

Corporate Transparency Policy

Policy Owner:	Chief Financial Officer
Division:	External Affairs
Department:	Information Management
Policy Type:	Governance Policy
Category of Policy:	Information Management

Approved by:	Board of Directors	Dec. 17, 2015
Reviewed		February 2019

1. POLICY STATEMENT

Atlantic Lottery Corporation (ALC) will be open and transparent and endeavors to make many of its corporate records available to the public.

2. OBJECTIVE

The objective of this policy is to provide guidance and direction to ALC, its Board of Directors, management and employees to ensure that information requests are responded to in a timely, reasonable and complete manner in accordance with ALC's philosophy of openness, transparency and accountability. This policy is also intended to provide clarity to all external stakeholders with respect to disclosure of information by ALC.

3. SCOPE

This policy applies to ALC's Board of Directors and all levels of management and staff of ALC. ALC is not designated as a "Public Body" legally subject to Freedom of Information (FOI) legislation and regulations, however, ALC does operate with the intent to be open and transparent based on its core values of integrity and responsibility and comply where applicable to the FOI acts of Atlantic Canada.

The Corporate Transparency Policy applies to information requests falling into the following classifications:

- Routine Access requests
- Non Province specific requests
- Requests specific to a particular Province(s)
- Third Party FOI information request from Provincial FOIPOP Office

ALC's treatment of information requests will vary according to both the type of request received as well as the source of the request.

4. COMPLIANCE

Compliance with this policy is mandatory for ALC's Board of Directors and all levels of management and staff of ALC. Information Management will administer the policy. The Internal Audit department may audit information request processes and procedures and will report on compliance.

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5. POLICY DETAILS

In keeping with the spirit of this policy, ALC will:

- 5.1 designate an official to oversee the implementation of this policy including the development of appropriate standards and guidelines;
- 5.2 develop, implement and comply with appropriate and comprehensive standards and guidelines to respond to information requests in a timely, reasonable and effective manner and in accordance with this policy;
- 5.3 develop and maintain a system for recording, tracking, and reporting information requests which will account for all deliberations and decisions taken concerning each request, from which information will be reported regularly;
- 5.4 develop and adhere to routine access guidelines to provide for the periodic and proactive release of information or records;
- 5.5 develop, implement, and comply with guidelines to improve public accessibility to designated records not released through proactive disclosure, without the requirement to submit a request for information request to ALC;
- 5.6 ensure that directors and shareholder representatives are informed and properly consulted with respect to information requests that are interprovincial in scope, or that involve significant legal or policy issues or the potential release of confidential and/or proprietary information of any ALC provincial shareholder(s);
- 5.7 ensure that the privacy of individuals is protected by referring to the Corporate Transparency exclusions and exemptions when determining whether or not to disclose personal information;
- 5.8 ensure, as much as reasonably possible, that the identity of those making information requests via the Corporate Transparency Policy is protected from unnecessary disclosure.

6. ACCOUNTABILITY

The Director of Information Management & Regulations will monitor and oversee the effectiveness of the Corporate Transparency Policy. Any significant findings will be brought to the attention of the Chief Financial Officer on a timely basis, who will in turn determine whether consultation is required with the CEO, any of the Directors or the Board or its subcommittees.

7. RESPONSIBILITY

Information Management will coordinate the administration of this policy, receive all non-routine information requests, ensure requests for information are responded to in a timely and

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complete manner, ensure that all staff are aware of, and properly trained on their responsibilities with respect to this policy, and maintain information about records disclosed and not disclosed pursuant to requests for information applications.

All staff must understand, support and comply with the Corporate Transparency Policy and all related standards and guidelines governing their execution at ALC. It is the responsibility of all employees to direct all non-routine information requests to Information Management.

Managers are responsible for ensuring compliance with the Corporate Transparency Policy on a continuous basis as a component of their responsibilities.

8. DEFINITIONS

“FOI” – Freedom of Information

“FOIPOP” – Freedom of Information and Protection of Privacy

“information request” is a request for a record(s) of ALC from a person who is not an officer or director of ALC and who is not a shareholder of ALC or a representative of a shareholder of ALC.

“record” means anything on which information is recorded or stored by graphic, electronic, mechanical, or other means, but does not include a computer program or any other mechanism that produces records. It includes:

- Books, reports, memos, letters, papers, documents
- Information in notebooks and journals
- Photographs, drawings, blueprints
- Email messages and text messages
- Video and audio recordings, voicemail messages, surveillance tapes
- “transitory records” such as drafts, copies, margin notes, post-its

9. EXPLANATORY NOTES

A standard has been created titled: “Corporate Transparency Standard” which outlines how ALC will implement the intent of the policy. The standard provides guidelines to the business in the following areas:

- Types of information requests
 - Routine Access requests
 - Non province specific requests
 - Requests specific to a particular province(s)
 - Third party FOI information request from Provincial FOIPOP office
- Treatment of information requests
- Roles, responsibilities and authorities
 - Information Management
 - Business Owner

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- Communications
- CCC
- Legal

10. RELATED REFERENCE(S)

Reference	Owner
Corporate Transparency Standard	CFO
Routine Access Guidelines (Appendix A of the Standard)	CFO
Agency Agreement between ALC and Nova Scotia Gaming Corporation dated April 2000.	
Nova Scotia Gaming Corporation’s Routine Access Policy	NSPLCC
ALC Corporate Privacy Policy	CFO

11. INQUIRIES

Inquiries are made via email: Transparency@alc.ca