



# CCC

## CCC CODE OF BUSINESS ETHICS

### **Commitment to Legal and Ethical Conduct**

The Canadian Commercial Corporation (CCC) will conduct its business and affairs in accordance with all applicable laws in the countries in which it operates. If any CCC employee is ever uncertain as to the interpretation or application of a particular law, he or she must seek advice from CCC's Legal Services.

CCC is committed to conducting its business with honesty, integrity and fairness, and will advance its ethics and values through its expertise in international contracting. As such, CCC employees and representatives are expected to conduct all business activities in an ethical manner and abide by the Corporation's policies as they relate to the environment, bribery and corruption, human rights, conflict of interest and confidentiality of information.

All employees and representatives will have access to a copy of the Code of Business Ethics and are required to read it and abide by its principles. All employees will be required to sign annually an acknowledgment and agreement confirming their understanding of the Code of Business Ethics and their responsibility to comply with the Code.

### **The Environment**

CCC recognizes the importance of fostering trade competitiveness consistent with environmental conservation. As a federal Crown corporation, CCC follows a formalized environmental review process and complies with the *Canadian Environmental Assessment Act (CEAA)*. For all cases where the Corporation proposes to become involved in a capital project in a foreign country, it must comply with the *Project out of Country Regulations* pursuant to the CEAA. In cases where projects are funded through other export credit agencies or international organizations such as the World Bank, the Corporation complies with the requirements set by those institutions, which customarily apply international environmental standards outlined by the Organization for Economic Co-operation and Development (OECD).

In addition to compliance with Canadian legislation the Corporation is committed to respecting the environmental laws of countries where the capital projects will be undertaken and may also consider the corporate environmental policies, environmental management systems and reputation of the Canadian exporter and Capital Project sponsors, where applicable.

## **Bribery and Corruption**

CCC is unique in its international contracting role, and it is our intention to advance the Corporation's ethical values. Under no circumstances will CCC, directly or indirectly, knowingly offer, give or receive a bribe. CCC is subject to the *Corruption of Foreign Public Officials Act*, which stipulates that bribing foreign government employees is a criminal activity. The Corporation has, therefore, included in all its domestic contracts with Canadian suppliers a clause prohibiting the bribery and corruption of government officials. As such, should a Canadian supplier be caught bribing a government official while under a contract with CCC, the Corporation reserves the right to apply various sanctions including the termination of the contract with the supplier.

## **Human Rights**

CCC values human rights by following the applicable legislation and policies of the Government of Canada. CCC recognizes the sovereignty of other national governments when there is consistency with the policies of the Government of Canada. As such, the Corporation respects the Government of Canada's economic and trade sanctions, and international treaties.

CCC employees, representatives and other stakeholders are entitled to have their dignity as human beings respected and to work in an environment free from intimidation, hostility or offensiveness. CCC is therefore committed to creating and maintaining a work and business environment that is free from harassment and discrimination on prohibited grounds, including: age, race, colour, religion, creed, sex, nationality, ethnic or place of origin, citizenship, language, political belief, marital or family status, pregnancy, sexual orientation and disability.

## **Conflict of Interest**

Employees and representatives of CCC have a duty to act in the best interests of CCC at all times. A conflict of interest arises when an employee must choose between CCC's best interests and his/her own. The judgement of CCC employees and representatives must be, and must be seen to be, independent of any personal or financial interests that arise from business dealings, social ties or other personal considerations.

CCC requires employees and representatives of CCC to adhere to the highest standards of conduct with respect to conflicts of interest.

## **Confidentiality of Information**

CCC will respect the privacy rights of its stakeholders, including their right to security of information, and will use such information only for corporate purposes. CCC abides by the *Access to Information Act* and the *Privacy Act*, which govern the disclosure, use and communication of such information.