



# Code of Conduct





# Message from the CEO

We have an incredible mandate at FinDev Canada. It presents us with the opportunity to work with and through the private sector to enable sustainable and inclusive development in Emerging Markets and Developing Economies.

This mandate and the strategy we have put in place to fulfill it are powerful and energizing. They are why we work here. But how we work at FinDev Canada is something that is equally important and on which we must never lose focus.

How we work here speaks to our commitment to responsible business, and through that commitment, how we uphold the highest standards of ethical conduct. This must guide our work as much as our mandate; it must be as much a part of our value proposition as the solutions we bring to our clients.

We are a growing organization. As we grow our business, we grow our opportunity to have impact. Over the last six years, we've delivered consistent growth and through it built the platform to ensure our continued success in the years to come.

We have achieved this sustained growth not just through the transactions we have supported, but also by upholding the highest standards of ethical and responsible business. As we continue to grow it is more important than ever that we continue to maintain the public's trust and protect our reputation by reinforcing our commitment to these standards.

Our Code of Conduct sets the rules and approaches that govern our ethical behaviour. No matter your role at FinDev Canada, it is critical that you take time to understand the Code and to ensure that you embody the behaviours it promotes. It applies to all of us. Equally. Every day.

Please take the time to review the Code and reaffirm your commitment to the principles and processes which underpin it. By doing so, you are demonstrating your acknowledgement of and support for the standards of work and behaviour expected of all of us.

A handwritten signature in black ink, appearing to be 'Lori Kerr' with a stylized flourish at the end.

**Lori Kerr**

*President and CEO, FinDev Canada*



# Message from the Board Chair

As the Chair of FinDev Canada's Board of Directors and the CEO of Export Development Canada (EDC), I am proud to have witnessed and supported the growth of Canada's Development Finance Institution over the past six years.

In the past few years, FinDev Canada has built the foundation to deliver increased impact in emerging markets and developing economies, expand its geographical focus and scale up investments with new capitalization.

As we receive yet another demonstration of trust with a new capitalization and an expansion into the Indo-Pacific as a key component of Canada's strategy for the region, we are all reminded of the immense responsibility that comes with representing the Canada brand abroad, and how we can ensure that we are upholding the highest standards while sustaining our continued growth and deliver on our mandate.

The Code of Conduct that EDC and FinDev Canada share is one of the most important sources of guidance to remind us of our values and standards and set the expectations that model our work.

Part of your role in the success of this organisation is dependent on your understanding and respect of our Code of Conduct. This ensures that FinDev Canada can continue to grow into its mandate and continue its important mission in support of sustainable and inclusive economic growth.

A handwritten signature in black ink that reads "Mairead Lavery". The signature is written in a cursive style and is underlined with a single horizontal stroke.

**Mairead Lavery**

*President & CEO Export Development Canada  
Board Chair, FinDev Canada*

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## SECTION 1

# We Stand for Ethics and Integrity

## We Understand and Honour Our Code

Our Code of Conduct (Code) applies to all employees and serves as the foundation for how we do business and helps define our culture and reputation for ethical excellence. Our ethics, values, and integrity permeate every interaction we have—with customers, each other, our shareholder, and members of the public—and our Code helps us navigate the complexities of our business.

Our Code touches many areas of operation and employment. It cannot however address every circumstance, legal requirement, or cultural sensitivity we may face, which is why we review the relevant policies and other resources available on [LiveWire](#) and seek assistance as required.

### ✓ WE SUCCEED BY:

- Understanding that all employees, permanent and contract, including those on secondment or leave, are expected to honour and comply with our Code, policies and applicable laws, wherever we do business.
- Knowing that each of us are held accountable not only to our Code but also to the standards detailed in the [Values and Ethics Code for the Public Sector](#).
- Putting integrity above business results - even when there is pressure to do otherwise.

## We Lead with Our Values

While ours has always been a values-based organization, leading with our values is about putting them at the centre of everything we do so that they define us, guide us and enable us to be a force for the greater good. Our values are:



### COLLABORATION

We build partnerships and work together to achieve shared goals and foster an environment of trust.



### IMPACT

We are passionate about our mandate and strive to create positive sustainable impact with our clients and in the markets we serve.



### AGILITY

We see challenges as opportunities, we adapt to changing circumstances, and we seek creative solutions.



### RESPECT

We act with integrity, treat others with empathy and we value diversity to cultivate a supportive and inclusive environment.

## We Lead by Example

We are all responsible for:

- Embracing our responsibilities under the Code by taking initiative, ownership and accountability for our decisions and actions.
- Safeguarding our reputation by considering how others, including the public, may perceive our actions and decisions.
- Participating in our compliance requirements by reading and understanding the Code, as well as completing any mandatory training and certification on time.
- Speaking up when we have questions or concerns.

**Leaders play a critical role in meeting our commitments.  
With leadership comes a heightened level of responsibility.**

Our leaders are role models to each other and their teams and set an example by their own actions. Our leaders succeed by:

- Never leaving the impression that it is acceptable to compromise our integrity or reputation to accomplish business goals.
- Actively listening and encouraging healthy debate of all views and opinions, collaborative thinking, ethical decision making and raising of concerns.
- Respectfully listening to concerns and escalating issues and conflicts through proper channels such as a leader, the Senior Officer for Internal Disclosure, or other [Code Resource](#).
- Helping to create a climate where employees feel safe to say what they think by encouraging employees to speak up and listening to their candid opinions, concerns, and suggestions, ensuring a zero-reprisal environment.

## We Make Business Decisions Based on Integrity and Sound Judgement

We make decisions that benefit our customers. With this comes a responsibility to place our ethical compass at the core of every choice we make. We ensure our decisions and actions are within the confines of our responsibilities and delegated authority and are open to public scrutiny. In instances where the direction we should take is not clear, we ask ourselves the following questions and seek assistance as required from a **Code Resource**:

Would you be proud of the decision if it were publicly disclosed?

Is the decision grounded by what is both ethical and legal?

How would it be perceived by others?

Will the decision drive value by putting long-term success over short-term gain?

Could it harm FinDev Canada's, our customer's or our own personal reputations?

Could it expose our customers to increased business risk?

Making ethical decisions begins and ends with each of us. When in doubt, we should seek clarity and guidance from a **Code Resource** which are listed on page 35.



## We Speak Up When We Have Questions or Need to Report Concerns

Speaking up, asking questions, or sharing concerns when something doesn't seem right is important and keeps us on track. Every single one of us, regardless of our role, has a personal duty and obligation to ask questions and raise concerns in good faith. If there are any concerns that something is not right, we disclose the matter or talk to a **Code Resource** with whom we feel comfortable. We understand that all concerns raised will be taken seriously, considered and, where action is required, it will be taken as promptly as possible. We protect FinDev Canada's secure and confidential process for reporting concerns or potential misconduct in the workplace. All reports of concerns are reviewed fairly and in an impartial manner.

## We Have Zero Tolerance for Reprisal Against Others

Everyone should feel comfortable speaking up without fear of any form of reprisal or retaliation. If there are concerns that someone has been the target of reprisal because of speaking up, we contact a **Code Resource** for assistance. Any reporting of acts of reprisals committed against another individual will be reviewed and may lead to disciplinary action up to and including termination of employment.

***Reprisal or retaliation** occurs when someone is subjected to an action, penalty, or mistreatment for speaking up or raising a concern in good faith or cooperating in an investigation. Examples of reprisal include intimidation, coercion, disciplinary action, demotion, termination of employment, actions that adversely affect employment or working conditions—or a threat to do any of those things or to direct someone to do them.*

## We Cooperate in Investigations

At times, we may be called upon to assist with an internal or external investigation. The details of the investigation will be kept confidential wherever possible, consistent with resolving the issue and in compliance with applicable laws. Regardless of whether an investigation is conducted by external or internal parties we cooperate fully with the investigators. Where necessary, leaders ensure capacity to enable team members to fully cooperate with and participate in investigations.

## We Are Accountable for Our Actions

We are all accountable for our actions and decisions and have an obligation to adhere to our Code, policies, standards, guidelines and procedures and applicable laws. Despite our strong commitment to ethical conduct, violations of our Code, our policies and other standards can occur. If a violation is found, appropriate action will be taken which, depending on the severity of the violation, may include enhanced controls, coaching, communication, training, or disciplinary action up to and including termination of employment. Where warranted, situations may be referred to external authorities.



### WE SUCCEED BY:

- Cooperating in investigations in a truthful and honest manner while maintaining the confidentiality of the situation.
- Immediately contacting Legal Services if we are issued a notice of legal action or subpoena and the Chief Compliance & Ethics Officer if we receive a request from a regulator or any other regulatory authority.
- Ensuring that no one is subject to reprisal of any form for cooperating in an investigation.
- Reporting questionable behaviour and concerns as soon as reasonably possible.



## SECTION 2

# We Stand for Trust with Our Customers and Other Stakeholders

# Inclusive business for a sustainable future



## We Drive Growth with Integrity

We are committed to growing our business while serving our current and future customers with passion, perseverance, and integrity. We have built our reputation on how we serve our customers, and we strive to build on our foundation of trust in order to retain current customers and serve new customers. We achieve our success by aligning our business goals with our customer's priorities and conducting business with integrity.



### WE SUCCEED BY:

- Achieving our targets with honesty and professionalism.
- Understanding our clients' objectives, the environmental and social risks as well as the impact of our investments in the market we serve.
- Addressing complaints from customers promptly and with the utmost professionalism.

## We are Responsible When Giving or Receiving Gifts, Hospitality & Other Benefits

Giving or receiving of gifts or hospitality may be common business practices, but too often can be misinterpreted or suggest the appearance of something improper, even when there is no inappropriate intent. We are committed to doing business based strictly on the value of the services being offered and not on gifts, hospitality, or other benefits we extend or accept.

**Before offering or accepting any gifts, hospitality or other benefit, ask the following questions:**

Is it considered a normal expression of courtesy, and consistent with local standards and customs, without the appearance of favourable treatment?	YES
Could it call into question your or the Company's objectivity or impartiality?	NO
Could it compromise the Company's integrity or reputation?	NO
Can it influence anyone's judgement or performance?	NO

If your answers are not the same as the above, the exchange could be damaging to both yourself and the Company. You must not proceed without consulting a **Code Resource** first.

**✔ WE SUCCEED BY:**

- Avoiding giving or receiving gifts, hospitality or other benefits that could give the appearance of impropriety.
- Being aware that attempts at gift giving or making a gesture of hospitality to a government official can be illegal and that we must contact Legal Services for advice in these situations.
- Advising our third parties of our policies regarding the exchange of gifts and hospitality.
- Ensuring the exchange cannot impact anyone's objectivity or good judgement—or even have the appearance of doing so.
- Being aware of and sensitive to the gifts and hospitality policies of others.
- Avoiding hospitality from current and prospective suppliers.
- Only giving or accepting gifts in accordance with our **Policies and Guidelines** and disclosing gifts, hospitality, or other benefits through the **Disclosure Hub**.

## We Have Zero Tolerance for Bribery and Corruption

We are dedicated to conducting our business responsibly, free of any form of bribery or corruption and in compliance with all applicable anti-bribery and anti-corruption laws and regulations and our internal standards and guidelines. We all strive to know our customers better. We do not hesitate to raise concerns or ask questions if something does not seem right.

**Nearly anything of value can be considered a bribe if it is used to benefit someone personally and influence a business decision. This includes:**

- Payment of travel expenses—especially when there is no clear business purpose for the trip.
- Gifts including, cash, gift cards or gift certificates.
- Extravagant or particularly expensive entertainment or hospitality
- Personal services—such as a personal chef
- Political contributions



### **WE SUCCEED BY:**

- Performing the necessary due diligence to ensure that we do not knowingly engage in or support any transaction that involves any form of bribery or corruption.
- Raising concerns to leaders or a **Code Resource** if we, in good faith, suspect any illicit or unethical activity by parties with whom we work.
- Raising potential concerns of bribery to the Compliance & Ethics Financial Crimes team or a **Code Resource**.

## We Take Measures to Prevent Money Laundering and Terrorist Financing

We recognize and play our role in combatting financial crime. We do not tolerate, aid, or support money laundering or terrorist financing in any part of our business. We comply with all applicable laws and regulations relating to this global problem and we take measures to prevent our products and services from being used in connection with money laundering and terrorist financing.

***Money laundering** is the process by which the funds or proceeds of criminal activity, such as drug trafficking, are moved through legitimate businesses to hide all traces of their criminal origin. Terrorist financing refers to funding for terrorist activities and can come from legitimate or criminal sources.*

### Risk Indicators of Money-Laundering

When engaged with clients and conducting due diligence for our transactions, we report unusual activity which may include some of the following risk indicators of financial crime:

- The customer is apprehensive to answer KYC/due diligence questions.
- The customer asks probing questions about our processes and financial crime controls.
- The transaction does not appear to make business sense (e.g., the goods are being sold for significantly over or under current market value)



#### **WE SUCCEED BY:**

- Understanding that we are all responsible to detect, deter and protect against financial crime.
- Knowing our customers by conducting due diligence.
- Raising any situation that looks unusual or may indicate that someone is using or wants to use their transactions for money-laundering.
- Escalating unusual situations to the Compliance & Ethics Financial Crimes team or a **Code Resource** for further review.

## We Are Vigilant for Signs of External Fraud

We recognize and guard against fraudulent activity such as identity theft or customer impersonation, forgery of documentation or intentional misstatement. We are committed to guarding against criminals who intend to use FinDev Canada and its products and services while employing deception, misappropriation of property or company assets in the process of circumventing regulations, laws, or company policy for financial or personal gain.



### WE SUCCEED BY:

- Raising any unusual situations that indicate someone may be deliberately misrepresenting information via misstatements, omissions, or forgery of documentation.
- Being vigilant for signs of external fraud including:
  - Financial statements that have omissions, overstated assets or understated liabilities, or other unusual alterations to transaction documentation.
  - Failure to include the auditor's report with financial statements.
  - Unusual questions, unusual methods of communication, missing contact information, or a lack of an online presence
  - The corporate structure is opaque and does not correlate with the line of business.
- Escalating unusual situations to the Compliance & Ethics Financial Crimes team or a [Code Resource](#) for further review.





## We Comply with Relevant Sanctions

We recognize the importance of economic or financial sanctions as instruments used by governments and multinational bodies.

We are committed to complying with all applicable economic or financial sanctions, requirements, export controls or trade embargoes imposed, administered, enacted, or enforced by a Sanctions Authority (e.g., the Canadian government, including Global Affairs Canada).



### WE SUCCEED BY:

- Ensuring business is conducted following all due diligence procedures.
- Confirming sanctions declarations are made where necessary.
- Escalating unusual situations to the Business Integrity team, the Compliance & Ethics Financial Crimes team, or a [Code Resource](#) for further review.

## We Safeguard the Information in Our Care

We all have access to confidential information about EDC or FinDev Canada, our colleagues, our customers, or other third parties. We are entrusted to protect this information and safeguard it from any breach or unauthorized access or disclosure. Inappropriate use or mismanagement of information threatens the public trust and can result in a violation of law and contracts. We only access confidential information if we have a legitimate business reason to do so and only share it with colleagues that have a need to know. We also hold any outside party who is given access to this information accountable for protecting it.

### **Although not everything is confidential, customer information can only be shared with others when we have written consent to do so.**

When in doubt it is important to contact a **Code Resource** before sharing or using confidential information for any purpose. Some types of confidential information include:

- Customer or other third-party information
- Corporate information created by or about EDC or FinDev Canada
- Personal information
- Government sensitive information



### **WE SUCCEED BY:**

- Presuming that any information we receive is confidential.
- Seeking clarity on what constitutes confidential information from a **Code Resource**.
- Only collecting, using, disclosing, and disposing of personal information in accordance with our **Policies and Guidelines**.
- Honouring any confidentiality agreements and other contractual terms that apply to our relationships.
- Being careful when discussing or working with confidential information so that others cannot overhear or see it.
- Protecting intellectual property and avoiding any infringement, including copying the information of others for our own use. Intellectual property includes copyrights, patents, and trademarks.
- Reporting any suspected or actual breaches or cybersecurity incidents immediately to a **Code Resource**.
- Understanding that our confidentiality obligations continue after our employment ends.

## We Do Not Tolerate Insider Trading

Through our work, we have access to material, non-public information (MNPI) about other companies and we never use this information or provide "tips" to our family members or friends, in trading activities. This applies to transactions or trades conducted by, or on behalf of EDC or FinDev Canada, or in our personal accounts or any other account over which we have direct or indirect control. Having access to MNPI makes an individual an Insider.

### **Insider Trading is when an individual has MNPI and trades stocks or other securities.**

MNPI is any information that has not been made public that an investor would value.

Examples include:

- Information about financial results, a merger, purchase, sale, or joint venture
- Changes in orders or information about major contracts
- Important management changes
- Gain or loss of a significant customer or supplier



### **WE SUCCEED BY:**

- Safeguarding MNPI and not sharing it with anyone else, including coworkers, family members or friends.
- If we choose to conduct personal trading activity, ensuring that we do so in full compliance with applicable securities laws and our Policies, Standards, Guidelines and Procedures.
- Understanding that the consequences for violations of security laws can be severe, including civil and/or criminal penalties regardless of value.
- Ensuring that all necessary disclosures or approvals are completed when related to our personal assets and liabilities.
- Not allowing the information we have to inappropriately influence any business activities conducted on behalf of EDC or FinDev Canada.

## We Work with Third Parties Who Honour Our Commitments

We maintain high standards of performance and business ethics for ourselves and when working with suppliers, partners, and other third parties. This means we comply with all applicable laws and trade agreements when participating in purchasing decisions. We base our relationships with our third parties on lawful, fair, and ethical business practices. We declare any related personal interests or relationships with third parties that may pose a conflict of interest or appear to place us in conflict. Unless authorized, we do not make procurement commitments to third parties, and we consult with our Sourcing and Supplier Management colleagues as required.

We expect our third parties to demonstrate similarly high standards and to adhere to all applicable laws and principles of ethical business conduct, as set out in more detail in our Supplier Code of Conduct and Agreement on Principles of Conduct.

### WE SUCCEED BY:

- Always consulting the Sourcing & Supplier Management team before approaching a third party to discuss potential business sourcing options.
- Following all procurement rules to ensure appropriate due diligence in the selection of third parties.
- Basing all procurement decisions on objective criteria such as the quality, price, and reliability.
- Unless in accordance with our policies and procedures, declining any third party request for a reference or endorsement.
- Raising concerns of any activity that could be in breach of contractual obligations to the Sourcing & Supplier Management team or a [Code Resource](#).



## SECTION 3

# We Stand for Accountability

## We Recognize and Disclose Actual, Potential and Apparent Conflicts of Interest

We are trusted to act in the best interest of EDC, FinDev Canada and our customers. This means ensuring all our business decisions are free from any actual, potential, or apparent conflicts of interest. Our business decisions must be based on sound judgement, objectivity, and impartiality.

Conflicts of interest may arise through personal outside interests or activities. Examples can include political activity, outside employment and personal or close financial relationships with parties within or connected to EDC or FinDev Canada.

Having a conflict of interest is not necessarily a violation of our Code, however, failing to disclose one is.

### When evaluating a potential conflict of interest, ask the following questions:

Could it be a real, apparent or potential conflict of interest?

Would it interfere with our performance or decrease the quality of our work?

Can it impact our capacity, or be perceived to influence, our ability to perform our jobs objectively and impartially?

If we answered "yes" to any of the above questions, we must seek guidance from a [Code Resource](#) and disclose the situation.

### WE SUCCEED BY:

- Recognizing, avoiding, and disclosing potential conflicts of interest which is critical to protecting our reputation.
- Removing ourselves from any decision which could give the appearance of partiality or bias.
- Understanding that outside employment and activities can represent conflicts of interest and impact our ability to perform in our roles.
- Not allowing these activities to interfere with our impartiality (or be perceived as such), with our obligations to protect the confidentiality of information or our roles.
- Understanding that actual and apparent conflicts of interest must be disclosed through the [Disclosure Hub](#) and managed under our Policies, Standards, Guidelines and Procedures.
- Recognizing that conflicts of interest can arise post-employment with FinDev Canada and notification to our leader is required where the position offered may pose an actual, potential, or apparent conflict of interest.



## We Are Conscientious When We Create Business Documents

We ensure the business documents and records we create are complete and truthful to ensure responsible business decisions and to provide correct information to our customers, regulators, and other stakeholders. Recording information accurately is critical to running our business and satisfying our legal disclosure and retention requirements. We always write in a professional manner, ever mindful that much of what we record can be accessed by the public and media under access to information laws.

### WE SUCCEED BY:

- Being honest and accurate in all documentation including expense reports, business reports and transaction records.
- Creating business records and other documents including e-mail in a professional manner.
- Understanding that, with limited exceptions, Canadians have a legal right of access to information under our control.

## We Use Information & Technology Responsibly

We are enabled to achieve success with access to technology resources such as laptops and smartphones. When using these resources, as well as other corporate information and technology assets, we are prudent and responsible and use them in ways that advance our business purpose while preserving confidentiality, integrity, and availability of our information and technology. We build information and technology security controls into the design of our digital business, follow security best practices, and continue to strengthen our human firewall, to achieve better protection of the information and technology in our care from accidental or unauthorized access, disclosure, misuse, improper alteration, or destruction.

Our information technology resources include our network, systems, and applications, internet and intranet, email, accounts, and collaboration tools, as well as issued mobile phones, computers, and tablets.



### WE SUCCEED BY:

- Using EDC and FinDev Canada business information for business purposes only, and always through approved technologies and systems.
- Understanding that corporate assets are provided to execute on our business commitments and taking care that any personal use of corporate assets is permitted under our policies and procedures.
- Always exercising sound judgement when using our information and technology to protect our integrity.
- Ensuring that our networks and systems remain secure by setting strong and unique passwords and not sharing them with others or using them for personal applications, accounts, or subscriptions.
- Taking care to compose all emails, text messages and other electronic communications in a professional manner.
- Reporting suspicious activity or improper use of business information or technology.
- Not expecting that the information we send or receive using corporate assets and systems is completely private and understanding that our activity may be monitored.



## We Communicate with Transparency and Honesty

The way we communicate with the public is important. It sets the tone for the organization and is essential to maintaining a positive reputation. All communications about our business must be honest, accurate and consistent. We are also bound by very specific rules about how and when our information is released to the public. Unless we have been specifically authorized, we never disclose any information about our customers or business activities to anyone outside the organization.

***Social media** is an effective way to stay current with friends and family. While we are encouraged to support our brand and promote our trade insights through our social networks, we take care to promote only information that is already publicly available through official social media channels. When making public expressions of personal views with our social media accounts or through other means, we are mindful of our duty to act and communicate with integrity, and in a manner that bears the closest public scrutiny.*



### WE SUCCEED BY:

- Protecting confidential information from disclosure to any unauthorized party without appropriate approval and written consent.
- Forwarding any requests from the media to the Marketing And Communications team.
- Applying our values and integrity when using social media for personal use considering the potential consequences for EDC, FinDev Canada and the Government of Canada.
- Being clear in our social media posts that the opinions expressed are our own personal views.



## SECTION 4

# We Stand for Respect with Each Other



## We Promote Inclusion, Diversity & Equity

We promote inclusion, diversity, and equity in every aspect of our business and at every level of our organization. We create a welcoming environment where everyone is included and feels they belong. We know that we can provide the best solutions for our customers when we combine our individual talents, skills, perspectives, and contributions.

### ✓ WE SUCCEED BY:

- Focusing solely on a person's qualifications, competencies, relevant experience, and performance when making employment related decisions.
- Taking care to see, hear, value, and empower each other to succeed.
- Being aware of how our actions and words may make others feel.
- Avoiding actions that someone else might interpret as intimidation, bullying or favouritism.

## We Provide a Work Environment Free from Harassment and Discrimination

We maintain a safe and positive work environment free from harassment, discrimination, intimidation, and violence where everyone has an equitable opportunity to succeed. We do not tolerate or behave in a manner or act in a way that harasses, degrades, or discriminates against others.

**Discrimination** is any distinction, exclusion or preference based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability, and conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.

**Harassment** is any behaviour that has the effect of demeaning, humiliating, or embarrassing a person and which a reasonable person should know is unwelcome. Harassment can include written or verbal comments, unwanted sexual behaviour or physical assault.



### WE SUCCEED BY:

- Recognizing our success depends on valuing different ideas, strengths, interests, and cultural backgrounds.
- Caring for people, for their wellbeing and growth, beyond business.
- Treating everyone with professionalism, consideration, and respect.
- Listening to other points of view, keeping in mind that we achieve better results when we work collaboratively together.
- Fostering inclusion where individual differences are valued and all ideas and opinions are welcomed with respect.
- Encouraging everyone to speak freely, ask questions and raise concerns.



## We Create a Healthy and Safe Workplace

We are committed to ensuring a healthy and safe work environment at any place where our employees are engaged in our work. We also take accountability for our own physical and mental health and overall wellness and take steps to protect the health, wellness, and safety of others.

### ✔ WE SUCCEED BY:

- Complying with relevant health and safety policies and applicable laws.
- Consulting Information and resources for support as made available to all employees through the HR Hub.
- Raising a concern to a leader, Security Services, the Health & Safety Committee, or any **Code Resource** if any situation appears unsafe or if asked to perform a task that we feel is unsafe.
- Performing our work responsibilities while not impaired by alcohol or drugs.
- Knowing that threats, intimidation, aggression, harassment, or violent behaviour of any kind are not tolerated.



**SECTION 5**

**We Stand for  
Strengthening Our Society**

## We Respect Human Rights

We take thoughtful and deliberate action in our workplace and communities in order to improve inclusion, diversity and equity as well as effectively manage the risks we are connected to through our customers relationships. Across our operations, we respect the rights of people enshrined in the *International Bill of Human Rights* and the *International Labour Organization Declaration on Fundamental Principles and Rights at Work*. We demonstrate respect for the rights of our employees through our commitments in the Code of Conduct and various human resources policies, standards, and guidelines. Our human rights-related commitments are also detailed for our third parties in our *Supplier Code of Conduct* and *Procurement Policy*.



### WE SUCCEED BY:

- Treating others with dignity and respect and upholding human rights.

## We Are Dedicated to Environmental, Social and Governance (ESG) Practices

We understand that good environmental, social and governance (ESG) practices are key to the long-term growth and success of our clients and the markets we serve. We recognize that our business decisions and activities have the potential to impact the environment and local communities where we do business. By fostering a culture of broader business risk awareness, we position our customers to prevent and mitigate negative impacts of their business, setting them up for longer term success and business sustainability.

### WE SUCCEED BY:

- Understanding and reviewing the environmental, social and governance impacts of the transactions and businesses we support.
- Conducting our business in as transparent a manner as possible, to maintain stakeholder trust and confidence.
- Adopting initiatives that foster sustainable, responsible, and inclusive business.





**SECTION 6**

**We Stand for Our Reputation and Values**



## **We Know that Speaking Up Protects Our Reputation**

We take pride in being a part of and helping to protect the reputation of EDC and FinDev Canada. Integrity starts with our individual actions and decisions - we act on behalf of all stakeholders when we uphold our ethical standards. When we need further guidance on a provision in our Code, or we see something that raises concern or could be a potential wrongdoing, we have a duty and obligation to speak up. Any employee who engages in intimidation, retaliation or reprisal will be subject to disciplinary action. It takes courage to speak up, however, doing so is working for the good of EDC, FinDev Canada, our colleagues, customers, and our reputation.

Raising a concern in good faith simply means that we have raised a concern that we believe to be true, and the information was reported with no malicious intent.

## Our Code Resources

### Questions or advice

- Your leader
- Any other leader with whom you are comfortable.
- Legal Services
- The C&E Ethics team [CodeofConduct@edc.ca](mailto:CodeofConduct@edc.ca)
- Employee Relations [EmployeeRelationsTeam@edc.ca](mailto:EmployeeRelationsTeam@edc.ca)
- Vice-President and Chief Compliance & Ethics Officer
- Senior Officer for Internal Disclosures (SOID) [SOIDFinDevCanada@edc.ca](mailto:SOIDFinDevCanada@edc.ca)

### Options for reporting concerns

- Chief Internal Auditor and SOID [SOIDFinDevCanada@edc.ca](mailto:SOIDFinDevCanada@edc.ca)
- Your leader or any other leader you feel comfortable with
- Third Party Confidential Disclosure Line
  - 1-866-335-2053 (to be used within Canada and the USA)
  - 1-647-439-9463 (to be used as a collect call outside Canada and the USA)
  - Or via the web at [www.clearviewconnects.com](http://www.clearviewconnects.com)

An additional external option to raise concerns about wrongdoings is the Public Sector Integrity Commissioner of Canada (PSIC).

### Disclosing a potential, actual or apparent conflict of interest

- Your leader
- C&E Ethics team [CodeOfConduct@edc.ca](mailto:CodeOfConduct@edc.ca) for assessing a conflict
- [Disclosure Hub](#) to submit a disclosure



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