

## GOVERNMENT ENGAGEMENT POLICY

Governance and Nominations Committee

<b>Purpose</b>	The purpose of the Government Engagement Policy ("Policy") is to establish the framework for how First West Credit Union ("First West" or the "Credit Union") engages with provincial and federal governments.
<b>Application &amp; Scope</b>	This Policy applies to all employees of First West and First West's Board of Directors (the "Board").
<b>Policy Statement</b>	<p>1. First West is a non-partisan and politically unaligned organization and does not directly or indirectly support any political candidate, political party or party supporting or opposing the election of a candidate ("Third Party"). Moreover, First West expects its Directors and employees to adhere to the following standards with respect to political activities:</p> <p>1.1 No contributions to a political candidate, political party or Third Party will be made in the name of First West. No Director or employee shall suggest that a personal contribution represents the support of First West.</p> <p>1.2 No property of First West, including computers and cellphones, will be used to assist a political candidate, political party or Third Party in any matter.</p> <p>1.3 No First West funds, including any funds received from a grant, donation or sponsorship program, will be transferred or donated, directly or indirectly, to any political candidate, political party or Third Party. Further, no First West funds will be used to support, directly or indirectly, the political activities of a political candidate, political party or Third Party.</p> <p>1.4 No political activities will be conducted on First West premises or facilities. This includes campaigning or actively promoting political parties, candidates or causes and soliciting funds from co-workers, members or suppliers for political parties, candidates or causes.</p> <p>1.5 Similarly, no political activities will be conducted during regular work hours, while First West is compensating an employee for their time.</p> <p>1.6 While respecting the right of Directors and employees of First West to participate in political activities and make political contributions on their own time and in their own names, it is required that individuals ensure that their personal support of a political activity is not construed as representing the support of First West. Further, Directors and employees</p>

who engage in “lobbying activities” will be required to disclose their personal (provincial) contributions in the provincial lobbyist registry.

- 1.7 First West proactively engages with various levels of government (including agencies, boards, commissions, crown corporations and regulators) in “lobbying activities”. The goal of these activities is to advance the strategic interests of First West, the members of First West, the credit union system as a whole, and social endeavours supported by First West. For greater clarity, “lobbying activities” include those activities defined as such in applicable legislation and any communications or activities that would require making any filings or registration pursuant to applicable legislation.
2. In the interests of maintaining a clear message with various levels of government across the organization and ensuring compliance with federal and provincial lobbying legislation and regulations:
  - 2.1 No Director or employee of First West shall engage in “lobbying activities” unless that individual has been authorized in advance, in writing, to do so by First West’s CEO, Board Chair, or the government relations team.
  - 2.2 No Director or employee will delegate “lobbying activities” to an individual or permit an individual to conduct “lobbying activities” on their behalf unless that individual is authorized in advance, in writing, to do so by First West’s CEO, Board Chair, or the government relations team.
  - 2.3 No Director or employee who previously worked for the federal or provincial government shall engage in “lobbying activities” if they are subject to a cooling-off provision under applicable federal or provincial legislation or regulation.
  - 2.4 No Director or employee shall give (or promise to give) a gift to a public office holder unless that individual is authorized in advance, in writing, to do so by First West’s CEO, Board Chair, or the government relations team. For greater clarity, a gift is anything of value or anything of reduced value. Gifts include but are not limited to money, tickets, meals, alcohol, plaques, and artwork.
  - 2.5 All “lobbying activities”, whether written or oral, by any Director or employee on behalf of First West must be immediately reported to the government relations team.
  - 2.6 Directors and employees lobbying on behalf of First West must ensure they are familiar with and comply with all relevant reporting and ethical requirements, whether they apply to in-house lobbyists, consultant lobbyists or both.
  - 2.7 Directors or employees lobbying on behalf of other organizations, including charities and industry associations must ensure they comply with all

relevant reporting and ethical requirements, whether they apply to in-house lobbyists, consultant lobbyists or both.

3. Further to the criteria listed in First West's Rules pertaining to Director and candidate eligibility:
    - 3.1 An individual who is an elected official at the federal or provincial level may not stand for election to the Board.
    - 3.2 A sitting Director who intends to stand for election at the federal or provincial level must declare such intention, in writing, to the Audit and Conduct Review Committee, before making their intention public. This will ensure all conflicts of interest related to their candidacy, whether real, potential or perceived, are identified and managed appropriately. In connection with any election for public office for which a sitting Director intends to stand for election, including federal, provincial, municipal or elections for other positions of public office, the sitting Director must comply with the Code of Conduct and Conflict of Interest Policy.
    - 3.3 A sitting Director who publicly announces their intention to stand for election at the federal or provincial level must temporarily recuse themselves from all matters related to First West, until the date a winner is officially declared by the appropriate governmental agency or authority that administers the respective election. Such Directors shall only be compensated and receive any fees payable to such Director for and to end the month in which the recusal period commenced and the Director will not be compensated for and during the recusal period that extends beyond such month.
    - 3.4 A sitting Director who has been officially declared the winner of a provincial or federal election by the appropriate governmental agency or regulatory authority, is deemed to have resigned from the Board on the date they were declared the official winner or an alternate date as may be agreed to by the Board. Such Director shall only be compensated and receive any fees payable to such Director for and to the end of the month in which the Director's recusal period commenced and the Director will not be compensated for and during the recusal period that extends beyond such month. In connection with any other election for public office, including municipal elections, for which a sitting Director has been officially declared the winner, the sitting Director must ensure that the duties as the respective public office holder do not conflict with First West's Rules, policies, including the Code of Conduct and Conflict of Interest Policy, or applicable laws or regulations.
    - 3.5 A sitting Director is prohibited from leveraging their role as a Director to improve their candidacy and/or their stature. A Director may mention their service on the Board as part of their background and experience, but they
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are prohibited from “leading” with their role as a Director of First West in any biographical material or campaign promotions. “Leading” includes but is not limited to prominent placement, font, letter sizing and imagery on biographical or campaign materials.

3.6 In the course of seeking elected office, a sitting Director is prohibited from claiming specific First West projects or initiatives were their own. The Board operates as one entity and any biographical or campaign materials should reflect this.

3.7 A sitting Director is prohibited from using property of First West, including computers and cellphones, to assist their candidacy in any matter. A sitting Directory is also prohibited from conducting campaign activities in First West premises or facilities.

4. The Board expects the CEO to report to the committee designated by the Board with respect to the government engagement activities and lobbying disclosure obligations of First West as necessary.

#### Policy Governance

The Board has delegated the authority to monitor adherence to this policy to the Governance and Nominations Committee (the “Committee”). The Committee will review the Policy at least every two years and recommend amendments, as necessary, to the Board.. The Board will approve the Policy.

#### Authorities

- Federal *Lobbying Act* [R.S.C., 1995, c. 44),
- Federal *Lobbyists’ Code of Conduct*,
- B.C. *Lobbyist Transparency Act* [SBC 2001, c. 42]

#### Related Documentation

- First West Credit Union Rules
- Government Engagement Process
- Code of Conduct and Conflict of Interest Policy

#### Review cycle

This Policy will be reviewed at least every two years by the Governance and Nominations Committee.