



# Code of Conduct and Business Ethics



**CCC**

Corporation Commerciale Canadienne  
Canadian Commercial Corporation

Canada 



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## MESSAGE FROM THE PRESIDENT AND CEO

I am pleased to announce and share with you the Canadian Commercial Corporation's (CCC's) revised Code of Conduct and Business Ethics (Code). This Code is a keystone for our vision for responsible business conduct at CCC.

Our Code will help employees uphold both CCC's and Canada's public sector core values when making decisions. It also supports a positive and respectful work environment and gives our clients confidence in our conduct. Our Board of Directors is highly supportive of the revised Code and CCC's enhanced focus and direction on the areas covered by the Code.

CCC's success, and our ability to help Canadian exporters by facilitating trade, depends on all employees. Each of us must adhere to this Code and assume our respective roles with confidence and clarity. Understanding the Code will help us all do that. I therefore ask that all employees read this Code thoughtfully and reflect on its importance.

**“CCC is committed to conducting its business responsibly with honesty, integrity and fairness, and will advance its ethics and values through its expertise in international contracting”**

Our continued dedication to the values embodied in this Code enhances our reputation for integrity and ethical business practices. It also enables us to be a leader in responsible business conduct, while serving the needs of Canadian exporters.

**Martin Zablocki**  
President and CEO



# 1. INTRODUCTION

## 1.1 About CCC's Code of Conduct and Business Ethics

This Code of Conduct and Business Ethics (Code) is a keystone for CCC's enhanced approach to responsible business conduct. It supports a positive and respectful work environment and ensures our clients can have confidence in CCC's conduct.

Our approach to responsible business conduct means that we have in place policies and processes that guide our work, particularly with regard to human rights, bribery and corruption, the environment, conflict of interest and confidentiality of information. With these tools to guide behaviour and decision-making, CCC's employees are better equipped to uphold CCC's

core values as well as Canada's public sector values, to which this Code is fully aligned. CCC aims to continually update its suite of procedures and policies to align with best in class practices in the area of responsible business conduct and corporate social responsibility.

## 1.2 Guiding Everything We Do At CCC

This Code applies to everything that we do here at CCC and guides our daily behaviours and decision-making. It applies to every director, officer, employee, contractor, consultant, student or other persons working for or representing CCC.



## 1.3 Our Commitment to Values and Ethical Conduct

CCC is committed to ensuring the highest standards in values and ethical conduct. This commitment plays a fundamental role in how we serve Canadian exporters and the public interest as part of the mandate entrusted to us by the Government of Canada. As federal public servants, we all have a role to play in upholding the public's trust and contributing to public confidence in the integrity of CCC.

Regardless of our level or position, we are also expected to conduct ourselves in all activities related to our professional duties in accordance with the Treasury Board's [\*Values and Ethics Code for the Public Sector\*](#) (TBS Code), (See Annex "A"). These values include:

- ✓ Respect for democracy
- ✓ Respect for people
- ✓ Integrity
- ✓ Stewardship
- ✓ Excellence

To ensure all CCC employees are aware of, and adhere to the above requirements. Each CCC employee must sign, on an annual basis, the *Employee Code of Conduct and Business Ethics Acknowledgement and Acceptance Form* (see Annex "B") confirming that the employee has read and understood both the CCC Code and the TBS Code. Acceptance of these values and adherence to the expected behaviours is a condition of employment for every employee in the federal public sector. The *Employee Code of Conduct and Business Ethics Acknowledgement and Acceptance Form* is kept in the employee's Human Resources file.

Members of CCC's Board of Directors must also adhere to the [\*Ethical and Political Activity Guidelines for Public Office Holders\*](#) as a condition of holding office in the Government of Canada.

## 1.4 Our Core Values and Business Principles

CCC is committed to excellence in serving Canadian exporters. As such, CCC abides by the following core values and business competencies 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. Employees should always act in good faith and in the best interests of CCC.

**Professionalism:** Dedication and skill is our strength at CCC. We approach our work with the highest levels of professionalism, and demand the same from the Canadian companies we help and the foreign governments who buy their products and services. Employees should adopt high standards of behaviour and demonstrate competence at all times. We should portray a respectable and positive image to colleagues, clients, customers and members of the public, when representing CCC in Canada or internationally.

**Responsibility:** We are 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.

CCC's core values and competencies underpin all of our work and enable us to deliver on our corporate objectives and Canadian exporter needs. CCC's core competencies are as follows:

**Business Perspective:** At CCC, we strive to have a clear understanding of business issues, processes and outcomes to ensure we deliver value for Canadian exporters.

**Client-focus:** At CCC, we are client-focussed, endeavouring to find solutions for Canadian exporters navigate complex markets. We also focus on service excellence as a means of enhancing business performance. Our team strives to be creative and adaptable in finding solutions to clients' needs.

**Teamwork:** At CCC, we recognize 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.

Compliance with these values is also fundamental to ensuring CCC's reputation as a trusted partner in international trade.

Employees are the custodians of CCC's reputation, and by extension, the Government of Canada's. We behave with integrity to uphold Canada's strong image abroad.

We have a responsibility to act, in all circumstances, in a manner that respects and protects CCC and the Government of Canada's reputation.



## 2. OUR RESPONSIBILITIES

### 2.1 As an Individual

CCC has developed this Code to promote the ethical and professional behaviour of employees and to assist employees and representatives in daily decision-making.

#### Your Responsibilities

- ✓ Read, understand and follow this Code.
- ✓ Understand the risks in your particular role and how to manage them.
- ✓ Seek advice when things are not clear or you are unsure of how to deal with a situation.

- ✓ Ensure third-party contractors, agents or consultants are aware of, and abide by, our Code when representing CCC.
- ✓ Report any breaches of this Code to CCC's Human Resources or Legal Team.

#### Whistleblowing and Wrongdoing in the Workplace?

It is important to understand that the [Public Servants Disclosure Protection Act \(PSDPA\)](#) offers CCC's employees, and other persons who disclose information concerning wrongdoing, the right to be treated fairly and be protected from reprisal. In addition to the Code, CCC also has a policy regarding the Disclosure of Wrongdoing in the workplace.

Further to this policy, all reports of serious wrongdoing in the workplace, including serious breaches of the Code, will be investigated in a secure and confidential manner, and corrective and/or disciplinary actions will be taken as appropriate. These actions will be in accordance with the Government of Canada's and CCC's policies and regulations, and the collective agreement between CCC and the Professional Institute of the Public Service of Canada, when applicable.



## FURTHER READING

CCC's Policy on Disclosure of Wrongdoing.

## 2.2 Our Integrity Check

**Integrity is non-negotiable at CCC. We expect the same from the Canadian exporters and foreign governments with whom we work.**

**Trust, fairness and honesty are intrinsic to all our interactions.**

Integrity is the cornerstone of good governance and democracy. CCC employees serve the public interest by:

- ✓ Acting at all times with integrity and in a manner that withstands public scrutiny and maintains the public's trust.
- ✓ Never using our positions to obtain an inappropriate advantage.
- ✓ Taking all possible steps to prevent and resolve any real, apparent or potential conflicts of interest.

To help clarify a dilemma relating to this Code, work through the questions in the Integrity Check:













### **When in doubt, ask yourself...**

Am I upholding CCC's core values of professionalism, integrity and responsibility? Is it ethical? Is it legal? Have I thoroughly understood the potential risks, including the potential impact of a decision on CCC's or the Government of Canada's reputation? Would we be embarrassed if others knew CCC or one of its employees took this action?



CCC's policies and procedures are designed to help you think about these important questions and guide you through the decision-making process. We all have a responsibility to ensure we always do what is right.

Ask yourself each of these important questions, and see if you get a "green light" to move on to the next question, or whether you need to "proceed with caution." You may need to seek advice, or even stop. Then move on to the next question until, ultimately, you are certain it is appropriate for you to proceed.

Is it ethical?		
	 Unsure? Seek Advice	 Report Immediately
Is it legal?		
	 Unsure? Seek Advice	 Report Immediately
Have I thoroughly understood the potential risks, including the potential to reflect negatively on CCC?		
	 Unsure? Seek Advice	 Report Immediately
Would we be embarrassed if others knew CCC or one of its employees took this action?		
	 Unsure? Seek Advice	 Report Immediately
<b>PROCEED</b>		

## 2.3 Responsibilities as a Manager

Every CCC manager is expected to demonstrate leadership in respecting and promoting the standards of this Code, and is responsible for explaining and clarifying any questions, concerns or matters of interpretation relating to this Code to team members.

### Manager's responsibilities:

- ✓ Read, understand and follow this Code.
- ✓ Understand the risks that apply in your business or function in terms of the application of this Code, and the procedures required to mitigate risks.
- ✓ Ensure members of your team understand the procedures to be followed. This includes the requirement to declare potential conflicts of interest, and gifts and hospitality.
- ✓ Ensure new employees or team members are briefed on this Code, the risks presented by their role, and sources of advice and support.
- ✓ Be alert to any violations of this Code, and encourage your team members to speak up if they know or suspect a violation.
- ✓ If you are informed of a possible violation of this Code, you have a duty to report it to your supervisor, your Human Resources representative, CCC Legal Counsel or the CCC Senior Officer for Disclosure of Wrongdoing (Vice President, Legal Services, General Counsel and Corporate Secretary).
- ✓ Implement appropriate actions in response to a violation of this Code.





## 3. OUR BEHAVIOURS, PEOPLE, AND CULTURE

We want CCC to be a great place to work and we want to protect our reputation as an organization that always strives to do the right thing.

To do that, we must conduct all CCC business in a manner that lives up to our core values of integrity, professionalism and responsibility.

This section of the Code sets out the standard of behaviour expected at CCC.

### 3.1 Health and Safety

We are committed to ensuring that the Corporation's work environment is both healthy and safe. No employee should undertake an action or activity that would jeopardize his/her own health and safety, or that of others.

CCC aims to promote high standards of employee health and wellness. Consistent with the spirit and intent of this commitment, CCC has established a comprehensive policy regarding the use of drugs and alcohol to minimize the risks associated with intoxication or impairment in the workplace. The use of alcohol, cannabis, and other drugs can affect workplaces in a number of ways including increasing the risk of workplace injury, absenteeism, diminished quality of work, strain on work relationships, and deterioration in employees' physical, emotional, and mental health. Accordingly and as further detailed in this policy, CCC employees are prohibited from impairment when conducting CCC business activities, either at work or offsite.

Employees will make every effort to:

- ✓ Ensure we are fit for work every day.
- ✓ Take all reasonable precautions to ensure job safety and continuously strive to improve safety.
- ✓ Work to promote safety awareness and a safety-first mindset.
- ✓ Emphasize prevention, the removal of unsafe conditions and the elimination of unsafe behavior.
- ✓ Follow safe work practices and procedures.
- ✓ Not compromise health and safety for any reason.



## FURTHER READING

**CCC's Health and Safety Policy, Joint Health and Safety Committee Policy, and Alcohol and Drug Policy.**

## 3.2 Diversity and Inclusion

People are at the core of CCC's success and at the heart of our business. CCC's competitive advantage and reputation are enhanced when our workforce and decision-making reflects the principles of diversity and inclusion.

To support this commitment to a diverse and inclusive work environment, we must:

- ✓ Promote diversity and inclusion within our teams.
- ✓ Seek, respect, value and leverage diversity of thought and ideas.
- ✓ Hold ourselves accountable to share in the responsibility for inclusiveness.
- ✓ Ensure that inclusiveness is visible in decision-making and behaviour.
- ✓ Abide by the principle that all of our relationships are based on mutual respect and growth.

## 3.3 Discrimination and Harassment

Employees have the right to receive fair and equitable treatment, and are entitled to a harassment-free workplace. Each of us has a responsibility to ensure that CCC provides a safe, respectful and inclusive environment, free of discrimination and harassment.

To ensure we can achieve this, we must:

- ✓ Treat others with respect at all times.
- ✓ Avoid physical or verbal intimidation.
- ✓ Ensure humiliating, hostile or intimidating treatment towards others is not tolerated at CCC.
- ✓ Promote a work environment free from discrimination and harassment.



## FURTHER READING

CCC's Anti-Harassment Policy, Workplace Violence Prevention Policy and Recognizing Workplace Harassment Guidelines.

### 3.4 Sustainability

CCC's goal is to ensure that sustainability is a core component of its business strategy. Employees can contribute to sustainability by promoting open dialogue with stakeholders on CCC's economic, social and environmental objectives, including CCC's commitment to upholding Canada's respect for international human rights.

Promoting a sustainable approach to business can ensure we are each doing our part to ensure a long-term, globally minded and holistic business perspective and serve to protect the future of CCC and Canadian industry.



## FURTHER READING

CCC's Responsible Business Conduct Framework.

**CCC seeks to work with Canadian exporters who are committed to responsible business practices.**

### 3.5 Fiscal Integrity and Responsibility

As federal public servants, we must be fiscally responsible in all business activities and ensure value for money is recognized. We are expected to exercise responsible management of expenditures and use corporate facilities and assets with prudence.

All corporate assets should be used only for lawful and proper purposes, and should be protected from theft, misuse or damage.

### 3.6 Human Rights in the Workplace

CCC is committed to creating and maintaining a work environment that is free from harassment and discrimination on prohibited grounds, including: race, national or ethnic origin, colour, religion, age, sexual orientation, gender, gender identity or expression, marital status, family status, genetic characteristics or disability.

We recognize cultural differences and in CCC's business activity support internationally agreed conventions on human rights and labour rights, including the United Nation's [Universal Declaration of Human Rights](#) and the International Labour Organization's [Declaration of Fundamental Principles and Rights at Work](#).

CCC upholds human rights in the workplace through:

- ✓ Health and safety at work.
- ✓ Equitable working conditions.
- ✓ The right to equal pay and benefits.
- ✓ Freedom of association and the right to collective bargaining.

CCC is a unionized work environment, and is guided by a collective agreement that details



employee rights with regard to working environment, leave, travel and other terms and conditions of employment.



## **FURTHER READING**

**CCC's Official Languages Policy, Flexible Work Policy and Collective Agreement.**

## **3.7 Workplace Environmental Impact**

CCC enhances responsible corporate citizenship through active stewardship of its operations.

CCC is committed to building a more sustainable society by striving to minimize our environmental footprint and developing solutions that conserve resources and protect our planet. All employees are encouraged to improve our daily operations on a continuous basis with the objective of environmental consciousness.



## **FURTHER READING**

**Greening CCC Operations Policy.**





## 4. MANAGING RISK IN INFORMATION MANAGEMENT AND COMMUNICATION

At CCC, we respect the privacy rights of our employees, the companies we work with and our business partners. We are committed to managing personal data in a professional, lawful and ethical way.

### 4.1 Confidentiality and Disclosure of Information

CCC creates, uses and protects information in a responsible way, especially when it comes to personal details, commercially sensitive information and intellectual property – both our own and that of others. CCC employees are responsible for following internal policies and procedures aimed at protecting the confidentiality of third party information held by CCC in connection with our business activities.

All CCC employees are responsible for ensuring the confidentiality, integrity and availability of the Corporation's information assets.

CCC respects the privacy rights of its stakeholders, including their right to the security of their personal information, and ensures that the use of their information, is only for the purposes for which it was originally provided and collected.

### Requests for Information

As a Crown corporation, CCC is subject to the [Access to Information Act](#) and the [Privacy Act](#) governs CCC's collection, use, storage and disclosure of information.

- ✓ The *Access to Information Act* gives Canadian citizens and permanent residents access to information in federal government records. When a request has been received under the *Access to Information Act*, CCC employees must ensure that they do not destroy, alter, falsify or conceal a record relating to the request, in contravention of the *Act*.
- ✓ The *Privacy Act* gives Canadian citizens and permanent residents the right to access their personal information held by federal agencies and protects the information against unauthorized use or disclosure.

Access to Information and Privacy (ATIP) requests are managed by CCC's ATIP Office. Accordingly, employees should refer requests for information to the CCC ATIP Office or to the CCC Legal Team. These teams can also assist you with managing other requests for information.

### Inquiries from Media, General Public and Parliamentary

All inquiries should be directed to CCC's Director of Communications. Please note that only CCC's designated spokesperson(s) is entrusted with issuing a statement or making public comments regarding CCC's position on a given subject. When asked to comment publicly on issues related to CCC or its work, employees should refer the enquiry to CCC's Director of Communications.



### FURTHER READING

CCC's Procedures for Handling Enquiries/Correspondence Received from Ministers, Senators or Members of Parliament, Security Operational Policy and Information Security Instruction.

## 4.2 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.

Our commitment to conducting business transparently is carried out through the following:

### Annual Corporate Reports

- ✓ *Corporate Plan*: CCC's annual Corporate Plan sets out its business strategies, performance measures and targets over a five-year planning horizon. It is available on our website.
- ✓ *Annual Report*: CCC's Annual Report presents our results against its business strategies, performance measures and targets as set forth in the Corporate Plan, and reports on our compliance with the *Canadian Environmental Assessment Act* and the *Financial Administration Act*.

### Financial Reports

- ✓ *Quarterly Financial Reports*: CCC releases its financial results against targets set forth in the Corporate Plan on a quarterly basis.

### Stakeholder Engagement

- ✓ *Annual Public Meeting*: CCC conducts an annual public meeting to provide information on activities, results and strategic directions, as well as to answer questions from the public. This meeting forms part of our plan to continually enhance transparency and gain insight on shareholder and stakeholder considerations.
- ✓ *Quarterly and Regular Reporting*: CCC reports regularly to Global Affairs Canada and the Minister of International Trade Diversification, and other central agencies on a variety of topics, including international pursuits and transactions as part of our human rights consultation process, and Significant Project Instruction.

### Annual Reporting Requirements

In addition to information included in CCC Annual Report, CCC also tables the following reports Pursuant to applicable legislative requirements:

- ✓ *Access to Information and Privacy Statistical Reports* included as part of the ATIP Annual Reports tabled by the Minister of International Trade Diversification in Parliament. CCC also provides *Monthly Travel and Hospitality Reports* regarding senior officers required by the *Access to Information Act*.
- ✓ *Official Languages Act Report* to Parliament through the Official Languages Commissioner.
- ✓ *Corruption of Foreign Public Officials Act (CFPOA) Report* tabled in Parliament through the Minister of Foreign Affairs.
- ✓ *Employment Equity Act Compliance Reports* to Employment and Social Development Canada.
- ✓ *Export and Import Permits Act* amendments to accede to the Arms Trade Treaty will require transactional reporting by CCC through the Minister of Foreign Affairs in a form to be directed by Global Affairs Canada.



### FURTHER READING

CCC's Transparency and Accountability Policy.

## 4.3 Political Activity

Employees may engage in any political activity so long as it does not impair, or is not perceived as impairing, the employee's ability to perform his or her duties at CCC in a politically impartial manner.



## 5. MANAGING RISK IN INTERNATIONAL CONTRACTING

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

### 5.1 Human Rights in International Transactions

Canada is committed to the protection of human rights at home and abroad. As a federal Crown corporation, and as outlined in our Human Rights Policy and Human Rights Due Diligence processes, CCC strives to operate in a manner consistent with the policies of the Government of Canada, taking into account the commitments Canada has made to abide by international human rights principles.

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 Organisation for Economic Co-operation and Development *Guideline's for Multinational Enterprises*.



Adhering to these standards is an important aspect of our risk management as we strive to:

- ✓ Review human rights as part of our project risk reviews.
- ✓ Identify human rights risks and sensitive transactions.
- ✓ Ensure CCC has processes to help prevent, mitigate and monitor human rights impacts.
- ✓ Protect our reputation and the reputation of the Government of Canada.
- ✓ Contribute to our long-term sustainability through the above.



## FURTHER READING

CCC's Human Rights Policy and CCC's Human Rights Due Diligence processes.

## 5.2 Anti-bribery and Corruption

CCC seeks to be a leader in promoting due diligence in the area of corruption and anti-bribery.

Our Integrity Compliance Instruction and Fraud Policy provide guidelines for employees as to how we manage areas of risk related to integrity, bribery and corruption and fraud. Ensuring that CCC's transactions are of the highest ethical standard is not achieved simply through strong up-front due diligence. Proper oversight by CCC officers during business development and contract management activities have an equally important role to play as corruption can take place at any point throughout a contract.

We take Integrity Compliance seriously at CCC. We also recognize that new issues and matters of concern can occur. We encourage all

employees to raise any concerns regarding bribery and corruption to CCC's Integrity Compliance Committee.

Outlined below are details regarding how we address anti-bribery and corruption concerns for CCC transactions as well as our obligations under the *Corruption of Foreign Public Officials Act*.

### CCC Transactions

CCC's role in international government-to-government contracting on behalf of the Government of Canada is unique. As such, we have a duty to uphold our integrity and that of the Government of Canada, as well as enforce the ethical values set out in this Code. To do this, CCC completes:

- ✓ Ethical risk assessments.
- ✓ Integrity due diligence.
- ✓ Reviews of contractual obligations in CCC's international contracts with Canadian exporters and foreign buyers to include provisions to address bribery and corruption.
- ✓ Periodic training of business development officers and other individuals in contact with foreign buyers.
- ✓ Contract monitoring for ethical compliance.
- ✓ Procedures and reporting to deal with violations and alleged violations.
- ✓ While these safeguards are not absolute, they serve to significantly mitigate risks.

### Compliance with Canada's *Corruption of Foreign Public Officials Act (CFPOA)*

CCC also complies with Canada's [\*Corruption of Foreign Public Officials Act \(CFPOA\)\*](#). The CFPOA states that it is illegal to bribe a foreign public official.

A bribe consists of directly or indirectly, giving, offering or agreeing to offer a reward, advantage or benefit of any kind as consideration for an act or omission by the official or to induce the official to use his position to influence acts or decisions of the foreign states.



#### FURTHER READING

CCC's Integrity Compliance Instruction and Fraud Policy.

## 5.3 Gifts and Hospitality

CCC's *Travel, Hospitality, Conference & Event Expenditures Policy* provides detailed guidelines for employees regarding gifts and hospitality. Employees may not accept or solicit gifts, hospitality or other benefits that have a real or potential influence on their objectivity in carrying out their duties or which could, or be perceived, to influence their decision-making. This includes cash, personal items or other inappropriate gifts. If it is impossible to decline a gift, hospitality and other benefit without causing offence, the recipient should notify and discuss the situation with their Vice-President or the President, as set out in the *Travel, Hospitality, Conference & Event Expenditures Policy*.

We recognize that some situations can be difficult to navigate. Employees can always refer to CCC's policy on this matter or further discuss any questions with their Vice-President or the President, for additional clarification.



#### FURTHER READING

CCC's *Travel, Hospitality, Conference & Event Expenditures Policy*

## 5.4 Conflicts of Interest

### What is a conflict of interest?

A conflict of interest exists when by serving one interest, our actions are incompatible with, or could improperly influence, another interest. In the employment context, a conflict of interest arises when an employee must choose between CCC's interests and his/her own personal interest.

### Why is this important?

**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.

### How do we achieve this? Conflict Disclosure

We achieve this by ensuring that our decision-making is free from any real or perceived conflicts of interest. Where we think there “may” be a real, apparent, or potential conflict of interest we disclose the situation to Human Resources or CCC Legal Team.

Conflicts of interest arise but the Code requires each employee to disclose the conflict. This will ensure that the conflict of interest is managed as appropriate and that decisions are made in a manner that upholds the public trust.

### Where do conflicts arise?

Conflicts can arise in any situation where your personal interests detract from your work responsibilities or could influence your impartiality. However, examples of conflicts of interest include when your decision-making or work is influenced by:

- ✓ Your personal or financial interests;
- ✓ Your personal or social ties;
- ✓ Outside employment and activities;
- ✓ Concurrent appointments; or
- ✓ Participation in certain political activities;

Adherence to this Code and the TBS Code minimizes the possibility of conflicts arising between an employee’s private interests and his or her official duties. Moreover, the Treasury Board has a detailed policy which addresses Conflicts of Interest entitled the [Policy on Conflict of Interest and Post-Employment](#).

If you have questions at any time, wish to declare a conflict of interest or are unsure whether you are in a conflict of interest situation, you can contact Human Resources.

## 5.5 Environmental Impacts

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. 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.

Furthermore, CCC also strives to take into account sustainable development considerations (economic, social and environmental) as part of an appraisal of all the risks in our transactions.



### FURTHER READING

CCC Environmental Assessment Instruction.



## 6. CONCLUSION

**Responsible business conduct and sound ethical behaviour are vital to maintaining CCC's credibility and reputation.**

Each of us is responsible for upholding not only CCC's and the public sector's values but also the high standards we have set for responsible business conduct. **Abiding by this Code is key.**

However, **this Code cannot cover every situation.** If you are unsure of what to do, you must seek advice. Your manager, Human Resources, or the CCC Legal Team can help. This is particularly important and relevant if you suspect that someone is violating this Code in any way or otherwise putting CCC at risk. It is your duty to speak up, and you will be protected when you do so.

Remember, together, we can make a difference, and be the change we want to see in the world.

# ANNEX A

## Values and Ethics Code for the Public Sector

### Statement of Values

These values are a compass to guide public servants in everything they do. They cannot be considered in isolation from each other as they will often overlap. This Code and respective organizational codes of conduct are important sources of guidance for public servants. Organizations are expected to take steps to integrate these values into their decisions, actions, policies, processes, and systems. Similarly, public servants can expect to be treated in accordance with these values by their organization.

### Respect for Democracy

The system of Canadian parliamentary democracy and its institutions are fundamental to serving the public interest. Public servants recognize that elected officials are accountable to Parliament, and ultimately to the Canadian people, and that a non-partisan public sector is essential to our democratic system.

### Respect for People

Treating all people with respect, dignity and fairness is fundamental to our relationship with the Canadian public and contributes to a safe and healthy work environment that promotes engagement, openness and transparency. The diversity of our people and the ideas they generate are the source of our innovation.

### Integrity

Integrity is the cornerstone of good governance and democracy. By upholding the highest ethical standards, public servants conserve and enhance public confidence in the honesty, fairness and impartiality of the federal public sector.

### Stewardship

Federal public servants are entrusted to use and care for public resources responsibly, for both the short term and long term.

### Excellence

Excellence in the design and delivery of public sector policy, programs and services is beneficial to every aspect of Canadian public life. Engagement, collaboration, effective teamwork and professional development are all essential to a high-performing organization.



## ANNEX B

### Employee Code of Conduct and Business Ethics Acknowledgement and Acceptance Form

To be generated and accepted electronically

I have read and understood the Canadian Commercial Corporation's "Code of Conduct and Business Ethics" and the "[\*Values and Ethics Code for the Public Sector\*](#)" in the past thirty (30) days.

I have also reviewed the Conflict of Interest sections in detail and declare that I have no conflict, real or perceived that I have not previously declared.

By clicking my acceptance, I agree to abide by the obligations and to respect the principles set out in these documents.

Electronic Signature (Employee) \_\_\_\_\_

Date \_\_\_\_\_