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Code of Business Conduct

and

Ethical Behaviour

[Employees]

March 2014

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1. Introduction

The reputation of the Canada Deposit Insurance Corporation is dependent on the quality of the actions and the integrity of the behaviour of its employees. Compliance with appropriate standards of conduct is fundamental to the preservation of the Corporation's image and the success of its operations.

This *Code of Business Conduct and Ethical Behaviour* ("Code") applies to all CDIC employees. It is designed to help employees understand the standard of conduct that is expected of them. Its objective is to ensure that the Corporation's tradition of professionalism and excellence is maintained and enhanced while supporting a positive work environment in which people are respected.

Throughout the Code there are references to various ethics-related policies; further details are available in the policies themselves. Specific reference in this Code to a CDIC ethics-related Policy is made for ease of reference. In the event of a discrepancy in the wording of any such policy and this Code, the wording of the specific policy will govern.

2. Values and Ethics Code for the Public Sector

Under section 5 of the *Public Servants Disclosure Protection Act* ("PSDPA") CDIC employees are required to adhere to the Values and Ethics Code for the Public Sector, established by the Treasury Board Secretariat ("TBS Code"). This Code integrates the fundamental values and commitments set out in the TBS Code (see Appendix "A").

All employees have a responsibility to be knowledgeable of the Code, all of the Corporation's policies, and **must** comply with these codes and policies as adherence is a condition of employment.

To acknowledge a commitment to abide by the values and standards of conduct required, each employee must sign the *Acknowledgement and Acceptance Form* (see appendix) and return it to the Human Resources department. The form is kept on record in the employee's Human Resources file.

3. The Expected Standards of Business Conduct and Ethical Behaviour

The Corporation expects each employee to abide by the provisions of this Code.

Employees are to keep confidential all information regarding the business and affairs of CDIC and are to exercise their duties in good faith, in the best interests of the Corporation.

Employees are to conduct themselves in a manner that reflects the overall spirit of the Code and CDIC's corporate values. These values cannot be considered in isolation from each other as they will often overlap. These values are:

- Professionalism and excellence
- Integrity and trustworthiness
- Communication and teamwork
- Respect and fairness

and include the values described in the TBS Code set out in Appendix “A”.

Employees are to conduct themselves in a professional manner at all times and strive to achieve the highest standards of behaviour and integrity in their work, both individually and in working with others.

Professionalism is not only measured by the kind of work one does. It is also determined by the attitude and behaviour with which one approaches and performs one's work. Professionalism entails the demonstration of competence at all times, being dedicated to the pursuit of excellence and committed to the principles of ethical behaviour. Ethical behaviour is behaviour that is honourable and consistent with accepted principles of correct moral conduct. Failure to adhere to these standards can impede one's work and the ability to perform it. It can also cast doubt on the integrity and competence of the Corporation as a whole.

In interactions with outside parties, employees are expected to act in good faith in the best interest of CDIC and exercise good judgment, having primary regard for the importance of maintaining and promoting CDIC's high standard of professionalism and excellence.

Managers are expected to explain an employee's duties and responsibilities and the performance expectations by which the employee will be measured. Employees are expected to fulfill the duties and responsibilities outlined in their job descriptions and to follow their supervisor's instructions.

Many employees have acquired a professional designation as members of an association or organization. These designations signify the achievement of a level of professional competence or expertise in a particular field. In many instances, the designation was a contributing factor in the hiring of the individual. The Corporation expects all such employees to remain a member in good standing of their applicable professional association, and to adhere at all times to their association's standards in their work as employees of CDIC.

Employees are to be neat, clean and well groomed. The Corporation expects that an employee's appearance and dress will reflect the Corporation's professional image and will be appropriate to his or her duties.

4. Leadership Role of Managers

The personal example set by CDIC managers speaks louder than any written code. Every CDIC manager must demonstrate leadership in respecting and promoting the standards of the *Code of Business Conduct and Ethical Behaviour*.

5. Internal Disclosure of Information Concerning Wrongdoing in the Workplace

Any employee who has reasonable grounds to believe that another person has done something unethically, immorally or illegally in the conduct of CDIC business is expected to disclose this information to his or her immediate supervisor, or to the senior officer of

CDIC as designated under the *Internal Disclosure of Information Concerning Wrongdoing in the Workplace* Policy.

Under the CDIC policy on *Internal Disclosure of Information Concerning Wrongdoing in the Workplace*, an employee disclosing such information in good faith will be treated fairly and protected from any resulting reprisal.

6. Conflicts of Interest Code

Each employee is expected to avoid situations that may lead to a real, potential or perceived conflict of interest and to comply with the *Conflicts of Interest Code*.

Adherence to the *Conflicts of Interest Code* minimizes the possibility of conflicts arising between an employee's private interests and his or her official duties and responsibilities with the Corporation. The *Conflicts of Interest Code* also provides a process to resolve any potential conflict of interest that may arise.

7. Oath of Fidelity and Secrecy

All employees must take the *Oath of Fidelity and Secrecy* at the beginning of employment. Employees are required to solemnly swear that he or she will treat as confidential any information that is obtained by that employee regarding the internal affairs of CDIC or of a federal or provincial institution or of any person dealing with that institution.

8. Confidentiality and Disclosure of Information

The *Access to Information Act* and the *Privacy Act* govern how the Corporation collects, uses, stores, discloses, and disposes of certain information.

Every employee is required to fully respect the provisions of these Acts and the confidentiality requirements of information the employee has obtained because of his or her position.

The *Access to Information Act* gives Canadian citizens and permanent residents access to information in federal government records. CDIC expects employees to comply with the *Access to information Act* and not to destroy, alter, falsify or conceal a record.

CDIC expects employees to comply with the *Privacy Act* which gives Canadian citizens and permanent residents the right to access their personal information held by federal agencies and which protects against the unauthorized use or disclosure of that information.

Procedures relating to access to information and privacy are set out in the CDIC Access to Information and Privacy Policies.

9. Public Comment

Employees are required to refrain from any public discussion, in the media or otherwise, regarding CDIC's business, affairs, policies or organization.

Only a designated spokesperson can issue a statement or make comments about CDIC's position on a given subject. If an employee is asked to comment publicly on any issues related to CDIC's affairs, the employee must decline to comment and refer the enquiry to CDIC's department of Communications and Public Affairs.

10. Respect in the Workplace

The Corporation is committed to providing a safe and healthy workplace free of harassment, discrimination and violence. In accordance with its policies on *Harassment and Workplace Violence Prevention*, the Corporation expects each employee to comply with these policies and to contribute to a harassment and violence-free workplace.

11. Personal and Family Relationships in the Workplace

Any employee who has a personal or family relationship with another employee that might affect work performance, or might be perceived as affecting work performance or the credibility of the Corporation, should inform Human Resources of this matter.

An employee with management responsibilities who has a personal or family relationship with another CDIC employee must take steps to ensure that the relationship is kept outside of the manager's immediate working group or line of authority and ensure that the relationship will not affect the credibility or reputation of CDIC.

12. CDIC Property

Employees are expected to use and safeguard CDIC property for the conduct of CDIC business, and to protect it from theft, misuse or damage.

The Corporation expects that employees who have access to CDIC electronic networks and the Internet will use these networks only for authorized purposes and in a responsible and informed way, respecting the law and applicable CDIC policies. Reference should be made to the Internet policy and CDIC Social Media Policy for greater details.

The Corporation will arrange to have a corporate credit card issued to employees that are required to incur business expenses in the course of their employment. Employees to whom corporate credit cards have been issued are responsible for the charges they incur and are expected to abide by the *Corporate Card Agreement* between the card issuer and the employee.

An employee is required to return all CDIC property if and when employment ends or the employee is requested to do so.

13. Punctuality and Absenteeism

Employees are expected to attend the workplace regularly and punctually in the hours established by their supervisor. In the event circumstances arise which prevent an employee from reporting to work as expected, the employee must notify the supervisor immediately.

Medical or other appointments should be arranged so that limited time is required away from work. Except for periods of approved leave, employees are expected to make every effort to make up any time lost due to absences, personal appointments or tardiness.

14. Consumption of Intoxicants

No employee should work under the influence of alcohol, illegal drugs or other intoxicants. "Under the influence" is defined as a condition that any reasonable person would consider as impairing an employee's effectiveness. If, under a prescription issued by a physician, an employee is required to take medication that could affect his or her performance, the employee should advise his or her manager accordingly.

As long as doing so does not impair the employee's work performance, judgment or behaviour, an employee may consume alcohol in moderation during business-related social occasions. On these occasions, an employee is expected to behave in a manner that does not bring discredit to CDIC. Reference should be made to the Social Events - Consumption of Alcohol policy for greater details.

15. Smoking

CDIC supports a safe and healthy working environment and does not permit smoking on CDIC premises. Employees are expected to use good judgment regarding the timing and frequency of smoking breaks. Abuse of this privilege may lead to a limitation on the number or duration of smoking breaks.

16. Failure to Comply

Adherence to CDIC's *Code of Business Conduct and Ethical Behaviour* and to CDIC policies is considered to be a condition of employment. An employee whose behaviour and decisions do not demonstrate these values and commitments, and whose conduct constitutes a breach of the Code will be subject to appropriate disciplinary action up to and including termination of employment.

17. Conclusion

A reputation for appropriate business conduct and sound ethical behaviour is vital to maintaining CDIC's credibility and image. Accordingly, the highest standards of ethical behaviour and business conduct must govern the work of its employees and the Corporation's operations overall.

It is the responsibility of CDIC to establish clear standards of conduct and behaviour for its employees. It is the responsibility of each employee to adhere to these standards. The adherence of employees to the provisions of this Code will be assessed annually as part of the performance appraisal process in which an employee's "personal effectiveness" is assessed in comparison with CDIC's corporate values. This *Code of Business Conduct and Ethical Behaviour* provides guidance to assist employees in making decisions that are consistent with these expectations.

Cross-references

Access to Information Policy
Oath of Fidelity and Secrecy
Conflicts of Interest Code
Harassment Policy and related brochure: Respect in the Workplace
Internal Disclosure of Information Concerning Wrongdoing in the Workplace
CDIC Internet Policy
Privacy Policy
Social Events – Consumption of Alcohol
Social Media Policy
Workplace Violence Prevention Policy
TBS Values and Ethics Code for the Public Sector

Appendix “A” – Code of Business Conduct and Ethical Behaviour for Employees**Extracts from TBS Values and Ethics Code****a) Respect for Democracy**

The system of Canadian parliamentary democracy and its institutions are fundamental to serving the public interest. CDIC employees recognize that elected officials are accountable to Parliament, and ultimately to the Canadian people, and that a non-partisan public sector is essential to our democratic system.

CDIC employees shall uphold the Canadian parliamentary democracy and its institutions by:

- i) Respecting the rule of law and carrying out duties in accordance with legislation, policies and directives in a non-partisan and impartial manner.
- ii) Loyal carrying out the lawful decisions of leaders and supporting ministers in their accountability to Parliament and Canadians.
- iii) Providing decision makers with all the information, analysis and advice they need, always striving to be open, candid and impartial.

b) Respect for People

Treating every person with respect, dignity and fairness is fundamental to CDIC's relationship with the Canadian public and contributes to a safe and healthy work environment that promotes engagement, openness and transparency. The diversity of CDIC's employees and the ideas they generate are the source of CDIC's innovation.

CDIC employees shall respect human dignity and the value of every person by:

- i) Treating every person with respect and fairness.
- ii) Valuing diversity and the benefit of combining the unique qualities and strengths inherent in a diverse workforce.
- iii) Helping to create and maintain a safe and healthy workplace that is free from harassment and discrimination.
- iv) Working together in a spirit of openness, honesty and transparency that encourages engagement, collaboration and respectful communication.

c) Integrity

Integrity is the cornerstone of good governance and democracy. By upholding the highest ethical standards, CDIC's employees conserve and enhance public confidence in the honesty, fairness and impartiality of the federal public sector.

CDIC employees shall serve the public interest by:

- i) Acting at all times with integrity and in a manner that will bear the closest public scrutiny, an obligation that may not be fully satisfied by simply acting within the law.
- ii) Never using their official roles to inappropriately obtain an advantage for themselves or to advantage or disadvantage others.
- iii) Taking all possible steps to prevent and resolve any real, apparent or potential

- conflicts of interest between their official responsibilities and their private affairs in favour of the public interest
- iv) Acting in such a way as to maintain CDIC's trust

d) Stewardship

CDIC's employees are entrusted to use and care for public resources responsibly, for both the short term and long term.

CDIC employees shall use resources responsibly by:

- i) Effectively and efficiency using public money, property and resources managed by them.
- ii) Considering the present and long-term effects that their actions have on people and the environment.
- iii) Acquiring, preserving and sharing knowledge and information as appropriate.

e) Excellence

Excellence in the design and delivery of CDIC policy, programs and services is beneficial to every aspect of Canadian public life. Engagement, collaboration, effective teamwork and professional development are all essential to a high-performing organization such as CDIC.

CDIC employees shall demonstrate professional excellence by:

- i) Providing fair, timely, efficient and effective services that respect Canada's official languages.
- ii) Continually improving the quality of policies, programs and services they provide.
- iii) Fostering a work environment that promotes teamwork, learning and innovation.

Appendix “B” – Code of Business Conduct and Ethical Behaviour for Employees

Acknowledgement and Acceptance Form

I acknowledge that I have received my copy of the *Code of Business Conduct and Ethical Behaviour* for the Canada Deposit Insurance Corporation (“CDIC”), which incorporates the values and expected behaviours in the Treasury Board Secretariat Values and Ethics Code for the Public Sector (the “TBS Code”), and the CDIC ethics-related policies referred to in this Code.

I have read the above-mentioned documents and agree to abide by the provisions set out therein for the duration of my employment with CDIC and thereafter, as applicable.

Employee’s signature

Manager’s signature

Employee’s name
(type or print)

Manager’s name
(type or print)

Date

Note: Original copy to be placed on the employee’s personnel file in the Human Resources department.