



1. Executive Sponsor

The Vice President, Legal Services, General Counsel & Corporate Secretary (VP Legal), has approved this Instructions document and revisions thereafter.

2. Definitions

“Canadian exporters/suppliers” means Canadian exporters/suppliers that seek to use CCC services.

3. Application, Compliance, and Monitoring

This instruction applies to all CCC employees, consultants, contractors and temporary staff. The Policy Suite Governance Policy (PG-101) shall be consulted regarding Application, Compliance and Monitoring of this document.

This Instruction applies to all transactions.

4. Context

4.1 Forming part of the larger Responsible Business Conduct (RBC) Framework, this

Through incorporating human rights into the transactional due diligence and risk assessments, the Corporation seeks to identify, prevent or mitigate human rights impacts in CCC transactions. CCC also seeks to promote cooperation, transparency and responsible action in international trade with respect to human rights both with its exporters and with foreign government buyers.

4.2 The Corporation is committed to meeting its responsibility to respect human rights and establish processes to assess human rights impacts in accordance with the standards and criteria in The UN Guiding Principles on Business and Human Rights, the OECD guidelines for Multinational Enterprises and the United Nations Arms Trade amendments to the *Export and Import*

Permits Act (R.S.C. , 1985, c. E-19).

4.3 This Instruction is designed to ensure that CCC establishes and ensures the effectiveness of its human rights due diligence process to account for human rights impacts that may be affected by its transactions. This Instruction parallels the Integrity Compliance Instruction and Integrity Compliance Guidelines and complements the assessments and work of the Corporation in the field of anti-bribery and corruption.

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5. Instruction Requirements

5.1 Background

5.1.1 This document defines the business processes to be followed in the transactions.

5.1.2 This Instruction will guide CCC to operate in a manner consistent with the

commitments to respect, protect and promote human rights domestically and internationally. CCC must take i -term bilateral relationships in the interests of peace and security while at the same time

international standards. The complexity operations particularly with respect to its transactions in the defence and security sector and the infrastructure sector.

5.2 CCC Human Rights Committee Role:

5.2.1 The Corporation has established a Human Rights Committee (HRC) composed of cross-functional representatives from across the Corporation to review human rights issues, perform due diligence on transactions, and to make recommendations for policy, practice, procedures and control improvements to management. The HRC reports to the

This group, in turn, reports to the Board of Directors that has oversight and provides governance for CCC policies involving Responsible Business Conduct policies, practices and processes.

5.2.2 The HRC is responsible for ensuring human rights due diligence is completed for all transactions that contain a human rights trigger. Triggers (non-exhaustive) for assessment include transactions involving:

Defence or security goods or technology (including cyber technology);
Buyer/end-user is the military, police, security or armed forces;
The mandate of the buyer raises human rights concerns; and
Infrastructure transactions.

Other triggers may be identified by the HRC and ROC, prompting further assessment.

5.3 Human Rights Due Diligence

5.3.1 The human rights due diligence process includes the following steps:

- a. The Integrity Compliance Instruction includes a Due Diligence Questionnaire for each line of business of the Corporation. A separate human rights questionnaire

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5.3.2 The VP Legal is responsible for ensuring the form and content of the Due Diligence Questionnaire and the Human Rights Due Diligence Guidelines are relevant and up-to-date and includes input from the VP, BD&S, VP D&CM and VP CS&CFO. With the recommendation of the HRC, ROC may approve changes to the Human Rights Due Diligence Questionnaire and Human Rights Due Diligence Guidelines, as required.

5.4 Certification of Projects - Triggering Human Rights Due Diligence

5.4.1 All involved officers are responsible for ensuring a project will not receive certification until the human rights due diligence is completed, when appropriate, in a satisfactory manner, updated when necessary and reported to ROC. Current and expired due diligence documentation associated with a project file will be retained by the HRC.

5.4.2 Prior to contract signature and as part of the certification process, the HRC will make recommendations that may include representations or commitments from the Exporter and/or buyer/end-user regarding responsible business conduct and human rights.

5.5 Contract Management - Monitoring of the Project:

All CCC employees, in conjunction with the HRC, are responsible for ensuring that once

6. Annexes and Appendices (as required)

- Annex A Human Rights Due Diligence Background - Defence & Security
- Annex B Human Rights Due Diligence Exporter Questions Defence & Security
- Annex C Human Rights Due Diligence Exporter Questions

7. References

External

The United Nations Guiding Principles on Business and Human Rights
The OECD Guidelines for Multinational Enterprises
The United Nations Arms Trade Treaty
The Export and Import Permits Act.

Internal

PG-102-EN CCC Code of Conduct and Business Ethics Policy
PG-003-EN Responsible Business Conduct Framework Policy
PG-004-EN Transparency and Accountability Policy
PG-007-EN Human Rights Policy
IN-002-EN Integrity Compliance Instructions
GU-004-EN Defence and Security Human Rights Due Diligence Guidelines
GU-005-EN Infrastructure Human Rights Due Diligence Guidelines

8. Exceptions

The Vice President, Legal Services must approve any exception to this Instruction through the use of the Exception Authorization Form found within the Policy Suite Management Procedures (PR-101-EN).

9. Enquiries