specifically authorized by legislation or departmental guidelines.

## ELECTRONIC NETWORKS ACCESS AND USE

As a CDC employee, you must:

- understand that CDC computer systems or the external sites you access via the CDC's network, software, equipment, Internet, Intranet and e-mail are for business use;
- refer to TBS [Policy on Acceptable Network and Device Use](#)
- follow the [CDC IT Policy](#)
- use CDC computer systems and networks for:
  - conducting the duties of your position;
  - professional communications with people in and outside the CDC;
  - professional development, such as online learning;
- not allow Internet use to affect your productivity or that of your colleagues, or to impose a storage burden on CDC computer systems; and
- not use CDC's electronic networks:
  - for private business, personal gain, political activities or for any other unacceptable activities.

## INTELLECTUAL PROPERTY

As a CDC employee, you must not market or sell anything you created, designed, developed or produced as part of your job — even if you improved or modified it outside working hours (i.e. software, computer devices, work methodologies, forms, manuals, policies, procedures, or evaluation systems). Doing this while employed by the CDC, or after, is a conflict of interest; is against the law; and could result in disciplinary and/or legal action.

## CARE AND USE OF GOVERNMENT PROPERTY

As a CDC employee, you must:

- make acceptable use of property, office equipment and supplies, computers, software, video equipment, telecommunications devices such as cell phones, databases, intellectual property, government acquisition cards and telephone calling cards, taxi chits, materials for official purposes in accordance with CDC policies, guidelines and standards;
- account for and protect any government property and valuables that you possess or control;
- immediately report the loss or theft of, or damage to, any government property to your director/ manager and security; and
- respect CDC's *Policy on the Use of Electronic Networks* and while using the Internet for personal reasons, such as social networking (Twitter and Facebook) as well as Blogging.

## PERSONAL ASSETS

As a CDC employee, you should evaluate your personal financial assets, taking into account the nature of your job. If there is any real, apparent or potential conflict of interest between your job at the CDC and your personal financial assets, complete a Conflict of Interest Disclosure Form and forward it to the Values and Ethics Champion.

## CDC-RELATED ASSETS

If an employee at the CDC or his or her immediate family members owns a dairy farm, invests in businesses related to milk production, milk processing, or food processing, or is considering such ownership or investments, those assets must be disclosed using the CDC Conflict of Interest Disclosure form.

## OUTSIDE EMPLOYMENT OR ACTIVITIES

Employees may engage in employment outside the public service and take part in outside activities unless the employment or activities are likely to give rise to a real, apparent or potential conflict of interest or would undermine the impartiality of the public service or the objectivity of the employee.

Employees at the CDC are required to provide a report to the CEO when their outside employment or activities might subject them to demands incompatible with their official duties or cast doubt on their ability to perform their duties or responsibilities in a completely objective manner. The CEO may require that the outside activities be modified or terminated if it is determined that a real, apparent or potential conflict of interest exists.

Employees who receive a benefit or income either directly or indirectly from a contract with the Government of Canada are required to report to the CEO on such contractual or other arrangements. The CEO will determine whether the arrangement presents a real, apparent or potential conflict of interest, and may require that the contract be modified or terminated.

### *CDC-related outside employment or activities*

If a CDC employee participates in, or is considering participation in, any of the following activities, those activities must be disclosed using the CDC Conflict of Interest Disclosure form:

- carrying out dairy farming activities as a hobby or for commercial farming purposes, including activities of the employee or his or her immediate family members; or
- applying for or receiving benefits under any grant, contribution, or any other program administered by the CDC, whether as an individual or as part of an organization that applies for or receives benefits.

At no time should an employee at the CDC assist the public on a fee-for-service basis in completing application forms for funding from a program administered by the CDC.

If an employee at the CDC, as an outside activity, is a member of a board of directors of a corporation, society, organization or external entity that lobbies, has dealings with the CDC, or is related to the employee's official duties or CDC activities, such activities must be disclosed using the CDC Conflict of Interest Disclosure form.

## *Political Activities*

Any employee (including casual and part-time workers) who is subject to this Code but who is not subject to Part 7 of the PSEA, who wishes to engage in any political activity that could constitute a conflict of interest, is to report the proposed activity to their manager and to the CEO before proceeding.

## **GIFTS, HOSPITALITY AND OTHER BENEFITS**

Employees are expected to use their best judgment to avoid situations of real, apparent or potential conflict of interest by considering the following criteria on gifts, hospitality and other benefits and in keeping with the full context of this Code, which includes the obligations of the *Values and Ethics Code for the Public Sector* and the *Treasury Board Policy on Conflict of Interest and Post-Employment*.

Employees are not to accept any gifts, hospitality or other benefits that may have a real, apparent or potential influence on their objectivity in carrying out their official duties and responsibilities or that may place them under obligation to the donor. This includes activities such as free or discounted admission to sporting and cultural events, travel or conferences.

The acceptance of gifts, hospitality and other benefits is permissible if they are infrequent and of minimal value, within the normal standards of courtesy or protocol, arise out of activities or events related to the official duties of the employee concerned, and do not compromise or appear to compromise the integrity of the employee concerned or of the CDC.

Employees are to seek written direction from the CEO where it is impossible to decline gifts, hospitality or other benefits that do not meet the principles set out above, or where it is believed that there is sufficient benefit to the CDC to warrant acceptance of certain types of hospitality.

## **SOLICITATION**

With the exception of fundraising for such officially supported activities as the Government of Canada Workplace Charitable Campaign (GCWCC), CDC employees may not solicit gifts, hospitality, other benefits or transfers of economic value from a person, group or organization in the private sector who has dealings with the government, or with the CDC.

When fundraising for such official activities, employees should ensure that they have prior written authorization from the CEO in order to solicit donations, prizes or contributions in kind from external organizations or individuals.

Similarly, if an outside individual or entity, with whom the CDC has past, present or potential official dealings, offers a benefit to the CDC such as funding for an event or a donation of equipment, CDC employees are to consider whether any real, apparent or potential conflict of interest exists, and obtain the consent in writing of the CEO prior to accepting any such benefit.

The CEO may require that the activities be modified or terminated where it is determined that there is a real, potential or apparent conflict of interest or an

obligation to the donor. These provisions are designed to ensure that this Code is consistent with paragraph 121(1) (c) of the [Criminal Code](#).

### **AVOIDANCE OF PREFERENTIAL TREATMENT**

Employees are responsible for demonstrating objectivity and impartiality in the exercise of their duties and in their decision-making, whether related to staffing, financial awards or penalties to external parties, transfer payments, program operations or any other exercise of responsibility.

This means that they are prohibited from granting preferential treatment or advantages to family, friends or any other person or entity. They are not to offer extraordinary assistance to any entity or persons already dealing with the government without the knowledge and support of their supervisor. They also are not to disadvantage any entity or persons dealing with the government because of personal antagonism or bias.

Providing information that is publicly accessible is not considered preferential treatment.

### **FAVOURITISM / NEPOTISM**

Every effort should be made to avoid conflict of interest situations, or the appearance of a situation where a person might benefit from special consideration or obtain preferential treatment, whether real or perceived.

Employees should make sure that any person with whom they have a personal relationship (e.g. relatives, close friends or persons living in their household) works outside their line of control. This means they should have no influence, input or decision-making over the other employee's performance evaluation, salary, promotion, special permissions, conditions of work and similar matters. The CEO may approve an exemption, when appropriate.

Working indirectly with relatives, close friends or persons living in the employee's household may be acceptable as long as there is:

- no opportunity for favouritism; or
- no conflict of interest, real or perceived, for the employees involved.

Employees must not take part in staffing actions that involve relatives, close friends or persons living in their household.

### **ABUSE OF AUTHORITY**

As a CDC employee, you:

- must not use your job title or any other official identification to:
  - obtain or appear to obtain any privilege or favour for others, or yourself; or
  - do anything that is illegal, improper or against the best interests of the CDC;
- may only access official information if it is authorized and required for work;



- must never use official information for personal use, gain or financial benefit for yourself, your relatives or anyone else; and
- are expected to foster a respectful workplace through the prevention and prompt resolution of harassment.

## **SPONSORED TRAVEL**

Accepting travel sponsored by an outside organization may:

- create a conflict of interest and harm the CDC's reputation; and/or
- compromise the impartiality and objectivity of the public service or create a perception of preferential treatments towards the donor in future decisions.

That is why, as a CDC employee, you must not accept:

- an offer that is not in the interest of the CDC or the Government of Canada;
- the offer of funded travel;
- the offer if you are an employee in an executive (EX) position, or a position that has delegated financial authority;
- if the third party is a current supplier to the CDC, other than one with a formal agreement with the CDC with an explicit provision for funded travel;
- if the third party actively lobbies the CDC; or
- if the third party receives grants or contributions from the CDC, unless there is a cost-sharing agreement that exists between the CDC and the organization.

If a third party offers to pay or reimburse the costs related to travel by an employee at the CDC, the employee must discuss the offer with the CEO and obtain his/her approval before accepting.

Travel costs refunded to the CDC by virtue of a federal-provincial agreement or of a service contract (e.g. audits), or to attend or participate in international meetings as approved in advance by the CEO, are acceptable under this Code.

## POST-EMPLOYMENT MEASURES

### REQUIREMENTS FOR PREVENTING POST-EMPLOYMENT CONFLICT OF INTEREST SITUATIONS BEFORE AND AFTER LEAVING OFFICE

As a CDC employee, you must avoid any real, apparent or potential conflict of interest between your recent responsibilities within the federal public service and any employment you accept when you leave the public service.

#### BEFORE LEAVING THE CDC AND/OR THE PUBLIC SERVICE

Before leaving the CDC and/or the public service, all employees must:

- disclose their intentions regarding any future outside employment or activities that may pose a risk of real, apparent or potential conflict of interest with their current responsibilities and discuss potential conflicts with their director/manager or the CEO;
- return all government property and valuables they received as part of their duties;
- protect corporate data and the privacy of all personal, confidential, and third party information they have had access to because of their job;
- not take or keep any CDC records and documents, CDs and memory sticks with electronic information and video, unless authorized by their manager.

#### POST-EMPLOYMENT LIMITATION PERIOD FOR PUBLIC SERVANTS IN DESIGNATED POSITIONS

The CEO is responsible for designating positions of risk for post-employment conflict of interest situation in accordance with the [Policy on Conflict of Interest and Post-Employment](#).

Employees at the CDC in these designated positions are subject to a one-year limitation period after leaving employment. Before leaving employment and during this one-year limitation period, these employees are to report to the CEO all firm offers of employment or proposed activity outside the public service that could place them in a real, apparent or potential conflict of interest with their public service employment. List of designated positions:

<http://onncrcdc60.agr.gc.ca:8080/DairyDOCS/cs.exe?func=ll&objaction=overview&objid=682697>

They are to also disclose immediately the acceptance of any such offer. The CDC Conflict of Interest Disclosure Form (Appendix 1) may be used for this purpose.

In addition, these employees may not, during this one-year period, without the authorization of the CEO:

- accept appointment to a board of directors of, or employment with, private entities with which they had significant official dealings during the period of one year immediately prior to the termination of their service. The official dealings in question may either be directly on the part of the employee or through their subordinates;

- make representations to any government organization on behalf of persons or entities outside of the public service with which they had significant official dealings, during the period of one year immediately prior to the termination of their service. The official dealings in question may either be directly on the part of the employee or through their subordinates; or
- give advice to their clients or employer using information that is not publicly available concerning the programs or policies of the departments or organizations with which they were employed or with which they had a direct and substantial relationship.

### **WAIVER OR REDUCTION OF LIMITATION PERIOD**

An employee or former employee of the CDC may ask the CEO to waive or shorten the post-employment limitation period. To do so, the employee occupying a position at risk for post-employment must provide enough information to assist the CEO in deciding whether or not to grant the written waiver. The CEO will consider the following criteria:

- the circumstances under which the termination of our service occurred;
- general employment prospects of the employee or former employee;
- the significance to the government of the information possessed by the employee due to their position in the public service;
- the desirability of a rapid transfer of the employee's or former employee's knowledge and skills from the government to private, other governmental or non-governmental sectors;
- the extent to which the new employer might gain unfair commercial or private advantage by hiring the employee or former employee;
- the authority and influence the employee had while in the public service; and/or
- any other consideration the CEO may choose.

### **AVENUES FOR RESOLUTION**

The expected behaviours will not address every ethical issue that might arise in the course of our daily work. So, when ethical issues arise, you should discuss and resolve them with your director/ manager. Employees can also seek advice and support from the Human Resources Section or other appropriate sources within the department.

At the CDC, the Integrated Resolution Services group, in the Human Resources Branch of AAFC, provides options to help prevent, manage, and resolve workplace conflict. For guidance in situations of workplace conflict, including alternative dispute resolution services, please contact them at (866) 654-1834 or [aafc.confliresolution-resolutionconflits.aac@Canada.ca](mailto:aafc.confliresolution-resolutionconflits.aac@Canada.ca)

The CEO encourages its employees at all levels to resolve issues in a fair and respectful manner and to consider informal processes such as dialogue or mediation. When an employee and the CEO disagree on the appropriate arrangements to resolve a real, apparent or potential conflict of interest, the disagreement will be resolved through the established grievance procedures.

Sections 12 and 13 of the Public Servants Disclosure Protection Act, directs public servants with information that could indicate a serious breach of this Code, to bring the matter to the attention of their director/ manager, Labour Relation Advisor, or to the Public-Sector Integrity Commissioner.

## CONSEQUENCES

An employee who does not comply with the requirements set out in this Code may be subject to disciplinary measures, up to and including termination of employment.

## DISCLOSURE OF WRONGDOING

The Public Service Disclosure Protection Act defines "wrongdoing" as any of the following actions in or relating to the public sector (wrongdoing is not restricted to the activities of public servants):

- the violation of a federal or provincial law or regulation;
- a misuse of public funds or assets;
- gross mismanagement in the public sector;
- a serious breach of a code of ethics established under the Act;
- an act or omission that creates a substantial and specific danger to the life, health and safety of Canadians or the environment; or
- knowingly directing or counselling a person to commit wrongdoing.

If you are aware of a possible breach of this Code, you may contact your director/manager or the Public-Sector Integrity Commissioner, at 1-866-941-6400 or <http://psic.gc.ca/>. Employees who disclose possible wrongdoing in this manner are protected from reprisal under the *Public Servants Disclosure Protection Act*.

## ENQUIRIES

Enquiries relating to this Policy should be referred to the Human Resources Manager.

## REFERENCES

- [Values and Ethics Code for the Public Sector](#)
- [TBS Policy on Conflict of Interest and Post-Employment](#)
- [Duty of Loyalty - Summary](#)
- [Policy on Communications and Federal Identity](#)
- [Policy on Harassment Prevention and Resolution](#)
- [Canadian Human Rights Commission](#)
- [Canada Labour Code](#)
- [Official Languages Act](#)
- [Collective Agreements](#)
- [Public Servants Disclosure Protection Act](#)
- [Access to Information Act](#)
- [Privacy Act](#)
- [Policy on Management of Information Technology](#)
- [Policy on Information Management](#)
- [Directive on Payments](#)



## Conflict of Interest Disclosure Form

Using this form, employees at the CDC must report, within 60 days of their first appointment, transfer or deployment, all assets and liabilities, as well as outside activities that might give rise to a conflict of interest with respect to their official duties. This form should also be used to report any real, apparent or potential conflict of interest. Whenever there is a significant change in the personal affairs or official duties of the employee, he or she must review their obligations under the *Code of ethics of the CDC and* determine whether a conflict of interest disclosure should be made.

At any point, you may contact your immediate supervisor or the CEO of the CDC for guidance.

### Nil Disclosure

Making a nil disclosure means you have considered any real, apparent or potential conflicts of interest between your private affairs and the duties and responsibilities of your current position with the Commission and you have nothing to disclose.

### Assets and Liabilities

The following is a list of examples of assets and liabilities that must be disclosed using this form if they do, or could, constitute a real, apparent or potential conflict of interest, for example, by being related to the CDC's operations or the employee's official duties. This list is not exhaustive:

- publicly traded securities of corporations and foreign governments, and self-administered Registered Retirement Savings Plans (RRSPs), and self-administered Registered Education Savings Plans (RESPs) that are composed of these securities, where these securities are held directly and not through units in mutual funds;
- interests in partnerships, proprietorships, joint ventures, private companies and family businesses, in particular those that own or control shares of public companies or that do business with the government;
- commercially operated farm businesses;
- the personal ownership, or immediate family ownership (including immediate family of the employee's spouse) of a dairy farm, whether as a hobby or commercially operated business;
- real property that is not for the private use of employees or their family members; commodities, futures and foreign currencies held or traded for speculative purposes;
- assets placed in trust or resulting from an estate of which the employee is a beneficiary;
- secured or unsecured loans granted to persons other than to members of the employee's immediate family;
- any other assets or liabilities that could give rise to a real, apparent or potential conflict of interest due to the particular nature of the employee's official duties; and
- direct and contingent liabilities in respect of any of the assets described in this section.

### Outside Activities or Employment

Employees at the CDC must disclose any outside activities that might be incompatible with their current official duties, or cast doubt on their ability to perform their official duties in an objective and impartial manner, including:

- any dairy farming activities, as a hobby or for commercial farming purposes, including the employee's personal activities or any activities of his or her immediate family members (including immediate family of his or her spouse);
- any applications for or the receipt of benefits under any grant, contribution, or any other program administered by the CDC, whether as an individual or as part of an organization that applies for or receives benefits;
- any membership on a Board of Directors as an outside activity, that is related to milk production or processing, or to food manufacturing; and
- any other outside activity or employment situation (including any offer or acceptance of employment to begin after leaving the public service) that could give rise to a real, apparent or potential conflict of interest due to the particular nature of the CDC or the employee's official duties.

Employees at the CDC must disclose any matter that could give rise to a conflict of interest, even if it does not clearly fit one of the other descriptions above. Such disclosures may include those related to:

- conflict of duties;
- conflict of interest of a friend or family member;
- post-employment opportunities, including all firm offers of employment, and acceptance of employment; and
- acceptance of a gift as part of his or her official duties.