

CCC Responsible Business Conduct (RBC) Framework

1. Introduction

a. Mandate

The Canadian Commercial Corporation (CCC) is a Crown corporation that is accountable to the Parliament of Canada through the Minister of International Trade Diversification. Established in 1946, CCC's mandate is to assist Canadian exporters sell goods and services abroad and strengthen bilateral trade relationships between Canada and other nations.

b. CCC's commitment to RBC

CCC is committed to operating in an environmentally, socially and ethically responsible manner consistent with Canada's international commitments including respect for human rights. We achieve this by maintaining high standards of behaviour within the following operating principles:

- Governance
- Business Ethics
- Human Rights
- Environmental Stewardship
- Employee Engagement

c. Our core values and competencies

CCC is committed to excellence in serving Canadian exporters. As such, CCC abides by the following core values in guiding its business activity:

- **Integrity:** Trust, fairness and honesty are intrinsic to all our interactions and we expect the same from our clients and our customers. CCC expects employees to always act in good faith and in the best interests of CCC.

- **Professionalism:** CCC approach work with the highest levels of professionalism, and demand the same from the Canadian companies we work with and the foreign governments who buy their products and services. CCC promotes high standards of behaviour and respectable conduct when engaging business.
- **Responsibility:** CCC is committed to upholding our responsibilities and accountabilities as a Crown corporation and a corporate citizen. We believe in sustainable business practices and maintaining transparent relationships with all of our stakeholders. In our business transactions, we seek to operate with integrity and with respect, recognizing our responsibilities in the areas of human rights, anti-corruption and the environment.

d. Embedding sustainability in CCC's corporate culture

At CCC, we recognize the importance of promoting a sustainable approach to business that can ensure we are each doing our part to ensure a long-term, globally minded and holistic business perspective. This, in turn, serves to protect the future of CCC, and Canadian industry over the long term.

To this end, CCC is committed to operating in a manner which delivers long-term value in financial, social, environmental and ethical terms. Through enacting policies, procedures and processes, CCC manifests its commitment to realizing these objectives.

2. Governance

a. CCC as a Crown Corporation

CCC is a Crown Corporation that operates at arm's length but is accountable to the Government of Canada. CCC adheres to the guidelines and regulations concerning the management and governance of Crown corporations set by the Treasury Board Secretariat of the Government of Canada. The Government has numerous tools to control Crown Corporations and appoints individuals to key positions and roles (e.g. CEO and Board of Directors). The Government also controls amendments to the constituent act of CCC, approves corporate plans and oversees annual audits. There is also a directive power whereby the government can use its authority to intervene in the management of a Crown Corporation by directing the Board of Directors.

b. Ensuring good corporate governance

Good governance leads to sound decisions. CCC will continue to maintain a standard of corporate governance that promotes transparency and adaptability while ensuring accountability to our numerous stakeholders.

CCC achieves good governance by ensuring:

- Board of Directors independence
- Board of Directors assessment and oversight of CCC
- Regularly held Board of Directors meetings
- Public disclosure of Corporate expenses
- Financial accountability
- Synergistic Board and Senior Management relations
- Stakeholder engagement through public meetings
- Rigorous planning and reporting practices
- Culture of continuous improvement
- Culture of strong Board governance and effectiveness

c. Transparency

Transparency is a core guiding principle of our enhanced approach to responsible business conduct. We are committed to working in an open and transparent manner, while balancing the need for confidentiality and the protection of interests entrusted to us by Canadian exporters and other partners.

3. Business Ethics

CCC views business ethics as fundamental to successful business practices and is committed to conducting business with honesty, integrity and transparency and working with Canadian exporters to help them do the same.

a. Code of Conduct and Business Ethics

CCC's *Code of Conduct and Business Ethics* promotes ethical and professional behaviour by its employees and assists employees in making decisions related to their day-to-day operations.

b. Anti-Bribery and Corruption

Operating ethically means, at a minimum, conducting business affairs in accordance with the letter and spirit of the applicable laws of the countries in which CCC does business and complying with the *Canadian Corruption of Foreign Public Officials Act*. CCC is a contributor to the Annual Report submitted to Parliament as required under the *Corruption of Foreign Public Officials Act*. The Annual Report outlines activities undertaken by government departments and agencies in support of the Act's requirements.

In addition:

- CCC's internal policies and processes align with global best practices in combatting bribery and corruption.
- CCC's due diligence efforts are designed to detect and prevent unethical practices throughout its transactions.
- CCC continually seeks to improve and promote its integrity compliance processes.

c. Conflict of Interest

As employees, CCC staff are required to act in the best interests of CCC:

- As a client-facing organization, CCC is called upon to act in the best interests of the Canadian exporters we support under our Government of Canada mandate.
- As a Crown Corporation, we are responsible for ensuring the non-partisan provision of programs and services by our organization.
- As federal public servants, we must ensure we serve the public interest and uphold the public trust by taking all possible steps to prevent and resolve any real, apparent or potential conflicts of interest between our roles and official responsibilities and our private affairs and activities.

We achieve this by ensuring that our decision-making is free from any real or perceived conflicts of interest. Where a conflict of interest arises, employees are required to disclose the conflict. CCC ensures that this is managed appropriately and in a manner that upholds the public trust.

d. Disclosure of Wrongdoing in the Workplace

CCC adheres to the *Public Servants Disclosure Protection Act* and recognizes that employees and other persons who disclose information concerning wrongdoing the right to be treated fairly and be protected from reprisal.

4. Human Rights

a. CCC's commitment to human rights

The Government of Canada believes in the importance of responsible business conduct and the duty of Canadian corporations to respect human rights, both in Canada and abroad.

CCC is committed to respecting all internationally recognized human rights in line with the *United Nations Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises*.

Our commitment to human rights is a vital part of our work with Canadian exporters, their supply chains, foreign government buyers, and our shareholder, the Government of Canada.

b. How does CCC ensure respect for human rights?

CCC operates in a manner consistent with the policies of the Government of Canada, and in particular, with the commitments Canada has made to respect, protect and promote human rights domestically and internationally. CCC ensures its transactions comply with Canada's human rights obligations and international standards.

Overall leadership of human rights policies and practices rests with CCC's cross-functional Human Rights Committee. All employees must assume and promote the these policies and practices to ensure the respect for human rights is a core principle throughout our business.

5. Environmental Stewardship

a) CCC's commitment to environmental stewardship

CCC is committed to respecting the environment and the environmental laws of the countries where our projects will be undertaken. We also consider the corporate environmental policies and environmental management systems of Canadian exporters and their partners (such as project sponsors or lenders), where applicable.

CCC further seeks to enhance its responsible corporate citizenship through active oversight of its own operations and the impact they may have on the environment.

b) How does CCC demonstrate this commitment?

In cases where projects are funded through export credit agencies or international organizations such as the World Bank, CCC adopts the requirements set by those institutions. For projects with potential environmental impacts, we conduct a formal environmental review process and comply with the *Canadian Environmental Assessment Act, 2012*, under the purview of the Canadian Environmental Assessment Agency (CEAA). In accordance with CEAA, CCC will only carry out a project outside Canada if we determine it is not likely to cause significant adverse environmental effects.

CCC encourages exporters to undertake due diligence on the environmental and social impacts of a project (such as those enunciated in the *World Bank Group's IFC Performance Standards*) and comply with requirements set by international organizations.

Employees at all levels are not only challenged to improve the way in which they conduct daily operations but to do so with the objective of reducing environmentally consumptive behaviours.

6. Employee Engagement

a) Health and wellness

Employee health and wellness is critical for achieving our goals. At CCC, we recognize both that the team is stronger than the individual, and that people are our strength. We work collaboratively with others to achieve our goals and those of our clients. We build lasting relationships through respect for others and ourselves. We value and respect diverse cultures, customs and business practices in Canada and internationally.

b) Promoting diversity and inclusion in the workplace

People are at the core of CCC's success and at the heart of our business. CCC's seeks to ensure its decision-making reflects the principles of diversity and inclusion. To support this commitment to a diverse and inclusive work environment, CCC promotes diversity and inclusion within our teams and seeks to, respect, value and leverage diversity of thought and ideas.

c) Learning and Recognition

CCC is committed to developing the skills of our employees and has instituted a policy on Learning and a policy on Rewards and Recognition to promote our most important asset – our people. Broad, active support for learning is critical to ensuring that CCC continues to effectively fulfill its purpose as the international contracting agency of the Government of Canada.

d) Community involvement

CCC participates annually in the Government of Canada Workplace Charitable Campaign (GCWCC), which supports the United Way among other designated charities. CCC has an active Social Committee that encourages employee engagement in this area with various events held throughout the year. These campaigns have proven to be very successful and boast high-levels of employee participation and donations.

e) Training and Continuous Improvement

Training is provided to CCC employees on responsible business conduct policies and practices, including anti-bribery and corruption and human rights.

CCC is committed to monitoring best practices and keeping up to date with developments in this area. Adhering to the Government of Canada guidelines as they relate to responsible business conduct is fundamental for CCC in advancing CCC's practices in this area.

Document History

Original	Version 1.0
Approval: Name	D. Harrison
Approval: Title	Chair, Board of Directors
Approval: Date	October 1 st , 2008

Amendment History	
Version/Date	Change Summary
1.1/Nov 15, 2010	Environmental Assessment Policy Update (Section 3)
1.2/April 26, 2011	Compliance & Monitoring/Greening CCC Ops plus Annual Content review
1.3/July 27, 2012	Section 2 Update to reflect in-place Code of Conduct & Business Ethics
1.4/March 26, 2014	Annual Review by BoD
1.5/March 11, 2015	'Bribery and Corruption' Section updated.
1.6/March 30, 2016	Annual Content Review – DFATD replaced with GAC.
1.7/March 28, 2017	Annual Content Review – No Changes
1.8/March 28, 2018	Annual Content Review – No Changes
1.9/April 15, 2019	Replaces “CSR Framework” - All content updated
Note: Add Rows as Required	