

# Confidential Business Information Policy

## Purpose

The purpose of this policy is to set Manitoba Liquor and Lotteries Corporation's (the Corporation) requirements for the protection, limitation, awareness, and responsibility of Confidential Business Information.

## Statements

1. The Corporation owns all business information created by its employees and the protection of this information should have adequate safeguards to ensure protection.
2. The Vice President, General Counsel and Corporate Secretary is responsible for oversight of Confidential Business Information.
3. If an individual is unsure if information is Confidential Business Information or has questions about this policy, the Manager, Records and Information Compliance should be immediately consulted before discussing or disclosing it to anyone.

## Management Responsibilities

4. Management is expected to identify Confidential Business Information and instruct their employees on the proper use and disclosure of the material.
5. Safeguard and limit the use of Confidential Business Information under their control.

## Employee Responsibilities

6. Employees are expected to exercise appropriate care and discretion when collecting, using, and disclosing Confidential Business Information and must not disclose confidential information that may harm the Corporation's competitive position, reputation, financial position or business relationships.
7. Employees who possess Confidential Business Information will return all the material to their direct supervisor, on or before the final day their employment with the Corporation.
8. If any Employee becomes aware of any actual or potential violation of this Policy, they must immediately notify the Manager, Records and Information Compliance about the relevant facts.

Policies are subject to amendment. The approved version of this document is retained by the Policy and Regulatory Compliance Office and shall be the governing version. Upon request, a copy of this policy will be provided in an accessible format.

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## Non-Compliance

9. Employees who do not comply with this policy are subject to disciplinary action up to and including termination of employment.

## Definitions

**Confidential Business Information** – any and all knowledge, data, and information, whether documented or undocumented, in digital, physical, or other format, concerning the Corporation’s business and affairs, and includes, but is not limited to:

- Financial information, relating to the Corporation’s products, services, and business plans;
- Business activities and information, strategies, legal matters, governmental information, dealings with external organizations or individuals, including acquisitions and divestitures; and
- Any other information that a reasonable person acting prudently would consider to be of a confidential nature.

**Employee(s)** – All full-time, part-time, casual, seasonal, term or contract employees of the Corporation, including individuals seconded or on a government interchange agreement.

## References

Code of Conduct

Privacy and Protection of Personal Information Policy

Release of Information to the Media Policy

The Freedom of Information and Protection of Privacy Act

## Executive Responsible

Vice President, General Counsel and Corporate Security

## Applies To

All Employees

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## Approved

*Original Approved by - Gerry Sul*

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President & CEO

January 9, 2024

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Date

## Policy History

Updated On	Revisions	Approved By
Jan. 9, 2024	New template, executive responsible. Revised/added Purpose, 1, 2, 3, 4, 5, 6, 7, 8, definitions	President & CEO
Mar. 28, 2014	New	President & CEO

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