

Conflict of Interest

Purpose

The purpose of this policy is to provide direction in identifying and managing conflicts of interest situations involving The Manitoba Liquor and Lotteries Corporation (the Corporation).

Statements

1. The Corporation is committed to the highest levels of honesty, integrity, and impartiality in its conduct. Employees must avoid situations which might result in a conflict of interest.
2. The provisions of this policy are in addition to, and not in place of any legislation, statute, rule or statement which applies to the Corporation.
3. This policy is not intended to be a complete list of conflicts of interest. When in doubt, employees should discuss any situation which is or may result in a conflict of interest with their manager.
4. Employees must not use their position to give anyone special treatment that would advance their own interests or personal gain or that of any member of the employee's immediate family.
5. Business decisions must be based on value, quality, service, or other similar factors and what is in the best interest of the Corporation and free from conflicts of interest. Care must be taken to avoid the appearance of lack of objectivity regarding all business transactions with suppliers and the appearance of putting the Corporation in a position of obligation.
6. Employees who have a personal interest, financial or otherwise, in a business transaction with the Corporation, or have immediate family members with such interests, must not participate, advise, or represent the Corporation in such a transaction.
7. The responsibility to report any potential conflict of interest using the appropriate form rests with the employee. By declaring a potential conflict of Interest, a solution may be found to minimize the impact of the situation.

Business Interests and Outside Employment

8. Employees may not use confidential information, business contacts, corporate property or materials, or knowledge gained that is not publicly available, for personal gain. Employees may not use their position, title or the Corporation's name to advance a personal or business interest.
9. Employees may not engage in any outside work or business activities which conflict or compete with their duties as an employee, or impair their work efficiency, judgment and/or impartiality.

Policies are subject to amendment. The approved version of this document is retained by the Policy and Regulatory Compliance Office and shall be the governing version. Upon request, a copy of this policy will be provided in an accessible format.

10. Employees are restricted from having a financial or beneficial interest in private companies that are doing business with the Corporation.
 - If the employee or immediate family member of the employee has a financial or beneficial interest in a private company which does or intends to do business with the Corporation, the employee should immediately disclose the interest and seek guidance from their manager.
11. An employee may be permitted to be employed by an organization that does business with the Corporation provided that the employee has appropriately disclosed the employment to their manager and received approval from the executive responsible for the division. Approval may only be granted if the employment does not create a conflict of interest.
12. An employee shall not represent or hold themselves out as representing the Corporation when speaking/presenting in the capacity of a subject matter expert without the prior approval of the Corporation.
 - Any fee/honourarium or payment toward costs received as a result of a presentation given on an employee's personal time may be kept by the employee if the fee/honourarium is less than \$500.
 - Any fee/honourarium received as a result of a presentation given during an employee's working hours should be refused or must be turned over to the Corporation as it is deemed that the employee is representing the Corporation.
13. In accordance with The Public Service Act, board members, the President and Chief Executive Officer, executive vice-presidents, and vice-presidents shall not, without the approval of the Lieutenant Governor in Council, enter into a contract with, or accept a benefit from, the government, the Corporation, or another organization prohibited in the Public Service Act, for a period of one year following the date on which they leave their position with the Corporation.

Receiving Gifts

14. Employees shall not accept sums of money, credit, discounts, loans, or services in kind from an individual or organization that is doing business or potentially may do business with the Corporation.
15. Employees shall not accept gifts or prizes from an individual or organization that is doing business or potentially may do business with the Corporation unless the gift or prize is unsolicited and has a value of \$100 or less.
16. Employees shall not accept entertainment privileges or meals from an individual or organization that is doing business or potentially may do business with the Corporation unless the entertainment privilege or meal is for the purpose of conducting business with the Corporation or for the purposes of education related to the interests of the Corporation and has a value of \$350 or less. Meals and entertainment may require approval of the executive responsible for the Division as may be determined by that executive.

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17. Employees shall not accept travel paid for by an individual or organization doing business or potentially may do business with the Corporation unless the travel is approved in advance by: (a) the executive responsible for the division for in-province travel; or (b) the executive responsible for the division and the President & CEO for out of province travel and:
 - the travel is for business or education purposes; or
 - there is more than one unrelated individual or company at the event to be attended; or
 - the travel is being provided in respect to a contractual obligation the individual or organization has with the Corporation.
18. Notwithstanding that a gift, prize, entertainment privilege, meal, or travel may be received as permitted by this policy, Employees must consider whether such item is intended to influence, or may appear to influence, a decision by the employee on behalf of the Corporation, in which case, it must be declined.
19. Unsolicited gifts or prizes received in accordance with this policy must be reported to the employee's immediate manager.
20. If an employee receives an unsolicited gift or prize that is contrary to this policy, it must be either graciously refused, or if refusal is not possible, the Corporation's general counsel and the executive responsible for the division must be notified, who may in turn consult with the executive responsible for human resources as appropriate, to determine the appropriate course of action.

Compliance

21. Failure to comply with this policy may result in disciplinary action up to and including termination.

Definitions

Conflict of Interest – Refers to an actual or perceived situation in which private interests or personal considerations may affect an employee's judgment in acting in the best interest of the Corporation. It includes using an employee's position, confidential information or corporate time, material or facilities for private gain or advancement. A conflict of interest may also occur when corporate knowledge benefits a member of the employee's immediate family.

Immediate Family – For the purpose of this policy, immediate family is defined as spouse/partner, parent (including stepparent or in-law), child (including stepchild), guardian, sibling (including stepsiblings or in-laws), or any other members of the employee's family residing with an employee.

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References

[The Crown Corporations Governance and Accountability Act](#)

[MBLL's Code of Conduct](#)

[Conflict of Interest Declaration](#)

[The Public Service Act](#)

Executive Responsible

Vice President, General Counsel & Corporate Secretary

Applies To

All Employees

Approved

Ian Urquhart

President & CEO (Acting)

April 4, 2025

Date

Policy History

Updated On	Revisions	Approved By
April 4, 2025	Added new statement 13	President & CEO (Acting)
Aug. 16, 2023	Required review, changed statements 1,5,6,12,13,14,15, new template	President & CEO
Feb. 28, 2019	Required review, no significant changes	President & CEO
Mar. 28, 2014	Required review, restructured, revised definition, new template	President & CEO

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POLICY



Dec. 5, 2011	Required review, new purpose, revised and restructured, added \$250 threshold, added Conflict of Interest definition	President & CEO
2009	Required review, no changes, new template	President & CEO
Dec. 10, 2003	Required review, no significant changes	President & CEO
May 22, 2001	Required review, no significant changes, new template	President & CEO
June 1, 1999	New Policy	President & CEO

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