



## **1. Effective date**

The President approved this policy which is effective December 15, 2016. This policy replaces the Travel (Operational Policy) last revised March 31, 2015 & Hospitality (Operational Policy) last revised January 15, 2014.

## **2. Executive Sponsor**

Vice-President, Corporate Services & Chief Financial Officer.

## **3. Definitions**

Definitions of key terms to be used in the interpretation of this policy are provided in Appendix E.

## **4. Application**

This policy applies to the members of the Board of Directors and all CCC employees. "CCC employees" for the purposes of this policy is defined as Corporate Officers, CCC employees and CCC consultants that represent the Corporation. This policy does not apply to China Representative Office staff who follow relevant Global Affairs Canada (GAC) policies.

## **5. Compliance and Monitoring**

All CCC employees are to comply with the content of this policy, related policies/instructions and all subordinate unit specific procedures as it pertains to the conduct of all CCC operations. It is incumbent upon each employee to know and abide by the content of this policy/instruction. Further, it is the responsibility of their respective Managers and Executive to ensure that:

- All employees are made aware of the policies, instructions or procedures that govern daily work activities, especially during the orientation phase of a new employee or an employee transferred from another business unit within CCC;
- All employees are continuously monitored in the application of all relevant policies, instructions and procedures during the conduct of daily business operations; and,
- Cyclical review of policies, instructions and procedures take place as defined in the 'Policy Governance Framework'; and that any resultant amendments or amendments otherwise derived from lessons learned be forwarded to VP Corporate Services & CFO for overall policy suite reconciliation.



## **6. Context**

- 6.1 Parliament and Canadians expect the Canadian Commercial Corporation to be well managed with the prudent stewardship of public funds, and the effective, efficient and economical use of public resources. In doing so, they also expect CCC to act at all times with the highest standards of integrity, fiscal prudence, accountability, transparency and values and ethics. These fundamental management principles apply to all CCC expenditures.
- 6.2 It is also understood that a range of travel, hospitality, conference and event related activities are necessary in order for CCC to effectively deliver on the corporation's core mandate to assist in the development of trade between Canada and other nations and assist Canadian exporters to obtain goods and commodities from outside Canada, and to dispose of goods and commodities that are available for export from Canada..
- 6.3 This policy is a key financial management instrument that requires CCC to have oversight mechanisms, accountabilities and controls in place to ensure that expenditures related to travel, hospitality, conferences and events are managed in an effective, efficient and economical manner.
- 6.4 It is expected that CCC will focus travel expenditures on core mandate activities in doing business internationally and where travel is required CCC will maintain financial business processes that minimize expenditures. In addition, CCC will maintain effective travel planning, approval and reporting processes and ensure the consideration of alternatives to travel such as virtual presence and other remote meeting solutions.
- 6.5 This policy is also to be read in conjunction with the Values and Ethics Code for the Public Sector and CCC's Code of Conduct & Business Ethics, other financial management policy instruments, the National Joint Council Travel Directive and the Directive on Special Travel Authorities.

## **7. Policy Statement**

- 7.1 **Objective**  
That travel, hospitality, conferences and event expenditures are managed with prudence and probity and represent the most economic and efficient use of funds given the nature of the international business activity in relation to the achievement of CCC's core mandate to assist in the development of trade between Canada and other nations and assist Canadian exporters to obtain



goods and commodities from outside Canada, and to dispose of goods and commodities that are available for export from Canada..

## 7.2 Expected Results

CCC will have effective oversight mechanisms, accountabilities and controls in place for travel, hospitality, conferences and events to ensure:

- a. Expenditures incurred are focused on achieving CCC's core mandate;
- b. expenditures are minimized and where they are necessary are managed in an effective, efficient and economical manner;
- c. where travel is required justification is provided regarding: why virtual presence and other remote meeting solutions were not used to meet operational requirements; the selection of the mode of transportation, the accommodation, and the number of travellers necessary to conduct CCC business.

## 8. Policy Requirements

8.1 The **President** is responsible for:

8.1.1 Approving the CCC's total annual budgets for travel, hospitality, conferences and events.

8.1.2 Ensuring that effective CCC oversight and control mechanisms are in place so:

- a. An accountability framework and decision support and reporting system is in place to manage approval processes, including to support necessary Chair approvals, consistent with the specific approval authorities set out in Appendices A to D of this policy;
- b. Means to avoid or minimize travel, hospitality, conference and event costs have been considered in the approval process, including; the use of virtual presence and other remote meeting solutions whenever available and appropriate to meet the objectives; ensuring the most economical means considering the location and the scale of activities or events; the minimum number of appropriate attendees are selected; and that travel is targeted to CCC's core mandate, provides value for money and is justified;
- c. Individual proposals for travel, hospitality, conferences and events are reasonable and appropriate and support CCC's core mandate, objectives and priorities;
- d. Expenditures with respect to the annual budgets for travel, hospitality, conferences and events are periodically reviewed during the year and managers with financial authorities have access to timely reporting to support effective monitoring and fiscally prudent decisions; and



- e. The requirements for travel, hospitality, conferences and events set out in Appendices A to D are applied.
- 8.1.3 Under the authority of the Board of Directors, approving CCC delegation of authority matrices relative to travel, hospitality, conferences and events.
- 8.1.4 Disclosing the total annual expenditures for each of travel, hospitality, and conference fees for CCC, through its website, including a brief description of the main variances from the previous year's actual expenditures. The timing of this disclosure is to coincide with the tabling of the Annual Report.
- 8.2 The **Vice-President, Corporate Services & Chief Financial Officer** is responsible for:
  - 8.2.1 Providing the President with independent and objective advice and recommendations on the annual budgets and proposals, priorities and expenditures pertaining to the management of travel, hospitality, conferences and event expenditures.
  - 8.2.2 Supporting the President and Vice-Presidents in establishing sustainable and robust corporate frameworks and plans, policies, financial management systems, decision support information, monitoring and reporting necessary to meet the requirements of this policy.
  - 8.2.3 Supporting periodic reviews of expenditures necessary to meet the requirements of this policy.
  - 8.2.4 Acting as the delegated travel approval authority in situations where the traveller is the President, based on established written policies and procedures.
  - 8.2.5 Ensuring that delegated financial authorities and associated responsibilities relative to travel, hospitality, conferences and events are clearly communicated, and adhered to by directors and managers.
- 8.3 **Vice-Presidents, Directors and Managers with delegated financial authorities** are responsible for:
  - 8.3.1 Ensuring within their areas of responsibility:
    - a. Means to avoid or minimize travel, hospitality, conference and event costs have been considered in the approval process, including; the use of virtual presence and other remote meeting solutions whenever available and



- appropriate to meet the objectives; ensuring the most economical means considering the location and the scale of activities or events; the minimum number of appropriate attendees are selected; and, that travel is targeted to the CCC's core mandate, provides value for money and is justified;
- b. Individual proposals and expenditure decisions for travel, hospitality, conferences and events demonstrate that they are necessary to achieve CCC core mandate, objectives or priorities while demonstrating value for money;
  - c. Expenditures with respect to travel, hospitality, conferences and events are monitored throughout the year and are considered as part of periodic reviews with recurring travel, hospitality, conferences and events periodically assessed to ensure continued relevance; and
  - d. The specific requirements for travel, hospitality, conferences and events set out in Appendices A to D are applied.

#### **8.4 Monitoring and Reporting**

- 8.4.1 The President is responsible for ensuring appropriate monitoring frameworks are in place to support their oversight of the sustained and effective implementation of this policy.
- 8.4.2 The Vice-President, Corporate Services & Chief Financial Officer is responsible for supporting the President by overseeing the implementation and monitoring of this policy in CCC; bringing to the President's attention any significant difficulties, gaps in performance or compliance issues and developing proposals to address them; and reporting significant performance or compliance issues to the Audit Committee of the Board of Directors.
- 8.4.3 The Director of Internal Audit is responsible for monitoring the Corporation's compliance with the requirements of this policy and conducting periodic reviews in accordance with approved Internal Audit Plans.

#### **8.5 Consequences**

- 8.5.1 In instances of non-compliance, the President is responsible for taking corrective measures with those responsible for implementing the requirements of this policy.
- 8.5.2 In support of the responsibility of the President, the Vice-President, Corporate Services & Chief Financial Officer is to ensure corrective actions are taken to address instances of non-compliance with the requirements of this policy. Corrective actions can include requiring additional training, changes to



procedures and systems, the suspension or removal of delegated authority, disciplinary action and other measures as appropriate.

## **9. References**

### 9.1 External

9.1.1 [Financial Administration Act](#)

9.1.2 [Directive on the Management of Expenditures on Travel, Hospitality and Conferences](#)

### 9.2 Internal

9.2.1 Code of Conduct & Business Ethics

9.2.2 Integrity in Business Operations (Policy)

9.2.3 Delegation of Financial Authority (Policy)

## **10. Exceptions**

The President must approve any exception to this policy and in the case where the exception arises in relation to the President, the Vice-President, Corporate Services & CFO must approve the exception. Original, written evidence of the exception approval must be placed on the project file or with the Sponsor as applicable; and, a copy of such approval recorded and available to the Quality Management & Process Analyst, CS & CFO / QM & P. The Vice-President, Corporate Services & CFO must inform the Chair of Board of Directors of exceptions to this policy in an instance where the approval of the Chair of Board of Directors was otherwise required under this policy.

## **11. Enquiries**

Enquiries regarding content of this policy are to be forwarded to the Vice-President, Corporate Services & CFO.



**Document History**

<b>Original</b>	Version 1.0 July 2016
<b>Approval: Name</b>	Martin Zablocki
<b>Approval: Title</b>	President
<b>Approval: Date</b>	August 18, 2016

<b>Amendment History</b>	
<b>Version/Date</b>	<b>Change Summary</b>
1.0 Aug 18, 2016	NB: Replaces previous Travel & Hospitality Policies
1.1 Dec 15, 2016	Clarification added regarding exceptions to policy (10), Board of Directors' travel (A.2.3) and where travel entails a non-CCC business component (A.2.4) and approvals for hospitality where both the President and Vice-President, Corporate Services and Chief Financial Officer are in attendance (B2.6)
Note: Add Rows as Required	



## **Appendix A - Specific Requirements for Travel**

### **Introduction**

Travel covers a large spectrum of legitimate activities that are necessary to support the requirements of carrying out international business development, contracting and contract management work in delivering services to Canadians and to meet CCC priorities. In this way travel supports the direct delivery of the core mandate and operations of CCC. Travel also supports other CCC objectives and priorities in areas such as governance, planning and having a well trained workforce. The specific requirements set out in this Appendix are in addition to terms and conditions of reimbursement of travel on government business provided in the *National Joint Council Travel Directive*.

### **A.1 Planning**

- A.1.1 Prudent planning for travel applies to both CCC employees and non-CCC employees. Travel is to be avoided where effective cost efficient alternatives are appropriate and available. Virtual presence, teleconference, videoconference and other remote meeting solutions are to be considered for every travel situation, and if not used the reason is to be documented in the travel authorization justification.
- A.1.2 The following categories of travel are to be identified and form part of the travel authorization for expenditure initiation for each proposed trip:
- a. Travel that is required in support of the direct delivery of the core mandate of CCC, legislative or legal requirements;
  - b. Travel that is necessary to engage key stakeholders in relation to policy, program or regulatory development or renewal or other matters that support CCCs' ongoing working relationship or operations with such clients & partners;
  - c. Travel that is necessary to support sound internal governance of CCC including any management planning sessions and Board of Director & Committee meetings, or that is necessary for the recruitment or hiring of employees;
  - d. Travel to enable the training of employees to meet the assigned duties of their positions; and
  - e. Other travel.





- A.1.3 Where "other travel" is selected as the category for the travel a detailed explanation regarding the purpose of the travel is required as part of the travel authorization.
- A.1.4 The number of CCC travellers is to be limited to the minimum necessary to effectively deliver the business of CCC and achieve the objective of the travel. The total number of travellers attending the same event or activity is to be documented for each travel authorization. When the number is five or more the justification is to be noted on the travel authorization.
- A.1.5 The most economical means is to be selected given the nature of the trip when booking transportation, accommodations and meeting facilities, including giving preference to using appropriate government facilities. Where possible the travel arrangements should be booked in advance to obtain optimal discounted rates.
- A.1.6 To facilitate the identification and selection of the most economical means given the nature of the trip, when booking transportation and/or accommodations, CCC employees must avail themselves of the services provided by CCC's travel provider.

**A.2 Travel Authorization**

- A.2.1 The authority to pre-approve both domestic and international travel (excluding China Trade Offices) is delegated by the President to each Vice-President for their respective areas of responsibility.
- A.2.2 The President further delegates the authority to pre-approve travel within Canada and/or United States to each Director for their respective areas of responsibility.
- A.2.3 Travel by members of the Board of Directors to attend meetings of CCC's Board of Directors and its committees does not require pre-approval. Travel for other purposes must be pre-approved by the President.
- A.2.4 Any travel including a non-CCC business component requires additional pre-approval by the Vice-President, Corporate Services & CFO.
- A.2.5 Expenditure initiation for travel is to be documented and communicated as follows:



- a. approval by the authorized delegate of the travel for a trip on the Travel Authority Form; and
- b. Travel Authority Forms must be copied via e-mail to (a) Senior Management Committee, (b) Finance Helpdesk, (c) CM&P – CM Pre-Contract Billings & (d) the RC Owner of the Work Order being charged.
- c. Travel and all costs incurred directly and inherently for purposes of hosting non-public servants such as foreign delegations are considered as part of hospitality and are to be approved in accordance with Appendix B

A.2.6 In situations when the President is the traveller, the Vice-President, Corporate Services and CFO will be the approval authority for travel.

A.2.7 The travel pre-approval authority required under A.2.1 or A.2.2 does not apply to:

- a. local travel within the normal office location and working environs of an employee using means such as taxis, public transit or personal vehicle for the conduct of CCC's day to day business, such local travel can be authorized and approved after such travel by the appropriate RC Owner of the Work Order being charged.

A.2.8 All China Trade Offices travel must be approved by the Global Affairs Canada Senior Trade Commissioner (STC) and this travel authority approval must be copied via e-mail to the CCC China Helpdesk.

A.2.9 The trip data elements of Table 1 are to be included in the travel authorization for expenditure initiation purposes and, at a minimum, will form part of the associated authorization form.

<b>Table 1: Checklist of Trip Authorization Elements</b>	
<b>Element</b>	<b>Description</b>
A. Objective	Summary of the objective of the travel
B. Category	Include the applicable category from A.1.2. Only include one category
C. Traveller as public servant or non-public servant	Identify whether the traveller is a public servant or non-public servant
D. Virtual presence or	Rationale why virtual presence or other remote meeting



other remote meeting solutions	solutions were not applied
E. Number of travellers	Rationale for the number of travellers as it relates to the suitability of the named traveller for the stated objective
F. Mode of transportation	Identify the estimated cost and rationale for the use of each of the applicable modes of transport: air, rail, bus, ferry, taxi, personal motor vehicle, rental motor vehicle, government fleet vehicle, public transit or other mode
G. Accommodations	Identify the estimated cost and rationale for of each type of accommodation including commercial accommodation, commercial accommodation not listed in Accommodation and Car Rental Directory, private accommodation, other accommodation.
H. Meals	Identify the estimated cost of the meals based on the meal allowances set out in the <i>NJC Travel Directive</i> and excluding those meals that are paid as part of the event or the mode of transportation
I. Incidentals and other costs	Identify the estimated cost of the incidentals and other costs based on the allowances set out in the <i>NJC Travel Directive</i>

**A.3 Reporting and Control**

A.3.1 CCC will collect and sustain in their financial management or related systems the travel category (element B.) and the associated financial information data elements F. to I. specified in Table 1.

A.3.2 Claims for reimbursement of travel must be completed and include original receipts/supporting documentation, be accompanied by the pre-approval, and be approved in accordance with the Delegation of Financial Authority. Travel claim approval in all instances is by the RC Owner of the Work Order being charged regardless of the pre-approval person or level. Where actual travel costs exceed pre-approved estimates by more than ten percent (10%), a written explanation must accompany the claim for reimbursement.

A.3.3 CCC will have appropriate internal controls and an associated monitoring system in place to support periodic reviews of travel expenditures. This will also contribute to the validation of the annual report on the total annual spending on travel as set out in policy [provision 8.1.4](#).



---

## Appendix B - Specific requirements for Hospitality

### Introduction

The provision of hospitality is often necessary to support the conduct of CCC's international business development, contracting and contract management work and to deliver on its core mandate and priorities. In this way, it may support the conduct of business with other levels of government, industry or public interest groups, visits by foreign dignitaries as well as corporate business meetings. All CCC employees are responsible for exercising rigorous management of hospitality, including taking measures to minimize and/or avoid costs. Decisions to offer hospitality must be carefully considered and demonstrate the necessity based on the circumstances and/or courtesy, diplomacy or [protocol](#).

### B.1 Planning

In the planning of hospitality expenditures the following limitations or exclusions are applied:

- B.1.1 The provision of food and beverages is acceptable in accordance with the standard and maximum per person cost limits in Tables 2A & B. These limits are based on the allowances set out in the [National Joint Council Travel Directive](#) and reflect per person hospitality costs provided per meal type over the course of a single day and per serving for refreshments.
- a. The Standard Cost per Person is the expected meal cost per person to be applied in normal circumstances, particularly for events involving CCC employees and/or other federal public servants only, and are approved by Vice-Presidents in their respective areas of responsibility;
  - b. A cost per person exceeding the Standard Cost and up to the Maximum Cost per person is to be applied in exceptional circumstances, justified by the type of event, the status and nature of participants and for reasons of courtesy, diplomacy and/or protocol. Vice-Presidents in their respective areas of responsibility are the approval authority for these proposed hospitality costs; and
  - c. Planned costs exceeding the maximum cost per person require approval by the President.

**Table 2A: Maximum Food and beverage Cost Per Person  
(internal: hospitality includes only public servant attendees)**

Food and beverages	Standard Cost per Person	Maximum Cost per Person
Breakfast	1.5 X Breakfast Allowance	1.5 X Standard Cost Per Person
<a href="#">Refreshment</a>	0.5 X Breakfast Allowance	
Lunch	2.0 X Lunch Allowance	
<a href="#">Reception</a>	2.0 X Breakfast Allowance	
Dinner	1.75 X Dinner Allowance	

**Table 2B: Maximum Food and beverage Cost Per Person  
(external: hospitality includes non-public servant attendees)**

Food and beverages	Standard Cost per Person	Maximum Cost per Person
Breakfast	1.5 X Breakfast Allowance	2.0 X Standard Cost Per Person
<a href="#">Refreshment</a>	0.5 X Breakfast Allowance	
Lunch	2.0 X Lunch Allowance	
<a href="#">Reception</a>	2.0 X Breakfast Allowance	
Dinner	1.75 X Dinner Allowance	

B.1.2 The standard for hospitality is the provision of non-alcoholic beverages. The provision of alcoholic beverages is only permitted in special circumstances where it is a matter of courtesy, diplomacy or protocol involving non-public servants in government events. Alcoholic beverages will not be provided as hospitality at events involving only CCC employees and other federal public servants. The provision of bottled water or water coolers to CCC employees is not part of hospitality except in situations where they are provided as part of refreshments at events covered under this policy.

B.1.3 Exceptionally, the offering to non-public servants of tickets to the theatre or sporting events, tours of local areas or other places of interest, and other similar [entertainment](#) activities as well as other reasonable measures deemed appropriate for reasons of courtesy, diplomacy or protocol as part of a government event. Federal employees who are required to accompany non-federal government persons can similarly partake in the entertainment activities.



- B.1.4 Local transportation to and from the event or activity is not considered as part of hospitality except in special circumstances involving non-public servants (e.g. a foreign dignitary) for reasons of courtesy, diplomacy or protocol.
- B.1.5 Facility rental and associated costs such as audio/video equipment and technical support or translation services are not considered as part of hospitality except in special circumstances for reasons of courtesy, diplomacy or protocol (e.g. in circumstances where the costs are directly and inherently for hospitality purposes, such as the rental of a room to be used only for hosting a lunch). These costs, however, do form part of approvals of events under this policy in Appendix D.
- B.1.6 CCC employees can be provided hospitality only in situations where:
- a. CCC employees are required to participate in operations, business meetings, training or events that extend beyond normal working hours or outside normal office location and working environs. This includes situations where employees are required to work through normal break and meal periods. It may include situations where there are no nearby or appropriate facilities to obtain [refreshments](#) or meals and/or where staff dispersal is not effective or efficient.
  - b. CCC employees are required to be part of an event, or to participate in a CCC or government hosted [conference](#), which includes participants that are not employees of the Government of Canada and for whom hospitality will be provided as a matter of courtesy, diplomacy or protocol.
- B.1.7 Non-public servants can be provided hospitality in events where it is a matter of courtesy, diplomacy or protocol or is necessary to facilitate the achievement of CCC's business objectives. All costs, such as travel, transportation and accommodation, incurred directly and inherently for purposes of hosting non-public servants such as foreign delegations are considered as part of hospitality and are to be approved in accordance with Appendix B.

## **B.2 Hospitality Authorization**

- B.2.1 The Chair of the Board of Director's pre-approval in writing is required when the following hospitality components are present, unless delegated under paragraph B.2.2
- a. Total hospitality costs exceed \$5,000; or
  - b. Alcohol beverages will be provided; or



- c. Food and beverage costs exceed the maximum cost per person (Tables 2A & B); or
  - d. [Entertainment](#) will be provided; or
  - e. Hospitality or [entertainment](#) will be provided to a spouse or to a person accompanying an event participant; or
  - f. Hospitality paid by CCC will be extended at the residence of a CCC employee.
- B.2.2 The Chair of the Board of Directors delegates to (a) the President and each Vice-President in their respective areas of responsibility the approval authorities in B.2.1 (b.) to (f.) and (b) the President an increased hospitality approval authority limit under B.2.1 (a.) to \$20,000 to meet operational requirements.
- B.2.3 When the President and each Vice-President have increased delegation for any element of B.2.1 (a.) to (f.), event approvals will still be required as set out in Appendix D if applicable.
- B.2.4 President pre-approval in writing of hospitality is required when the total hospitality costs exceed \$2,000 but are \$20,000 or less
- B.2.5 Vice-President pre-approval in writing of hospitality is required when total hospitality costs associated with the event are \$2,000 or less.
- B.2.6 With the exception of the Chair of the Board of Directors, an individual who is a participant at a hospitality event may not approve the hospitality. In such circumstances, the approval of higher authority is to be obtained. In situations when the President is in attendance the Vice-President, Corporate Services & Chief Financial Officer will be the approval authority for hospitality. In situations where the President and Vice-President, Corporate Services & Chief Financial Officer are in attendance, then the President and Vice-President, Corporate Services & Chief Financial Officer must jointly approve the claim for hospitality to a maximum of \$2,000.
- B.2.7 The President has the authority to provide for awards to employees and may approve hospitality as a part of a related ceremony consistent with this policy. The President may also provide hospitality consistent with the *National Public Service Week: Serving Canadians Better Act*. Event approvals under Appendix D of this policy may still apply.
- B.2.8 Blanket Hospitality Authorities (BHA) pre-approval limits are provided for the President and Vice-Presidents using Annex A & B to this policy. A BHA may be provided to other CCC employees using Annex C, D or E where their duties would
-





reasonably result in these individuals extending hospitality on a recurring basis upon recommendation of the respective Vice-President and approval of the President or in the case of a Board of Director member upon recommendation of the Vice-President, Corporate Services & CFO and approval of the Chair of the Board or Audit Committee as appropriate.

B.2.9 CCC employees are called upon to use their best judgment to avoid situations of real or perceived conflict of interest for themselves and for any recipient of gifts from CCC. CCC employees are permitted to extend CCC inventoried gifts after considering the following criteria, keeping in mind the full context of CCC's Code of Conduct & Business Ethics:

- a. it is culturally appropriate or protocol demands a demonstration of consideration; and,
- b. local regulations or laws deem the offering of gifts permissible.

B.2.10 In cases where there is strong business rationale to provide a "Special Gift" beyond those in the CCC gift inventory, CCC employees are required to seek written pre-approval from their respective Vice-President or the President using Annex F.

B.2.11 CCC employees are called upon to use their best judgment to avoid situations of real or perceived conflict of interest for themselves when in receipt of hospitality or a gift. CCC employees and Board members are permitted to receive hospitality and/or gifts after considering the following criteria, keeping in mind the full context of CCC's Code of Conduct & Business Ethics:

- a. are infrequent and of minimal value (low-cost promotional objects, simple meals, souvenirs with no cash value);
- b. arise out of activities or events related to the official duties of the CCC employee or Board member concerned;
- c. are within the normal standards of courtesy, diplomacy or protocol; and,
- d. do not compromise or appear to compromise in any way the integrity of the recipient concerned or CCC.

B.2.12 CCC employees shall not accept or solicit any gifts, hospitality or other benefits that may have a real or apparent influence on their objectivity in carrying out their official duties or that may place them under obligation to the donor.

B.2.13 Where it is impossible to decline gifts, hospitality and other benefits that do not meet the principles set out in B.2.11 and B.2.12 without causing offence, the recipient shall notify their Vice-President or the President. The Vice-President or President will then respond to the recipient in writing as to whether the gift is to



be retained by CCC, donated to charity, disposed of, or retained by the recipient concerned.

### **B.3 Reporting and Controls**

- B.3.1 When a public servant is the recipient of hospitality, he/she is responsible for ensuring that he or she does not seek reimbursement for equivalent meals or refreshments as a part of a travel claim or other expense claim.
- B.3.2 Claims for reimbursement of hospitality must be completed and include original itemized receipts/supporting documentation, be accompanied by the pre-approval, and be approved in accordance with the Delegation of Financial Authority. Where actual hospitality costs exceed pre-approved estimates by more than ten percent (10%), a written explanation must accompany the claim for reimbursement. Claims for reimbursement of hospitality expenditures must list the names of the individuals to whom hospitality was extended. Where hospitality involves a group larger than 10 people it is sufficient to describe the nature of the event and to describe the participants in general terms without listing each participant by name. However, the most senior CCC participant should be named.
- B.3.3 CCC will have appropriate internal controls and an associated monitoring system in place to support periodic reviews of hospitality expenditures. This will also contribute to the validation of the annual report on the total annual spending on hospitality as set out in policy [provision 8.1.4](#).



---

**Annex A**

**Canadian Commercial Corporation  
Hospitality Blanket Pre-Approval Form: President**

Given CCC's new focus on business development and the need to align its policies with the corporate objectives, CCC is adopting a blanket hospitality approach which will equip key CCC personnel to undertake hospitality in the ordinary course of business exercising their professional judgement.

**Blanket Pre-Approval of Hospitality - President:**

Pre-approval of hospitality expenditures for the President is hereby set at a maximum of \$\_\_\_\_\_ (Value) per event. For any single hospitality expenditure above this amount a separate pre-approval must be obtained in accordance with this policy.

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
Chairperson, Board of Directors

**Note:** Once completed and approved, the original form is to be sent to CCC's Finance Unit to be filed with Delegation of Financial Authority documentation.



---

**Annex B**

**Canadian Commercial Corporation  
Hospitality Blanket Pre-Approval Form: Vice-Presidents**

Given CCC's new focus on business development and the need to align its policies with the corporate objectives, CCC is adopting a blanket hospitality approach which will equip key CCC personnel to undertake hospitality in the ordinary course of business exercising their professional judgement.

**Blanket Pre-Approval of Hospitality - Vice-Presidents:**

Pre-approval of hospitality expenditures for Vice-Presidents is hereby set at a maximum of \$\_\_\_\_\_ (Value) per event. For any individual hospitality expenditure above this amount a separate pre-approval must be obtained in accordance with this policy.

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
President

**Note:** Once completed and approved, the original form is to be sent to CCC's Finance Unit to be filed with Delegation of Financial Authority documentation.



**Annex C**

**Canadian Commercial Corporation  
Hospitality Blanket Pre-Approval Form:  
Non-Senior Executive CCC Personnel**

Given CCC's new focus on business development and the need to align its policies with the corporate objectives, CCC is adopting a blanket hospitality approach which will equip key CCC personnel to undertake hospitality in the ordinary course of business exercising their professional judgement.

**Part 1: Blanket Pre-approval of Hospitality Rationale  
- Non-Senior Executive CCC Personnel:**

**Part 2: Blanket Pre-approval of Hospitality  
- Non-Senior Executive CCC Personnel:**

Pre-approval of hospitality expenditures for \_\_\_\_\_ (Employee Name) is hereby set at a maximum of \$\_\_\_\_\_ (Value) per event. For any individual hospitality expenditure above this amount a separate pre-approval must be obtained in accordance with this policy.

Recommended by: \_\_\_\_\_ Date: \_\_\_\_\_  
Vice-President \*

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
President

\* Recommendation is required by the respective Vice-President of the non-senior executive CCC personnel.

**Note: Once completed and approved, the original form is to be sent to CCC's Finance Unit to be filed with Delegation of Financial Authority documentation.**



**Annex D**

**Canadian Commercial Corporation  
Hospitality Blanket Pre-Approval Form:  
Chairperson, CCC Board of Directors**

Given CCC’s new focus on business development and the need to align its policies with the corporate objectives, CCC is adopting a blanket hospitality approach which will equip CCC Board members to undertake hospitality in the ordinary course of business exercising their professional judgement.

**Part 1: Blanket Pre-approval of Hospitality Rationale  
- Chairperson, CCC Board of Directors:**

**Part 2: Blanket Pre-approval of Hospitality  
- Chairperson, CCC Board of Directors:**

Pre-approval of hospitality expenditures for \_\_\_\_\_ (Chairperson, CCC Board of Directors Name) is hereby set at a maximum of \$ \_\_\_\_\_ (Value) per event. For any individual hospitality expenditure above this amount a separate pre-approval must be obtained in accordance with this policy.

Recommended by: \_\_\_\_\_ Date: \_\_\_\_\_  
Vice-President, Corporate  
Services and CFO

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
Chairperson, Audit Committee

**Note: Once completed and approved, the original form is to be sent to CCC’s Finance Unit to be filed with Delegation of Financial Authority documentation.**

---

**Annex E**

**Canadian Commercial Corporation  
Hospitality Blanket Pre-Approval Form:  
CCC Board Member**

Given CCC's new focus on business development and the need to align its policies with the corporate objectives, CCC is adopting a blanket hospitality approach which will equip CCC Board members to undertake hospitality in the ordinary course of business exercising their professional judgement.

**Part 1: Blanket Pre-approval of Hospitality Rationale  
- CCC Board Member:**

**Part 2: Blanket Pre-approval of Hospitality  
- CCC Board Member:**

Pre-approval of hospitality expenditures for \_\_\_\_\_ (CCC Board Member Name) is hereby set at a maximum of \$\_\_\_\_\_ (Value) per event. For any individual hospitality expenditure above this amount a separate pre-approval must be obtained in accordance with this policy.

Recommended by: \_\_\_\_\_ Date: \_\_\_\_\_  
Vice-President, Corporate  
Services and CFO

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
Chairperson, Board of Directors

**Note: Once completed and approved, the original form is to be sent to CCC's Finance Unit to be filed with Delegation of Financial Authority documentation.**



**Annex F**

**Canadian Commercial Corporation  
Special Gift Pre-Approval Form**

**Part 1: Special Gift Rationale**

(Describe event and purpose here; indicate potential conflicts of interest or risks with mitigation strategy, if any)

**Part 2: Special Gift Application and Pre-Approval**

Requested by: \_\_\_\_\_ Date: \_\_\_\_\_  
Employee Name

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_  
President or Vice-President

**Note:** Once completed and approved, the original of this form is to be included with the claim for reimbursement of hospitality expenditures.





## **Appendix C - Specific requirements for Conferences**

### **Introduction**

[Conferences](#) or similar events often provide unique opportunities for exchange, debates, networking or discussion of specialized or professional information, including establishing or maintaining relationships necessary for the conduct of CCC business or the delivery of the core mandate CCC. Conferences tend to be organized by external organizations and participants are charged fees to attend. To that end, conference approval authorities are conscious of the need for prudence and probity including justification where travel approval is required under Appendix A or under the event approval requirements of Appendix D.

### **C.1 Planning**

- C.1.1 The objective of attending a conference will be principally to support the delivery of the core mandate of CCC and should be specified in the applicable conference approval document. Where travel is involved the travel authorization elements of Table 1 in Appendix A will apply as well as the rationale for the minimum number of necessary conference participants.
- C.1.2 The number of employees attending a conference from CCC will be the minimum necessary to achieve CCC objectives.
- C.1.3 When CCC is organizing a conference it will consider the availability and appropriateness of virtual presence or other remote meeting solutions to minimize costs for participating departments or other participants, and will use available government facilities as a first choice.

### **C.2 Conference Authorization**

- C.2.1 The conference approval authority is both the Vice-President, Corporate Services & Chief Financial Officer along with the delegate as set out in the Delegation of Financial Authority matrix.
- C.2.2 Where multiple employees at CCC will be attending the same conference which constitutes an event, the total planned conference costs will be provided for approval to the most senior approval authority as defined under Appendix D.



### **C.3 Reporting and Controls**

C.3.1 CCC will have appropriate internal controls and an associated monitoring system in place to support periodic reviews of conference expenditures. This will also contribute to the validation of the annual report on the total annual spending on conferences as set out in [provision 8.1.4](#).



## **Appendix D - Specific requirements for events**

### **Introduction**

[Events](#) typically represent or support the business activities and governance of CCC and may include both employees and non-public servants. In keeping with the provisions of this Appendix, the approval of planned spending on events will be subject to appropriate disclosure that supports both Board and President oversight of CCC.

### **D.1 Planning**

D.1.1 CCC will determine the maximum number of employees that are appropriately attending the same event in considering the appropriate event approval authority as specified in section D.2. This will include obtaining the records of the planned costs where travel is involved, as well as other cost factors when CCC is hosting an event such as professional services and facilities rental that will usually fall under a specific fund centre.

D.1.2 In situations where the primary purpose of an event relates to the direct delivery of the core mandate of CCC approvals as set out in section D.2 are not required. All other appendices to this policy continue to apply.

D.1.3 Training activities are considered events. The following criteria define training that does not require event approvals, note that all other appendices to this policy continue to apply, as set out in section D.2 including:

- a. Formalized programs approved and delivered by CCC to staff to ensure that staff are qualified to perform their assigned duties;
- b. Formalized program of instruction to ensure that staff are qualified to perform their assigned duties approved by CCC and delivered by a third party such as the Canada School of Public Service, universities or colleges; or
- c. Formalized program of instruction or accreditation approved by a professional body as recognized by federal or provincial statute and delivered by organizations certified by the professional body, including for the purpose of acquiring or maintaining those accreditations required by staff as part of their duties.

### **D.2.1 Event Authorization**

D.2.1 President pre-approval is required when total planned CCC costs associated with an event will exceed \$25,000.

- D.2.2 Where an event requiring President approval is hosted by CCC, the Audit Committee will also be provided, for information purposes, the total planned and actual CCC costs.
- D.2.3 Vice-President pre-approval of an event is required when the event has a total planned CCC cost of \$25,000 or less.
- D.2.4 For the calculation of the total CCC costs for a single event in order to determine the required approval authority, total costs are to include items such as conferences fees, professional services charges, hospitality, accommodation, transportation, meals, taxes, gratuities and service charges, and other relevant costs directly attributable to the particular event. These costs exclude salary costs and other fixed operating costs as part of the on-going operations of CCC.

### **D.3 Reporting and Controls**

- D.3.1 CCC will have appropriate internal controls and an associated monitoring system in place to support periodic reviews of event expenditures.



## **Appendix E - Definitions**

### **Business meetings**

meetings conducted to advance CCC objectives or operations, including CCC and/or interdepartmental working sessions, work planning meetings, advisory and corporate management committees and staff retreats. Business meetings may or may not involve non-public servants. Typically, meetings that take place as part of sound management and governance of a Crown Corporation, including meetings of Board of Directors & Committees, are considered business meetings.

### **Conferences**

refers to a congress, convention, seminar, symposium or other formal gathering, which are usually organized by a third party external to CCC, where participants debate or are informed of the status of a discipline (e.g. sciences, economics, technology, management). Guest speakers are often part of such conferences that involve employees and/or non-public servants. Retreats, work-planning meetings and training seminars or courses that provide training are not considered as conferences.

### **Entertainment**

includes, but is not limited to tickets to musical, theatre, sporting or similar events, tours of local or other places of interest, and other similar activities for reasons of courtesy, diplomacy and protocol.

### **Events**

include business meetings, CCC or corporate management meetings, conferences as well as any other formal gathering of public servants or non-public servants invited to participate in these activities including prestigious ceremonies, awards and recognition ceremonies. Events do not include meetings or activities whose sole purpose is the direct delivery of core CCC mandate.

### **Hospitality**

consists of the provision of meals, beverages or refreshments to non-public servants in events which are necessary for the effective conduct of CCC business and for courtesy, diplomacy or protocol purposes. In some circumstances and within restrictions defined in this policy, hospitality can also be provided to employees. Exceptionally, in situations involving non-public servants, it may also include entertainment, local transportation to and from events as well as other



reasonable measures deemed appropriate for reasons of courtesy, diplomacy or protocol. Hospitality does not include expenditures for employees or individuals on travel status subject to the [National Joint Council Travel Directive](#); local transportation to and from events or activities for employees; rental of facilities and associated costs; and bottled water or water coolers provided to employees on on-going basis above and beyond an event as defined in this policy.

### **Non-Public Servant**

is any person who is not currently paid a salary by the Government of Canada from the Consolidated Revenue Fund or by a Crown Corporation.

### **Public Servant**

is any person who is currently paid a salary by the Government of Canada from the Consolidated Revenue Fund or by a Crown Corporation.

### **Protocol**

is a set of conventions governing correct etiquette and precedence.

### **Reception**

an extended period between when attendees arrive and when the meal is served, these might also serve the purpose of sustaining attendees during the wait before a meal. Reception food may also be served with no main meal afterward if circumstances dictate.

### **Refreshments**

include beverages or food (e.g. light snacks) or both, that do not constitute a normal meal but are served between meals.

### **Travel status**

occurs when an employee or traveller is on authorized CCC travel.

### **Traveller**

a person who is authorized to travel on federal CCC business.