

Policy Area	Human Resources – Employment Practices
Policy Number	HR – EP – CCEP
Effective Date	June 22, 2021
Date of Last Review	

## 1. Policy Statement

Employees are required to conduct themselves ethically and with integrity, honesty and diligence in performing their work or work-related duties.

## 2. Preamble

The Employee Code of Conduct and Ethics Policy (“Code”) is meant to provide general guidance on the standards of conduct. It addresses many areas where concerns may arise but is not designed to be comprehensive in nature.

In situations of uncertainty or confusion regarding this Code or its application, employees are encouraged to speak with their supervisor or another appropriate individual at the AMA. When in doubt, a good indicator for deciding whether you are doing the right thing is to ask the following questions: "If there was full public disclosure of the facts, would it harm or embarrass me, the AMA, my fellow employees or members of my family?" "Would others such as the AMA, physicians, stakeholders and colleagues trust my judgment if they knew I was in this situation?"

## 3. Compliance with the Law and AMA Policies

Employees shall comply with all applicable provisions of laws, regulations and AMA Policies. No employee shall commit or condone an illegal act or instruct another individual to do so. Employees must not engage in or give the appearance of being engaged in any improper conduct that is in violation of this Code.

## 4. Conflict of Interest

A conflict of interest is when an employee’s self-interest conflicts with a duty that they owe to the AMA, or where an employee owes a duty to the AMA and another entity whose interests are in conflict. A conflict of interest can be real, perceived, or potential:

- 4.1 A **real conflict of interest** occurs when an employee performs an action, makes a decision, influences a decision, or seeks to influence a decision, which **benefits** their self-interest, or which could interfere with the employee’s job duties and responsibilities.
- 4.2 A **potential conflict of interest** occurs when an employee’s action, decision, influence on a decision, or attempt to influence a decision **may benefit** their self-interest, or which could interfere with the employee’s job duties and responsibilities.
- 4.3 A **perceived conflict of interest** is a situation where there is no actual conflict, but an informed and impartial observer might **reasonably think that there is**. A perceived conflict of interest can be just as damaging to AMA as a real conflict of interest.

As an AMA employee, we are obligated and have a duty to act in the best interests of the AMA. Therefore, employees shall endeavor to proactively avoid or manage situations in which there is a real, potential or perceived conflict of interest.

Within **30 days** of an employee:

- discovering a real, potential or perceived conflict of interest
- planning to become engaged in outside business activities either related or unrelated to their work at the AMA or work pertaining to the AMA

that employee must submit the *Conflict of Interest Disclosure and Declaration Form* found on the AMA staff intranet. When completing this form, an employee is required to provide complete and accurate information. Management plans for addressing or mitigating approved conflicts of interest situations as set out in the *Conflict of Interest Disclosure and Declaration Form* must be adhered to by the employee.

Employment of relatives can be a conflict of interest. Employees must comply with this Code and the *Employment of Relatives Policy* with respect to the employment of relatives.

#### **4.1 Outside Employment, Contracts and Activities**

In general terms, employees may engage in outside employment, contracts or activities as long as they do it on their own time, use their own resources, is not detrimental to AMA or does not adversely impact upon their performance or responsibilities with AMA.

More specifically, employees are prohibited from competing with AMA.

Employees who work within an externally funded program (e.g., grant funded by Alberta Health) are further constrained from engaging in outside activities that would conflict with said funding arrangements or jeopardize the AMA's relationship with the funder.

Further, employees shall not serve as a director, officer, partner, consultant, or any other role in an unaffiliated profit-making or nonprofit organization if, in the sole discretion of the AMA, that activity is detrimental, or could be perceived to be detrimental to, the interests of the AMA.

Employees must not be involved in decisions to acquire or purchase products or services on behalf of the AMA if the employee or their immediate family members owns or controls, directly or indirectly, a material financial interest of a supplier, contractor, competitor, or any other entity.

#### **5. Confidential Information**

Employees shall at all times maintain the confidentiality of all confidential information of the AMA and must not make use of or reveal such information or records except in the course of performance of their duties or unless the information is released by the AMA for public knowledge. This obligation extends beyond the term of the employee's employment with the AMA (see AMA Staff Guide – Confidentiality of Information, for more information).

#### **6. Gifts and Entertainment**

Employees shall not accept entertainment, gifts or other benefits that are intended to influence or can reasonably be perceived or inferred by others to influence the judgment of the employee in pursuing

the best interests of the AMA. Employees should be aware that the acceptance of gifts or entertainment can be found to be a real, potential or perceived conflict of interest under this policy.

Subject to the forgoing, and as a general guideline, employees may only receive entertainment, gifts or other benefits when it is immaterial and valued at less than \$100 and only when it is lawful and ethical, occasional and infrequent, customary and consistent with accepted business norms and practices and is in support of the business of the AMA and not principally for the staff member's use or wellbeing.

On occasion, gifts may be offered in excess of \$100. In these cases, employees are required to document the situation details in a summary report and send it promptly to their Senior Manager and the Director, Human Resources. Employees are required to await instructions before taking any action. Approval to accept these gifts will only be given if it is consistent with the policy statement above and other conditions may be placed upon acceptance of a gift.

If an employee has any doubt about whether it is appropriate to accept entertainment, gifts or other benefits the employee is required to promptly notify and discuss the situation with both their Senior Manager and the Director, Human Resources before taking any action.

## **7. Use of AMA Property**

Employees are entrusted with the care and proper use of AMA assets and should not make significant use of these resources for their own personal benefit or purposes (see AMA Staff Guide – Use of Computers and Telecommunications Systems, for more information).

## **8. Respectful Workplace: Violence and Harassment Prevention**

Employees shall treat others with respect and shall avoid behaviors that are or can reasonably be construed as discrimination, harassment or bullying (see AMA Staff Guide – Respectful Workplace: Violence and Harassment Prevention, for more information).

## **9. Health and Safety**

Employees have a responsibility to act safely and to avoid creating situations that may endanger themselves or others (see AMA Staff Guide – Health and Safety, for further information).

## **10. Use of Electronic Devices While on AMA Related Business**

Employees shall not use mobile devices such as cell phones or iPads while driving on AMA-related business.

## **11. Financial Integrity**

Employees shall do their utmost to ensure that all transactions are authorized and executed in a timely fashion and in accordance with AMA policies and procedures. Further, employees shall use best efforts to ensure that all assets, liabilities and transactions are accurately and completely reported, supported by appropriate documentation and recorded and that no asset, liability or transaction is hidden or concealed from management and/or the external auditor.

## 12. Reporting Process

Employees who become aware of the behavior of another person that may damage the AMA's standing or reputation because it may be unethical, harmful, illegal, or inconsistent with the standards of conduct expressed in this policy shall immediately notify their Senior Manager and/or the Director, Human Resources.

If employees believe that such disclosure would be inappropriate or fear retribution or retaliation as a result of their reporting the matter, they may report the concern in confidence to ConfidenceLine at 1.800.661.9675 or via their website at [www.albertamedicalassociation.confidenceline.net](http://www.albertamedicalassociation.confidenceline.net). In some cases, the complainant may be required to make themselves known before an investigation can proceed. The investigation of complaints will be conducted in a timely manner, and the outcome will be made known to the complainant.

Complaints will be investigated under the direction of the Executive Director, with any complaints involving financial matters also being reported to the Chair of the Committee on Financial Audit. Complaints involving the Executive Director will be investigated under the direction of the President.

## 13. Breaches of the Code of Conduct and Ethics Policy

Employees found to have violated or breached this policy may, in addition to any civil or criminal proceedings, be subject to appropriate disciplinary procedures, including dismissal.

## 14. No Retaliation

The AMA will not permit retaliation of any kind against employees for a complaint submitted in good faith under this policy, regardless of the outcome of the investigation. However, employees who do not act in good faith or make an allegation maliciously or without having reasonable grounds may be subject to disciplinary action, including dismissal.

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### TO BE SIGNED ANNUALLY BY ALL EMPLOYEES

I ACKNOWLEDGE that I have read and understand this *Code of Conduct and Ethics Policy* and I agree to conduct myself in accordance with its provisions.

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Date

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Signature

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Print name