



## **2. Definitions - N/A**

## **3. Application, Compliance, and Monitoring**

3.1 This Code applies to everything that we do here at CCC and guides our daily behaviours and decision-making. It applies to every CCC employee, consultant, contractor, temporary staff or other persons representing CCC.

3.2 To ensure all CCC employees are aware of, and adhere to the above requirements, each CCC employee must complete a refresher, on an annual basis, thus confirming that the employee has understood and acknowledges 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. Records of the Employee Code of Conduct and Business Ethics refresher and acknowledgement are kept in the employee's Human Resources file.

## **4. Context**

### 4.1



**Business Perspective:** Uses their understanding of business issues, processes and outcomes to enhance the Corporation's performance.

**Client Focus:** Provides service excellence to exporters and buyers as part of CCC's value proposition.

**Values and Integrity:** Demonstrates CCC's values and ethics in personal behavior and integrates these into corporate and branch policies and practices; Treats others fairly, honestly and respectfully, furthering the integrity of CCC and its relationships of trust with the broader community.

**Collaboration and Influencing:** Uses understanding of competing interests to maneuver successfully to a win/win outcome.

**Team Leadership & Developing Others:** Assumes a leadership role in helping others achieve excellent results.

*We have a responsibility to act, in all circumstances, in a manner that respect*

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

## **6.2 Our Responsibilities as Individuals**

6.2.1 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 in this regard are:

Read, understand and follow this Code.



| 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 |

**PROCEED**

*Figure 1 – The Integrity Check. 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.*

### 6.3 Responsibilities as a Manager

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.

#### **6.4 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







## 6.5 Managing Risk in Information Management and Communication

### 6.5.1 Confidentiality and Disclosure of Information

As public servants, we are the custodians of the information we use in the course of our employment. We have an obligation to create and maintain records that document the decision-making processes of Government. This allows CCC to be held accountable for the work that CCC carries out in fulfillment of its mandate.

CCC collects, uses and discloses personal information, commercial information, and intellectual property in compliance with legislative and contractual requirements. CCC employees are responsible for following internal policies and procedures designed to protect the confidentiality of third party information held by CCC in connection with our business activities.

*At CCC, we respect the privacy and confidentiality of our employees, the companies we work with and our business partners. We are committed to managing corporate information in a professional, lawful and secure way.*

All CCC employees are responsible for ensuring the confidentiality, security and availability of the Corporation's information assets. Employees should only use CCC-issued devices to conduct their work.

CCC respects the privacy rights of its employees, stakeholders, and members of the public. CCC safeguards all personal information in its control, and ensures that personal information is only used 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, protection 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 is 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 individuals the right of access to their personal information held by federal institutions and protects the information against unauthorized use or disclosure.

Access to Information and Privacy (ATIP) requests are managed D arä n, use,





### 6.6.1 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.



#### 6.6.4 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.







