

# Vendor Code of Conduct

## Purpose and Scope

The Canada Mortgage and Housing Corporation Vendor Code of Conduct (“the Code”) sets out the principles and expectations that Vendors, service providers, intermediaries, and independent contractors, including their employees and representatives (each, a “Vendor”) must comply with when conducting business with, or providing goods and services to, or acting on behalf of CMHC.

CMHC is committed to source goods and services from Vendors who respect human rights, ethics, and the environment and have responsible policies and practices, and we expect Vendors to operate in a manner that is consistent with these values.

The Code establishes specific obligations for Vendors regarding the following issues: business integrity, responsible business practices, responsible treatment of individuals, information and data management, and monitoring and compliance.

CMHC may have additional requirements, which are specified during the procurement and contracting process and the ongoing management and monitoring of the relationship.

Agreements between CMHC and its Vendors contain requirements which may address issues identified in the Code. In the event of a conflict or inconsistency between the Code and an agreement between CMHC and a Vendor, the agreement will govern and prevail.

## Business Integrity

### Compliance with laws

In all their activities, Vendors must ensure all applicable provisions of constitutions, laws, statutes, ordinances, rules, treaties, regulations, permits, licenses, approvals, interpretations and orders of courts or governmental authorities in Canada and all orders and decrees of all courts and arbitrators.

The Vendor shall comply with any sanction regimes, applicable to the Vendor, its supply of goods or services, or industry of work concerned by the Vendor’s business under Canadian law, whether in Canada or outside of Canada.

### Conflicts of Interest

The Vendor and its personnel shall avoid any real, potential, or apparent Conflict of Interest and shall declare any Conflict of Interest to CMHC immediately upon becoming aware of the Conflict of Interest. The Vendor shall, take steps to eliminate any real, potential, or apparent Conflict of Interest, to the satisfaction of CMHC.

### Gifts, Hospitality and Other Benefits

The nature of any gifts, hospitality or other benefits must not, by their quality, quantity, or timing, be used by Vendors to gain improper advantage or preferential treatment from CMHC employees or their representatives. Vendors should also avoid giving or receiving gifts, hospitality, or other benefits that could give the appearance of impropriety.

### Anti-Bribery and Anti-Corruption

Vendors must comply with applicable laws related to anti-bribery and anti-corruption in the jurisdictions in which they operate. Vendors must not engage directly or indirectly in any activities that would put CMHC at risk of violating anti-bribery and anti-corruption laws. It is never acceptable for any Vendor to offer any bribe, kickback or other unlawful payment or benefit to secure any concession, contract, or other favorable treatment.

## Responsible Business Practices

### Privacy & Information Security

We expect Vendors to protect CMHC customer and personal information in accordance with their contractual obligations to CMHC and applicable law and best practice. Information should be collected, used, and disclosed strictly for the purposes agreed and protected through all stages of the information lifecycle.

Vendors requiring access to CMHC designated/classified information and/or networks must have passed the government security screening process performed by CMHC or a Government of Canada Department and be aware of their role as information custodians (the handling, storage, transmission, and destruction of the information) in advance of access.

Vendors must notify CMHC immediately of any actual or suspected breaches of CMHC customer or personal information and security (physical and cyber) breaches and assist CMHC in managing any consequences arising from such events.

### Business Resumption and Contingency Planning

As some Vendors' goods and services are critical to CMHC's businesses, Vendors are expected to have and maintain business continuity and disaster recovery plans in accordance with applicable regulatory, contractual, and service level agreement requirements established contractually with CMHC.

### Outsourcing and Subcontracting

The Vendor must obtain CMHC's written consent, which may be given or withheld in CMHC's sole discretion, prior to entering into agreements with or otherwise engaging any person or entity, including all subcontractors and affiliates of the Vendor, other than the Vendors' employees, to provide any Services to CMHC.

## Responsible Treatment of Individuals

### Respect, Diversity, and Inclusion

Vendors must maintain workplaces characterized by professionalism, and respect for the dignity of every individual with whom their employees interact. Vendors must respect the diversity of their employees, clients, and others with whom they interact, both in and outside the workplace, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin, and religion. Vendors must not tolerate harassment, discrimination, violence, retaliation, and other disrespectful and inappropriate behavior.

### Vendor Diversity Program

CMHC's Vendor Diversity Program is in place to enhance equal access opportunities to support economic growth for underrepresented vendors and communities. This program allows Vendors to:

- benefit from increased visibility and business opportunities
- help CMHC deliver the best value to clients through competitive offerings and greater innovation

Businesses that are owned or led by Canadians from underrepresented groups qualify under the Vendor Diversity Program.

Underrepresented businesses are defined as being owned, operated, and controlled by 51% of a given group. We consider businesses that are led by women, Indigenous Peoples, 2SLGBTQIA+ people, persons with disabilities as well as Black and racialized people examples of underrepresented groups.

To be included in our program, Vendors must have a current diversity certification from one of the certifying organizations for inclusion into the program:

### Employment Practices

Vendors must abide by applicable employment standards, labour, health and safety, non-discrimination, and human rights legislation. Where laws do not prohibit discrimination or where they allow for differential treatment, Vendors are expected to be committed to non-discrimination principles and to operate in a way that does not differentiate unfairly.

## Environment

### Environmental Sustainability

Vendors must have the appropriate management procedures in place to comply with all environmental laws. Vendors should seek to conduct their business in an environmentally responsible way.

Where appropriate, Vendors should support the advancement of CMHC's environmental agenda by providing goods and services that have a lesser or reduced impact on the environment.

Key environmental considerations include reduction of greenhouse gas emissions, improved energy efficiency, use of renewable resources, waste reduction, reduction of plastics and packaging, and reduction of hazardous waste.

## Compliance and Monitoring of the Code of Conduct

Vendors must maintain all information and management systems necessary to document their compliance with the Code, applicable laws, and their contractual obligations with CMHC, and provide evidence to CMHC upon request.

CMHC reserves the right to monitor a Vendor's compliance to the Code and audit their control environment. Vendors may be required to periodically confirm in writing that they meet their obligations under the Code.

In the case of any deficiencies identified with respect to compliance with the Code, Vendors are expected to promptly take corrective action to address identified deficiencies. Failure to comply with the Code may result in termination of a Vendor's relationship with CMHC.

## Contact Information

If you have any questions about the Canada Mortgage and Housing Corporation Vendor Code of Conduct, contact Procurement Sourcing:

[ProcurementSourcing\\_Sourcesd'approvisionnement@cmhc-schl.gc.ca](mailto:ProcurementSourcing_Sourcesd'approvisionnement@cmhc-schl.gc.ca)