



CCC

CCC CODE OF CONDUCT

1. CCC Values

- 1.1. The Canadian Commercial Corporation's (CCC) Code of Conduct is based on its shared values. These values are:

We are a *client-focused* organization. We are adaptable and creative in finding solutions for our clients.

We approach our work with the highest levels of *professionalism*, and demand the same from our clients and our customers. We are committed to continuously developing the skills our clients and our customers value.

Our *integrity* is not negotiable and we expect the same from our clients and our customers. Trust, fairness and honesty are intrinsic to all our interactions.

Our strength is our *people*. We build lasting relationships through respect for others and ourselves.

- 1.2. Compliance with these values, as well as any legal obligations the Corporation is subject to in the foreign countries in which it operates, is fundamental to the preservation of the Corporation's reputation. CCC's employees are the custodians of that reputation and have a responsibility to act, in all circumstances, in a manner that protects that reputation.

2. Scope and purpose

- 2.1. CCC has developed this *Code of Conduct* to promote ethical and professional behaviour by its employees and to assist employees and representatives in making decisions related to their day-to-day operations. The Code is designed to help employees uphold CCC's core values while also supporting a positive work environment in which people are respected and clients are well served. The Code summarizes the principles and policies that guide our business activities, and as such, is not meant to replace CCC's detailed policies. Rather, the Code should be used as a reference guide in addition to the various CCC policies and procedures already in place. In addition, the *Code of Conduct* is not intended to cover all issues or situations CCC employees may face, as such, employees should work

with their managers to clarify any uncertainties. Professionalism and the exercise of good judgement are paramount in all business matters.

- 2.2. The *Code of Conduct* applies to employees, which is meant to refer to all employees whether permanent, term, student, contract or members of the executive, and includes consultants and others representing CCC. Please note that for ease of reference, the term employee has been used throughout the Code.
- 2.3. All employees will have access to a copy of the *Code of Conduct* and are required to read it and abide by its principles. All employees will be required to sign annually their acknowledgement and agreement confirming their understanding of the *Code of Conduct* and their responsibility to comply with the Code.

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3. Client relations

- 3.1. In interactions with clients and outside parties, employees are expected to act in good faith, conducting business in a positive and polite manner. Employees should act in the best interest of the Corporation and exercise good judgement while striving to be creative and adaptable in finding solutions to clients needs.

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4. Professionalism

- 4.1. Employees should strive to conduct themselves in a professional manner at all times. They should strive to achieve the highest standards of behaviour and integrity in their work, both individually and in working with others.
- 4.2. Professionalism is not only measured by the type of work one does. It is also determined by the attitude and behaviour with which one approaches and performs one's work. Professionalism entails the demonstration of competence at all times, being dedicated to the pursuit of excellence and committed to the principles of ethical behaviour.
- 4.3. Employees are encouraged to portray a respectable and positive image to colleagues, clients, customers and members of the general public, either in an

office environment or when representing CCC at public functions in Canada or internationally.

- 4.4. Employees are expected to respect the diverse cultures, customs and business practices they encounter when working in Canada or in a foreign country.

5. Public comments

- 5.1. With respect to media requests, only a designated spokesperson can issue a statement or make comments regarding CCC's position on a given subject. If an employee is asked to comment publicly on issues related to the Corporation's affairs or projects CCC is undertaking, the employee must decline to comment and refer the enquiry to the Vice President, Strategy and Organizational Development.

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6. Business conduct

- 6.1. Employees must comply with all applicable laws in Canada and in the countries where they will be doing business, and will abide by the regulations and policies that govern the Corporation.
- 6.2. Employees must comply with CCC's *Fraud Policy*, and are encouraged to consult it for more details.
- 6.3. Employees will communicate and negotiate with honesty with coworkers, clients, customers, suppliers, partners, stakeholders and the public in general.
- 6.4. Employees are expected to act in a manner that will meet the standards of close public scrutiny.

7. Conflict of interest

- 7.1. Each employee is expected to avoid situations that may lead to a real, potential or perceived conflict of interest. In adhering to the Code, employees are encouraged to read and observe the spirit of the Treasury Board's *Values and Ethics Code for the Public Service*. Adherence to this Code minimizes the possibility of conflicts arising between an employee's private interests and his or her official duties and responsibilities with the Corporation. In the event of a real, potential or perceived conflict of interest, employees are to consult with his or her immediate supervisor and/or a Human Resources representative.

8. Confidentiality and disclosure of information

- 8.1. Employees or others working for CCC must respect the confidentiality of the Corporation's clients and must protect corporate information.
- 8.2. All employees of CCC are responsible for ensuring the confidentiality, integrity and availability of the Corporation's information assets. Employees must comply with CCC's *Information Security Policy*.
- 8.3. The *Access to Information Act* and the *Privacy Act* govern how the Corporation collects, uses, stores, discloses and disposes of certain information.
- 8.4. Every employee is required to respect the confidentiality requirements of any information the employee has obtained through his or her position.
- 8.5. The *Access to Information Act* gives Canadian citizens and permanent residents access to information in federal government records. CCC expects employees to ensure that they do not destroy, alter, falsify or conceal a record in contravention of the Act.
- 8.6. CCC expects employees to comply with the *Privacy Act*, which gives Canadian citizens and permanent residents the right to access personal information held by federal agencies and protects against the unauthorized use or disclosure of that information.

9. CCC property

- 9.1. CCC assets are to be used only for lawful and proper purposes and employees are expected to use and safeguard CCC property for the conduct of CCC business and to protect it from theft, misuse or damage.
- 9.2. Employees and others working for CCC are required to return all CCC property if and when employment ends or they are requested to do so.

10. Copyrights

- 10.1. Copyrighted work is work, including intellectual property, for which the owner thereof has the sole right to produce or reproduce in whole or substantial part, in any material form whatsoever, or to authorize such act. Copyrighted works are not to be copied improperly.

11. Bribery

- 11.1. Under no circumstances will CCC employees knowingly offer, give or receive a bribe, either in a direct or indirect manner. Bribery is defined as money or favours given or promised in order to influence the judgment or conduct of a person in a position of trust.

12. Fiscal integrity and responsibility

- 12.1. CCC is committed to being fiscally responsible in all its business activities. Employees should recognize and act to ensure value for money in fulfilling day-to-day duties and responsibilities. Employees shall exercise prudent and responsible management in their expenditure and use of corporate facilities and assets.

13. Political activity

- 13.1. CCC Employees can participate in political activities as private citizens during non-working hours. Employee participation in political activity shall not jeopardize their impartiality as employees of a federal Crown corporation nor interfere with their capacity to perform their duties as employees of CCC. Participation in political activities shall be kept separate from the employee's association with CCC.
- 13.2. CCC Employees who wish to work for a candidate or a political party during regular work hours and present themselves as candidates in elections at the federal, provincial or municipal level must submit a written request for leave without pay.

14. Internal disclosure of wrongdoing in the workplace

- 14.1. CCC Employees shall disclose information concerning wrongdoing in the workplace and have the right to expect to be treated fairly and to be protected from reprisal when they report allegations of internal wrongdoings in good faith. *CCC's Policy on Internal Disclosure of Wrongdoing in the Workplace* can be consulted for more information.

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15. Health and safety

- 15.1. CCC is committed to ensuring that the Corporation's work environment is both safe and healthy for its employees. No employee should undertake an action or activity that would jeopardize his/her own safety. Employees are encouraged to consult CCC's *Occupational Safety and Health Policy* for more details.
- 15.2. No employee shall work under the influence of alcohol, illegal drugs or other intoxicants that would impair an employee's effectiveness.

16. Employee relations

- 16.1. CCC Employees are expected to conduct themselves professionally and with personal integrity when representing the Corporation whether in or out of the workplace and to respect and cooperate with fellow workers.
- 16.2. Employees have the right to receive fair and equitable treatment. They are entitled to a harassment-free workplace. CCC's *Policy for a Harassment-Free Workplace* can be consulted for more information.

17. Executives, managers and employees responsibilities

- 17.1. Everyone at CCC must read the *Code of Conduct* and comply with all the principles of this Code. Upon joining the Corporation, employees must sign a Declaration of Compliance confirming that the employee understands the policy.
- 17.2. On an annual basis, employees will review and sign and re-affirm by signature their understanding of the *Code of Conduct* and their commitment to uphold the principles of the Code.
- 17.3. All employees have the responsibility to report any breaches of CCC's *Code of Conduct*. In all cases, the matter will be treated confidentially and there will be no negative consequences for reporting a breach in good faith. The applicable Policy can be consulted for more information on how to report specific breaches of the Code. In cases where no Policy applies, please report these breaches to CCC's management.
- 17.4. Management is responsible for ensuring that employees have access to copies of the *Code of Conduct* and that any questions, concerns or matters of interpretation relating to the Code are explained.

18. Breach of the Code of Conduct

- 18.1. Employees who knowingly violate the *Code of Conduct* are subject to appropriate corrective and/or disciplinary actions. For those employees who are unionized, these corrective actions will be in accordance with the agreement between CCC and the Professional Institute of the Public Service of Canada, which could range from further training to dismissal.