



CODE OF CONDUCT





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Message from the CEO

“Trust is earned when actions meet words.”

– Chris Butler

We operate in an industry that relies on transparency and strong partnerships. The key ingredient that allows us to support our customers, partner with our industry peers and make a meaningful impact as an organization is trust.

Simply put: without trust, we do not exist.

Building and maintaining a culture of trust, integrity and accountability takes all of us. We all play a crucial role in upholding our reputation as a trusted partner in every single one of our touchpoints. We need to work together to serve the industry that feeds the world, inspiring possibility and passion. FCC’s culture, which is built on 100% accountability and committed partnerships, is our cornerstone and should influence our actions both internally and externally. Wherever we show up, we have an obligation to demonstrate the highest ethical standards of behaviour at all times.

We are living in a complex world that is only getting more challenging to navigate. This is why FCC’s Code of Conduct is a critical resource and the foundation for how we do business. The Code reinforces the ethical standards we expect from employees so we can deliver on our ability to serve

our customers and positively impact the industry. It guides us through a wide range of circumstances so we can be proud of our decisions and how we interact with each other.

Thank you for your commitment to learning, understanding and following the Code of Conduct. Your commitment not only supports the organization’s culture, but it also signals to our customers, industry peers and teammates that their trust has been placed in the right hands.



Justine Hendricks
President and Chief Executive Officer

IT TAKES ALL OF US

- 6 WHO WE ARE
- 7 SCOPE



As a federal Crown corporation, Farm Credit Canada's (FCC's) public perception is important. The trust and confidence of our customers, stakeholders and the public are key to our success. The FCC Code of Conduct forms a foundation that outlines how we're expected to behave at and outside work, keeping in mind that we all represent FCC. Following the Code is a condition of our employment, with violations resulting in serious consequences, including termination and legal action. It's a tool to help us navigate situations to ensure FCC operates ethically and maintains that public trust. But like any tool, it's the people using it who build something special.

With every interaction and decision we make, **we bring the Code to life.**

The Code is at the core of everything we do – it supports our vision, mission, value propositions and cultural practices. And it's up to all of us to live the Code every day.



The Code can't cover every possible situation or replace good judgment – if there are any events or questions not specifically covered in the Code, contact the [Ethics Office](#) for clarity.

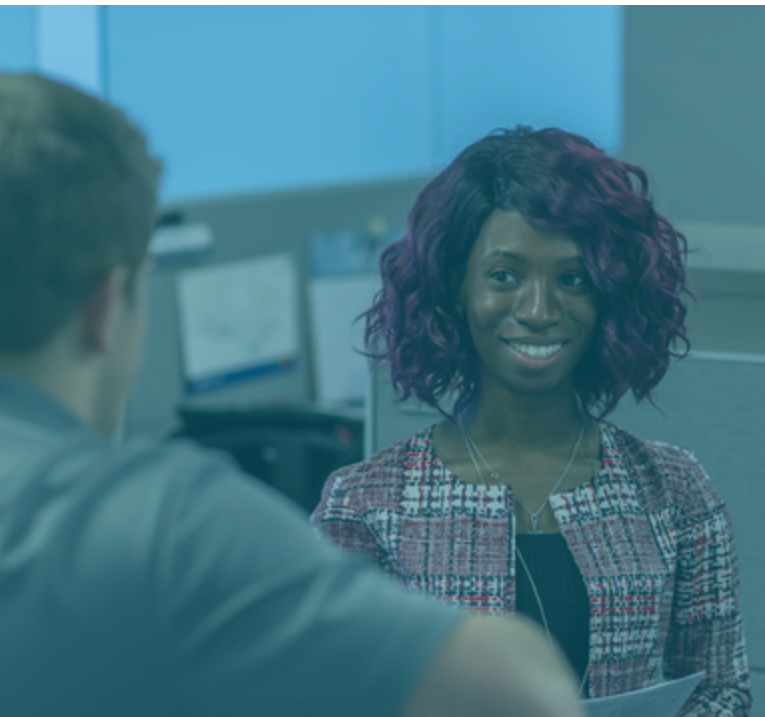
WHO WE ARE

FCC is a federal commercial Crown corporation reporting to Canadians and Parliament through the Minister of Agriculture and Agri-Food. We provide financing, knowledge and software to over 100,000 customers. We're a team of more than 2,200 employees operating from 100-plus offices located primarily in rural Canada and our corporate office in Regina, Saskatchewan.

CORPORATE VALUES

We are committed to advancing the business of agriculture. We do this by setting our sights high – working to benefit our customers and to help employees achieve their potential.

Our corporate values represent these core beliefs:



Act with integrity

We are ethical and honest. We treat customers, colleagues and all stakeholders with respect.



Focus on the customer

We care about our customers, and we pride ourselves on providing them with an extraordinary experience based on personal relationships, flexibility and industry knowledge.



Achieve excellence

We share a commitment to high performance, accountability and efficiency in order to achieve excellence.



Working together

We believe in the power of teamwork. Whether delivering services tailored to customer needs or designing solutions to benefit the industry, we work together as one team.



Give back to the community

We take corporate social responsibility seriously. We believe in giving back to the communities where our customers and employees live and work, striving to reduce our impact on the environment and contributing to the success of the agriculture industry.

SCOPE

The Code applies to all employees. It also applies to members of FCC's Board of Directors, in addition to the sections on conflicts of interest and conducting business during elections. In these matters, the Board must adhere to the Conflict of Interest Act and other applicable instruments and Board policies.



At FCC, all permanent, long-term, short-term, contract and casual employees must follow the Code. Consultants and third-party vendors are governed by the Supplier Code of Conduct.

Values and Ethics Code for the Public Sector (VECPS)

As a federal Crown corporation, FCC is a part of the public service of Canada and is subject to the VECPS. The VECPS applies to all of us and compliance to VECPS is a condition of employment. Employees should read its text in conjunction with our Code. It's available on the [Treasury Board of Canada Secretariat](#) website.



IT TAKES ETHICS

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We create something pretty special at FCC.

Our work helps drive the Canadian agriculture and food industry. We finance people's dreams and livelihoods. It's a privilege and a responsibility – to be successful, we need to trust each other and approach every interaction with the best intentions. Acting ethically is all about doing the right thing and keeping our radar up.

PERSONAL RESPONSIBILITY

The Code is something we take seriously. As employees, we're required to follow the standards set out in this Code and speak up if we have questions or concerns – it is not only good for our business, it is a condition of our employment. In relationships with colleagues, customers, third parties, members of the public and federal government stakeholders, we:

- deal openly, honestly and fairly in all communications and negotiations
- behave respectfully and contribute to a healthy and safe work environment
- act in the best interests of FCC and protect our reputation
- act within our duties, qualifications and delegated authority
- avoid putting ourselves in a conflict-of-interest situation
- only access or share corporate, confidential or personal information when there is a legitimate business reason to do so
- are transparent and share complete information when appropriate
- comply with all FCC policies and procedures
- ensure our actions comply with the laws and regulations applicable to FCC



LEARNING TOGETHER

We participate in mandatory training, awareness activities and attest to comply with the FCC Code of Conduct. The Code forms the foundation of how we're required to behave at and outside work, and revisiting it regularly ensures we're keeping it top of mind.

LEADER RESPONSIBILITY

Leaders lead by example to inspire ethical behaviour in their teams and are expected to provide advice and guidance on issues according to their authority and responsibilities. They have additional accountabilities to ensure their personal behaviour in relationships with colleagues, customers, third parties, members of the public and federal government stakeholders is beyond reproach, including:

- modelling ethical behaviour
- ensuring business decisions meet FCC's expectations with respect to the Code
- providing advice and guidance as needed to employees on issues related to values, ethics and conflicts of interest, with the support of the Ethics Officer
- receiving and applying ethical business judgment to Declarations of potential violations of the Code before elevating to the Ethics Office in a timely manner



PROTECTING FCC ASSETS

FCC's assets are the tools, information and places we need to conduct our business.

We all protect FCC assets and interests, and never take advantage of them for our personal benefit. This includes, but isn't limited to:

- cash
- negotiable instruments such as letters of credit and certificates
- leased premises
- physical and electronic equipment
- FCC's records and information
- customer and employee information

CONFLICTS OF INTEREST

A conflict of interest is a situation where our personal interests or activities – or the interests or activities of people with whom we have relationships – conflict or could appear to conflict with our FCC roles and responsibilities. It's something we avoid at all costs.

We don't give preferential treatment to any person or entity, including family members, friends or people we have a personal or personal business relationship with, when:

- providing lending or other services
- negotiating contracts for products and services on behalf of FCC
- hiring employees
- managing employee performance
- determining salaries or promotions

We also ensure the business activities of our FCC department or division don't conflict with the business activities of another FCC department or division. Avoid conflicts of interest by recognizing when there is a real, potential or perceived conflict, staying curious, keeping the lines of communication open and asking before acting.



DID YOU KNOW?

There are three types of conflicts of interest.

REAL

When our private interests are sufficient to influence the exercise of our public duties and could undermine or compromise the public's trust in FCC or in an employee's ability to do their work.

POTENTIAL

Where a conflict of interest could arise in the future.

PERCEIVED or APPARENT

When it would appear to a reasonable person that the private interests of an employee could improperly influence the performance of their duties.

We must be as concerned with preventing apparent conflicts of interest as we must be with preventing real and potential conflicts of interest.

A. BUSINESS GIFTS, HOSPITALITY AND OTHER BENEFITS

We always need to consider how our customers, the public and the Government of Canada would view the gifts we give to, or accept from, customers, partners, vendors or other third parties. There may also be legal consequences to giving or accepting gifts. Any real, potential or perceived incident of bribery or corruption won't be tolerated – it can result in criminal or legal consequences, and damage our business and relationships with customers, co-workers, stakeholders and the public.

Giving or receiving gifts

When it comes to gifts, we don't:

- **solicit or seek a gift, prize, entertainment, hospitality or other benefits from a customer, business partner or contractor**
- **accept sponsored travel unless we're guest speakers**
- **offer, give or accept gifts, prizes, entertainment, hospitality or other benefit, directly or indirectly for ourselves or for anyone else, that:**
 - creates an expectation in the mind of others that special or preferential treatment will be provided in exchange
 - is cash, or methods that can be used for payment, including gift cards
 - may be reasonably perceived by a member of the public to be made in exchange for a business favour from FCC
 - may be reasonably perceived to be in bad taste or would risk embarrassment to FCC
 - is over \$200 in value from or to the same individual or company more than once in any 12-month period, without the prior approval of our Vice-President and the Ethics Office through the Declaration of Outside Activities and Gifts over \$200 form
 - is, even if valued at less than \$200, reasonably considered extravagant (for example, a \$150 bottle of wine)



Learn more details on how to apply the **rules of giving and receiving gifts** in the [Appendix](#).



DID YOU KNOW?

The term "benefit" is defined very broadly in Subsection 121(1) of the Criminal Code of Canada and includes "loan, commission, reward, advantage, or benefit of any kind."

Depending on the circumstances, giving or receiving a gift or benefit could be considered a bribe.

This can include tangible items, prizes, entertainment, hospitality or any other benefit that the public or the law could consider to be a gift or advantage.

B. POLITICAL ACTIVITIES

As a federal Crown corporation, we must ensure FCC remains non-partisan and impartial in providing programs and services. We don't wear campaign buttons or display or promote in any manner for any political party or candidate during working hours or at any FCC office or event.

Everyone's welcome to participate in political activities, as long as we aren't representing FCC or doing it at work. This includes:

- voting in federal, provincial, territorial or municipal elections
- volunteering or fundraising for a candidate or a political party
- supporting or opposing a candidate or a political party by displaying political material



Learn more about applying the rules to **engaging in political activities** in the [Appendix](#).



RUNNING FOR OFFICE?

If you're looking to present yourself as a candidate in elections to the House of Commons, or provincial or territorial legislature, there are a few things to do first:

1. Get the permission of our President and Chief Executive Officer. The President ensures the impartiality of the public sector/FCC and confirms the proper time and duration for you to take a leave of absence from FCC.
2. Submit a written request for leave without pay outlining the full particulars of the time required for the nomination procedure and the election campaign.

C. PARTICIPATING IN OUTSIDE BUSINESS ACTIVITIES

Outside business activities include employment outside FCC working hours, whether for another employer or on a self-employment basis, such as farming. We avoid situations where personal interests conflict, or could appear to conflict, with our FCC role and responsibilities.

FCC can ask us to discontinue outside business activities that:

- result in a decrease in our work performance or quality of work produced for FCC
- affect our ability to perform our duties and responsibilities objectively, impartially and responsibly
- directly conflict with our employment status with FCC – for example, we can't work for another Crown corporation or an entity that is a direct competitor of FCC, such as another financial institution.



Learn more about applying the rules to **participating in outside business activities** in the [Appendix](#).

D. ACQUIRING FARMLAND OR FCC SUPPORT AS AN EMPLOYEE

Many of us who work at FCC also work in Canadian food. It's important to avoid situations where our personal interests conflict, or could appear to conflict, with our FCC roles and responsibilities.

Acquiring farmland

No one at FCC can directly or indirectly acquire an interest in real property that's being sold as a result of a recovery action that FCC initiated or participated in.

Doing business with FCC

We may do business with FCC by applying for a loan in our personal name, through a company we are involved in or acting as a guarantor on a loan from FCC. When we apply to do business with FCC, we must meet the same eligibility requirements as non-employees. We must also comply with specific policy and processes that apply to FCC employees.

If we're approved to do business with FCC, we must clearly separate our work duties from personal business. This includes a commitment to: (1) not access any information about our file at FCC other than in the normal course of business through our assigned Relationship Manager (for example, don't view or add to your customer record in FCC systems) and (2) not access any information about FCC customers or files that may give us inside information to benefit our personal business.



Learn more about applying the rules to **acquiring farmland or FCC support as an employee** in the [Appendix](#).

E. SEEKING AN EXCEPTION

There are situations where we must submit a Declaration of Outside Activities and Gifts Over \$200 form to our Vice-President and the Ethics Office for approval before proceeding. This includes:

- pursuing any outside business activities that are or could appear to be in a conflict with FCC's activities or our roles and responsibilities at FCC
- offering, giving or accepting gifts, prizes, entertainment, hospitality or other benefits valued at more than \$200, or that could be perceived as extravagant by a reasonable person (for example, a \$150 bottle of wine)
- acquiring farmland and acreages or applying for FCC support or services

Getting this approval protects us and FCC, and removes any suggestion that the activity wasn't addressed and approved before being acted on.



F. INSIDER TRADING AND TIPPING

It's against the law to trade securities (for example, shares in a publicly traded company) based on information not generally available to the public. We have a strong reputation with our customers and within the industry that must be upheld. Violating the trust our customers have placed in us by trading on their confidential information won't be tolerated.

We make sure we:

- maintain the confidentiality of customer and third-party information
- contact the [Ethics Office](#) if we have questions relating to insider trading and tipping
- report any incidents of insider trading or tipping to our leaders or the Ethics Office



TIPPING

Disclosing material non-public information (MNPI) about a publicly traded entity. MNPI is information relating to a company that has not been made public but could have an impact on its share price.



INSIDER TRADING

Using MNPI to our advantage to buy or sell stock or other securities in a publicly traded entity.

PROTECTING INFORMATION

At FCC we understand the importance of respecting and protecting all our information, including personal information of individuals. We always start from the premise that information is confidential and can only be shared if we have a legitimate business reason to do so.

FINANCIAL CRIME

It's important that the customers and vendors we work with also follow an ethical code. Money laundering, terrorist financing, corruption, bribery and sanctions are serious issues that we all play a role in recognizing and reporting. We follow all applicable laws and conduct due diligence to ensure our products or services aren't used for these activities. If anything seems out of sorts or suspicious, we must take the appropriate action and report the issue.



MONEY LAUNDERING – disguising financial assets so they can be used without detection of the illegal activity that produced them

TERRORIST FINANCING – the collection or the supplying of funds for terrorist purposes. The money can come from both illegal and legitimate sources

CORRUPTION – the abuse of entrusted power or position for personal gain

BRIBERY – the offering, giving, soliciting or receiving of any item of value as a means of influencing the actions of an individual

ECONOMIC SANCTIONS – commercial and financial penalties applied by one or more countries against another country, group, or individual

SOCIAL MEDIA

We're welcome to share on our social channels, but it's important that we let people know our views are our own and that we don't position our channels or posts as officially representing FCC in any capacity. When using social media, we should use the same

lens we apply to all our public interactions as an FCC employee – conscious that we all represent FCC and any real or perceived breach of ethics can have a serious and negative impact on the corporation.



IT TAKES A COMMUNITY

- 20 OFFICIAL LANGUAGES
- 20 DIVERSITY, INCLUSION AND ACCESSIBILITY
- 21 ENVIRONMENT
- 21 HEALTH AND SAFETY





An ever-changing agriculture and food industry needs an innovative and diverse FCC. Different ideas lead to better solutions for our customers, our co-workers and our industry. Creating a space where we all feel represented, supported and valued is up to all of us to achieve.

OFFICIAL LANGUAGES

Canadians have the right to communicate with and receive services from federal institutions in either official language. Canadians also have the right to equal opportunities for employment and advancement and for the composition of our workforce to reflect the general population.

We're committed to providing an equitable experience in both official languages when serving our customers, our stakeholders and our co-workers. Our collective linguistic duality sets us apart from other agricultural lenders and helps us live into our obligations under the Official Languages Act.



DID YOU KNOW?

The Official Languages Act grants equal status of English and French throughout the federal government.

DIVERSITY, INCLUSION AND ACCESSIBILITY

We want FCC to be a place where individuals feel safe, respected, engaged, motivated and valued for who they are and their contributions to the organization. FCC values differences and enabling all individuals to be authentic, successful and contribute meaningfully. To this end, we ensure our policies, procedures, practices, work arrangements and facilities are free of discriminatory and accessibility barriers.



FCC must comply with the requirements of the Employment Equity Act, the Canadian Human Rights Act and the Accessible Canada Act.

Together, we create a workplace free of harassment, discrimination and violence for all employees at all times. We're committed to a healthy, inclusive environment and respect the dignity and rights of our co-workers and customers.

Our definition of workplace includes, but isn't limited to:

- physical work sites
- virtual platforms used for conducting business
- FCC-sponsored events
- customer sites
- conferences

ENVIRONMENT

We operate sustainably and support our customers to do the same. We care about the environmental issues affecting our industry and the planet.

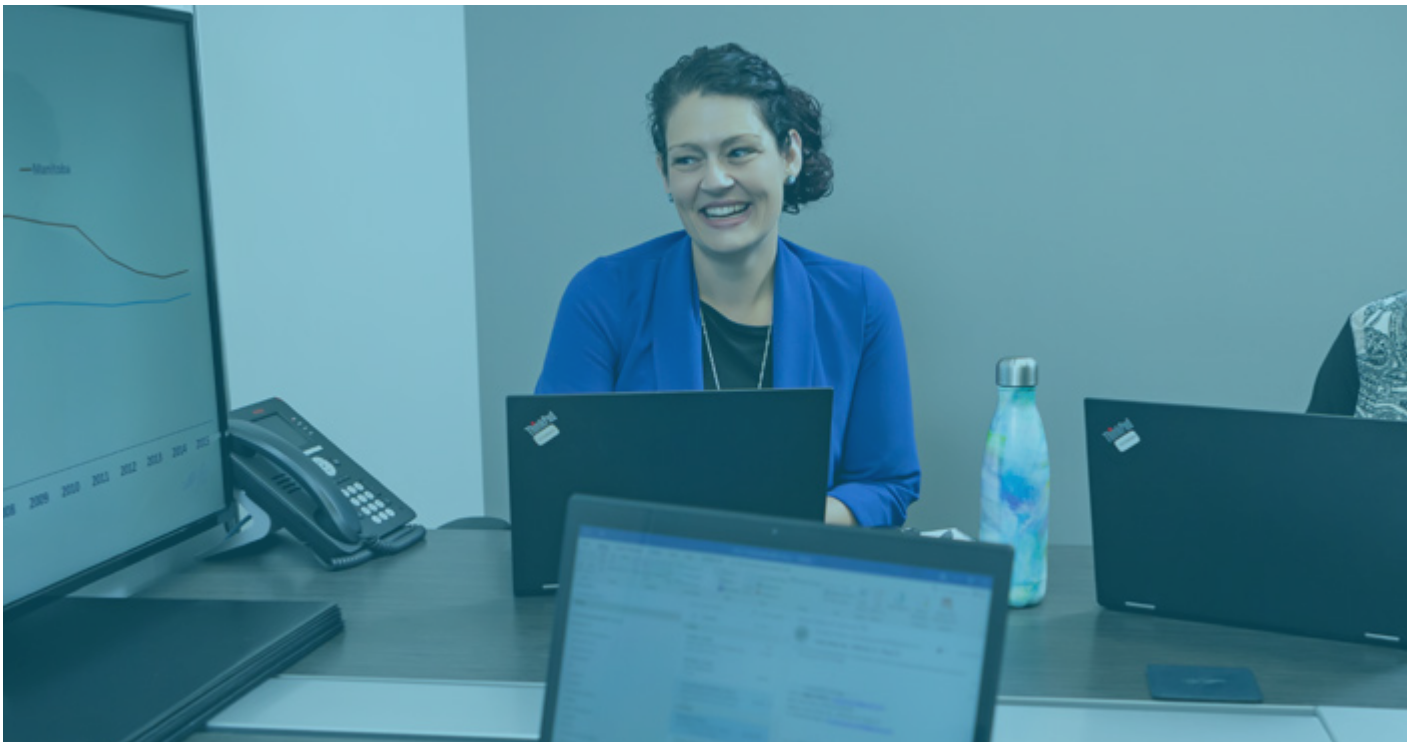
Employees are encouraged to minimize their impact on the environment. This includes actions such as

reducing paper use, embracing hybrid working conditions, reducing trips for frequent travellers and optimizing vehicle routes.

HEALTH AND SAFETY

FCC's safety practices and procedures protect us from physical harm caused by hazards in the workplace. All of us:

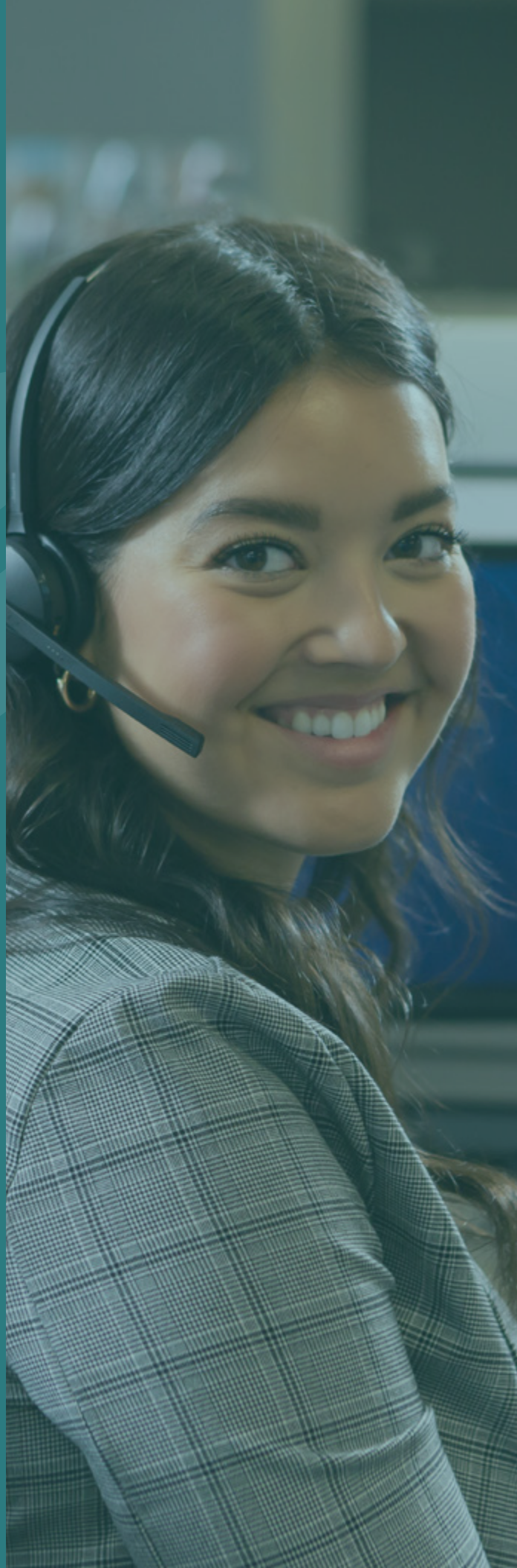
- maintain a safe and healthy work environment
- comply with health and safety policies and guidance
- follow directions of health and safety representatives, safety wardens, building management or emergency services personnel during emergencies
- report all workplace hazards, incidents, near misses, injuries and illnesses




IT TAKES COMMUNICATION

24 REPORTING VIOLATIONS

25 WHISTLEBLOWER PROTECTION





The FCC Code of Conduct forms the foundation that outlines our expected behaviours, and it only works if we're all in. Part of maintaining the integrity of FCC is speaking up when something doesn't look or feel right. The other part is helping create an environment where everyone feels safe and supported to ask questions and raise concerns without fear of retaliation.

REPORTING VIOLATIONS

A violation of the Code is a big deal. Every violation undermines relationships of trust we've made with our customers, our partners and each other. It can result in disciplinary or legal action, including dismissal, fines or penalties. Speaking up when we see something wrong isn't always easy, but we have support and resources to help us do the right thing.

TRUST YOUR GUT

Never hesitate to report potential violations of the Code by other employees, Board members or third parties dealing with FCC. If something feels off, speak up in a way that is comfortable to you.

STAY SAFE

Once a violation is reported, trust the process to take its course and best protect everyone involved. FCC has a fair and appropriate process and people specifically trained to manage the disclosure from start to finish.

- Don't confront potential wrongdoers yourself.
- Never intimidate or retaliate against a person who reports a violation of the Code or participates in an investigation.
- Keep all information confidential. Sharing information with anyone would compromise the process and may result in reprisals against the person alleged to have violated the Code or anyone involved in the process.



DID YOU KNOW?

Discussing information relating to a disclosure or an investigation is a breach of law.

REACH OUT

We can report violations or seek advice by:

- reporting to leaders
- contacting the ConfidenceLine at 1-800-661-9675
- sending an email to the Ethics Office at: EthicsOffice@fcc-fac.ca
- reporting to the Public Sector Integrity Commissioner (PSIC)



Learn more about applying the rules to **receiving and managing disclosures as an FCC leader** in the [Appendix](#).



ConfidenceLine

ConfidenceLine is a 24-hour-a-day, seven-day-a-week hotline providing a confidential reporting channel for both us and the general public to use when we have reason to believe that someone has violated the Code.

1-800-661-9675

WHISTLEBLOWER PROTECTION

FEEL SAFE AND SUPPORTED

Individuals who make a disclosure of potential violation of the Code or participate in the management of a disclosure, including as a witness in an investigation, are protected against reprisal.

The identity of individuals is also protected. The Public Servants Disclosure Protection Act (PSDPA) and other federal laws protect the identity and information relating to disclosures if the process is followed.

The confidentiality of the process and the protection from reprisal is in the law to create a healthy environment where people feel safe and supported to raise ethical matters. It's a critical component of maintaining the health and resilience of an organization.

If you believe you're being retaliated against, you can discuss your options with the Ethics Office or file a complaint of reprisal with the Public Sector Integrity Commissioner (PSIC).



Learn more about applying the rules to **reporting or seeking advice on violations of the Code** in the [Appendix](#).



Sometimes a violation of the Code isn't what someone *did*, but what they *didn't do*. Cutting corners and skipping steps can have serious consequences.




Reprisal for reporting violations includes discipline, demotion, termination or imposing any measure that adversely affects our job or working conditions, and is not tolerated in any form.



IT TAKES GRATITUDE





Understanding and applying the Code, or reaching out when you have a question, is required of all employees at FCC. It keeps you and FCC safe. Thank you for helping bring the Code to life. Together, we create trust that FCC will always do the right thing.



QUESTIONS? CONCERNS?

The Code helps manage day-to-day ethical concerns but can't cover every situation. Questions about the FCC Code of Conduct or concerns regarding the conduct of FCC employees or Board members who may be in violation of the Code, can be directed to the FCC Ethics Office:

E-mail: EthicsOffice@fcc-fac.ca

Farm Credit Canada
Attention: Ethics Office
1800 Hamilton St. P.O. Box 4320
Regina, SK S4P 4L3

You can also call or email the ConfidenceLine 24 hours a day, seven days a week:

1-800-661-9675

Our related policies, standards, guidelines and procedures are available for employees on our internal Compass intranet.

ACQUIRING FARMLAND OR FCC SUPPORT AS AN EMPLOYEE

This procedure applies to all employees whether proceeding individually or as a partner, shareholder, guarantor, director, officer or member of any closely held legal entity that has, or wants to have, financial dealings with FCC (including family members).

Procedure

Acquiring farmland and acreages

Before you buy farmland or an acreage, submit a Declaration of Outside Activities and Gifts over \$200 (Form 3407) in ServiceNow and include the following information:

- name of the seller (person or corporate entity)
- relationship with the seller, if any
- description of how you became aware that the property was for sale
- confirmation and undertaking not to access any information about FCC customers or files that may have given you inside information you used for your benefit
- any other information relevant for your situation

Note: You must not directly or indirectly acquire an interest in real property that is being sold as a result of a recovery action which FCC initiated or participated in. You must also submit a declaration when you receive or inherit farmland as part of an estate.

Applying for a credit facility or other FCC financial services

Before you apply for a credit facility or other FCC financial service, submit a Declaration of Outside Activities and Gifts Over \$200 (Form 3407) in ServiceNow and include the following information:

- confirmation and undertaking not to access any information about your file at FCC other than in the normal course of business through your assigned Relationship Manager
- confirmation you'll comply with the specific policies and procedures that apply to FCC employees
- confirmation and undertaking not to access any information about FCC customers or files that may have given you inside information you used for your benefit
- any other information relevant to your situation

Note: If you're applying for an FCC credit facility, you must meet the same eligibility requirements as non-employees. The specific policy and processes that apply to credit facilities to employees will be followed.

Exceptions

Approval authority: [Ethics Officer](#)

To request an exception, send an email to [RES-CO: Ethics Office/Bureau de l'Éthique](#).

Additional information

Because FCC is a federal Crown corporation, you need to consider how our customers, the public and the Government of Canada could perceive the purchase of farmland and acreages by employees and the provision of credit facilities to employees. It's important that you and FCC avoid situations where your personal interests conflict, or could appear to conflict, with your FCC role and responsibilities.

ENGAGING IN POLITICAL ACTIVITIES AS AN FCC EMPLOYEE

This procedure covers political activities such as seeking nomination or being a candidate in elections and non-candidacy political activities.

Procedure

Running for office as a Member of Parliament in the House of Commons or as a member of a provincial or territorial legislature

1. Before you seek nomination as a candidate, get the President and Chief Executive Officer's permission in writing.
2. Submit a written request for leave without pay outlining the details of the time required for the nomination procedure and the election campaign.
3. If you're elected to office in any provincial, territorial or federal election, you'll be deemed to have resigned from FCC as of the date of the election.

Note: You must also follow these steps when seeking election to a full-time municipal office or serving a term when elected to a full-time municipal office.

Supporting a political party or candidate

1. If you're involved in any activities that support a political party or candidate, you must confirm that your participation in political activities will not interfere with:

- your work
- your effectiveness in your position
- your ability to perform your duties in an impartial manner

You can participate in these types of non-candidacy political activities as long as it's clear that you aren't representing FCC and you aren't conducting these activities while you're at work:

- voting in a federal, provincial, territorial or municipal election
- volunteering or fundraising for a candidate or a political party
- supporting or opposing a candidate or a political party by displaying political material such as a picture, sticker, badge or button, or placing a sign on the lawn
- attending events, meetings, conventions, rallies, or other political gatherings in support of, or in opposition to, a candidate or a political party

- developing promotional material such as writing campaign speeches, slogans and pamphlets for a candidate or a political party

See below for direction on using social media.

2. To ensure you're upholding the non-partisan nature of FCC:

- If you meet and serve the public, you must not wear campaign buttons or promote any political party or candidate during working hours or at any FCC office or event.
- You must not conduct political activities during business hours.

Making financial contributions to a political party or candidate

1. You may personally contribute to any political party or candidate. However, Treasury Board guidelines prohibit FCC from making a financial or any other electoral contribution to:

- any political party at any level of government in Canada or elsewhere
- any candidate seeking election at any level of government in Canada or elsewhere.

This includes purchasing tickets or corporate tables at fundraising events for a political party or candidate.

Engaging in social media and online activities to support a political party or candidate

1. Your engagement in social media or online activities in support of a political party or candidate must not impair, or be perceived to impair, your ability to perform your duties at FCC in a politically impartial manner.

Note: You must also exercise judgment when making comments about any political figures on your social media feeds if you could be perceived to be representing FCC. Refer to the Personal Use of Social Media policy and related material for more guidance on social media activities.

Sound practices

It is recommended that you complete the Declaration of Outside Activities and Gifts Over \$200 (Form 3407) in ServiceNow before engaging in substantial political activity or if unsure that your proposed activity will comply with this procedure.

Exceptions

Approval authority: [Ethics Officer](#)

To request an exception, send an email to [RES-CO: Ethics Office/Bureau de l'Éthique](#).

Additional information

As a federal Crown corporation, FCC must ensure that it remains non-partisan and impartial in providing programs and services.

FCC also recognizes that you have the right to participate in the political process at any level of government by working or volunteering on behalf of or donating to a candidate or political party. FCC expects you to exercise discretion when participating in political activities. The public must not perceive your engagement in political activity to be as a representative of FCC.

For more information, refer to the Guidance Document for Participating in Non-Candidacy Political Activities of the Public Service Commission of Canada. Use this document as a guide only because the Public Service Employment Act (PSEA) isn't applicable to FCC and its employees. Therefore, some of the information contained in the Guidance Document relating to the PSEA isn't applicable.

GIVING OR ACCEPTING GIFTS, PRIZES, ENTERTAINMENT, HOSPITALITY OR BENEFITS

Gifts include tangible items, prizes, entertainment, hospitality or any other benefit that the public or the law could consider to be a gift.

Procedure

1. Determine if you can give or accept the gift.

If the gift is	Then giving or accepting it is
<ul style="list-style-type: none"> • cash • methods that can be used for payment, including gift cards • gifts that may reasonably be perceived as being in bad taste or would risk embarrassment to FCC • personal discounts offered to you or your family because of your position with FCC • invitations to sporting events, tours or trips • large or expensive items or items that could reasonably be considered extravagant regardless of the dollar value, for example, a significant amount of produce, expensive wine or spirits, jewelry or electronics, expensive clothing, or tickets to expensive events • a prize of a value of more than \$200 at a conference or event FCC has paid for you to attend and where everyone at the event is automatically entered into a free draw 	<ul style="list-style-type: none"> • Always prohibited. You must refuse or return the gift.
<ul style="list-style-type: none"> • a prize of a value of more than \$200 at a conference or event FCC has paid for you to attend and you personally paid for the ticket that was drawn 	<ul style="list-style-type: none"> • Acceptable
<ul style="list-style-type: none"> • sponsored travel 	<ul style="list-style-type: none"> • Only acceptable when you're a guest speaker or panelist at a conference that is open to the public. • You must disclose this travel to your Vice-President for their approval prior to accepting it.
<ul style="list-style-type: none"> • of a value of more than \$200 	<ul style="list-style-type: none"> • Must be approved by your Enterprise Management Team (EMT) member. • Only acceptable once in any 12-month period from or to the same individual or corporate entity.

Note: You can never solicit or seek a gift from a customer, partner, vendor or other third party.

2. Ask yourself if giving or accepting the gift would:

- put you in a situation where your personal interests would be, or would appear to be, in conflict with your role and responsibilities at FCC
- create an expectation in the minds of customers, partners, vendors or other third parties that FCC will give them special or preferential treatment in return of the gift
- be perceived as creating an obligation to any person who might profit from special considerations
- raise suspicion about the impact of the gift on the objectivity and impartiality of FCC

If you answered “yes” to any of the questions above, you can’t give or accept the gift.

If you answered “no” to all the questions above or you aren’t sure, go to step 3.

3. Determine the value of the gift you’re giving or accepting.

Value of \$200 or less

You can give or accept gifts without disclosure and approval if the gift is either:

- a token of attendance at a conference, event or customer visit
- generally accepted as business hospitality

Examples of gifts you can accept include:

- a small amount of produce
- a box of chocolates, flowers or gift baskets to be shared with your team
- a round of golf with a business associate
- a small item like a logo mug, t-shirt, pen or calendar

If you aren’t sure the gift is acceptable, go to step 4.

Value of more than \$200

You must get your EMT member’s approval to give or accept this gift. Go to step 4.

4. Submit a Declaration of Outside Activities and Gifts over \$200 (Form 3407) in ServiceNow and include all the following information:

- person or corporate entity name
- relationship with the person or entity
- description of the gift

- value of the gift
- circumstances
- gift history to or from this person or corporate entity
- name of event and who paid for the cost of event

Note: Your Enterprise Management Team member can reject the request. If they approve it, they’ll send it to the Ethics Officer for final approval.

Exceptions

Approval authority: [Ethics Officer](#)

To request an exception, send an email to [RES-CO: Ethics Office/Bureau de l’Éthique](#).

Additional information

Because FCC is a federal Crown corporation, you need to consider how our customers, the public and the Government of Canada would view the gifts you give to, or accept from, customers, partners, vendors or other third parties. There may also be legal consequences for employees of a Crown corporation when they give or accept gifts, hospitality and other benefits. For example, Subsection 121(1) of the Criminal Code of Canada imposes limits on giving and accepting benefits.

The term **benefit** is defined very broadly in the Criminal Code of Canada and includes “loan, commission, reward, advantage, or benefit of any kind (s. 121)”.

Giving gifts to Indigenous elders and leaders is an important custom in building Indigenous relationships and partnerships. Gifts should be appropriate for the occasion, such as FCC promotional items, authentic Indigenous art or blankets, and are subject to the restrictions listed above.

For rules around gifts from or to political parties or candidates, refer to the Engaging in Political Activities as an FCC Employee procedure.

The rules around the provision of money to charities, industry groups and various local initiatives as part of corporate social responsibility and sponsorship are governed by Marketing.

PARTICIPATING IN OUTSIDE BUSINESS ACTIVITIES

Outside business activities include employment or volunteer activities outside FCC working hours, including farming, that could conflict with your employment at FCC.

Procedure

1. Ask yourself if the outside business activity will, or is it likely to:

- create a real or perceived conflict of interest with your employment status at FCC given the nature of the activity
- result in a decrease in your work performance or a decline in the quality of your work for FCC
- affect your ability to perform your duties and responsibilities objectively, impartially and responsibly

If you answered “no” to all the questions above, go to step 2.

If you answered “yes” to any of the questions above or you’re unsure and would still like to pursue the activity, go to step 3.

2. Does the outside business activity you want to pursue include:

- appraising farm property for a fee or other compensation
- negotiating contractual arrangements (for example, selling a product to or buying a product from) with an FCC customer in any FCC business line
- providing to or receiving from an FCC customer, a service for any form of payment
- using the name of FCC or an employee or director of FCC for personal business interests, except as an employment reference
- being a director on any board of, or holding any position with, a corporation, association or other commercial organization, whether or not for payment

If you have answered “no” to all the questions above, you may pursue the outside business activity without formal approval.

If you have answered “yes” to any of the questions above, go to step 3.

3. Submit a Declaration of Outside Activities and Gifts Over \$200 (Form 3407) in ServiceNow and include all of the following information:

- any relevant name of person or corporate entity
- relationship with the person or entity, if any
- description of the outside business activity
- number of hours per week or month you’ll spend on the outside business activity

- confirmation and undertaking to recuse yourself from files, discussions and any information relating to an FCC customer in the circumstances where you will conduct business with FCC customers through personal business activities
- confirmation and undertaking not to collect, access, use or disclose FCC’s confidential information in the context of your duties with your outside business activity
- any other information relevant for your situation

Your Vice-President, in consultation with the Ethics Officer, will review your declaration and determine if the activity is acceptable under the Code of Conduct and this procedure.

Exceptions

Approval authority: [Ethics Officer](#)

To request an exception, send an email to [RES-CO: Ethics Office/Bureau de l’Éthique](#).

Additional information

You may need to submit a new Declaration of Outside Activities and Gifts Over \$200 (Form 3407) if:

- the situation has changed (for example, the number of hours you spend on this activity, the type of activity, etc.)
- your leader has changed and your new leader wants you to resubmit your declaration
- you submitted a declaration prior to 2015

You owe your primary business loyalty to FCC, so you must avoid situations where personal interests conflict, or could appear to conflict, with your FCC role and responsibilities. You’re also responsible for ensuring that your outside business activities don’t conflict with the code of conduct and ethics of your profession’s regulatory body (real estate broker, auditor, engineer, etc.)

FCC reserves the right to request that you discontinue an outside business activity if at any time there’s a real or reasonably perceived conflict of interest or it’s reasonable to believe your ability to perform your FCC duties are compromised.

Every situation is different and, even if your Vice-President and the Ethics Officer have approved the activity, certain controls may be implemented to limit the risks related to real or perceived conflicts of interests.

RECEIVING AND MANAGING DISCLOSURES AS A LEADER AT FCC

Note: This procedure only applies to leaders who have received a disclosure that an employee may have committed an act of wrongdoing, as defined in FCC's Code of Conduct and related materials.

Leaders can deal with employee matters as appropriate within their authority and responsibility, such as issues with performance or relationship issues.

If you receive a report of potential wrongdoing, you must follow the steps below.

Procedure

1. Explain to the employee who disclosed the potential wrongdoing that the following action will be taken.
 - a. As the leader, you'll report the potential wrongdoing to the Ethics Office.
 - b. The Ethics Officer will contact them.
 - c. The Ethics Officer will review the disclosure.
2. Inform the employee that their disclosure will be treated in confidence and that their identity will be protected to the extent possible.
3. Send the disclosure in a confidential email to the Ethics Office at EthicsOffice@fcc-fac.ca.

Exceptions

Approval authority: [Ethics Officer](#)

To request an exception, send an email to [RES-CO: Ethics Office/Bureau de l'Éthique](#).

Additional information

Leaders must always:

- behave ethically and foster an ethical culture
- inform employees about the Public Servants Disclosure Protection Act (PSDPA), options for making disclosures, the protection the PSDPA provides and where to go if they need more information
- protect the identity of all individuals involved in the disclosure process
- protect employees who report potential wrongdoing from possible reprisals

REPORTING OR SEEKING ADVICE ON VIOLATIONS OF THE CODE OF CONDUCT OR ACTS OF WRONGDOING

You're expected to report all suspicious activities, whether or not you're certain that there has been a violation of the Code of Conduct or a potential act of wrongdoing. The appropriate stakeholder will assess the situation and apply the appropriate measures. You can also follow this procedure if you're just seeking advice on a specific situation.

Procedure

You must report actual and suspected violations of the Code of Conduct or potential wrongdoing if you believe that:

- you may have violated the Code of Conduct by something you did or failed to do
- another person is in violation of FCC's Code of Conduct or has committed, is about to commit or has been asked to commit potential wrongdoing in the workplace

You can report the violation to:

- your manager in a one-on-one discussion or by sending an email
- FCC's Ethics Officer by sending an email to [RES-CO: Ethics Office/Bureau de l'Éthique](#)
- ConfidenceLine if you'd like to report anonymously – by calling 1-800-661-9675
- Public Sector Integrity Commissioner (PSIC)

Note: Don't confront potential wrongdoers yourself. Once you've reported the potential wrongdoing, you must let the process take its course.

Exceptions

Approval authority: [Ethics Officer](#)

To request an exception, send an email to [RES-CO: Ethics Office/Bureau de l'Éthique](#).

Additional information

Identifying potential wrongdoings

Wrongdoing relates to serious violations that go against the public interest and include but are not limited to:

- contravention of an Act of Parliament or of the legislature of a province, or any regulations
- misuse of public funds or a public asset
- gross mismanagement by leadership
- endangerment of life, health or safety of people, or the environment

- a serious breach of FCC's Code of Conduct
- intentional direction or recommendation to a person to commit any of the above wrongdoings
- false reports of wrongdoing against another person for the purpose of harming that person or FCC, or to make mischief

ConfidenceLine

ConfidenceLine is a 24-hour-a-day, seven-days-a-week, 365-days-a-year hotline providing a confidential, anonymous reporting channel for FCC employees. Members of the public who have reason to believe that an FCC employee has violated the Code may also contact ConfidenceLine.

Your calls are answered by a professional assistant who will gather facts from you and forward the information you provide to FCC's Ethics Officer through a secure online system. The assistant will give you a Caller Information Number, which is the only identification you need to track the progress of your call. The more specific the information you provide, the more efficiently FCC can respond to the issues you raise.

FCC's Ethics Officer will determine the most appropriate course of action to take in response to your information and will stay in touch with you using ConfidenceLine's online system.

For more information on how disclosures of wrongdoing are managed, refer to the Managing Disclosures of Wrongdoing content on Compass.

For information on how you're protected if you've made a disclosure, refer to the Whistleblower Protection content on Compass.





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