

# Code for Exporters



## Purpose

CCC supports the growth of international trade by helping Canadian exporters gain access to foreign government procurement markets. CCC is committed to upholding Canadian values by doing business in a responsible way to ensure economic, social and environmental sustainability is at the core of our operations. This Code is based on CCC's commitment to ESG principles, support for the UN Sustainable Development Goals (SDGs) and the Ten Principles of the UN Global Compact.

CCC seeks to work with Exporters that adopt, respect and adhere these values to further our shared contribution to the accomplishment of the SDGs and in building a better future for all. Exporters must also ensure they respect all applicable laws, rules and regulations relating to integrity, human rights, the environment and any other laws in the jurisdiction in which they may operate. CCC encourages Exporters to go beyond legal compliance, drawing upon internationally recognized standards, in order to promote sustainable and responsible business at home and abroad. CCC's supports the [Government of Canada's Responsible Business Conduct Abroad Strategy](#), acknowledging the unique role CCC can play in championing RBC best practices with Canadian companies.

When businesses operate responsibly, this builds and sustains confidence in the marketplace, the values of democracy and economic and social development. Therefore, ensuring that ESG is at the centre of every transaction allows, both CCC and its Exporters, to maintain long-term competitive success, brand reputation

x Bribery and corruption: compliance

Bribery is the payment or giving, directly or indirectly, of a benefit of any kind or anything of value to a public official in order to obtain an advantage in the course of business. Exporters should not engage in activities that could constitute corruption or bribery and must attest that they have not been convicted or sanctioned for such activities, as part of CCC's due diligence process. CCC expects Canadian Exporters to have an anti-bribery and corruption policy in place, with zero tolerance for behaviour that could constitute corruption, bribery or fraud. Proper financial controls based on a risk assessment of the business vulnerabilities for bribery and corruption is recommended. Canadian fo53 ( )]TJ d-3 (t)-3 (er) to obtfo53 (

agents should be fair and reasonable with extra caution being taken to avoid potential illegal payments.

x Conflict of interest

CCC expects Canadian Exporters to avoid any behaviour or situations that could be perceived as a conflict of interest when dealing with CCC and buyers and foreign government officials. Exporters should ensure that all their decisions are made free of any actual or perceived conflict of interest. Any actual or perceived conflict of interest should be disclosed to CCC.

## Human Rights

CCC has a [Human Rights Policy](#) that enunciates our commitment to respecting all internationally recognized human rights in line with the UN Guiding Principles and OECD Guidelines for Multinational Enterprises. CCC expects Exporters to ensure the following:

- x Due diligence is carried out on all projects with CCC to identify actual or potential human rights risks and work with CCC to devise strategies to mitigate any risks.
- x The use of forced or child labour is strictly prohibited in the performance of work and Exporters should implement all reasonable measures possible to ensure that their supply chains conform to Canadian laws and restrictions with respect to the prohibition on the import of goods produced by forced labour.
- x Adherence to proper labour standards, occupational health and safety and compliance with all applicable labour and employment laws and regulations in the countries where they operate including freedom of association, equal opportunities and fair compensation.
- x A diverse, inclusive and respectful workplace and supply chain. CCC embraces the principles of diversity and inclusion and seeks to afford equal opportunities to all Exporters, representing the communities in which we live and work and the economies in which we trade, recognizing that a diverse Exporter base builds stronger communities and local economies. To further foster inclusion and sustainability, CCC expects Exporters to integrate Canadian values into their activities to effectively combat discrimination and to promote human rights, gender equality and Indigenous peoples' rights. Exporters are encouraged to do so by establishing internal policies, commitments, due diligence processes or appropriate grievance mechanisms.

## The Environment

CCC is committed to environmentally sustainable operations and reducing our impact on the environment. In particular, CCC supports the [Greening Government Strategy](#) and the commitments that the government has made to transition to net-zero carbon and climate-resilient operations.

CCC expects Exporters to consider their environmental impact, strive to reduce any adverse impact of their operations, products or services on the environment and promote sustainable practices.

In capital and infrastructure projects, Exporters should take all necessary measures to ensure they comply with international standards in CCC transactions ensuring that the appropriate environmental and social impact assessments have been conducted and



compliance. Exporters are expected to cooperate and provide the necessary documentation and responses to facilitate the monitoring and reviews conducted by CCC.

In some instances, CCC may, directly or through a third party, conduct a compliance audit on Exporters' information, accounts and business records.

In an effort to reduce and mitigate risk, CCC may require Exporters to implement or improve their internal programs and processes to prevent conduct contrary to the provisions of this Code.

When CCC discovers that an Exporter has acted or carried out activities that violate the principles of this Code, CCC will conduct an in-depth review of the Exporter's compliance policies and programs, considering any corrective actions and mitigation measures taken by the Exporter to discourage and prevent further contraventions. This in-depth review will be completed before determining whether CCC should continue to support the exporter on ongoing or potential projects.

References – Resources for Exporters

Canada's International Commitments