



Code of Conduct for Employees

November 2020



Table of Contents

I.	Introduction	4
II.	Scope	4
III.	Values	5
1.	Our Values	5
2.	Values and Ethics Code for the Public Sector	5
IV.	Accountability and Statement of Compliance	6
V.	Waivers	6
VI.	Guiding Principles	7
1.	How to Use the Code	7
•	We Promote a Diverse, Inclusive and Respectful Workplace	7
•	We Maintain a Healthy, Safe and Secure Workplace	7
•	We Communicate Openly and Honestly	7
•	We Avoid and Disclose Conflicts of Interest	7
•	We Decline Inappropriate Gifts, Hospitality and Other Benefits	7
•	We Protect the CIB's Assets and Information	7
•	We Comply with Laws and Regulations	7
2.	Internal Resources for Advice	8
VII.	Improving Practices and Reporting Concerns	8
VIII.	Failing to Comply	10
IX.	Guidelines for Ethical Conduct	11
1.	We Promote a Diverse, Inclusive and Respectful Workplace	11
	Diversity and Inclusion	11
	Workplace Violence and Harassment	11
2.	We Maintain a Healthy, Safe and Secure Workplace	13
3.	We Communicate Openly and Honestly	14
	Official Languages	15
4.	We Avoid and Disclose Conflicts of Interest	15
	Outside Activities	16
	Political Activities	17
	Requirements Post Employment	17
5.	We Decline Inappropriate Gifts, Hospitality and Other Benefits	17
	Travel & Hospitality Expenses	19
6.	We Protect the CIB's Assets and Information	19
	Assets	19
	Confidential Information	20
	Access to Information	21
	Privacy	22

7.	We Comply with Laws and Regulations	23
	Fraud and Misappropriation	23
	Lobbying.....	23
	Bribery and Corruption	23
	Preventing Money Laundering and Terrorist Financing	24
	Insider Trading and Tipping	24
X.	Reporting Obligations.....	25
1.	Completing the Personal Information Form	25
2.	Additional Reporting Obligations	25
XI.	Definitions	27
XII.	Review	30
	APPENDIX A STATEMENT OF COMPLIANCE	32
	APPENDIX B PERSONAL INFORMATION FORM.....	33
	APPENDIX C SUPPORTING POLICIES AND PROCEDURES	36

I. Introduction

The mission of the Canada Infrastructure Bank (“**CIB**”) is to work with provincial, territorial, municipal, federal, Indigenous and private sector investor partners to transform the way infrastructure is planned, financed and delivered in Canada.

Everyday we make decisions that impact one another, our partners, our stakeholders and the Canadian public. These decisions reflect on us all, affect our reputation and influence how others perceive the CIB. Moreover, as financial stewards of public resources, it is imperative that we manage those resources responsibly and that our conduct and ethics are beyond reproach.

The purpose of this Code of Conduct for Employees (“**Code**”) is to maintain and increase public confidence in the integrity of the CIB. The Code describes the guiding principles and includes seven (7) guidelines for ethical conduct that we all need to demonstrate when working for the CIB. They are not exhaustive and cover minimum standards and common business situations in which ethical or legal concerns arise. ***Nevertheless, the guiding principles and guidelines for ethical conduct in this Code are mandatory, as we must therefore understand and comply with the spirit of these standards.***

The Code also addresses the relationship between the CIB and its counterparties, partners, suppliers and other business contacts with whom the CIB interacts or contracts. CIB will not knowingly enter into or maintain a relationship with a person or organization that does not maintain the standards of business conduct and ethics that are reflected in the Code.

In this document, “you” and “your” refers to you as a CIB Employee, and “we”, “us” and “our” refers to all of us at the CIB as a group. The definitions of capitalized terms required for reading the Code are provided in Section XI.

II. Scope

The Code applies to all Employees of the CIB, including the Chief Executive Officer, for the duration of their employment relationship with the CIB, including personal, short-term and long-term disability and other leaves of absence. Some provisions – including the confidentiality of information and, more generally, the duty of loyalty to the CIB – continue to apply after employment ends. **Compliance with the Code is mandatory and a condition of employment.**

In addition to this Code, specific situations are covered in detail in the CIB’s Policies, Procedures and Guidelines. This Code and these documents are regularly updated to reflect evolving expectations and compliance requirements. In committing to abide by the Code you also undertake to abide by the Policies, Procedures and Guidelines referenced in this Code.

Consultants, contractors and agents of the CIB are also expected to adhere to the values, principles and behaviours set out in the Code when performing services for, or on behalf of, the CIB. They may also be required to contractually acknowledge their commitment to the Code and the underlying compliance requirements, as determined by the CFO & CAO. Directors of the CIB are subject to a separate code of conduct, which is consistent with this Code.

III. Values

1. Our Values

Our values establish the behaviours and expectations that guide our conduct in all our relationships and set the standards by which we are measured. This Code has been developed based on the CIB's five core values:



Integrity

We are trustworthy, show that actions and words are consistent, act honestly, communicate openly, adhere to policies and follow guidelines and procedures.



Accountability

We take responsibility and accept accountability, show a commitment to continuous improvement, learn from mistakes and share best practices.



Respect

We treat everyone with respect and demonstrate understanding and empathy towards others.



Inclusion

We place equal value on individuals regardless of their roles, job titles or standing within the organization. We are considerate of all aspects of diversity.



Leadership

We role-model positive behavior and create a culture that supports mentoring, individual motivation and enhanced team performance.

2. Values and Ethics Code for the Public Sector

As a Crown corporation, the CIB is subject to the *Public Service Disclosure Protection Act* (the “**PSDPA**”), which requires all federal public servants to adhere to the *Values and Ethics Code for the Public Sector* in all activities related to their official duties in the federal public sector. These values are:

- **Respect for democracy**

The system of Canadian parliamentary democracy and its institutions are fundamental to serving the public interest. Public servants 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.

- **Respect for people**

Treating all people with respect, dignity and fairness is fundamental to our relationship with the Canadian public and contributes to a safe and healthy work environment that promotes engagement, openness and transparency. The diversity of our people and the ideas they generate are the source of our innovation.

- **Integrity**

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

- **Stewardship**

Federal public servants are entrusted to use and care for public resources responsibly, for both the short term and long term.

- **Excellence**

Excellence in the design and delivery of public sector policies, 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.

A copy of the *Values and Ethics Code for the Public Sector*, which is incorporated by reference and must be read in conjunction with this Code, can be accessed on the [Treasury Board of Canada Secretariat](#) website.

IV. Accountability and Statement of Compliance

All Employees have an obligation to hold themselves and each other to high ethical standards and expected behaviours described in this Code. This means that upon commencing your employment or engagement with the CIB, you must complete the Statement of Compliance to confirm your understanding of the Code and agreement to comply with the Code's principles and the CIB's Policies, Procedures and Guidelines incorporated by reference.

Annually thereafter, generally in April alongside the year-end performance review process, you will be asked to complete the Statement of Compliance to confirm past compliance and acknowledge the ongoing obligation to comply with the Code and the CIB's Policies, Procedures and Guidelines incorporated by reference. Completing the Statement of Compliance along with other periodic certifications and disclosures required under this Code is a condition of employment. The Statement of Compliance can be found in Appendix A.

V. Waivers

Waivers of the Code and related compliance requirements will be granted only in very exceptional circumstances. The Governance Committee of the Board of Directors must approve waivers for the Chief Executive Officer. The Chief Executive Officer may grant waivers for other officers and

employees and report the waiver, including any conditions imposed, to the Governance Committee.

VI. Guiding Principles

1. How to Use the Code

Our status as a Crown Corporation responsible for investing public funds in new revenue generating infrastructure that is in the public interest heightens the public's expectations of the CIB in terms of our commitment to acting with integrity.

It is your responsibility to understand and apply the values, and the following seven (7) guidelines for ethical conduct set out in the Code and exercise sound, ethical judgment in your actions and when making decisions.

Guidelines for Ethical Conduct

- **We Promote a Diverse, Inclusive and Respectful Workplace**
- **We Maintain a Healthy, Safe and Secure Workplace**
- **We Communicate Openly and Honestly**
- **We Avoid and Disclose Conflicts of Interest**
- **We Decline Inappropriate Gifts, Hospitality and Other Benefits**
- **We Protect the CIB's Assets and Information**
- **We Comply with Laws and Regulations**

In most situations, your sense of honesty and integrity will determine the right path to take. However, if you are not sure of the right thing to do, **always act in the best interests of the CIB.**

The following questions are examples of issues to consider when evaluating a particular situation under the Code:

- Is it legal?
- Does it comply with this Code or the CIB's Policies, Procedures or Guidelines?
- Does it follow the CIB's core values and culture?
- Does it take into consideration the interests of the CIB and its stakeholders ahead of any private interest?
- Does it meet or exceed the standard of behaviour that the Canadian public reasonably expects of the CIB?
- Would I feel comfortable if my action or decision were made public?

If the answer to any of these questions is **NO, DO NOT ACT**.

2. Internal Resources for Advice

If you are not sure about a specific situation or the correct course of action, or have questions regarding an aspect of this Code, you are encouraged to raise any questions or advice to any of the internal resources below:




- Your manager
- Head, Human Resources
- General Counsel & Corporate Secretary (who is the CIB's designated Senior Officer for Disclosure under the PSDPA)
- Chief Financial Officer & Chief Administrative Officer
- Chief Executive Officer
- Chair of the Board

Contact information outlining how to reach these individuals will be separately made available to all Employees.

VII. Improving Practices and Reporting Concerns

Internal reporting is critical to the CIB's success, and is both expected and valued.

You are required to be proactive and promptly report any illegal or unethical behaviour, including violations or suspected violations of this Code. CIB has established an anonymous reporting facility through an independent third-party vendor that can be accessed through any of the following channels:

	http://www.cib-bic.confidenceline.net/
	1-800-661-9675
	ConfidenceLine #101 – 8333 Eastlake Drive, Burnaby, BC V5A 4W2

You are encouraged to use the anonymous reporting facility for issues or concerns if you are uncomfortable speaking to one of the resources listed in Section VI.2 above. Any report made using this method should include specific details in order to permit adequate investigation of the concern or conduct reported.




We will keep confidential all questions and reports of known or suspected violations of this Code, underlying Policies, Procedures and Guidelines, or any law or regulation, and, upon request, we will also do our best to maintain the confidentiality of reports made under this Code to the fullest

extent reasonably possible, consistent with the need to conduct an adequate review and subject to applicable law.

All concerns and any investigation conducted in response to a potential violation of this Code, another CIB Policy, Procedure or Guideline, a law and / or regulation will be investigated in accordance with the CIB's ***Wrongdoing Investigation Procedure***. You must cooperate with any inquiries or investigations to ensure compliance with this Code and understand that during the course of such inquiry or investigation, personal information may be used or disclosed.

CIB will not tolerate reprisals in any form against anyone who makes a disclosure of wrongdoing or reports an allegation based on reasonable belief or who honestly participates in an investigation into the violation or suspected violation reported. If you believe someone is retaliating or plans to retaliate against you or someone else, you should immediately speak to one of the above resources.

Notwithstanding the foregoing, nothing in the Code prohibits or restricts you in any way from making a disclosure of wrongdoing to the Public Sector Integrity Commissioner of Canada pursuant to the PSDPA.

	https://www.psic-ispc.gc.ca/
	613-941-6400 or 1-866-941-6400 (toll-free)
	60 Queen Street, 4 th Floor Ottawa, Ontario K1P 5Y7

For more information, refer to the ***Disclosure of Wrongdoing Policy for Employees***.

VIII. Failing to Comply

Compliance with the Code is mandatory. CIB has zero tolerance for deliberate or purposeful violations of the Code, legal or regulatory requirements.

Employees who contravene the letter and spirit of the Code and/or related Policies, Procedures and Guidelines will be subject to disciplinary measures appropriate to the severity of the matter and the particular facts of the violation, as determined by senior management.

Examples of disciplinary measures may include, but are not limited to:

- verbal warning,
- written warning placed in the Employee's record,
- suspension from work,
- termination of employment,
- legal action,
- referral to the appropriate law enforcement or regulatory agencies if the matter involves criminal activity.

Examples of prohibited behaviours

- Taking advantage of others
- Manipulation
- Concealment
- Wilful Obstruction
- False Statements
- Falsification of Records
- Abuse of Privileged Information
- Misrepresentation of Facts
- Reprisals
- Disrespectful Behaviours
- Discrimination
- Harassment, Bullying and Violence

IX. Guidelines for Ethical Conduct

1. We Promote a Diverse, Inclusive and Respectful Workplace

Diversity and Inclusion

CIB is committed to providing an inclusive, equitable, and respectful work environment for its employees, where diversity is valued and where employees can bring a range of ideas, knowledge and approaches.

In addition to observing the laws, regulations, and most importantly the spirit pertaining to fair employment practices, we are committed to providing equal employment opportunities with regard to hiring, compensation, promotion, training, and other terms of employment for all persons.

We do not tolerate discrimination. This means we do not allow unequal treatment on the basis of 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.

Consistent with the CIB's values, you are expected to:

- treat everyone with professionalism, consideration and respect,
- listen to other points of view, and encourage others to share their opinion,
- foster an inclusive environment where individual differences are valued and welcomed.

Workplace Violence and Harassment

We do not tolerate any form of discrimination, harassment, bullying or acts or threats of violence, intimidation or hostility in our workplace, whether directed at colleagues, business partners or visitors. We also are responsible for complying with the ***Respectful Workplace Policy***.

Consistent with the CIB's values, you are expected to:

- behave in a manner that will not offend, intimidate, embarrass or humiliate others, whether deliberate or unintentional,
- speak up if you receive or witness comments, conduct, actions or gestures that would be reasonably considered to create an intimidating, humiliating, hostile or offensive work environment,
- report incidents of violence, bullying or harassment.

If you witness inappropriate conduct in the workplace, speak up and do not look the other way, regardless of whether the individual who engaged in the behavior is a manager, business partner, consultant or visitor. If you are not comfortable addressing the behavior directly with the individual who engaged in it, you should contact the Head, Human Resources.

Harassment and Violence	<p>According to Part II of the <i>Canada Labour Code</i>, harassment and violence means “any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee, including any prescribed action, conduct or comment.”</p> <p>This includes all types of harassment and violence, including sexual harassment, sexual violence and domestic violence.</p>	
Examples of harassment include:	Examples of sexual harassment include:	Examples of bullying include:
<ul style="list-style-type: none"> • Slurs, disparaging remarks, inappropriate jokes, insults, vulgar language, epithets and teasing. • Displaying offensive posters, symbols, cartoons, drawings, computer images or emails. 	<ul style="list-style-type: none"> • Unwelcome propositions, demands or advances of a sexual nature. • Unwelcome physical contact such as hugging, kissing, grabbing, pinching, patting or brushing up against someone. • Unwelcome and inappropriate remarks about someone’s body or appearance, sexual gestures or comments, or unwanted verbal or physical interactions of a sexual nature. • Unwelcome vulgar or obscene gestures, language or comments. 	<ul style="list-style-type: none"> • Humiliation, threats or abuse. • Aggressive behavior. • Teasing or practical jokes. • Pressuring someone to do something against his or her will.

I have noticed that one of our consultants keeps making mildly sexual comments that seem to make one of my colleagues uncomfortable. If that colleague never makes a complaint to Human Resources, is there anything I can do? Do we have to accept the behavior to maintain the business relationship?

Even if an apparent target of the behavior does not make a complaint, he or she still may be uncomfortable. You should talk to Human Resources so we can take appropriate steps to address the behaviour.

For more information, consult the ***Respectful Workplace Policy***.

2. We Maintain a Healthy, Safe and Secure Workplace

CIB is committed to maintaining a safe, healthy and secure environment that is consistent with our corporate values. A safe, healthy, and secure workplace not only protects us from harm but also builds trust, prevents accidents and enhances our reputation.

All Employees are responsible for ensuring that the CIB has a healthy and safe work environment. This includes being responsible for your own safety and for the safety of others by taking reasonable precautions to prevent you or someone else from being injured.

Health and safety are a **shared responsibility**, in performing your work, you are expected to:

- comply strictly with all occupational, health and safety laws, and CIB's Policies, Procedures and Guidelines,
- participate in safety-related training and preparations,
- understand potential health and safety risks to protect yourself and others against these risks,
- report all accidents, injuries, potential security hazards and other health and safety concerns without delay to the Office Manager and Human Resources.

We must also be fit for duty when reporting to work and performing our work. You are prohibited from using alcohol, cannabis, illegal drugs or other prohibited items which affect your ability to perform your work duties safely and responsibly, endangers the safety of others, or violates the law. We are all encouraged to take action, to seek professional assistance and to use the Employee Assistance Program made available by the CIB for its Employees when help is required.

I have a domestic issue at home that affects my personal safety. Do I need to disclose it at work?

If you have a domestic or personal issue that may apply to or affect safety in the workplace (e.g., an order of protection or a restraining order), you should report it to Human Resources. That is the best way to help ensure not only your safety but also that of your colleagues.

I have a colleague who seems to be terribly stressed right now. I tried to talk to him/her about it, but he/she refused to do so. Yesterday, he/she fainted at work. What should I do?

It is important that Human Resources and your colleague's manager be immediately informed so that they can act quickly. If you are not sure whether this has been done, do not hesitate to escalate the matter on your side.

For more information, consult the **Health and Safety Policy**.

3. We Communicate Openly and Honestly

Speaking to media on behalf of the CIB	<ul style="list-style-type: none"> • All public requests, particularly media inquiries, must be forwarded to Corporate Affairs, Policy and Communications in advance of any response on behalf of the CIB. • According to the CIB's <i>Communications, Media and Stakeholder Relations Policy</i>, only the CEO is the principal spokesperson with the authority to speak to media on behalf of the CIB. The CEO may determine that another Employee with subject-matter expertise respond to an external request for information on behalf of the CIB.
Speaking engagements and Conferences	<p>Prior to accepting invitations for speaking engagements and conferences as a result of your subject-matter expertise, you must consult with Public Affairs and Communications. You must also follow these guidelines:</p> <ul style="list-style-type: none"> • Be clear as to whether the information you present and the opinions you express represent the CIB or your own personal views. • Be consistent in your public communications by referencing previously published information from key publications, such as the annual report and corporate plan summary.
Social media	<p>Employees using social media for personal or professional use are expected to use the same kind of judgment and criteria as would be applied to any other workplace decisions. You are a representative of the CIB when engaging in online activities and you must ensure that your behavior online, including on social media, is professional, appropriate and consistent with the CIB's values. In particular.</p> <ul style="list-style-type: none"> • Be aware of your language and actions (inappropriate behaviour can reflect negatively on the CIB or the Government of Canada). • Do not disclose confidential information and protect the privacy of others. <p>You must also follow the values set out in the Values and Ethics Code for the Public Sector, such as respect for democracy, integrity, and respect for people.</p>
Use of the CIB's Brand and Image	<ul style="list-style-type: none"> • Unless specifically authorized by Corporate Affairs, Policy and Communications, you cannot use the CIB logo, trademark or brand name in your personal communications or for your own benefit in any communication medium.

	<ul style="list-style-type: none"> • In addition, you must respect the copyright and other intellectual property rights of suppliers and third parties doing business with the CIB.
--	--

Official Languages

CIB is committed to the promotion and use of English and French as the two official languages of Canada in the delivery of its mandate. This includes ensuring that the CIB's communication products and services are available to the public in both official languages, and the language rights of the public are respected when communicating with, and receiving services from, the CIB.

In upholding the CIB's commitment to the promotion of official languages, you are expected to demonstrate professionalism and respect the right of members of the public to communicate with the CIB in the official language of their choice.

For more information, consult the ***Official Languages Policy*** and ***Guidelines on Official Languages for Services and Communications to the Public***

4. We Avoid and Disclose Conflicts of Interest

CIB is committed to the highest levels of integrity, objectivity and impartiality, and expects that Employees will perform their official duties and responsibilities conscientiously and in a manner that will not put their personal interests in conflict with the best interests of the CIB and the Government of Canada.

You must never use or attempt to use your position at the CIB to obtain any improper benefit for yourself, your family or others connected to you, and you must always seek to avoid not only real, but also potential and perceived, conflicts of interest. Avoiding and disclosing situations that could give rise to a conflict of interest, or the appearance of a conflict of interest is the primary means by which Employees help maintain public confidence in the CIB.

CIB has adopted the ***Conflict of Interest Policy for Employees***, which describes the procedures to help you:

- identify real, potential or perceived conflicts of interest
- minimize the chance that you will find yourself in one, and
- resolve any existing conflicts of interest

Conflicts of interest are not always clear cut, and actions that appear to be conflicts of interest can negatively impact the CIB's reputation and undermine trust. In determining whether a situation could raise a perceived conflict of interest, you should ask yourself the following questions:

- Do I stand to gain personally from my actions?
- Will my actions give an advantage to a relative or a friend?
- Would I feel uncomfortable or embarrassed with the situation if it were reported to senior management of the board of directors?

If you answered **YES** to any of these questions, **YOU PROBABLY HAVE A CONFLICT OF INTEREST** and should seek advice from your manager or the General Counsel & Corporate Secretary.

Examples of conflicts of interest

Financial interests: you or a family member have a substantial investment or other financial interest in a supplier or other business partner, and you have an active working relationship or responsibility towards this supplier of business partner.

Personal relationships at work: you supervise or are supervised by a relative, or you – as a line manager – are considering hiring a close relative as an employee or supplier.

Corporate opportunities: you take personal advantage of a business opportunity that CIB may also have an interest in (unless CIB has already been made aware of and declined the opportunity).

A close personal friend of mine has recently submitted an application in response to a job opportunity with the CIB. I'm slightly concerned that people might think there could be a conflict of interests here. What should I do?

The answer is simple: if the relationship is such that it could influence your objectivity, then you should apply this policy and ask for guidance. In this situation, every effort must be made to ensure that the process is managed by an independent person, and that these situations are monitored on an on-going basis to ensure objectivity and fairness to all.

Outside Activities

You may undertake external professional or non-professional activities or commitments with external organizations, unless the activities or commitments are likely to give rise to a real, potential or perceived conflict of interest, would interfere with your ability to perform your official duties and responsibilities to the CIB objectively, or would undermine the impartiality of the CIB.

Subject to certain exceptions for permitted outside activities, you must receive prior written approval from the CEO before accepting an appointment or position with a public or private business entity, not-for-profit or charitable trust, government-owned corporation, agency, commission or other public organization where directors are appointed by government.

For more information, consult the ***Conflict of Interest Policy for Employees***

Political Activities

CIB recognizes your right to be involved in political activities as long as they do not impair, or are perceived as impairing, your ability to perform your official duties in a politically impartial manner. Before deciding whether to engage in a political activity, you should consider: (1) the nature of the political activity; (2) the nature of your duties; (3) the level of visibility of your position; and (4) the personal or professional visibility in participating in the political activity.

Any political activity must be conducted outside your working hours and the workplace, and without using any of our assets. If you wish to be a candidate, or to seek nomination as a candidate, in a federal, provincial or municipal election, you must first obtain the written approval of the CEO and you will be required to take a leave of absence during your candidacy. Voting in an election is a right and, as such, is a political activity that is permissible in all instances.

No political contributions will be made, directly or indirectly, by the CIB, including reimbursing Employees for personal political contributions.

For more information, consult the ***Conflict of Interest Policy for Employees***.

Examples of Political Activities

- 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 lawn sign
- Attending events, meetings, conventions, rallies, or other political gatherings
- Developing promotional material for candidate or political party
- Using social media to express personal views in support of, or in opposition to, a candidate or a political party

Requirements Post Employment

Employees have a responsibility to minimize the possibility of a real, potential or perceived conflict of interest between their most recent responsibilities within the CIB and their subsequent employment outside the CIB. You are required to make full disclosure and to co-operate in any decision to remove you from situations that could be perceived as creating a conflict, such as a situation that could accord preferential treatment to your future employer.

CIB's procedures to manage conflicts that could arise after leaving your employment with the CIB are set out in the ***Conflict of Interest Policy for Employees***.

5. We Decline Inappropriate Gifts, Hospitality and Other Benefits

CIB is sensitive to the public's perception that may be created by the acceptance of gifts, hospitality and other benefits. We must therefore exercise judgment to avoid situations that may give rise to a conflict of interest.

You (including your family members) ***must not*** accept or solicit gifts, hospitality or other benefits that may have a real, potential or perceived influence on your objectivity in carrying out your official duties and responsibilities, or that may place you under an obligation to the donor.

You may accept gifts, hospitality and other benefits without specific approval if they meet the following criteria:

- they are infrequent and of minimal value (e.g., low cost promotional objects, simple meals, or souvenirs with no cash value);
- they arise out of activities or events related to your official duties and responsibilities, are used for business purposes and arise from business relations;
- they are appropriate, reasonable and within the normal standards of courtesy, hospitality or protocol;
- do not compromise or reasonably appear to compromise your integrity or objectivity, or the impartiality or reputation of the CIB;
- they are offered in a neutral context, without expectation from the person giving the gift, hospitality or other benefit;
- gifts, hospitality or other benefits of a value greater than \$20 must be declared.

Invitations to participate in industry meetings or educational conferences related to your official duties and responsibilities are generally not considered to be gifts and other benefits prohibited by this Code. In general, you may accept meals or participate in conferences or events if all the participants or persons attending are entitled to the same treatment and if several organizations take part in the event. Acceptance of invitations from an industry-related body must be considered with your manager, be reasonable and must not include free airline tickets or accommodation.

This section of the Code should be read in conjunction with the CIB's ***Gifts, Entertainment and Hospitality Guidelines***. Questions regarding the acceptability of a gift should be directed to the General Counsel & Corporate Secretary, or CEO as appropriate.

A supplier has just offered me a large basket of gourmet products. Can – and should – I accept it?

You should thank the supplier, but politely decline the gift. You can only accept gifts and invitations which are of minimal value.

One of our suppliers has invited me to lunch. Can I accept?

A meal paid for by a third party, namely a client or supplier, can be acceptable if the value is reasonable and it is an occasional occurrence, since it is a generally accepted practice and may enable business development or contribute to building good business relationships. Restrictions may however apply if the acceptance could bring into question the CIB's objectivity and impartiality; or if it places you under an obligation to the supplier or business partner.

Procurement Activities and Suppliers

We must ensure that all procurement activities comply with the law and are conducted in an open, fair, and transparent manner

If the CIB has issued a request for proposal (RFP) or has engaged in a similar selection process, you must not deal with suppliers, or other third parties, in any way that could cast doubt on the CIB's commitment to these objectives. For example, you must not accept any gifts, hospitality or other benefits from any party involved in responding to the RFP, until the process is completed.

When contracting with suppliers, we must also ensure that our policies regarding Supplier selection and contracting are respected. For more information, consult the ***Procurement Policy*** and the ***Procurement Procedure***.

Travel & Hospitality Expenses

Every Employee who travels to conduct business on behalf of the CIB must act responsibly and with integrity. You must ensure that all travel and hospitality expenses are for a valid business purpose and are reasonable in relation to the business requirements and/or services being provided. If you incur expenses or approve expenses on behalf of the CIB, including expenses incurred through the use of a corporate credit card, you must comply with the requirements outlined in the CIB's ***Travel and Hospitality Guide***.

6. We Protect the CIB's Assets and Information

Assets

Our assets include:

- physical property,
- electronic property (such as computers, devices, IT systems and Internet access),
- human resources,
- work completed by our Employees (such as intellectual property that you create in the course of your employment with the CIB), and
- work completed for us.

These assets are *public assets*, and we must use them responsibly, care for them, and use them exclusively for business purposes to serve the interests and benefit of the CIB.

Occasional and limited personal use of the CIB's information technology assets and systems is permitted if the use does not interfere with our work and does not violate any provisions of this Code or any other Policy. However, Employees should not expect a right to privacy in anything they create, store, send or receive through the CIB's IT Systems. Authorized Employees may access the IT Systems to periodically check that they are secure, to investigate potential breaches

of the Code, CIB's Policies, Procedures or Guidelines or laws, and to respond to legally authorized demands for information by a third party.

Examples of Expected Behaviours for Using CIB's Assets

- ✓ Only use CIB authorized technological solutions and devices to access, store or process information.
- ✓ Always protect electronic accounts, IDs and passwords.
- ✓ File paper records in locked cabinets and secure electronic devices when not in use.
- ✓ Report promptly any acts or anomalies that could be a real or suspected breach of information security including unauthorized access, theft, IT system or network intrusions or willful damage.

Employees must also read and apply the practices described in the **Information Security Policy** and the **Acceptable Use of Technology Procedure** for protecting the CIB's IT Systems and confidential information, and complete information security awareness training to follow the best practices and actions expected from us to prevent malicious threats and security breaches.

Confidential Information

Discretion must be exercised in all of our activities, particularly regarding the treatment of confidential information. Our confidential information includes:

- information relating to our business and affairs, including proprietary, technical, business, investment, financial, human resources and other information belonging to the CIB,
- Privileged Information relating to third parties we deal with (see text box to the right), and
- Personal Information of Employees, prospective employees, and individuals with whom we do business.

*Information received in relation to the proponents of, or private sector investors or institutional investors in, infrastructure projects is **privileged information** subject to section 28 of the CIB Act and cannot be disclosed to external parties without express written consent.*

You are required to protect the confidentiality of information we hold, not only when the CIB collects, uses or retains the information but also when it disposes of or destroys Information (e.g. by shredding).

This duty to protect the confidentiality of information continues following the end of your employment.

You must immediately report all instances of a breach of confidentiality, or unauthorized disclosure of confidential information to the General Counsel & Corporate Secretary.

Examples of Expected Behaviours for Protecting Information

- ✓ Only use or access confidential information on a need to know basis.
- ✓ Log out or shut down your electronic device before leaving it unattended.
- ✓ Do not display, review or discuss confidential information in public places, in the presence of third parties or where you may be overheard.
- ✓ Do not transmit confidential information to personal email accounts or copy such information to external file storage services.
- ✓ Be careful when forwarding e-mails: confidential information may be included.

You must also ensure our information is managed effectively and efficiently throughout its life cycle to foster informed decision making, facilitate accountability, and transparency. To this end, we must:

- ensure all reports (whether for external or internal use), records and other information are factual, fair, complete, timely and understandable and are maintained according to the CIB's Policies, Procedures and Guidelines, and legal requirements,
- ensure that decisions are properly authorized, promptly recorded in the right books and records and adequately supported by back-up documentation,
- file and classify all information of business value in the CIB's Electronic Document Management System,
- take care to compose all emails, text messages and other electronic communications in the same professional manner as other written correspondence,
- treat information in a manner that facilitates access while ensuring privacy and security requirements are met.

Employees must also read and apply the practices described in the ***Information Management Policy***.

Access to Information

As a Crown corporation, the CIB is subject to the *Access to Information Act*, which provides any individual or corporation present in Canada a right of access to information contained in records under the CIB's control, regardless of medium or format.

In performing your duties and responsibilities to the CIB, you must always be aware of the following:

- your communications in respect of the CIB's business and activities could be made public,
- all records you create or receive in the course of your work are accessible no matter the medium or form,

- you must co-operate fully and in a timely manner when contacted about a request to provide records within the required timeframe,
- destroying, altering, falsifying or concealing a record with the intention of denying a right of access is a criminal offense under the *Access to Information Act*.

I have identified records required for a response to an access to information request. I know that I must submit all records, but I have kept all the drafts. Can I delete them and only provide the final copy?

No. You must submit all required records that are in your possession at the time the access to information request is made, including drafts. If you destroy files after you receive the request, you could be guilty of an offence under the Access to Information Act.

All requirements related to the process of access to information requests can be found in the ***Access to Information Procedure***.

Privacy

We must safeguard the privacy, confidentiality and security of all Personal Information it collects and uses, in compliance with the *Privacy Act*.

In performing your duties and responsibilities to the CIB:

- you must ensure that Personal Information collected is current, accurate and complete,
- you are not permitted to share an individual's Personal Information, except for the purpose for which the information was originally collected,
- you are not permitted to disclose Personal Information, without the consent of the individual to whom it relates,
- you may share Personal Information only with parties who are authorized to receive it for the purpose it was obtained or compiled by the CIB, or a use consistent with that purpose,
- you have a right to access Personal Information about yourself held by the CIB.

A colleague is on maternity leave and a supplier would like to send her a card. The supplier has asked me for her address. Can I give the supplier this information?

No. This is confidential personal information and you may not disclose it. You can ask the supplier to give you the card and you can send it to Human Resources, which will forward the card to the Employee.

All requirements related to the protection of Personal Information can be found in the ***Personal Information and Privacy Protection Procedure***.

7. We Comply with Laws and Regulations

We are expected to exercise competence and diligence in the performance of our duties and responsibilities at the CIB. Competence is having the knowledge, judgement and skills to execute our duties successfully, including seeking guidance when appropriate. Diligence means performing our duties with care and attention.

To be competent and diligent, we must understand and comply with the letter and spirit of applicable laws and regulations, including this Code and the CIB's Policies, Procedures and Guidelines. When in doubt, we should seek guidance from the General Counsel & Corporate Secretary.

CIB has **zero tolerance** for any type of legal violation, including fraud, theft, misappropriation, insider trading, money laundering, bribery and corruption.

Fraud and Misappropriation

Fraud is generally defined as self-dealing, such as falsifying documents including internal financial records, contractual documentation, representations and warranties or due diligence information on which others rely for decision-making.

Our records must be maintained with integrity and care, in compliance with our procedures and all applicable accounting standards and laws. You are expected to be honest and accurate in all documentation including expense reports, business reports and transaction records.

We are also committed to being truthful with, and responsive to, both internal and external investigators, including regulators, auditors and other elected or appointed officials and government employees. If you have contact with these types of officials/employees in the course of your work or are asked to provide information in connection with an audit, inquiry or investigation, you must cooperate, be honest, and ensure that all information you provide is truthful.

Lobbying

In executing our mandate successfully, we must engage with federal, provincial, territorial and municipal governments and Indigenous communities. We are expected to uphold the highest standards of integrity and fairness while conducting business. You must not deal with any public official in a manner that would compromise the integrity or reputation of that official, or deal with any matters with a high public profile in a manner inconsistent with the approach approved by the Board or the CEO as the case may be.

Bribery and Corruption

Bribery and corruption are substantial threats to good governance, sustainable development, the democratic process and fair business practices. Corrupt actions also lead to loss of confidence in the CIB and the Government of Canada.

You may not give, solicit or accept anything of value, directly or indirectly, to or from any other person, in order to obtain or retain an unfair or illegal advantage for personal benefit, the benefit of the CIB or a third party. To this end, payments, gifts, hospitality entertainment and other benefits

to public officials for obtaining any advantages are **strictly prohibited**. This prohibition extends to agents, business partners or any other parties that may represent the CIB. For more information, refer to the ***Gifts, Entertainment and Hospitality Guidelines***.

Preventing Money Laundering and Terrorist Financing

The Government of Canada, as well as international bodies (i.e., United Nations), enact economic sanctions, anti-money laundering and terrorist financing laws to ensure that citizens are not trading with individuals or entities that endanger their interests, violate international norms or participate in criminal organizations. CIB is strongly committed to preventing the use of its operations for money laundering, the financing of terrorism or other criminal activities, and will take appropriate actions to comply with applicable anti-money laundering laws.

Employees are expected to use reasonable care to verify that counterparties are not owned or controlled by, or acting on behalf of, sanctioned governments, organizations, individuals or others. CIB has developed and implemented a written “Know Your Client” compliance program, with a view to identifying potential money laundering and terrorist financing risks and managing reputational risks in this area.

All requirements related to this obligation can be found in the ***Anti-Money Laundering, Terrorist Financing and Sanctions Policy*** and the ***AML/ATF/S Know Your Client Due Diligence Procedure***.

Insider Trading and Tipping

While at the CIB, you may have access to or become aware of material non-public information of a publicly traded entity. You must not use this information to gain a financial advantage for yourself or others, either by way of making a trade for yourself, “tipping” others on the information, or otherwise. Doing so is not only a violation of the Code that will result in immediate termination for cause but is also a serious violation of securities laws and will expose any individuals involved to potential civil and criminal prosecution.

Insider Trading	Trading while you, or the CIB, have material non-public information in relation to any public company or other entity before this information is announced to the public.
Tipping	Advising others, such as relatives or friends, to trade on the basis of the material non-public information or disclose this information to others.

For more information, consult the ***Insider Trading and Tipping Policy***, which establishes standards for securities trading for all Employees, with the intention of avoiding any improper conduct, or even the appearance of improper conduct.

X. Reporting Obligations

1. Completing the Personal Information Form

Upon commencing your employment with the CIB, and on an annual basis, we will ask you to complete the Personal Information Form found in Appendix B. This form must be returned with the Statement of Compliance (found in Appendix A) to Human Resources.

The information in the Personal Information Form will be provided to the General Counsel & Corporate Secretary for purposes of monitoring potential conflicts of interests. A summary of such information may also be provided to the Governance Committee of the Board of Directors.

Section 1: Disclosure of Material Relationship with Corporation, Trust, Partnership or Other Entity

In the first section of the Personal Information Form, you are required to disclose if you:

- (a) are a director, officer, employee or trustee of a corporation, trust, partnership or other entity; or
- (b) exercise control over, have more than 10% of the voting rights or make investment or other major decisions for a corporation, trust, partnership or other entity.

If so, you will need to provide the name of the organization and the position you hold with the organization. You do not, however, need to provide us with information concerning your role as a part-time director, officer or trustee of a non-profit organization unless such role constitutes a real, perceived or potential conflict of interest. Examples of roles that would not normally need to be reported include serving on the board of a religious, cultural, sports or recreation organization or club, or serving on the board of a condominium corporation in which you reside.

For more information, refer to the ***Conflict of Interest Policy for Employees***.

Section 2: Disclosure of Personal Interests or Activities

In the second section of the Personal Information Form, you are required to disclose any of your other outside activities, assets or interests that might give rise to a real, potential or perceived conflict of interest in relation to your official duties and responsibilities to the CIB or that may be relevant to our efforts to protect the CIB's reputation. For example, ownership of property that could be impacted by decisions made by the CIB should be reported in this section of the Personal Information Form.

Section 3: Disclosure About Family Members

In the third section of the Personal Information Form, you need to tell us if, to your knowledge, you have a family member (for purposes of this form only, a spouse, common-law partner, child, sibling or parent) who works or is on the board of directors of a supplier or other entity that has or is seeking to establish a major business relationship with the CIB.

2. Additional Reporting Obligations

In addition to the Statement of Compliance and the Personal Information Form, you also have ongoing reporting obligations with respect to:

- a suspected failure to adhere to the Code or any other CIB Policy, Procedure or Guideline,
- the existence of a real, potential or perceived conflict of interest,
- potential outside activities that may require approval under the Code,
- a request to engage in political activities,
- gifts, entertainment or benefits from outside individuals or entities with whom the CIB has past, present or potential dealings,
- possible receipt of undisclosed material information about a publicly traded entity.

XI. Definitions

Board	The Board of Directors of the Canada Infrastructure Bank.
CIB	Canada Infrastructure Bank.
CIB Act	<i>Canada Infrastructure Bank Act</i> , SC 2017, c 20, s 403.
CEO	The Chief Executive Officer of the Canada Infrastructure Bank.
CFO & CAO	The Chief Financial Officer & Chief Administrative Officer of the CIB.
Code	Code of Conduct for Employees.
Conflict of Interest	<p>Any situation in which you allow, or appear to allow, your personal or private interests, or the interest of your family, other relatives or associates, to affect your ability to perform your work for the CIB objectively, impartially and effectively.</p> <p>You have a real conflict of interest if such a situation exists at the present time.</p> <p>You have a perceived conflict of interest if a situation could be perceived by a reasonable observer to be a conflict of interest.</p> <p>A potential conflict of interest is a situation where a conflict of interest could reasonably be foreseen to exist in the future.</p>
Consultant	Any business or person who is not an Employee of the CIB and bound by a Master Agreement and one or more contracts to provide consulting services to the CIB.
Director	Individual appointed by an Order in Council to the CIB's Board of Directors.
Employee	Any person who is part of the personnel of the CIB, including any officer, whether working on a full-time, part-time, permanent or temporary basis, and including the CEO.
Electronic Document Management System	The CIB Document Portal on Microsoft Office SharePoint.
Family Member	A spouse or common-law partner, brother or sister, parent, child, grandparent, aunt, uncle, nephew, niece, grandchild, parent-in-law, brother or sister-in-law, child-in-law, stepchild, stepbrother or stepsister, and stepparent.
Information	Any information asset including data related to the CIB's operations and activities such as confidential business, financial, transactional, Employee and information in relation to proponents of, or private sector investors or institutional investors in,

	infrastructure projects, in any medium or form whatsoever, including electronic documents, paper documents or a database.
IT Systems	Any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the organization. IT Systems include computers, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources.
Manager	The individual who has full supervisory responsibility for an Employee. This may include executives, heads, managing directors and senior directors, as applicable.
Personal Information	Any Information about an identifiable individual (e.g., age, ethnic origin, religion, marital status, education and financial history, medical history, personal views or opinions of or about the individual). This includes personal information about CIB's Employees, Consultants and Suppliers, as well as its counterparties (e.g., directors, officers, shareholders and guarantors of corporate counterparties).
Personal Information Form	The form attached as Appendix B to this Code
Policies, Procedures and/or Guidelines	Refers to the corporate policies, corporate procedures and guidelines adopted by the CIB from time to time, as described in the CIB's Corporate Governance and Compliance Policy Framework.
Political Activity	Means any of the following: <ul style="list-style-type: none"> • carrying on any activity in support of, within or in opposition to a political party, • carrying on any activity in support of, or in opposition to, a candidate before or during an election period, or • seeking nomination as, or being, a candidate in an election before or during the election period, whether at the federal, provincial or municipal level.
PSDPA	<i>Public Servants Disclosure Protection Act</i> , SC 2005, c 46
Reprisal	Is defined in the PSDPA as any of the following measures taken against a public servant who has made a protected disclosure or who has, in good faith, cooperated in an investigation into a disclosure: <ul style="list-style-type: none"> • a disciplinary measure

	<ul style="list-style-type: none"> • demotion of the public servant • termination of the employment of the public servant • a measure that adversely affects the employment or working conditions of the public servant • a threat to do any of those things or to direct a person to do them.
Senior Officer for Disclosure	<p>The person appointed to receive and deal with disclosures made under the PSDPA. The Senior Officer for Disclosure has the following key leadership roles for implementing the PSDPA within the CIB:</p> <ul style="list-style-type: none"> • providing information, advice and guidance to Employees regarding the organization's internal disclosure procedures, including the making of disclosures, the conduct of investigations into disclosures, and the handling of disclosures made to supervisors; • receiving and recording disclosures and reviewing them to establish whether there are sufficient grounds for further action under the PSDPA; • managing investigations into disclosures, including determining whether to deal with a disclosure under the PSDPA, initiate an investigation or cease an investigation; • coordinating the handling of a disclosure with the senior officer of another federal public sector organization, if a disclosure or an investigation into a disclosure involves that other organization • notifying, in writing, the person(s) who made a disclosure of the outcome of any review or investigation into the disclosure and of the status of actions taken on the disclosure, as appropriate; and • reporting the findings of investigations, as well as any systemic problems that may give rise to wrongdoing, directly to his or her chief executive, with recommendations for corrective action, if any.
Statement of Compliance	The form attached as Appendix A to this Code.
Supplier	Any company or person who is not an Employee that provides services to the CIB under a Service agreement or one or more Statements of Work, or any other agreement (regardless of its title) stipulating the services to be provided to the CIB, but excluding any company that has adopted and has still in force an employee code of conduct. These firms are not required to sign

	or renew their acknowledgment to the Code so long as they have in force at all times their own code of conduct.
Wrongdoing	<p>Is defined in the PSDPA as any of the following actions in, or relating to, the public sector:</p> <ul style="list-style-type: none"> • violation of a federal or provincial law or regulation • misuse of public funds or assets • gross mismanagement in the public sector • a serious breach of a code of conduct • an act or omission that creates a substantial and specific danger to the life, health or safety of Canadians or to the environment • knowingly directing or counselling a person to commit a wrongdoing.

XII. Review

The General Counsel & Corporate Secretary shall review this Code at least once every two (2) years. Any substantive amendments to this Code must be approved by the Board of Directors on the recommendation of the Governance Committee.

APPENDIX A

STATEMENT OF COMPLIANCE

To be generated and accepted electronically

Employees are required to read and understand the *Code of Conduct for Employees* (the “**Code**”) (which incorporates the Values and Ethics Code for the Public Sector established by the Treasury Board of Canada pursuant to the *Public Servants Disclosure Protection Act*). To this end, and to ensure we are regularly reminded of the importance of upholding the values and guidelines for ethical conduct of the Code, and complying with these, all Employees are required to sign this Statement of Compliance upon joining the CIB and annually thereafter and return it to Human Resources.

The undersigned (“I”) acknowledges and confirms the following:

1. I have received, read and understand the Code and undertake to comply with its requirements.
2. I understand that my signature entails an undertaking to comply with, and I agree to conduct myself according to, the values and guidelines for ethical conduct as set out in the Code and the Policies, Procedures and Guidelines in effect.
3. Where applicable, I have disclosed the information required in the Personal Information Form (Appendix B to the Code).
4. I understand my obligations as set forth in the Code and that I have a shared duty to prevent, correct and promptly report knowledge of a potential or suspected breach of the Code.
5. I understand that compliance with the Code is a mandatory condition of my employment with the CIB. Conduct that does not meet the values and guidelines for ethical conduct set out in the Code, or is otherwise illegal, dishonest or unethical, may result in disciplinary measures up to and including termination of employment.

I certify that this is a true and correct statement by my signature below:

Name:	Position:
Signature:	Date:

APPENDIX B

PERSONAL INFORMATION FORM

To be generated and accepted electronically

Instructions

You are required to complete this form when you begin working with us and again annually while you are working with us. Instructions on how to complete this form can be found in Section X of the Code.

This information will help us monitor your objectivity in carrying out your duties and maintain public confidence and trust in the CIB.

Disclosure of an interest or association in this form does not necessarily mean that such interest or association constitutes a real, potential or perceived conflict of interest. **However, you are reminded that compliance with the Code is mandatory and ongoing and this form may not request you to disclose every circumstance that could constitute a real, potential or perceived conflict of interest under the Code.** Even if you are not specifically requested on this form, you still have an obligation to report any real, potential or perceived conflict of interest in accordance with the Code.

Privacy Statement

The information you provide on this confidential form is collected under the provisions of the Code of Conduct for Employees for the purposes of ensuring compliance and maintaining information about real, potential or perceived conflict of interest situations for Employees of the CIB. Personal information that you provide is protected under the provisions of the *Privacy Act*.

Employee Information
Name:
Position:

Section 1: Disclosure of Material Relationship with Corporation, Trust, Partnership or Other Entity

If you:

- (a) are a director, officer, employee or trustee of any organization;
- (b) exercise control over, have more than 10% of the voting rights or make investment or other major decisions for any organization,

you need to provide us with more information. You do not, however, need to provide us with information concerning your role as a part-time director, officer or trustee of a non-profit organization unless such role constitutes a real, perceived or potential conflict of interest.

Material Relationship with Corporation, Trust, Partnership or Other Entity
<i>Please check the appropriate box below:</i>
<input type="checkbox"/> No – you do not have a material relationship with a corporation, trust, partnership or other entity.
<input type="checkbox"/> Yes – you have a material relationship with a corporation, trust, partnership or other entity.
Name of Entity:
Address:
Type of Entity:
Description (<i>Please describe your association and how this activity may impact your duties to the CIB</i>)

Please provide disclosure for all applicable corporations, trusts, partnerships or other entities.

Section 2: Disclosure of Private Interests or Activities

Please disclose any of your outside activities, assets and interests that might give rise to a real, potential or perceived conflict of interest in relation to your duties to the CIB, or may be relevant to the CIB's efforts to protect its reputation, as described in the Code.

Disclosure of Private Interests or Activities
<i>Please check the appropriate box below:</i>
<input type="checkbox"/> No – you do <i>not</i> have any outside activities, assets or interests that could raise this concern.
<input type="checkbox"/> Yes – you have outside activities, assets or interests that could raise this concern.
Description (<i>If yes, please provide details.</i>)

Section 3: Disclosure About Family Members

Please disclose if, to your knowledge, you have a family member (for purposes of this form only, a spouse, common-law partner, child, sibling or parent) who works or is on the board of directors of a supplier or other entity that has or is seeking to establish a major business relationship with the CIB.

You should note that this form does not require disclosure of private interests of all relatives and friends although such interests could constitute a real, potential or perceived conflict of interest if you exercise a power, duty or function that provides an opportunity to further those interests. In such a case, you still have an obligation to report those circumstances in accordance with the Code.

Family Member Disclosure (Business Relationship)
<i>Please check the appropriate box below:</i>
<input type="checkbox"/> No – you do not have a family member who works for one of the parties listed above.
<input type="checkbox"/> Yes – you have a family member who works for one of the parties listed above.
Name:
Organization he or she works for:
Position held:
Description (<i>Please describe the organization's relationship with the CIB</i>)

Employee Acknowledgment and Signature

I certify to the best of my knowledge and belief that the above information is accurate and complete as of the date of my signature.

Name:	Position:
Signature:	Date:

APPENDIX C

SUPPORTING POLICIES AND PROCEDURES

Policy / Procedure	Description
Disclosure of Wrongdoing Policy for Employees	Policy supports the CIB's internal controls and operating procedures by providing a framework for Employees to disclose serious concerns of wrongdoing in the workplace and other breach of ethics, key policies, legislation or regulations. The policy also provides the contact details for the CIB's confidential whistleblower service.
Respectful Workplace Policy	Describes general respectful workplace responsibilities and expectations, including those related to providing a workplace free of discrimination, harassment, sexual harassment and violence when performing work at and for the CIB.
Health and Safety Policy	Describes the roles, responsibilities and activities to ensure that effective practices are in place to protect the health, safety and wellbeing of its employees, its guests as well as any person granted access to the CIB's premises.
Communications, Media and Stakeholder Relations Policy	Describes the roles and responsibilities and the principles to the CIB's management of its own communications, including with respect to enhancing transparency and accountability in respect of the CIB's operations, investments and decision-making processes.
Official Languages Policy	Describes governance structures, procedures and resources in place to support the CIB's obligations with regard to official languages, including with respect to communications with and services to the public.
Guidelines on Official Languages for Communications and Services to the Public	The purpose of the Guidelines is to establish sound and consistent practices and procedures in the area of communications with and services to the public in the official language of their choice, consistent with the <i>Official Languages Act</i> and the <i>Official Languages (Communications with and Services to the Public) Regulations</i> .
Conflict of Interest Policy for Employees	Describes the procedures for identifying real, potential or perceived conflicts of interest, minimizing the opportunity for conflicts to occur and resolving any existing conflicts of interest.
Gifts, Entertainment and Hospitality Guidelines	Describes the CIB's formal guidelines for giving or receiving gifts, entertainment or hospitality to ensure these exchanges are not misinterpreted or suggest the appearance of something improper.
Procurement Policy	Describes the CIB's framework for Procurement activities to ensure that the CIB receives the best value for the goods and services required for its operations and that these goods and services are purchased in a manner that is professional, fair, transparent, consistent, cost effective and cost efficient.
Procurement Procedure	Describes the principles and activities that govern the procurement of goods and services at the CIB, including the procedures related to competitive bid processes, sole source exceptions and approval limits for procurement.

Policy / Procedure	Description
Information Management Policy	Describes the governance principles and activities for the management and use of information held by the CIB to effectively meet its mandate, including the roles and responsibilities and the guidelines for the classification, retention and disposal of information to ensure proper treatment and protection.
Information Security Policy	Describes the CIB's governance and activities with respect to information security to be aligned with industry standards, including assessing CIB's information security risks and legal obligations; defining the internal controls and access rights; and providing mandatory training to promote awareness of security threats and best practices to mitigate them.
Acceptable Use of Technology Procedure	Describes the activities to ensure CIB's IT resources are used efficiently, ethically and lawfully, and serves to ensure the confidentiality and integrity of CIB's IT assets, and critical information including with respect to access, security measures and examples of non-acceptable use of CIB's IT systems and assets.
Access to Information Procedure	Describes the principles and practices followed to respond to access requests made under the <i>Access to Information Act</i> .
Personal Information and Privacy Protection Procedure	Describes the practices that Employees must follow to comply with the <i>Privacy Act</i> and to protect the privacy, confidentiality and security of Personal Information held by the CIB.
AML-ATF-S Policy	Describes the CIB's activities with respect to anti-money laundering, anti-terrorist financing and sanctions (" AML/ATF/S ") risk and articulates the CIB's policy that it will not transact business with sanctioned individuals, entities and/or restricted countries identified by the Canadian government, law enforcement or United Nations resolutions.
AML-ATF-S Due Diligence Procedure	Describes the procedures followed by the CIB to identify and assess potential legal, regulatory and reputational risks in transactions involving the CIB and various counterparties. Also provides direction to the CIB respecting required client identification, due diligence, and record-keeping standards when entering into business relationships with counterparties.