



PARKS CANADA AGENCY

# CODE OF ETHICS



Parks  
Canada

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Canada

PARKS CANADA AGENCY

# CODE OF ETHICS

Illecillewaet Glacier and Sir  
Donald Range  
Glacier National Park of Canada  
(BC), W. Lynch, 1990

Sea Anemone  
Pacific Rim National Park  
Reserve of Canada (BC), Parks  
Canada, 1981

Reconstruction of 1604-1613  
buildings, one of the earliest  
settlements in North America  
Port-Royal National Historic Site of  
Canada (NS), C. Reardon, 2003

## Bottom Landscape

- . Snowy Mountain, Mount Revelstoke National Park of Canada, Parks Canada
  - . Lake and mountains, Parks Canada
  - . Motherwell Homestead National Historic Site of Canada, Parks Canada
  - . Fortress of Louisbourg National Historic Site of Canada, Parks Canada
- . Château Frontenac National Historic Site of Canada, P. St.-Jacques, 1994
  - . Fall foliage, Parks Canada, Michael Wood, 1997
  - . Waves, Parks Canada, André Cornellier, 1991

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the Chief Executive Officer of Parks Canada (2005)

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### **Application**

This Code applies to all employees, including managers,  
working in the Parks Canada Agency.

This Code of Ethics of the Parks Canada Agency comes into  
effect on February 1, 2006.





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# CHAPTER 1

## STATEMENT OF THE PARKS CANADA AGENCY ETHICS

### *The Role of the Parks Canada Agency*

The Parks Canada Agency is an important national institution, part of the essential framework of Canadian parliamentary democracy. Through the support they provide to the duly constituted government, Parks Canada employees contribute in a fundamental way to good government, to democracy and to Canadian society.

The role of the Parks Canada Agency is to assist the Government of Canada to protect, as a first priority, the natural and cultural heritage of our special places and ensure that they remain healthy and whole; to present the beauty and significance of our natural world and to chronicle the human determination and ingenuity that have shaped our nation; to



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celebrate the legacy of visionary Canadians whose passion and knowledge have inspired the character and values of our country, and to serve Canadians. The *Constitution of Canada* and the principles of responsible government provide the foundation for Parks Canada's roles and responsibilities. The democratic mission of the Parks Canada Agency is to assist the Minister, under law, to serve the public interest.

The *Code of Ethics of the Parks Canada Agency* is a cornerstone of the Agency's organizational character. It enhances working conditions, employer/employee relations, interpersonal relationships and decision making at Parks Canada. The Chief Executive Officer expects all Parks Canada employees and managers to act in ways that support the *Code*. Actions and activities that best exemplify the *Code of Ethics of the Parks Canada Agency* will contribute to the recognition of employees within the Agency and to their personal success, as well as make Parks Canada a more rewarding place to work.



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## *Parks Canada Mandate*

The mandate of the Parks Canada Agency and its employees as per the Parks Canada Charter is:

*On behalf of the people of Canada, we protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for present and future generations.*

Doing this “on behalf of the people of Canada” entails great responsibilities. We should all be guided in our work and professional conduct by a balanced framework of democratic, professional, ethical and people qualities. This *Code* sets out the qualities expected of us by Parks Canada, which will guide us in the overall delivery of our work. It will help all Parks Canada employees to fully understand and uphold these qualities.

### *Objectives of the Code*

We all have a responsibility to keep in mind the balance between democratic, professional, ethical and people qualities as we make work-





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related decisions, to seek help when we feel that the balance may be in jeopardy, and to avoid real or perceived conflicts of interest. Managers have an additional responsibility to monitor behaviour with respect to these qualities and to assist employees in using them, as well as to monitor possible conflicts of interest. Doing so will help all of us to make informed decisions. Employees and managers who fail to respect the *Code of Ethics of the Parks Canada Agency* may be subject to disciplinary action, up to and including the termination of their employment with the Agency.

The *Code* sets out the Agency's mandate and rules of conduct concerning the Conflict of Interest and Post-Employment Measures.

The Chief Executive Officer is responsible for preserving public confidence in the integrity of management and operations of the Agency and for maintaining the tradition of political neutrality of the Government of Canada and its continuing ability to provide professional, candid and frank advice.



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**Democratic Qualities:** *Helping the Chief Executive Officer and the Minister, under law, to serve the public interest.*

- All Parks Canada employees shall give honest and impartial advice and make all information relevant to a decision available to their supervisor.
- All Parks Canada employees shall loyally implement Agency decisions, lawfully taken.
- All Parks Canada employees shall support Agency accountability, and provide their supervisor with information on the results of their work.

**Professional Qualities:** *Serving with competence, excellence, efficiency, objectivity and impartiality.*

- All Parks Canada employees must work within the laws of Canada and demonstrate political neutrality, as well as support for the agenda and objectives of the Government of Canada and the objectives of the Parks Canada Agency, as they undertake the responsibilities of their position.
- Within the scope of their authority, all Parks



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Canada employees must ensure the proper, effective and efficient use of public money.

- All Parks Canada employees must take into account that how Parks Canada's and the Government of Canada's objectives are achieved should be as important as the achievements themselves.
- All Parks Canada employees must continually improve the quality of service they provide, by adapting to changing needs, being innovative and striving to improve the efficiency and effectiveness of Parks Canada programs and services offered in both official languages.
- All Parks Canada employees must respect the confidentiality of information they have access to through their work, as required under the law.
- All Parks Canada employees must be open and honest in their dealings with the public, stakeholders and other organizations.

**Ethical Qualities:** *Acting at all times in such a way as to uphold the public trust.*

- All Parks Canada employees shall perform





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their duties and arrange their private affairs so that public trust in their integrity, objectivity and impartiality, as well as that of the Agency, is conserved and enhanced.

- All Parks Canada employees shall act at all times in a manner that will bear the closest public scrutiny.
- All Parks Canada employees shall, in fulfilling their official duties and responsibilities, make decisions in the public interest. If a conflict should arise between their private interests and their official duties, employees will resolve the conflict in favour of the public interest.
- All Parks Canada employees shall report, within 60 days of being appointed to their first position at Parks Canada, and within 60 days of any subsequent appointment, transfer, promotion or deployment within the Agency, all outside activities, assets, and direct or contingent liabilities that may result in a conflict of interest with respect to their official duties.
- All Parks Canada employees shall treat public property with care and respect, recognizing that it belongs to the people of Canada.



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**People Qualities:** *Demonstrating respect, fairness and courtesy in dealings with both citizens and colleagues, and recognizing that people who are treated with fairness and civility will be motivated to display these qualities in their own conduct.*

- Employees should always place respect for human dignity first in the exercise of authority and responsibility, in their dealings with the public as well as with their colleagues.
- In any circumstance where employees are placed in a leadership role, they should lead through participation, openness and communication and with respect for diversity and for the official languages of Canada.

**Overall:**

All the activities connected to each employee's and manager's work should be consistent with the *Code of Ethics of the Parks Canada Agency*. If employees and managers have questions about how and when the *Code* applies, they should ask their supervisor for guidance.



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## *Application*

This *Code* applies to all employees and managers working in the Parks Canada Agency.

## *Responsibilities, Authorities and Accountabilities*

### **Responsibilities of all Parks Canada Employees**

This *Code* forms part of the conditions of employment in the Parks Canada Agency. At the time of signing their letter of offer, all Parks Canada employees acknowledge that the *Code of Ethics of the Parks Canada Agency* is a condition of employment. All Parks Canada employees are responsible for ensuring that they comply with this *Code*.

All Parks Canada employees must also be aware of and observe the statutes governing the Parks Canada Agency and their profession, where applicable.

When negotiating financial arrangements with outside parties, employees must ensure



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compliance with the Conflict of Interest and Post-Employment Measures in accordance with directives on this matter issued by the Treasury Board. When in doubt, they must immediately report the situation to their supervisors in order to seek advice or direction on how to proceed.

When an employee faced with an ethical dilemma is in need of assistance with a particular issue or has knowledge of wrongdoing in the workplace, the employee is encouraged to seek the guidance from his/her immediate supervisor or manager, or the Field Unit Superintendent or Director General. They may also refer to the *Policy on the Internal Disclosure of Information Concerning Wrongdoing in the Workplace*.

In cases where an employee does not feel comfortable in pursuing this reporting relationship, the employee may bring the issue to the attention of the Ombudsman, to raise, discuss and resolve issues of concern related to this *Code*. The Ombudsman is also the designated officer in the Parks Canada Agency serving as the Senior Integrity Officer and the Senior Values and Ethics official.



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All Parks Canada employees who feel they are being asked to act in a way that is inconsistent with the qualities set out in this chapter are encouraged to raise the matter first using the usual reporting relationship. Should this fail to resolve the issue, the matter may be brought to the attention of the Ombudsman. Further avenues for resolution are contained in Chapter 4 of this *Code*.

### **Responsibilities of Parks Canada Managers**

Managers have a particular responsibility to exemplify, in their actions and behaviour, the qualities set out in this chapter. They have a duty to infuse these qualities into all aspects of the work of sectors in the Agency under their responsibility. It is expected that they will take special care to ensure that they comply at all times with both the spirit and the specific requirements of this *Code*.

Managers have an additional responsibility to monitor behaviour with respect to these qualities and to assist employees in using them, as well as to monitor possible conflicts of interest. Doing so will help all of us to make informed decisions.





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## The Chief Executive Officer

The Chief Executive Officer may delegate responsibilities and authorities for the implementation of this *Code*.

## *Ombudsman*

At Parks Canada, the Ombudsman is accountable to the Chief Executive Officer.

The role of the Ombudsman is to provide employees with informal and confidential support. He/she is a person with whom employees can raise their concerns and problems. He/she will attempt to help employees resolve their issues.

The Ombudsman at Parks Canada is also the Senior Integrity Officer and Senior Values and Ethics official. In these capacities, his/her role is to receive, record and review disclosures of wrongdoing in the workplace, including breaches of the *Code*, and to make recommendations where warranted to the Chief Executive Officer for resolution. Further, the Senior Integrity Officer may report on any cases



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dealing with breaches of the *Code* as part of his or her annual report. The Senior Values and Ethics official fosters and sustains dialogue on values and ethics, provides informal advice and guidance on ethical dilemmas, conflict of interest and the application of the *Code of Ethics of the Parks Canada Agency*, and provides advice and guidance on the development of policies and directives.

### **Effective Date**

The effective date of the *Code of Ethics of the Parks Canada Agency* is February 1, 2006.



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# CHAPTER 2

## CONFLICT OF INTEREST MEASURES

### *Objective*

The objective of these measures is to establish rules of conduct respecting conflict of interest and to minimize the possibility of conflicts arising between private interests and public service duties of Parks Canada employees and managers.

### *Measures to Prevent Conflict of Interest*

Avoiding and preventing situations that could give rise to a conflict of interest, or the appearance of a conflict of interest, is one of the primary means by which a Parks Canada employee maintains public confidence in the impartiality and objectivity of the Parks Canada Agency.



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Conflict of interest does not relate exclusively to matters concerning financial transactions and the transfer of economic benefit. While financial activity is important, it is not the sole source of potential conflict of interest situations.

*All Parks Canada employees have the following overall responsibilities:*

- a) In carrying out their official duties, all Parks Canada employees should arrange their private affairs in a manner that will prevent real, apparent or potential conflicts of interest from arising.
- b) They should not have private interests, other than those permitted pursuant to these measures, that would be affected particularly or significantly by government actions in which they participate.
- c) They should not solicit or accept transfers of economic benefit.
- d) They should not step out of their official roles to assist private entities or persons in their dealings with the government where this would result in preferential treatment to the entities or persons.



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- e) They should not knowingly take advantage of, or benefit from, information that is obtained in the course of their official duties and that is not generally available to the public.
  - f) They should not directly or indirectly use, or allow the use of, government property of any kind, including property leased to the government, for anything other than officially approved activities.
  - g) If a conflict does arise between the private interests and the official duties of an employee, the conflict should be resolved in favour of the public interest.

### *Methods of Compliance*

For a Parks Canada employee to comply with these measures, it will usually be sufficient to submit a Code of Ethics Report to the Human Resources Manager. Upon receipt of such Code of Ethics Report, the Human Resources Manager will assess whether or not a potential conflict of interest exists. The Code of Ethics Report outlines the Parks Canada employee's ownership of assets, receipt of gifts, hospitality or other benefits, or participation in any outside



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employment or activities that could give rise to a conflict of interest.

Without limiting the generality of the foregoing, all Parks Canada employees have the following obligations:

- a) They must report, within 60 days of their first appointment or any subsequent appointment, transfer or deployment, all outside activities, assets, and direct and contingent liabilities that might give rise to a conflict of interest with respect to their official duties. To this end, a Code of Ethics Report must be filed with the Human Resources Manager.
- b) Every time a major change occurs in the personal affairs or official duties of all Parks Canada employees, they must review their obligations under this *Code*. If a real, apparent or potential conflict of interest exists, they must file a new Code of Ethics Report with the Human Resources Manager.

There will be instances, however, where other measures will be necessary. These include the following:



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- a) avoiding or withdrawing from activities or situations that would place the employee in real, potential or apparent conflict of interest with his/her official duties; and
  - b) having an asset sold at arm's length or placed in a blind trust where continued ownership would constitute a real, apparent or potential conflict of interest with the employee's official duties.

If the employee and his/her supervisor cannot reach an agreement on how to resolve the apparent conflict of interest, the Ombudsman should be contacted and will make recommendations to the Chief Executive Officer, who will make the decision and communicate it to the employee. In determining appropriate action, the Chief Executive Officer will try to achieve mutual agreement with the employee in question and will take into account such factors as:

- a) the employee's specific responsibilities;
- b) the value and types of assets and interests involved; and
- c) the actual costs to be incurred by divesting



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the assets and interests, as opposed to the potential that the assets and interests represent for a conflict of interest.

### *Assets*

The types of assets and interests that should be included in a Code of Ethics Report, those that need not be declared, as well as procedures for divesting assets are set out in Appendix A.

It is to be noted that a Parks Canada employee may not sell or transfer assets to family members or others for purposes of circumventing the compliance measures.

### *Outside Employment or Activities*

All Parks Canada employees may engage in employment outside the Agency and take part in outside activities unless the employment or activities are likely to give rise to a conflict of interest or in any way undermine the neutrality, or the appearance of neutrality of the Agency.

Where outside employment or activities might subject Parks Canada employees to demands





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incompatible with their official duties, or cast doubt on their ability to perform their duties in a completely objective manner, they shall submit a Code of Ethics Report to their Human Resources Manager, who will assess whether or not a potential conflict of interest may exist. Where further review is required, the Ombudsman may be consulted. The Ombudsman in his/her role as Senior Integrity Officer may recommend to the Chief Executive Officer that the outside activities be curtailed, modified or terminated if it is determined that real, apparent or potential conflict of interest exists.

### *Gifts, Hospitality and Other Benefits*

All Parks Canada employees are called upon to use their best judgement to avoid situations of real or perceived conflict. In doing so, all Parks Canada employees should consider the following criteria on gifts, hospitality and other benefits, keeping in mind the full context of this *Code*.

All Parks Canada employees shall not accept or solicit any gifts, hospitality or other benefits that may have a real or apparent influence on their



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objectivity in carrying out their official duties or that may place them under obligation to the donor. This includes free or discounted admission to sporting and cultural events arising out of an actual or potential business relationship directly related to the Parks Canada employee's official duties.

The acceptance of gifts, hospitality and other benefits is permissible if they:

- a) are infrequent and of minimal value (low-cost promotional objects, simple meals, souvenirs with no cash value);
- b) arise out of activities or events related to the official duties of the Parks Canada employee concerned;
- c) are within the normal standards of courtesy, hospitality or protocol; and
- d) do not compromise or appear to compromise in any way the integrity of the Parks Canada employee concerned or his/her organization.

Where it is impossible to decline gifts, hospitality and other benefits that do not meet the principles set out above, or where it is



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believed that there is sufficient benefit to the organization to warrant acceptance of certain types of hospitality, a Parks Canada employee shall seek written direction from his/her Director General. The Director General will then notify the Parks Canada employee in writing whether the gifts, hospitality and other benefits are to be declined or retained by the Agency, donated to charity, disposed of, or retained by the Parks Canada employee concerned.

### *Solicitation*

At no time should Parks Canada employees 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.

In the case of fundraising for charitable organizations, all Parks Canada employees should ensure that they have prior authorization from their Director General to solicit donations, prizes or contributions in kind from external organizations or individuals. The Director General may require that the activities be curtailed, modified or terminated where it is



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determined that there is a real or apparent conflict of interest or an obligation to the donor.

### *Avoidance of Preferential Treatment*

When participating in any decision making related to a staffing process, all Parks Canada employees shall ensure that they do not grant preferential treatment or assistance to family or friends. Employees should not sit on selection boards or otherwise participate in hiring processes involving family or close friends.

When making decisions that will result in a financial award to an external party, all Parks Canada employees shall not grant preferential treatment or assistance to family or friends.

All Parks Canada employees should not offer any assistance to entities or persons that have dealings with the Agency or otherwise with the government, where this assistance is not part of their official duties, without obtaining prior authorization from their designated superior and complying with the conditions for that authorization.



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Providing information that is easily accessible to the public to relatives or friends or to entities in which Parks Canada employees or their family members or friends have interest is not considered preferential treatment.



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# CHAPTER 3

## POST-EMPLOYMENT MEASURES

### *Objective*

The objective of these measures is to establish rules of conduct regarding post employment.

### *Overall Responsibility*

Without unduly restricting their ability to seek other employment, former Parks Canada employees should undertake to minimize the possibility of real, apparent or potential conflicts of interest between their new employment and their most recent responsibilities within the Agency. Before leaving employment, all Parks Canada employees should disclose their intention of future employment and discuss potential conflicts with their supervisor.



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## *Application*

The overall responsibility cited above applies to all Parks Canada employees covered by the *Code*.

The measures that follow apply specifically to those Parks Canada employees staffed in Parks Canada executive positions (PCX) or their equivalents as well as PCX minus 1 and PCX minus 2 positions and their equivalents.

The Chief Executive Officer may designate other positions as being subject to these measures (where the position involves official duties that raise post-employment concerns), or exclude positions from the application of the post-employment measures (when the official duties of these positions do not raise concerns for post employment). Before doing this, the Chief Executive Officer must consult the appropriate bargaining agent, if applicable.

## *Before Leaving Office*

Parks Canada employees must disclose, in a Code of Ethics Report to their Human Resources Manager, all firm offers of



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employment that could place them in a real, apparent or potential conflict of interest situation. They must also immediately disclose the acceptance of any such offer.

### *Limitation Period*

Former Parks Canada employees shall not, within a period of one year after leaving office:

- a) accept appointment to a board of directors of, or employment with, entities with which they personally, or through their subordinates, had significant official dealings during the period of one year immediately prior to the termination of their service;
- b) make representations for, or on behalf of, persons to any department, agency or organization with which they personally, or through their subordinates, had significant official dealings during the period of one year immediately prior to the termination of their service; or
- c) give advice to their clients using information that is not available to the public concerning the programs or policies of the Agency, departments or organizations with which





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they were employed or with which they had a direct and substantial relationship.

### *Reduction of Limitation Period*

The Chief Executive Officer has the authority to reduce or waive the limitation period of employment for a Parks Canada employee or former Parks Canada employee. Such a decision should take into consideration the following:

- a) the circumstances under which the termination of their service occurred;
- b) the general employment prospects of the Parks Canada employee or former Parks Canada employee;
- c) the significance to the government of information possessed by the Parks Canada employee or former Parks Canada employee by virtue of that individual's position in the Parks Canada Agency;
- d) the desirability of a rapid transfer of the Parks Canada employee's or former Parks Canada employee's knowledge and skills from the government to private, other governmental or non-governmental sectors;



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- e) the degree to which the new employer might gain unfair commercial or private advantage by hiring the Parks Canada employee or former Parks Canada employee; and
  - f) the authority and influence possessed while at the Parks Canada Agency, and the disposition of other cases.

A decision by the Chief Executive Officer to waive or reduce the limitation period will be recorded in writing.

### *Exit Arrangements*

The Chief Executive Officer must ensure that a Parks Canada employee who is intending to leave the Parks Canada Agency is aware of these post-employment measures.

### *Reconsideration*

A Parks Canada employee or former Parks Canada employee may apply to the Chief Executive Officer for reconsideration of any determination regarding his/her compliance with the post-employment measures.



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# CHAPTER 4

## AVENUES OF RESOLUTION

### *Resolution of Ethical Dilemmas*

Any Parks Canada employee who wants to raise, discuss and clarify issues related to this *Code* should first talk with the appropriate manager in his/her chain of command or contact the Ombudsman designated by the Chief Executive Officer under the provisions of this *Code*.

Any Parks Canada employee who witnesses or has knowledge of wrongdoing in the workplace may refer the matter for resolution, in confidence and without fear of reprisal, to the Ombudsman who is the designated officer in the Parks Canada Agency, serving as the Senior Integrity Officer and the Senior Values and Ethics official. Employees may also refer to the *Policy on the Internal Disclosure of Information Concerning Wrongdoing in the Workplace*.



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Furthermore, any Parks Canada employee who believes that he or she is being asked to act in a way that is inconsistent with the qualities and ethics set out in this *Code* can report the matter in confidence and without fear of reprisal to the appropriate manager in his/her chain of command or to the Ombudsman, as described above.

It is expected that most matters arising from the application of this Code can and should be resolved at the working unit level.

### *Measures on Conflict of Interest and Post Employment*

With respect to the appropriate arrangements necessary to prevent conflict of interest or to comply with the post-employment measures described in Chapters 2 and 3 of this *Code*, it is expected that most situations will be addressed by discussing the matter with the Parks Canada employee, identifying avenues of resolution and taking appropriate action. When a Parks Canada employee and the supervisor, manager, or Director General disagree on the appropriate arrangements to prevent conflict of interest or to



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comply with the post-employment measures in this *Code*, the disagreement shall be resolved through the Ombudsman.

### *Failure to Comply*

A Parks Canada employee who does not comply with the requirements of this *Code* is subject to appropriate disciplinary action, up to and including termination of employment.

### *Form*

#### **Code of Ethics Report**

This form can be accessed through the Parks Canada intranet, in the *Human Resources* section.



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# APPENDIX **A**

## ASSETS, LIABILITIES AND TRUSTS

### *Assets and Liabilities Subject to a Code of Ethics Report*

All Parks Canada employees must carefully evaluate on a regular basis whether their assets and liabilities need to be included in a Code of Ethics Report. In doing so, they must take into consideration the nature of their official duties and the characteristics of their assets and liabilities. If there is any real, apparent or potential conflict between the carrying out of their official duties and their assets and liabilities, a Code of Ethics Report must be filed. If there is no relationship, no report is required.

The following is a **non-exhaustive** list of examples of assets and liabilities that must be reported in a Code of Ethics Report if they do,



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or could, constitute a conflict of interest:

- a) 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;
- b) 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;
- c) commercially operated farm businesses;
- d) real property that is not for the private use of Parks Canada employees or their family members;
- e) commodities, futures and foreign currencies held or traded for speculative purposes;
- f) assets placed in trust or resulting from an estate of which the Parks Canada employee is a beneficiary;
- g) secured or unsecured loans granted to persons other than to members of the Parks Canada employee's immediate family;



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- h) 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 Parks Canada employee's official duties; and
  - i) direct and contingent liabilities with respect to any of the assets described in this section.

### *Assets Not Requiring a Code of Ethics Report*

Assets and interests for the private use of Parks Canada employees and of their family members, as well as non-commercial assets, are **not** subject to the compliance measures.

For example, such assets include the following:

- a) residences, recreational properties and farms used or intended for use by Parks Canada employees or their families;
- b) household goods and personal effects;
- c) works of art, antiques and collectibles;
- d) automobiles and other personal means of transportation;
- e) cash and deposits;
- f) Canada Saving Bonds and other similar





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investments in securities of fixed value issued or guaranteed by any level of government in Canada or agencies of those governments;

- g) registered retirement savings plans and registered education savings plans that are not self-administered;
- h) investments in open-ended mutual funds;
- i) guaranteed investment certificates and similar financial instruments;
- j) annuities and life insurance policies;
- k) pension rights;
- l) money owed by a previous employer, client or partnership; and
- m) personal loans receivable from members of Parks Canada employees' immediate families and small personal loans receivable from other persons where Parks Canada employees have loaned the moneys receivable.

### *Divestment of Assets*

All Parks Canada employees must divest assets where the Chief Executive Officer determines



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that such assets constitute a real, apparent or potential conflict of interest in relation to their duties and responsibilities. Divestment, where required, must take place within 120 days of appointment, transfer or deployment. Divestment of assets is usually achieved by selling them through an arm's-length transaction or by making them subject to a blind trust arrangement.

Where divestment is by means of sale, confirmation of the sale, such as a broker's sales receipt, shall be provided to the Chief Executive Officer.

Where divestment is by means of a blind trust, the Senior Integrity Officer will assist and guide the Chief Executive Officer and the Parks Canada employee in setting up a blind trust and in determining whether a specific blind trust meets the requirements of the Conflict of Interest Measures. The Senior Integrity Officer will also make recommendations to the Chief Executive Officer on the reimbursement of certain trust costs to the Parks Canada employee by the home organization.



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**Managers should remember that they have a continuing responsibility to provide current print material to employees who do not have access to the intranet.**