



The Atlantica Party

Compliance Policy

The Atlantica Party is committed to conducting all activities ethically with integrity and honesty. To ensure this The Party has adopted a Compliance Policy such that all Covered Party members are subject to compliance policies.

Version 1.10 – Adopted 20170418

The Party has appointed a Compliance Officer who is responsible for the development and application of this Compliance Policy to Covered Members. Any compliance questions about should be sent to compliance@atlanticaparty.ca.

Covered Members

A Covered Member is any Party member with authority or standing beyond a regular member including but not limited to:

- Any officer of the Atlantica Party Association of Nova Scotia (The Party) including the Leader.
- Any officer in a constituency association.
- Party candidates standing for election to the House of Assembly.
- Party members in the House of Assembly.
- Volunteers.
- Party members on Party committees.
- All full time, part time and casual employees of The Party.
- All third-party providers.



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Code of Ethics

There is a difference between compliance and ethics. Ethics involve not only complying with the letter of the law but also complying with the spirit of the law. Ethics go beyond prescribed behavior and address situations where rules are not clear or are contradictory. It is possible to take an action that is unethical even though one is complying strictly with the rules.

The Party will not tolerate any breach or appearance of a breach of this Code of Ethics (the Code) and will immediately take appropriate disciplinary action(s) up to and including discharge from the Party and further punitive measures including legal action.

All Covered Members must:

- Understand and comply with all Party policies, applicable laws, rules, and regulations of any government, regulatory organization, licensing agency, or professional association governing their activities. In the event of conflict, employees must comply with the more strict law, rule, or regulation.
- Not knowingly participate or assist in and must dissociate from any violation of the Code
- Not engage in any conduct involving dishonesty, misrepresentation, fraud, or deceit or commit any act that reflects adversely on The Party's reputation, integrity, or competence.
- Not unjustly discriminate against an individual.
- Recuse themselves from activities or matters where they have a personal conflict of interest, or where a reasonable person would perceive a personal conflict of interest.
- Must not be a member of any other Nova Scotia political party.
- Not sexually harass any individual.
- Act with integrity, competence, diligence, respect and in an ethical manner with the Party, the public, fellow Party members, volunteers, third-party providers, the media and other participants in the political field.
- Comply with the Party's Privacy Policy.
- Comply with the Party's Social Media Policy.
- Act with loyalty towards and for the benefit of The Party and not:
 - Deprive The Party of the advantage of their skills and abilities
 - Divulge confidential information
 - Cause harm to The Party in any way.



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- Encourage other members to follow this Code of Ethics.
- Avoid conflict of interest or the appearance of conflict of interest; any situation in which a member exploits their Party position for personal benefit. Covered Members must:
 - Make full and fair disclosure of all real and potential matters that could reasonably be expected to impair their independence or interfere with respective duties to the public and The Party. Members must ensure that such disclosures are prominent, are delivered in plain language, and communicate the relevant information effectively.
 - Not offer, solicit, or accept any gift, benefit, compensation, or consideration that reasonably could be expected to compromise their own or another's independence.
 - ALL gifts, benefits, compensations must be registered with the Compliance Officer for public disclosure.
- Immediately report any suspected noncompliance with this Code to The Party Compliance Officer at compliance@atlanticaparty.ca whether observed, experienced personally, or reported to them.
- Voluntary disclosure of any possible breach of this code will be presumed to be a good faith effort to comply with the code.
- Not retaliate against individuals for reporting misconduct by others in good faith.
- Cooperate with internal investigations of alleged violation(s) of this Code.



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Social Media Policy

The Party strives to maintain a positive image in the community. Covered Members act as Party representatives at all times so they should conduct themselves in a manner that is appropriate. This policy is not intended to interfere with privacy or impinge on freedom of speech, rather this policy ensures The Party's image, reputation and branding are not impugned.

Social media content of all Covered Members must not:

- Conflict with any of The Party's existing policies including the Code of Ethics.
- Disseminate any private Party information.
- Disseminate negative or defamatory comments regarding The Party, its members, third-party providers or members of the public.
- Mention The Party without including a disclaimer stating that any opinions expressed are the member's own and do not represent The Party's positions, strategies, or opinions.
- Be un-professional and impolite.
- Use logos, other branding and identity applied to electronic communications, unless the member is officially designated to "speak" (whether orally or in writing) on the Party's behalf.



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Annual Compliance Checklist

Instructions

Annually the Compliance Officer must complete this checklist, sign acknowledgement, image and return to compliance@atlanticaparty.ca and present to the Executive Committee.

- Review and update Compliance Policy
- Administer Annual Compliance and Conduct Questionnaire
- Complete a Compliance review of Covered Member's actions and communications
- Ensure up to date Covered Member asset disclosure
- Ensure registration and public distribution of all emoluments
- Ensure public distribution of all contributions as required by law.
- Prepare compliance report for the Party Executive

Party Compliance Officer Name & Signature

Date



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Annual Compliance and Conduct Questionnaire

Instructions

Annually apply this Questionnaire to each Covered Member, get signature acknowledgement, image and return to compliance@atlanticaparty.ca and present to the Executive Committee.

Answer the following questions. If any response is a Yes please detail in a separate document.

Any matter described in the questions below must be disclosed, even if the matter is still pending. In the last year:

- Have you been the subject of, a defendant in, or respondent to any investigation, civil litigation, arbitration, or other action or proceeding in which your conduct has been called into question?
- Have you been convicted of or pled guilty to: (i) any crime defined as a felony or punishable by more than one year in prison (regardless of the sentence actually imposed), or (ii) any crime involving moral turpitude (fraud, lying, cheating, stealing, or other dishonest conduct) or any substantially equivalent crime in any court of law?
- Have you been temporarily or permanently suspended, barred, banned, or otherwise prevented from working or participating in any industry?
- Have your actions caused harm to The Party?
- Have you disclosed all of your assets to Compliance?
- Have you failed to follow compliance policies and procedures of the Party?
- Have you accepted ANY gifts, benefits, compensations due to your Party position?

By signing I:

- Represent the above responses and all information provided by me are truthful, accurate, and complete.
- Agree to notify Atlantica Party Compliance promptly of any material changes in my responses.
- Acknowledge I have read, understand and am bound by the Code of Ethics of The Atlantica Party.
- I agree no rule can cover every scenario so when confronted with a situation not covered by the Code of Ethics I will act in the spirit of the Code.
- Understand that if I violate the Policy I may face disciplinary action.

Name, Party Position & Signature

Date