

**Title: Gift and Hospitality Policy****Resolution: 2026-0264 (Oct 13/26)****Revised:****Special Notes/Cross Reference:****Next Review Date:****2030**

**POLICY STATEMENT:** The Town of Westlock is committed to conducting municipal business with integrity, impartiality, transparency, and accountability. Council members, employees, volunteers, and members of municipal boards and committees must avoid actual, potential, or perceived conflicts of interest arising from the acceptance or offering of gifts, hospitality, benefits, or other advantages.

**PURPOSE:** The purpose of this policy is to establish consistent expectations regarding the acceptance, offering, disclosure, and management of gifts and hospitality in order to maintain public confidence in the integrity of municipal decision making and operations.

## 1. DEFINITIONS

- 1.1. *Administration* - means the Chief Administrative Officer (CAO), Senior Management, or designated support staff of the Town of Westlock.
- 1.2. *Council* - means the Municipal Council of the Town of Westlock.
- 1.3. *Conflict of Interest* - means any situation in which personal interests, financial interests, or relationships may improperly influence, or reasonably appear to influence, the impartial performance of municipal duties.
- 1.4. *Gift* - means any item, service, benefit, favour, discount, loan, entertainment, prize, reward, or other thing of value provided without fair market consideration.
- 1.5. *Hospitality* - means the provision of meals, refreshments, receptions, accommodations, travel, entertainment, or similar courtesies provided without charge or at less than fair market value.
- 1.6. *Nominal Value* - means a value that is modest, infrequent, and unlikely to influence or be perceived to influence the recipient's objectivity or decision-making. Unless otherwise approved under this policy, nominal value shall not exceed \$150.
- 1.7. *Recipient* - means any member of Council, employee, volunteer, contractor acting on

behalf of the Town, or member of a municipal board or committee.

## **2. GUIDING PRINCIPLES**

2.1 The Town of Westlock is committed to the following principles:

- a) **Integrity** – Municipal decisions shall be made solely in the public interest.
- b) **Transparency** – Acceptance of gifts or hospitality shall withstand public scrutiny.
- c) **Impartiality** – No person shall accept gifts or hospitality that could influence, or reasonably appear to influence, the exercise of their duties.
- d) **Accountability** – Recipients are responsible for complying with this policy and disclosing gifts where required.
- e) **Public Confidence** – Municipal business shall be conducted in a manner that maintains the trust and confidence of the public.

2.2 This policy shall be administered in accordance with the Municipal Government Act, the Criminal Code of Canada, the Protection of Privacy Act (POPA), the Access to Information Act (ATIA), and all other applicable legislation.

## **3. ROLES AND RESPONSIBILITIES**

3.1. Council  
Council shall:

- a) Lead by example in complying with this policy.
- b) Avoid accepting gifts or hospitality that may create an actual, potential, or perceived conflict of interest.
- c) Disclose gifts where required.

3.2. Administration  
Administration shall:

- a) Promote awareness of this policy.
- b) Provide guidance regarding the application of this policy.
- c) Maintain any required gift disclosure records.

- d) Review reported gifts where further direction is required.

**3.3. Recipients**

Recipients shall:

- a) Exercise good judgment before accepting any gift or hospitality.
- b) Decline gifts that may compromise, or appear to compromise, their impartiality.
- c) Promptly disclose gifts requiring disclosure.

**4. ACCEPTABLE GIFTS AND HOSPITALITY**

- 4.1. The following may generally be accepted provided they are infrequent, of Nominal Value, and do not create a conflict of interest:

- a) Coffee, tea, refreshments, or modest meals provided during meetings.
- b) Promotional items of Nominal Value.
- c) Plaques, certificates, or tokens of appreciation.
- d) Flowers or similar expressions of sympathy or recognition.
- e) Hospitality associated with conferences, meetings, or official municipal events.

**5. PROHIBITED GIFTS**

- 5.1. Recipients shall not accept:

- a) Cash or cash equivalents.
- b) Gift cards, unless accepted on behalf of the organization and utilized for official municipal functions.
- c) Personal discounts or services unavailable to the general public.
- d) Loans or guarantees.
- e) Travel or accommodation unless approved by the CAO or Council as part of official municipal business.
- f) Gifts offered in exchange for favorable treatment or preferential consideration.

- g) Gifts from any person or organization where the recipient is involved in a procurement, enforcement, regulatory, licensing, planning, development, or other decision affecting the donor.

- 5.2. If refusing a gift would be culturally inappropriate or likely to damage an important municipal relationship, the gift may be accepted on behalf of the Town and shall become municipal property unless otherwise approved.

## **6. DISCLOSURE REQUIREMENTS**

- 6.1. Any gift or hospitality exceeding \$150, or multiple gifts from the same source exceeding \$150 within a calendar year, shall be disclosed to the CAO (or to Council in the case of the CAO) as soon as reasonably practicable.
- 6.2. Disclosure shall include:
  - a) Name of the donor.
  - b) Description of the gift or hospitality.
  - c) Estimated value.
  - d) Date received.
  - e) Circumstances surrounding the gift.
- 6.3. Administration may maintain a Gift Disclosure Register where appropriate.

## **7. OFFICIAL MUNICIPAL GIFTS**

- 7.1. Nothing in this policy prevents the Town from:
  - a) Presenting ceremonial gifts to dignitaries.
  - b) Providing recognition awards to employees or volunteers.
  - c) Accepting donations or sponsorships that have been approved by Council or Administration in accordance with applicable policies.

## **8. PROCEDURES**

- 8.1. When determining whether a gift or hospitality may be accepted, recipients shall consider:
  - a) The value.

- b) The frequency.
  - c) The timing.
  - d) The relationship with the donor.
  - e) Whether a reasonable person would perceive the gift as influencing municipal decision-making.
- 8.2. Where uncertainty exists, recipients shall seek guidance from the CAO before accepting the gift.
- 8.3. Nothing in this policy limits a recipient's obligations under the Municipal Government Act regarding conflicts of interest.

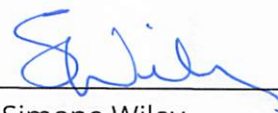
**9. REVIEW**

- 9.1. This policy shall be reviewed every four years, or sooner if required, to ensure continued alignment with legislative requirements and municipal best practices.

**10. EFFECTIVE DATE**

- 10.1. This policy shall take effect on the date passed by Council resolution.

  
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Mayor Jon Kramer

  
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CAO Simone Wiley