

Pabineau First Nation Code of Conduct

Effective Date: This Code of Conduct comes into effect on October 9 , 2009 as authorized by Band Council Resolution.

1 Purpose

The purpose of this Code of Conduct (the “Code”) is to formally set out the standard of professional conduct which the Pabineau First Nation (the “First Nation”) expects of all of those bound by this Code’s provisions.

The First Nation requires that all those individuals bound by this Code conduct themselves in accordance with traditional Mi’gmag values and the highest standards of professionalism, honesty, fairness, respect for others, and respect for the First Nation’s property and assets.

2 Application and Scope

The provisions of this Code of Conduct apply to the First Nation’s:

- Chief and Councillors,
- employees,
- contract employees,
- independent contractors,
- students, and
- volunteers.

While this Code refers to a range of unethical behaviour, it may not describe every action or inaction which constitute unethical conduct. If a particular set of circumstances is not described in this Code, no one should assume that the conduct is ethically acceptable.

Should anyone be in doubt as to whether any action, inaction or behaviour is ethical he or she should seek guidance from the Band Manager prior to engaging in that behaviour or conduct.

Existing employees and each new employee, contractors, students and volunteers will be given a copy of this Code. A copy of the Code will be posted at the First Nation's Administration office.

Please refer to the following Pabineau documents which complement this Code:

1. The Discrimination and Harassment Policy;
2. The Privacy and Protection of Personal Information Policy; and
3. Employee Confidentiality and Non-Disclosure Agreements

3 Acting in the Best Interest of the First Nation

All those to whom this Code applies should act in the best interests of the First Nation at all times. Those people should act in a manner which inspires confidence and trust and which reflects integrity, respect and professionalism for Pabineau in its dealings within and outside the First Nation. This is especially so for dealings with:

- Pabineau members;
- Other First Nation members or representatives;
- Crown representatives or agents (federal, provincial or municipal);
- Industry and business entities;
- Pabineau contractors and suppliers.

4 Confidentiality

All those to whom this Code applies should not disclose, either directly or indirectly, any information which they learned as a result of their working relationship with the First Nation to any person not authorized by Pabineau to

receive that information, including any corporate person. Examples of confidential information include: paper or electronic documents, e-mail messages, information received orally, knowledge as to plans and strategies of the First Nation, and, any personal information about Pabineau members, employees, contractors and suppliers.

All such information must be kept completely confidential, during the individual's working relationship with the First Nation and after that relationship has ended.

All First Nation employees shall sign a Confidentiality and Non-Disclosure Agreement.

5 Conflicts of Interest

No person should engage in any conduct which furthers his or her personal interests, or the personal interests of his or her friends and relatives, to the detriment of the First Nation's interests. Examples of such conflicts of interest could arise in the hiring or firing of employees, in the awarding of contracts and in financial matters of various kinds.

Not only should actual conflicts of interest be avoided, but so should situations which could give the appearance of a conflict of interest.

The best way to avoid inadvertent conflicts of interest is to disclose them to the Band Manager as soon as you become aware of facts and circumstances which could lead to an actual or perceived conflict between your personal interests and the interests of the First Nation.

6 Handling Cash and Other First Nation Assets and Resources

You should always be aware that when you handle or deal with funds, whether cash, cheques, bank drafts, credit cards or otherwise, as part of your work with the First Nation, you do so in trust for Pabineau.

Not only should you not take any such funds for your own personal gain, you must not borrow any such funds, even if you have the full intention of paying the funds back to Pabineau.

In all of your handling and dealing with funds of the First Nation you should do so in a transparent, accurate and completely accountable fashion.

You should never mix your personal assets or funds with those of the First Nation.

7 Reputation of the First Nation

You should remember that at all times your private actions may adversely affect the reputation of Pabineau and you should govern yourself accordingly.

8 Criminal Code

You should not engage in, or involve or assist others to engage in any activity which constitutes a breach of the *Criminal Code* of Canada, whether such activity is carried out on Pabineau lands or elsewhere. Such activities include theft, fraud, improper handling of funds, forgery or falsification of documents.