

1. Executive Sponsor

The Board of Directors have approved this Policy and it takes effect on April 15, 2019.

2. Definitions

NIL

3. Application, Compliance, and Monitoring

This Policy 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.

4. Context

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 assist in the development of trade between Canada and other nations. CCC is committed to adhering to and promoting responsible business practices.

5. Policy Statement

This policy document articulates CCC's commitment 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

6. Policy Requirements

6.1 Introduction

6.1.1 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 CCC 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 approaches work with the highest levels of professionalism, and expects the same from the Canadian companies that work with CCC and the foreign governments
- **Responsibility:** CCC is committed to upholding our responsibilities and accountabilities as a Crown corporation and a corporate citizen. CCC believes in operating responsibly recognizing our responsibilities in the areas of human rights, anti-corruption and the environment.

6.1.2 Embedding sustainability in CCC's corporate culture

At CCC, we recognize the importance of promoting a sustainable approach to business, so that we are each doing our part to ensure a long-term, globally minded and holistic business perspective. This 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.

6.2 Governance

6.2.1 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 govern 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.

6.2.2 Ensuring good corporate governance

Good governance leads to sound decisions. CCC continues to maintain a standard of corporate governance that promotes transparency 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
- Public disclosure of individual transactions
- 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

6.2.3 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.

6.3 **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.

6.3.1 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.

6.3.2 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* (S.C. 1998, c. 34). 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 with Canadian exporters.

6.3.3 Conflict of Interest

CCC employees 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.

6.3.4 Disclosure of Wrongdoing in the Workplace

CCC adheres to the *Public Servants Disclosure Protection Act* (S.C. 2005, c. 46) and recognizes that employees and other persons who disclose information concerning wrongdoing the right to be treated fairly and be protected from reprisal.

6.4 **Human Rights**

6.4.1 **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.

CCC's 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.

6.4.2 **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 the human rights policies and practices rests with CCC's Board of Directors and senior management respectively, in conjunction with CCC's cross-functional Human Rights Committee. All employees must adhere to these policies and practices to ensure that respect for human rights is a core principle throughout CCC's business.

6.5 **Environmental Stewardship**

6.5.1 **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, recognizing the detrimental impacts of climate change, is further committed to aligning with the federal [Greening Government Strategy](#) (the "Strategy"). The Strategy is the federal government's commitment to act on climate change within federal operations, focusing on four key areas: mobility and fleets, property and workplaces, climate resilient services/operations and the procurement of goods and services. The Strategy also supports Canada's overall sustainability goals already established under the Paris Agreement and other international agreements including the *United Nations' 2030 Agenda for Sustainable Development*.

6.5.2 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, CCC conducts a formal environmental review process and complies with the *Canadian Environmental Assessment Act, 2012* and subsequent *Impact Assessment Act* (S.C. 2019, c. 28, s. 1), under the purview of the Impact Assessment Agency of Canada. In accordance with these regulations, CCC will only carry out a project outside Canada if it is determined that it is not likely to cause significant adverse environmental effects.

CCC expects 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.

In relation to CCC's operational footprint, CCC has established a cross-functional working group comprised of multi-level employees to ensure CCC can align with, meet or succeed the objectives of the Greening Government Strategy.

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.

6.6 **Employee Engagement**

6.6.1 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.

6.6.2 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.

6.6.3 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.

6.6.4 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.

6.6.5 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.

7. **Annexes**

- Annex A – Responsible Business Conduct Framework diagram

8. **References**

- PG-102-EN CCC Code of Conduct and Business Ethics Policy
- PG-004-EN Transparency and Accountability Policy
- PG-006-EN Disclosure of Wrongdoing Policy
- PG-107-EN Human Rights Policy

9. **Exceptions**

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

CCC's compliance and respect for conducting business responsibly and ethically is not open to exceptions. As a member of CCC, if you face an issue, you are always encouraged to seek advice as noted below.

10. Enquiries

Questions and requests for interpretation/clarification should be submitted to the Vice-President of Legal Services, General Counsel and Corporate Services.