



CODE OF BUSINESS CONDUCT

April 2022



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MESSAGE FROM THE PRESIDENT & CEO

Hi team,

The work you do every day helps make life better for people across Ontario. OLG generates important non-tax revenue for the Province, by providing world-class gaming entertainment and lottery products to adult Ontarians in a responsible way. This revenue funds provincial priorities, and plays a vital role in contributing to job creation and economic growth in communities big and small.

The ability to deliver on our mandate depends on public confidence in the OLG brand. Establishing and maintaining trust with Ontarians is essential as OLG responds to challenges and engages customers in an increasingly competitive marketplace. We build trust by conducting and managing our business with the highest level of integrity, protection of personal privacy, promoting diverse perspectives across our organization and taking an inspired approach to social responsibility in everything we do.

As the Ethics Executive for all employees, I rely on each of you to uphold a strong, values-based culture by abiding by the standards of ethical conduct that are laid out in OLG's Code of Business Conduct. The Code also outlines our responsibility to act professionally while upholding the public oath of office we take as public servants.

The Code is designed to help us make the right decisions in all business situations in which ethical issues arise. It also provides guidance on how to seek assistance if you believe a breach of the Code has occurred. Holding each other accountable in good faith is an obligation we all embrace to contribute to making OLG a fair and equitable place to work.

I am proud to lead a team of people who strive to protect and build upon OLG's reputation by living our values of Respect, Integrity, Stewardship and Excellence. Thank you for joining me in attesting to this important commitment and for respecting and following the values of the Code.

Warm regards,

Duncan Hannay
President and Chief Executive Officer



PURPOSE

OLG's Code of Business Conduct (the "Code") sets out principles-based guidance on the standards of ethical conduct that everyone at OLG is expected to meet. The Code anchors our values, empowers us to do the right thing in every situation and trusts us to uphold its principles in our expectations of one another. It is designed to promote a culture of integrity, serves to protect our reputation, and preserve our mandate.

The Code is a reference concerning OLG's standards of professionalism intended to assist us to discharge our responsibilities:

- faithfully to our [public service oath/affirmation](#) which confirms our duty of loyalty to OLG, duty to comply with all laws, and obligation to maintain confidentiality;
- honestly and in good faith in all OLG and related business and regulatory dealings and relationships; and
- exemplifying OLG's values of respect, integrity, stewardship and excellence.

APPLICATION AND SCOPE

The Code applies to all employees and Board members of OLG. The Code includes a description of how conflict of interest rules made pursuant to the *Public Service of Ontario Act, 2006*, apply to current and former employees and Board members.

The Code is based on generally accepted standards of ethical business conduct and applicable laws. While it cannot cover every circumstance and aspect of ethical conduct, the Code is designed, through its Guiding Principles, to help us make the right decisions, consistent with the purpose and spirit of the Code, in all situations in which ethical issues arise. The Code is regularly reviewed by OLG senior management. OLG will provide notice of any updates or changes to the Code's terms.

Following the Code

When we follow the Code, we strengthen the public trust and contribute to making OLG a success and a great place to work.

We must read and understand the Code, as well as the corporate and operational policies and procedures that support it, as they apply to our positions. Together, they help us do our jobs effectively, ethically and in compliance with applicable law.

To the extent that any OLG policy or procedure is inconsistent with the Code, the Code takes precedence.

We must complete OLG's annual attestation to certify that we have received, read and understood the Code and will comply with the Code.



Getting Help and Reporting Breaches

Ethical situations can have serious implications for us and for OLG. We are not expected to deal with them on our own. We are encouraged to seek guidance or support. We may consult with our managers, Human Resources, Legal and Corporate Compliance groups, the Ethics Executive (in regards to conflicts of interest related matters), or communicate confidentially through [Integrity Matters](#). All inquiries and reports are treated with discretion.

We all have an obligation to report any breach or suspected breach of the Code. We do not have to be certain of a violation before reporting any breach or suspected breach of the Code, but any report must be made in good faith. Under OLG's policy on [Disclosure of Wrongdoing](#), OLG provides protection from reprisals for reports of wrongdoing made in good faith. Retaliation against someone who raises an issue concerning the Code also violates the Code. For OLG to be fair and accountable, everyone must be able to voice genuine concerns without fear.

Code Violations

Violating the Code, which may include breaches of OLG's policies and procedures or the failure to cooperate with a breach investigation, damages OLG's reputation and exposes our organization to serious risks. OLG does not condone Code violations and holds employees accountable for such breaches through corrective action ranging from training, to counselling to termination of employment. OLG may also refer the matter to the appropriate regulatory authorities and/or take legal action.



REQUIREMENTS

Our Guiding Principles

1. *Act With Integrity.* Our reputation for **Integrity** is what grounds the credibility of our brand.

We believe in doing the right thing. We do what we say and live up to high standards of fairness and ethical behaviour. We cultivate public trust and confidence in OLG and our products and services which is essential for our ongoing success and ability to deliver benefits to the Province. We show the people of Ontario that we are placing their interests first by running our operations openly and honestly, dealing with our regulators transparently, ensuring the integrity of our games, and structuring our policies, programs and procedures to foster a culture of employee and supplier integrity.

1.1 Transparency of Dealings with Regulators and Auditors

In all dealings with OLG's regulators, (including the Alcohol and Gaming Commission of Ontario (AGCO), the Information and Privacy Commissioner of Ontario (IPCO), and the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)), or with Internal and External Auditors, we are expected (subject to legal privilege and applicable law) to:

- engage and communicate in an honest, transparent and professional manner;
- cooperate fully in connection with any audit or other regulatory assurance activity;
- fully and truthfully make any data, information and documents available that are requested by authorized parties acting reasonably in the performance of their duties;
- report to the regulator in the appropriate manner whenever required, including regarding any public complaints related to compliance with the AGCO Registrar's Standards and Requirements; and
- bring forward any questions or concerns regarding transparency to our managers, Human Resources, Legal or Corporate Compliance.

1.2 Honest Business Relationships

We expect everyone to embrace honest and open relations with employees, customers, suppliers, and communities by:

- establishing honest dealings in all relationships and expecting the same of those with whom we have business relationships;
- maintaining high standards in dealing with customers, suppliers and employees, with due regard to OLG's ethical values and the interests of the community at large in all the organization's endeavours;



- dealing with suppliers objectively and in the best interests of OLG; and
- engaging in the procurement process and entering contracts or other formal arrangements with suppliers only through the approved procedures and with required business, finance and legal approvals.

1.3 Game Integrity

To maintain fair, transparent, secure and trustworthy games and services, we are expected to:

- ensure that OLG's businesses are conducted, managed and operated in accordance with the approved rules of play and standards and requirements prescribed by the regulations or established by the AGCO Registrar;
- ensure that those involved in our games treat players and market to them fairly and honestly; and
- promptly raise any issues or concerns regarding the integrity and security of our games and services or their delivery to our managers or Corporate Compliance.

1.4 Accurate Records

Maintaining accurate business records is a fundamental way that we maintain our integrity and protect OLG and its stakeholders. We must prepare and maintain accurate and complete records, including financial, accounting, research and expense reports. Expenses claimed must be in accordance with OLG's [Travel, Meal & Hospitality Expenses](#) policy. We must never participate in the creation of a false or misleading record, or the destruction of records other than in accordance with authorized practices regarding record retention.

1.5 Disclosure to OLG

During our employment with OLG, we are expected to advise our managers or Human Resources immediately of information that may impact the eligibility to hold our positions. Such information includes the loss or restriction of any required professional designations, any charges and convictions for criminal offences or outstanding civil actions alleging fraud or theft. For some employees the situation will also have to be reported to regulators.

Minor motor vehicle-related offences (e.g. speeding) do not have to be reported to OLG. If we are unsure whether a charge, conviction, or civil action should be reported, we should discuss the situation with our managers or Human Resources.



2. *Protect Privacy and Assets:* We respect the [Privacy](#) of our customers' and employees' personal information and we work to safeguard the [Security of Information](#) entrusted to us.

We meet the expectations of our stakeholders and colleagues by being vigilant and protecting OLG's information and other assets from improper use or disclosure. We follow our policies and procedures to ensure the appropriate use, retention, and security of records, data, systems, property and information that OLG owns, controls, creates, collects, uses and manages, in all forms. We appreciate that proper management and security of information, systems and property sustains public confidence in the integrity of our products and services.

2.1 Protect the Privacy of Personal Information

OLG and its Service Providers collect personal information about customers and employees in the normal course of business activity. In doing so, OLG is required to comply with the requirement to protect personal privacy established under Ontario's *Freedom of Information and Protection of Privacy Act* (FIPPA). FIPPA's provisions govern collection, access, use, disclosure, security and disposal of personal information. To adhere to FIPPA, we must safeguard personal information in accordance with OLG's privacy management program under OLG's policies, including the [Protection of Privacy Policy](#).

Access to personal information must be restricted to authorized personnel who need it to carry out their responsibilities. We may not seek out or collect personal information unless necessary to fulfill our duties with OLG and we are authorized to do so. If we believe that personal information may have been disclosed without authorization or in error, including cases where an OLG system, database or other technology containing personal information may have been compromised, we must report it immediately pursuant to the Privacy Breach Response Protocol under OLG's Protection of Privacy Policy.

As set out in OLG's [Acceptable Use of Information Technology Resources](#) policy, OLG monitors its systems and applications that store and transmit information (servers, networks, email, etc.), and reserves the right to intercept and review personal information, to investigate potential violations of OLG policy or the law.

2.2 Protect Information

We have an obligation to protect the information that belongs to OLG including information relating to our business and affairs that must not be disclosed except to the extent required in the performance of our employment or if authorized by law, OLG or the Crown, including:

- proprietary information known or used by OLG in connection with its business or technology that is not known to the general public, including know-how, trade secrets, intellectual property, technical information, business plans, procurement, customer information, financial information, gaming information, training and



operating procedures, promotional and other strategies, and research and development;

- records that provide evidence of a corporate decision, transaction, or business activity at OLG in any format or on any media, pursuant to retention requirements in OLG's [Enterprise Documents & Record Management](#) policy and [Records Classification Scheme](#) and [Retention Schedule](#); and
- human resources and employee information.

We also have an obligation to keep information relating to third parties confidential, including:

- intellectual property of third parties we deal with that should not be disclosed without OLG's authorization and the consent of the party holding the rights to it; and
- confidential and proprietary information of our past employers.

To prevent inappropriate disclosure of OLG's confidential information to other employees, we should limit access to confidential information to those employees who need to know the information to perform their jobs, not leave confidential documents where they can be seen or taken, lock our filing cabinets and drawers, secure our computers and mobile devices with passwords, and shred or otherwise properly dispose of documents. We may never seek out or collect confidential information unless it is necessary to fulfill our duties with OLG and we are authorized to do so.

Records in OLG's custody or control, including those created by us, may also be subject to an access to information under FIPPA. If requested, we are required to provide them to the Freedom of Information (FOI) Office for OLG's response to the request in accordance with FIPPA.

2.3 Protect Assets

We have an obligation to protect the corporate physical, electronic/technology assets that belong to OLG, including by:

- exercising reasonable safeguards to prevent theft, damage or fraud; and
- using OLG's property in the interests of OLG, in a manner that does not expose OLG to security risks, and in compliance with OLG's [Acceptable Use of Information Technology Resources](#) policy.

We should promptly raise any issues or concerns regarding breaches of confidentiality and security of information or other assets, including any unintentional disclosure of information, to our managers, Legal or Corporate Compliance groups.

2.4 Public Statements and Social Media

OLG information may only be shared publicly through authorized personnel in our Corporate Affairs department. Any inquiries from the media should be referred to this department. We are not absolved of this requirement by indicating that we are providing personal views that do not represent OLG. We must obtain pre-approval to share our



information publicly, including for the purposes of external speeches, presentations or articles.

To prevent inappropriate disclosure of confidential information in our external communications, including in public places and online communities, we should not refer to or disclose non-public OLG related information and we should comply with OLG's policy on [Employee Use of Social Media](#).

3. *Promote Diverse Perspectives:* To innovate and evolve our business we seek [Diversity](#) in the people, ideas and points of view in our workforce.

Diversity and inclusion are essential elements of our culture. We treat all individuals inside and outside the organization with respect and dignity and appreciate our differences. We recognize the benefits of diversity across the organization that help us improve and innovate and create a welcoming environment where our unique perspectives can be shared. We respect and support the communities where we work, live and serve. We work to earn and maintain the respect of our colleagues, our customers, our shareholder, and the people of Ontario.

3.1 Professional Conduct

We are expected to behave respectfully with everyone by keeping our workplace relationships free from discrimination or harassment based on:

- prohibited grounds under human rights legislation including race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy and breastfeeding), sexual orientation, gender identity, gender expression, age, marital status (including single status), family status or disability; and
- other personal characteristics or circumstances.

We are also expected to maintain our workplace environment free from unwelcome advances or solicitation. We cannot engage in sexual solicitation or advances which are known or ought reasonably be known to be unwelcome, including when in a position to confer, grant or deny a benefit or advancement to the person subject to the advances or solicitation. We also cannot engage in reprisal or make a threat of reprisal for the rejection of a sexual solicitation or advance.

These standards apply to our conduct within the workplace, in outside work-related settings, social or recreational activities involving OLG employees, and in connection with personal use of social media as set out in the [Employee Use of Social Media](#) policy, where inappropriate conduct may affect our employment with OLG.

OLG's [Human Rights & Workplace Harassment](#) and [Workplace Violence, Harassment and Sexual Harassment](#) policies reflect OLG's commitment to a safe and respectful workplace environment. The policies outline our rights, OLG's expectations, and the complaint process, if we have witnessed, or believe that we have been subject to inappropriate treatment. We are requested to report incidents when they occur. Any complaint brought forward will be treated with respect and in a confidential manner.



3.2 Accessibility

In line with OLG's commitment to an inclusive and accessible environment for our employees and for our customers as provided in our [AODA Integrated Accessibility Standards](#) and [Accessibility Standards for Customer Service](#) policies, we are responsible to support accessibility for persons with disabilities by:

- facilitating accessibility to the extent applicable to our functions and responsibilities; and
- completing accessibility training from time to time as may be required by OLG.

3.3 Accountability

We earn the respect of our colleagues, our customers, our shareholder and the people of Ontario when we are accountable for our work and when we strive to deliver against our strategic priorities. We are expected to:

- take account of OLG's mission and strategic objectives in our work;
- manage our resources to bring maximum benefit to the people of Ontario;
- take ownership by being engaged and by striving for high performance in our roles and teams;
- be candid; constructively challenge or acknowledge when we know or believe decisions, behaviour or processes are wrong, mistaken or can be improved;
- work collaboratively with others to share ideas, consult appropriately and achieve more together; and
- take all required OLG training and learn continuously to build skills.

4. *Support Social Responsibility:* When we design and deliver our products and services we enable our customers to [Play. Smart](#) 🎲

We integrate responsible practices across all business and corporate areas to encourage positive play and mitigate harm. We take into account the social and environmental impacts of our activities. We monitor the expectations of our stakeholders – employees, players, government agencies, business partners, Responsible Gambling (RG) organizations, treatment providers, researchers, communities and the public. We are responsible stewards in our work and communities, addressing our customers' needs. We take action on our own and in partnership with others to reduce the environmental impacts of our operations and our products and services.

4.1 Customer and Community Relations

OLG aims to preserve a strong relationship and reputation with our customers in a socially responsible manner, that is supportive of the communities where we live, work and do business. We are responsible to:

- comply with the Responsible Gambling [\(RG\) Code of Conduct](#) to the extent applicable to our duties and responsibilities; and
- obtain OLG's permission to solicit for or promote charitable causes in OLG workplaces and avoid any interference with OLG workplaces.



4.2 Sustainability

Recognizing that maintaining a sustainable business requires the conservation of finite resources, OLG is committed to lessening the environmental impact of our operations. We are expected to respect environmental laws and contribute to OLG's environmental sustainability initiatives, programs, and objectives as applicable to our roles and responsibilities.

5. *Maintain the Public Trust:* We pursue our outside interests in a way that does not create **Conflicts** with the interests of OLG and the public.

We are in a position of trust. We are responsible to be loyal to OLG in fulfilling our duty to achieve OLG's strategic priorities for the public good, in the best interests of the Province, and to do so in accordance with the law. As public servants, we put the interests of the public first and remain impartial in the exercise of our responsibilities.

5.1 OLG Conflict of Interest Rules

To maintain the public confidence, it is important that current and former OLG employees and Board members conduct themselves with integrity and be seen as objective, professional and ethical in regard to the performance of their responsibilities.

To assist current and former employees and Board members to meet this expectation, OLG has developed Conflict of Interest Rules ("Rules") which are posted on the website of the Office of the Integrity Commissioner of Ontario ("Integrity Commissioner") and are integrated in the Code of Business Conduct here: [Ontario Lottery and Gaming Corporation Conflict of Interest Rules](#).

The Rules address how to recognize, avoid, and manage conflicts of interest which arise when private interests interfere, or may reasonably be perceived to interfere, with the duties of current and former OLG employees. They also provide guidance on the duty to promptly disclose actual or potential conflicts of interest to the relevant Ethics Executive, who is:

- for current employees, the President and Chief Executive Officer (CEO), subject to his/her discretion to refer the matter for determination to the Integrity Commissioner;
- for Board members, the Chair of the Board, subject to his/her discretion to refer the matter for determination to the Integrity Commissioner; and
- for former employees or Board members, the Integrity Commissioner.

The Conflict of Interest Rules should be carefully reviewed in their entirety for complete details of the requirements.



5.2 Gifts

To promote impartiality and to avoid creating actual or perceived conflicts of interest and implied obligations, the Conflict of Interest Rules set out the general circumstances under which accepting a gift (i.e. a benefit of any kind) is prohibited or may be accepted by employees and Board members. To support compliance with the Rules on gifts, employees and Board members are also expected to follow the requirements under OLG's [Acceptance of Gifts](#) policy, which establishes further parameters around acceptable and prohibited gifts and provides for the disclosure, approval and oversight of certain gifts received by OLG employees and Board members.

If uncertain as to whether accepting a gift is appropriate or requires approval in the circumstances, we should consult with our managers, Corporate Compliance, Executive Committee member or the applicable Ethics Executive.

5.3 Personal Securities Trading

The Conflict of Interest Rules referred to above describe the requirements for financial declarations and the prohibition on certain purchases of securities. In addition, we must also ensure that we do not violate the Ontario *Securities Act* by engaging in (a) the purchase or sale of a publicly traded security when we have material non-public information ("insider information") related to a public company that has issued the security (illegal "insider trading"), or (b) providing insider information to others (the offence known as "tipping").

Insider Trading

We must ensure that we are not obtaining, or are perceived to be obtaining, a unique investment advantage for ourselves or anyone we know based on our access to OLG related information. If in the performance of our duties we come into possession of insider information about a public company (which includes an affiliate of that company), we must not trade the securities (equities, debt or derivatives) of the company about which we have insider information, or its affiliate, even if we owned the securities prior to becoming aware of the insider information, unless the insider information has been publicly disclosed.

Tipping

We must also not disclose to another person insider information related to a public company, unless that information has already been publicly disclosed or the person to whom we are disclosing the information is authorized by OLG to receive the information in the necessary course of business. This includes disclosing to any person the name of any company that is participating in an OLG strategic procurement or the name of an affiliate of that company.

Insider trading and tipping are serious offences under the law. If we have questions about our obligations relating to personal securities trading we should contact our Ethics Executive or Corporate Compliance prior to taking any action that may constitute insider trading or tipping.



5.4 Political Activity

Putting the interests of the public first, remaining impartial in the exercise of our responsibilities and carrying out the policies and decisions of the Government of Ontario are fundamental to OLG's operation. In so doing, we must comply with the *Public Service of Ontario Act, 2006* (PSOA) which includes, in Part V, political activity rules intended to balance the neutrality of the public service with a public servant's ability to engage in political activity.

For purposes of the PSOA, a public servant engages in "political activity" when he or she:

- does anything in support of or in opposition to a federal or provincial political party;
- does anything in support of or in opposition to a candidate in a federal, provincial or municipal election;
- is or seeks to become a candidate in a federal, provincial or municipal election; or
- comments publicly and outside the scope of the duties of his or her position on matters that are directly related to those duties and that are dealt with in the positions or policies of a federal or provincial political party or in the positions or policies publicly expressed by a candidate in a federal, provincial or municipal election.

While we are allowed to engage in some forms of political activity, we are required to refrain from the following "prohibited political activities":

- engaging in political activity in the workplace or when wearing a uniform associated with OLG/the public service;
- using OLG resources or premises for the purpose of political activity; and
- associating our OLG positions with political activity (except as necessary to identify our position and work experience if we are, or are seeking to be, a candidate in a federal, provincial or municipal election).

We are also required to apply to the Ethics Executive for an unpaid leave of absence to engage in the following "restricted political activities":

- being or seeking to become a candidate in a federal or provincial election;
- raising funds on behalf of a federal or provincial party or federal, provincial or municipal candidate, if we supervise staff or deal directly with the public and are seen to have power over the public;
- commenting publicly, outside the scope of our duties, on matters of political interest that are directly related to our duties and that are addressed in the policies of a federal or provincial party or of a candidate in a federal, provincial or municipal election; or
- doing anything in support of or in opposition to a candidate in a federal, provincial or municipal election, a federal or provincial political party, or being or seeking to become a candidate in a municipal election, if it could interfere with the performance of our jobs or conflict with the interests of OLG.



During an election period, the Ethics Executive must grant an unpaid leave of absence in the case of an application to engage in a restricted political activity.

Outside an election period, the Ethics Executive will determine whether to grant an unpaid leave of absence to engage in the restricted political activity. In the case of an application concerning being or seeking to become a candidate in a federal or provincial election, the Ethics Executive must grant leave if determined necessary, otherwise an unpaid leave of absence is not required to do so. Other restricted political activities may only be engaged if the Ethics Executive determines it is appropriate to grant an unpaid leave of absence.

If we are becoming a candidate in a municipal election, or if elected to a municipal office, the Ethics Executive will determine if termination of employment with OLG is warranted if elected, based on whether the responsibilities in municipal office would interfere with the performance of public servant duties or conflict with OLG's interests.

If we are considering engaging in restricted political activity or have questions about our rights or obligations, we are encouraged to contact our managers or Human Resources.

5.5 Participation in Gaming

Restrictions and conditions on how we and our family members participate in gaming activities are intended to manage the security, integrity and public perception of how gaming is conducted, managed or operated by OLG, in the interest of player protection.

Under the AGCO Registrar's Standards and Requirements and OLG's Rules of Play, including OLG's supplemental rules and conditions to the Interprovincial Lottery Corporation (ILC) Games, employees and Board members are prohibited or allowed to play or participate, by ourselves or as a group in the following OLG games or programs as set out below:

OLG Category	Casino Gaming Operated by Service Providers	cGaming	iGaming	Lottery	Operators registered with iGO	Lottery ILC – In Ontario	ILC Outside Ontario	OLG Loyalty Programs	Horse Racing
Board Member	No	No	No	No	No	No	Yes-if jurisdiction does not restrict	No	Yes
Officer	No	No	No	No	No	No	Same as above	No	Yes
Employee – AGCO Category 1 Registration	No	No	No	No	No	No	Same as above	No	Yes
Employee – AGCO Category 2 Registration	Yes	No	No	No	Yes	No	Same as above	No	Yes
Employee – No required AGCO registration	Yes	No	No	No	Yes	No	Same as above	No	Yes



To the extent that we are prohibited from participating in gaming in Ontario as described above, we are also not permitted to claim or win prizes. Family members of OLG employees or Board members, and former OLG employees or Board members, may be subject to enhanced scrutiny as part of prize claim procedures. If we have questions regarding the restrictions and conditions on participation in gaming, refer to the applicable OLG Rules of Play and we may also contact our managers, Legal or Corporate Compliance groups.

5.6 Following the Law

In our positions, we are responsible to realize OLG's objectives in accordance with applicable laws and regulations and with a commitment to the spirit of the law. We are expected to:

- be familiar with the basic legal requirements relevant to our areas of responsibility, including, as applicable, AGCO Registrar's Standards and Requirements, the *Gaming Control Act, 1992* and *Ontario Lottery and Gaming Corporation Act, 1999*;
- respect the law and OLG policies and procedures at all times, including:
 - *Canada's Anti-Spam Legislation* regarding commercial electronic messages and installation of computer programs, as well as OLG's [Anti-Spam \(CASL\)](#) policy;
 - the *Freedom of Information and Protection of Privacy Act* and OLG's [Protection of Privacy](#) policy;
 - the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLFTA), as well as OLG's [Anti-Money Laundering & Counter-Terrorist Financing Policy](#);
 - the *Accessibility for Ontarians with Disabilities Act, 2005* and OLG's [AODA Integrated Accessibility Standards](#) and [Accessibility Standards for Customer Service](#) policies;
 - the *French Language Services Act* and OLG's [French Language Services](#) policy;
 - performing health and safety accountabilities as reflected in the [OLG Health and Safety Policy Statement](#), and carry out duties in a safe manner pursuant to OLG's [Occupational Health and Safety Manual](#), including identifying, reporting, and, where appropriate, correcting workplace hazards, attending work fit for duty, and when working not being under the influence or suffering from the after-effects of alcohol or illicit drugs pursuant to the [Substance Use Policy](#); and
 - conducting our financial affairs lawfully, in accordance with OLG policies, with appropriate approvals and transactions recorded in accordance with appropriate accounting standards, such that the acquisition, use, disposal or movement of corporate funds and assets is clearly identified and is not diverted for anything other than the approved use.

Regulatory compliance is everyone's accountability. If we are ever in doubt or concerned regarding the application, interpretation, or effectiveness of any law, regulation, policy or procedure applicable to OLG, we should refer the matter to our managers, Human Resources, Legal or Corporate Compliance groups or confidentially to Integrity Matters.



Revision/Review History:	Updated By:	Date:
Revised to incorporate iGO restrictions	Ethics and Compliance Program Office	April 20, 2022