

Code of Ethics and Business Conduct

August 2022

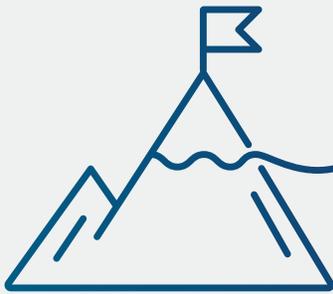


Summary

CODE OF ETHICS AND BUSINESS CONDUCT

Document Name	CMHC Code of Ethics and Business Conduct
Purpose of Code	The Code outlines CMHC's expectations and provides a common understanding of the minimum required ethical and workplace behaviours, which are a condition of employment for every CMHC employee, regardless of their position.
Scope and Application	<p>This Code applies to all CMHC employees, and, as applicable, to CMHC Board members.</p> <p>Other individuals accessing CMHC premises or otherwise working with CMHC employees are expected to abide by all relevant provisions of this Code that may apply to their circumstances.</p> <p>A breach of the Code may result in appropriate disciplinary actions, including dismissal.</p>
Governance Category	Board Level
Code Owner	VP, People and Culture
Effective Date	August 2022
Creation Date	October 2016
Review Cycle	Annual
Next Review Date	October 2023
Revision History	<p>Version 2.0 – July 2017: addition of disclosure of family or significant personal relationships</p> <p>Version 3.0 – September 2018: non-material changes; updates to content</p> <p>Version 4.0 – February 2020: non-material changes; updates to content</p> <p>Version 5.0 – May 2021: non-material changes; updates to content; removal of Annex A (COI and Post-Employment Policy) and Annex B (Assets and Liabilities Disclosure)</p> <p>Version 6.0 – March 2022: non-material changes; updates to content (including CMHC Values)</p>

OUR VALUES



COURAGE

We have a bold aspiration and must lead difficult but necessary **changes** to the housing system.



COMMUNITY

We are one diverse team, mutually trusting and supporting each other, and creating **partnerships** in the best interest of the communities that we serve.



IMPACT

We prioritize the results that have the most **impact** on our aspiration.

Table of Contents

Summary	2
Introduction	5
Ethical Principles	9
Expected Working Behaviours	11
Roles and Responsibilities	24
Reference Documents	25
APPENDIX A Ethical Decision-Making Tool	26

Note: This Code of Ethics and Business Conduct includes examples that are intended to illustrate how the Code is applied. The examples are not intended to be, nor should they be interpreted as, an exhaustive list of all circumstances experienced by a CMHC employee that may create threats to compliance with the values and expected working behaviours of this Code.

Introduction

The Code is designed to assist you in fully appreciating the ethical issues that relate to your role at CMHC and to allow you to make the best possible decisions in your daily activities, which in turn helps CMHC achieve its objectives and contributes to our success as a Corporation. The Code is in accordance with and adds to the conditions outlined in the *Values and Ethics Code for the Public Sector* (VECEPS), which applies to all employees working in the federal public sector. The VECEPS values are a compass to guide federal public sector employees in everything they do. They cannot be considered in isolation from each other as they will often overlap. The VECEPS and the CMHC Code of Ethics and Business Conduct are important sources of guidance for employees. The following are the VECEPS values:

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.

The **CMHC Code of Ethics and Business Conduct** also supports CMHC's values. We value Courage, Community, and Impact – which guide us in our day-to-day behaviours enabling us to be our best and achieve our 2030 aspiration.

COURAGE

We have a bold aspiration and must lead difficult but necessary changes to the housing system:

- **We are bold and act with conviction to challenge the status quo and experiment**, even at the risk of failing.
- **If something can be done better** – we bring it up for discussion.
- **We establish trust by showing our own vulnerability** thereby creating a safe space for all to thrive.

COMMUNITY

We are one diverse team, mutually trusting and supporting each other, and creating partnerships in the best interest of the communities that we serve.

- **We proactively seek out partners**, in our teams, at CMHC, and externally, to help accomplish our goals.
- **As allies, we reinforce and encourage positive and inclusive behaviours** in those around us by bringing attention to them.
- **We set team goals and approaches together** – in a way that achieves team wide alignment.

IMPACT

We prioritize the results that have the most impact on our aspiration.

- **We prioritize work that has the greatest impact in advancing our purpose** while saying “No” to the work that doesn't.
- We regularly reflect as a team on completed work – **learning from our successes and our failures.**
- **We always consider the interests of clients** (public and internal) as central to the solutions we build.

The CMHC *Code of Ethics and Business Conduct* provides guidelines on expected behaviours that reflect CMHC's values and those of the VECEPS (the 'Values'), and provides more specific guidance from a CMHC perspective. The Code has the following main sections:

- **Ethical Principles:** to help (i) clarify how the Values apply when considering the *ethical* implications of our work at CMHC, (ii) guide your decision making and behaviour in all activities related to your professional duties, and (iii) provide direction in situations where the right course of action may not always be evident.
- **Expected Working Behaviours:** setting out behaviours that form a part of the terms and conditions of employment of all CMHC employees, including contributing to mutual respect, civility and well-being by treating others in a courteous and professional manner and conducting ourselves in a manner that contributes to a safe, respectful environment that is free from discrimination, abuse of authority, harassment and sexual harassment, as outlined in CMHC's *Work Place Harassment and Violence Prevention Policy*.
- **Ethical Decision-Making Tool:** is designed to help you achieve the best possible course of action in situations of complexity, ambiguity, unease or uncertainty.

While CMHC employees are required to follow all of CMHC's internal policies, procedures, processes and business practices, adherence to the *Conflict of Interest and Post-Employment Policy* is of utmost importance as it preserves the public trust and ensures CMHC's continued commitment to integrity.

This Code applies to all CMHC employees, and, as applicable, to CMHC Board members. Other individuals accessing CMHC premises or otherwise working with CMHC employees are expected to abide by all provisions of this Code as they may be applicable to their circumstances.

Our responsibilities as employees

- We refer to CMHC's Values and the Ethical Principles as guidelines in our business practices.
- We apply the Expected Working Behaviours and help others to do the same.
- We resolve problematic situations through ethical decision making and dialogue.
- We seek assistance if we have questions or concerns regarding CMHC's standard of ethics.

Our additional responsibilities as people leaders

- We set an example for our team members and those partnering with CMHC.
- We help our employees understand the scope of the Code as it applies to their respective tasks.
- We maintain a work environment that fosters Code compliance, ethical decision making and dialogue.
- We take steps to provide our employees with the opportunity to raise issues, concerns and problems.
- We follow up when we suspect or are informed of a potential breach of the Code and take the necessary measures to ensure there are no negative consequences against CMHC employees who have raised such concerns in good faith.

Judgement required

No single policy can address every potential situation in which you may find yourself and, as such, the Code is not to be construed as a comprehensive policy. CMHC trusts its employees to (i) apply common sense and good judgement in their respective work practices, and (ii) consider how their actions may be perceived and come to affect the Corporation, colleagues, clients, business partners and the public.

Where to go for help

If you have questions about this Code, are unsure of what would be the best course of action or how to conduct yourself in a given situation, or if you find yourself in an ethical dilemma, you are to seek assistance from your people leader or [Employee Relations](#).

Improving practices and reporting breaches

CMHC recognizes that its employees are often in the best position to assist in ensuring sound ethical practices and compliance with this Code. We encourage you to raise issues or questions in order to help improve our current practices and to report any breaches or suspected breaches of this Code to your people leader or [Employee Relations](#). Alternatively, you may report a breach anonymously via [ClearView Connects™](#).

Disclosure of wrongdoing

In cases of suspected wrongdoing, you can bring the matter, in confidence and without fear of reprisal, to the attention of the CMHC Disclosure Officer or to the Public Service Integrity Commissioner.

CMHC's Disclosure Officer can be reached via email at Disclosure-Divulcation@cmhc-schl.gc.ca or by telephone at 1-888-227-0506. An alternative (anonymous) method of disclosure is also available through [ClearView Connects™](#).

In accordance with the *Public Servants Disclosure Protection Act* (PSDPA), CMHC's *Procedure Document for Disclosure of Wrongdoing* defines "wrongdoing" as:

- a) a contravention of any federal or provincial law or regulation;
- b) a misuse of public funds or a public asset;
- c) a gross mismanagement in the federal public sector;
- d) an act or omission that creates a substantial and specific danger to the life, health and safety of persons, or to the environment, other than a danger that is inherent in the performance of the duties or functions of a federal public sector employee;
- e) a serious breach of CMHC's *Code of Ethics and Business Conduct*; and
- f) knowingly directing or counselling an employee to commit a wrongdoing set out in any of (a) to (e) above.

Wrongdoing is not restricted to the activities of CMHC employees, but also includes any wrongdoing in or in relation to the federal public sector.

Ethical Principles

Tailored to CMHC’s mission and vision, the Ethical Principles are inspired by CMHC’s Values, our willingness to do the best we can, and the legitimate expectations of our different stakeholders, such as our clients, our business partners, our employees, the communities we serve, the general public and the Canadian government. Since the “Expected Working Behaviours” section of the Code and CMHC’s policies cannot provide for all situations that you may encounter, the Ethical Principles provide broader direction.

The “Ethical Principles” provide:

- general guidance to be followed in any situation, particularly in grey areas when no specific rules apply;
- a context to help you understand how to apply the Expected Working Behaviours; and
- criteria against which to evaluate the appropriateness of your actions, before making decisions or engaging in any given behaviour.

1. SERVING THE PUBLIC INTEREST

As stewards of the public trust, we serve with fairness, equity, impartiality and objectivity. The Canadian public must be confident that CMHC programs and services are designed with this in mind.

We always put the best interests of CMHC, our clients and the Canadian public first when making decisions. All of our activities, including those that are commercial in nature, are carried out in a manner which supports our public policy objectives.

2. PROVIDING HIGH QUALITY SERVICE

We are committed to providing the highest quality service to meet the needs of our clients. This entails acting with competence, commitment and professionalism, in order to achieve the best possible results for our clients and Canadians overall. Professionalism includes providing timely and useful services, with a focus on problem solving and accountability, while also preserving the principles of integrity and mutual respect (as outlined below).

Each one of us is a crucial member of the CMHC team. However we are stronger and more useful to our clients and to Canadians when we work together by (i) soliciting help when it is needed, (ii) being receptive and open to other opinions, beliefs and ideas, (iii) participating constructively in decision making, (iv) raising issues in a timely fashion and (v) suggesting improvements as needed in order to help us achieve the highest measure of quality service.

3. ACTING WITH INTEGRITY

We seek to build and maintain the trust of our clients, our business partners, our employees and colleagues, and the communities we serve. This is essential to the successful achievement of our mission and mandate. Exhibiting competency in the design and delivery of our programs and services is crucial, but is not sufficient to maintain trust. We must also act with integrity and uphold the values cherished by the Canadian public by (i) acting honestly and with fairness, (ii) focusing on doing the right thing, (iii) taking into account the possible impacts of our decisions and actions on our stakeholders, (iv) behaving in an open and transparent manner, (v) keeping promises and commitments, and (vi) walking the talk in ethical-related matters.

4. MUTUAL RESPECT AND WELL-BEING

We believe in taking care of our well-being and that of others, and that the quality of our business and working relationships with clients, partners and colleagues is based on mutual respect. Valuing diversity and multiculturalism, fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full potential, working collaboratively and recognizing the contributions of others are key pillars to creating and maintaining a respectful and motivating workplace. We also seek to contribute proactively in matters of health and safety and to strike a healthy balance between our CMHC work and the other parts of our lives.

Expected Working Behaviours

CMHC trusts that its employees seek to do what's right. Nevertheless, this section of the Code outlines CMHC's expectations and provides a common understanding of the minimum required ethical and workplace behaviours which all employees must adhere to.

1. SERVING THE PUBLIC INTEREST

1.1 How we conduct our business

Our clients and the Canadian public expect us to conduct our business with fairness, equity, impartiality and objectivity, putting their interests before our own and respecting the law. Therefore each of us must:

- a) uphold the letter and the spirit of the law at all times;
- b) follow CMHC policies, directives, procedures, and guidelines, while respecting CMHC's financial authorities and instruments of delegation;
- c) refrain from soliciting or accepting gifts, hospitality or benefits from clients and suppliers, including invitations to attend sports, cultural or entertainment events (please see the [Conflict of Interest and Post-Employment Policy](#) for more details);
- d) refrain from offering gifts or hospitality unless they constitute a generally accepted business practice, are of a reasonable amount, respect the legal and ethical framework the receiver is subject to and are declared as business expenses;
- e) avoid seeking personal advantage when faced with opportunities that might arise due to our employment at CMHC; and
- f) ensure that the provisions of the [Vendor Risk Management Policy](#), [Procurement Policy and Guidelines](#) are observed whenever goods and services are purchased on behalf of CMHC, and that selection processes and tenders promote equal access, transparency and full and open competition.



Question & Answer

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 CMHC's objectivity and impartiality; or if it places the employee in a real, apparent or potential conflict of interest. See the Section below and the [Conflict of Interest and Post-Employment Policy](#) for more details, and feel free to discuss the situation with your people leader.

1.2 Conflicts of interest

Conflicts of interest can undermine a person's impartiality and objectivity. Moreover, when they come to be known to our stakeholders (clients, suppliers, partners, colleagues, etc.), conflicts of interest negatively affect the trust that these stakeholders have developed in CMHC.

As indicated in CMHC's [Conflict of Interest and Post-Employment Policy](#), each of us must:

- a) take the appropriate steps to ensure our conduct is free of any real, apparent or potential conflict of interest;
- b) declare any real, potential or apparent conflict of interest without delay;
- c) ensure that we abide by the provisions of the [Conflict of Interest and Post-Employment Policy](#) if we wish to engage in secondary employment or in activities involving other organizations.



Question & Answer

I have recently accepted a position on the board of a building association. Since I don't work in a sector where I might have access to specific information they could take advantage of, I haven't informed anyone at CMHC of this yet. Must I declare this position to CMHC?

Yes, because there is a risk of an apparent conflict of interest, if not a real conflict, particularly regarding the different decisions that the board will have to make on a regular basis to carry out its day-to-day business. Updating a [Conflict of Interest Declaration](#) (in myHR - My Profile) will allow CMHC to tell you what to be careful of. Mitigation measures might include, for example, recusing yourself any time the board of the association discusses CMHC programs or services.



Question & Answer

As an employee of CMHC, my job involves performing physical condition reviews on properties. Can I accept a part-time job elsewhere or have my own part-time business, doing inspections? What about my colleague, whose job involves conducting residential property appraisals? Can they?

CMHC and lenders rely on the objectivity and impartiality of all employees who perform a supporting role such as property reviews and appraisals: the information they provide serves to make important decisions. Doing the same kind of work for a third party or for your own business might end up influencing your judgement in some cases or, at least, be perceived by others as influencing your judgement. Each of us has a duty to not engage in any outside activity that impairs or could be perceived as impairing our ability to perform our official duties at CMHC in an objective or impartial manner. All secondary employment should be disclosed. Please refer to the [Conflict of Interest and Post-Employment Policy](#) for specific obligations. You can also speak to your people leader or Employee Relations if you are unsure.



Question & Answer

I have just been promoted to a position where I have privileged information on strategic directions or decisions and actions to be taken shortly by CMHC. Does this affect my responsibilities regarding conflicts of interest?

This might create new situations where you might be facing a real, potential or apparent conflict of interest, namely regarding your assets or liabilities. For example, you might have access to information regarding upcoming changes to CMHC's insurance premiums or changes to insurance or securitization product offerings, or to recommendations CMHC has made regarding some of the federal government's programs, which have not yet been publicly announced. This type of information may potentially impact the future value of certain financial interests you may have or are considering purchasing, such as publicly traded shares. When you are promoted to a new position, it is expected that you review your private affairs to prevent any such conflicts. In case of doubt, make sure to inform Employee Relations and discuss with your people leader so that the necessary mitigation steps can be taken.

1.3 Personal trading

Employees identified by CMHC as subject to special rules with respect to personal trading and disclosure of financial interests must exercise extra care in protecting confidential or sensitive information. Please see the [Personal Trading Directive](#) for additional information.



Question & Answer

The special rules mentioned above apply specifically to staff involved in or supporting internally managed investment funds. However, personal trading conflicts may be present in other contexts. For example, I often have access, in my line of work, to non-public information regarding publicly traded third parties that might have an impact on the value of their shares. How does this affect the personal trading I can do?

The *Conflict of Interest and Post-Employment Policy* states that you must not knowingly take advantage of or benefit from information that is obtained in the course of your official duties and responsibilities and that is not available to the public. You cannot allow friends, family or other third parties to benefit from this information either. This could be, for example, information on important transactions to come, on strategic decisions or upcoming announcements, or on problems they are facing.

In addition, every CMHC employee has a responsibility to prevent real, potential or apparent conflicts of interest. If your job entails regularly analyzing, monitoring and/or making recommendations or decisions regarding such third parties, for example financial institutions, you may need to reconsider the types of investments you make. An apparent or real conflict of interest could exist in such a case, which would affect your professional credibility and that of CMHC. Please see the section on conflicts of interest above, the [Conflict of Interest and Post-Employment Policy](#) and the [Personal Trading Directive](#) for more details. If in doubt, contact Employee Relations to discuss the matter and see what measures should be taken.

1.4 Use of CMHC assets

CMHC facilities and resources, including computers and digital communication devices, are public assets entrusted to us. We must use them responsibly, care for them in accordance with corporate policies, and use them exclusively for the conduct of CMHC business.

Any intellectual property that is created by an employee in the course of their employment is also a public asset, and is the property of CMHC.



Question & Answer

One of my colleagues owns a small website design business. It appears they spend a significant amount of time on this business and that they access CMHC premises to use the office printer to print and scan documents related to their personal business. Are these practices tolerated?

Employees may have outside activities, commercial or not, as long as they don't impair or are not seen to impair their ability to perform their official duties. Using what would normally be time spent on CMHC work to work on one's personal business or activity not only affects the person's and the team's efficiency, it may impact the quality of service to clients and means that funds allocated to that person's salary are being wasted. As for using CMHC resources for another company's profit, this is an improper use of the public goods entrusted to us. These practices must not be tolerated. Employees may not use CMHC resources or work time for the purpose of secondary employment or the generation of additional income. If this situation cannot be resolved by talking to the employee, in order to make the employee realize what is problematic about the improper use, or if you are not comfortable doing so, talk to your people leader or Employee Relations.

2. PROVIDING HIGH QUALITY SERVICE

Providing the highest quality service in meeting the needs of our clients is an important value at CMHC. In order to help us achieve this, we must:

- a) maintain a high level of professional competence and the most up-to-date skills in our individual fields of competence;
- b) provide services in a timely manner;
- c) share knowledge willingly and document our activities properly in order to assist each other in performing our duties;
- d) co-operate with each other in such a way that allows us to meet the client's needs in an efficient and effective manner; and,
- e) if being a member of a professional order is required for our job, remain a member in good standing, and comply with the additional professional obligations that may apply.

3. ACTING WITH INTEGRITY



IT'S IN THE LITTLE THINGS

We strive for quality in everything we do, every day. Going the extra mile, doing it with a smile, while seeking to help first and foremost, makes achieving the highest level of quality a part of everything we do.

Acting with integrity is key to trust. Even small acts lacking integrity can affect the perception of CMHC's stakeholders, and that of our peers, as to how trustworthy we really are. Our status as a Crown Corporation, whose mandate is focused on serving the Canadian public, heightens the public's expectations of CMHC in terms of our commitment to acting with integrity. In order to meet this legitimate expectation of integrity, it is important that we do the following:

3.1 Act honestly and in a way that maintains trust

- a) Operate in an honest and open manner in the conduct of our duties.
- b) Avoid any misuse of assets or misappropriation of funds.
- c) Use CMHC resources only for our work at CMHC and never for the purpose of secondary employment or the generation of additional income.
- d) Create and maintain authentic, reliable and usable records in support of ongoing business, and protect the integrity of those records for as long as is required.
- e) Refrain from making unauthorized copies of corporate or third party software, or install or use any unauthorized or "pirated" software on corporate equipment. Please refer to the [Security Acceptable Use Directive](#) for additional information.
- f) Use social media accounts with integrity and in a manner that bears the closest public scrutiny. For example, these accounts must never be used to inappropriately obtain a personal advantage or to advantage or disadvantage others. Please refer to the [Social Media Guidelines for Employee Use](#).
- g) Abide by CMHC policies on Internet usage. Note that the use of the Internet is recorded by CMHC and can be monitored at any time. Information regarding employees' use of the Internet may be collected by CMHC and used for administrative purposes, which could include disciplinary action for a violation of CMHC's policies and procedures.



Question & Answer

What are CMHC's practices regarding the recording of meetings?

The use of the record function in meetings is intended for educational or information dissemination purposes. In those circumstances, there should be explicit disclosure to all participants. Generally, recording conversations between colleagues or between a people leader and their team member(s) without the knowledge or consent of both or all individuals is not appropriate. This type of behaviour erodes trust and can cause others to question our integrity. It is also not conducive to open and constructive dialogue, nor to building positive working relationships. Inappropriate recording of workplace conversations can lead to disciplinary measures.

3.2 Protect sensitive information

Discretion must be exercised in all of our activities, particularly regarding the treatment of sensitive information. The level of sensitivity assigned to CMHC information is based on the possible impact that the release of such information to an unauthorized source can cause. Sensitive CMHC information is divided into two categories: (i) **Protected** (Protected A, Protected B) or (ii) **Classified** (Confidential or Secret). Please refer to the [CMHC Information Security Placemat](#) for additional details regarding CMHC's information classification standards.

Protected information is information that, if disclosed, may result in harm, embarrassment or other negative consequences for a given individual, entity, or CMHC. It is important to remember that such information might be misused or misquoted. Therefore even information that seems inoffensive may, if disclosed, cause harm to others. **Classified information** is information that could cause injury/serious injury to the national interest.

Protected information can be corporate, personal or third party in nature. This includes, but is not limited to, (i) personnel files, (ii) medical records, (iii) information concerning complaints or investigations and disciplinary action, (iv) a client's or third party's financial information, and (v) non-public information on a property CMHC wishes to sell. **Classified information** includes most Cabinet documents or records containing information discussed or for discussion at Cabinet meetings or by a Cabinet committee.

Therefore each of us must:

- a) take appropriate measures to properly safeguard sensitive information obtained in the course of, or in activities related to, our professional duties;
- b) restrict access to such information only to employees who have the appropriate security status or clearance, as well as the need to know for legitimate CMHC business purposes;
- c) avoid disclosing any sensitive information that we obtain through our work for CMHC without proper authorization;
- d) have a clear and legitimate need for using personal or sensitive CMHC information and refrain from using it for personal gain or the benefit of friends, family or other third parties;

EXPECTED WORKING BEHAVIOURS

- e) avoid using information collected for a specific purpose, such as a survey or market analysis, for other purposes without the consent of the people who participated, unless the use has a reasonable and direct connection to the original purpose. Refer to section 3 of the *Ethical and Responsible Use of Personal Information Directive* for more information;
- f) acquire sufficient knowledge of relevant security requirements and ensure that those requirements are respected;
- g) protect electronic accounts and passwords at all times, as they are issued to employees for the sole use of the individual to whom they are granted and avoid sharing passwords or access to accounts unless specifically authorized to do so. Please refer to the *Security Acceptable Use Directive* for additional information;
- h) limit our public comments, in social or news media or otherwise, to our area of expertise and in line with the Corporation's values and official position on the subject. Ensure that we are well prepared and, if necessary, trained to participate in public discussions on the Corporation and its activities. Advising our people leader of these activities and seeking out clarification on unclear points remain best practices. Employees can access specialized training to act as a media spokesperson or social media ambassador through Communications and Marketing. Please refer to CMHC's *Social Media Guidelines for Employee Use* for additional details;
- i) protect and safeguard all information at all times, especially when working remotely;
- j) destroy or dispose of information according to security requirements and policies and procedures for document retention and destruction; and
- k) in the case of a suspected or actual improper or unauthorized access, use or disclosure of personal information (Privacy Incident), act in accordance with the *Privacy Incident Management Protocol*.

The obligation to protect and not disclose sensitive information continues following the end of employment at CMHC.

Any questions concerning security designations/classifications and the handling of sensitive information can be directed to *Security*.

If a request for access to a CMHC record or any other confidential or sensitive information is made, please advise your people leader or direct the person making the request to CMHC's *Access to Information and Privacy (ATIP)* office or to your Human Resources representative in the event that the request is for a personnel file.



HELP PROTECT CONFIDENTIAL AND SENSITIVE INFORMATION

Consult sensitive information only on a need-to-know basis

Log out or shut down your computer before leaving it unattended

Avoid using the speakerphone for confidential discussions

Don't let others use your passwords

Lock up confidential documents when not in use

Be careful when forwarding e-mails: sensitive information may be included

Protecting confidential information is everyone's business!

Employees must immediately report all instances of a breach of confidentiality, or unauthorized disclosure of confidential or sensitive protected information to their people leader. In the case of a suspected or actual improper or unauthorized use, access or disclosure of personal information (Privacy Incident), act in accordance with the Privacy Incident Management Protocol.

4. MUTUAL RESPECT AND WELL-BEING

CMHC endeavours to provide business relationships and a work environment that foster respect, equality, co-operation and that are conducive to professional growth and self-esteem. Diversity of culture, experience and thought is viewed as enriching the workplace, making it more interesting and productive. It can also fuel innovation and help us better respond to our clients' needs. We also promote a safe and healthy work environment.

CMHC expects every employee to contribute to mutual respect and well-being by doing the following:

- a) always treat others, be they clients, partners, colleagues or members of the public, in a courteous and professional manner;
- b) avoid discrimination. The Corporation will not tolerate discrimination by or toward employees on the following grounds: race, national or ethnic origin, colour, religion, age, sex, marital status, family status, sexual orientation, gender identity or expression, genetic characteristics, disability (physical or mental disability, including dependence on drugs or alcohol) or conviction for which a pardon has been granted or in respect of when a record suspension has been ordered;
- c) abstain from uttering offensive remarks or offensive jokes, bullying, workplace violence or the threat of violence, harassment (including but not limited to sexual harassment) as described in CMHC's Work Place Harassment and Violence Prevention Policy or participation in any of these behaviours;
- d) report to your people leader or to Employee Relations any of the behaviours stated above;
- e) take appropriate measures to protect the health and safety of other CMHC employees and other persons;
- f) consider the impact of your behaviour on the work environment and on those around you, and avoid negatively impacting others;
- g) uphold CMHC's commitment to the promotion of Canada's official languages and to ensuring that CMHC's products and services are offered to the public in both official languages. See our Official Languages Policy for more information;
- h) when using personal social media accounts or participating in any other public forum, remember your duty to act professionally. Your comments should reflect CMHC's values and comply with the expected working behaviours. For example, do not make negative or inappropriate comments about other employees, CMHC programs or policies, or about clients, outside individuals, organizations or government entities with which CMHC interacts. Please refer to the Social Media Guidelines for Employee Use;
- i) dress in a manner that respects the professional image of CMHC.



FOLLOW YOUR NOSE

Did you know that scents can trigger the symptoms of individuals with allergies and asthma or provoke headaches and/or nausea? Balancing our personal wants and other people's needs is a key component of respect.



Question & Answer

One of my colleagues tends to have violent outbursts and swear when he is stressed. This makes some members of our team uncomfortable, and even stressed, while others tend to brush it off as unimportant, saying that's just how he is and that he means no harm. Is such behaviour acceptable at CMHC?

Even if there is no intent to cause harm or be disrespectful, if some people consider this disrespectful or if this causes them discomfort or stress, it disrupts the work climate and is not conducive to good relationships. In addition, people may start avoiding this person, which will have an impact on collaboration and the effectiveness of the team. If this situation cannot be resolved by talking to the person, or if you are not comfortable doing so, contact your people leader or Employee Relations for assistance.



INCIVILITY: NOT THAT BIG AN ISSUE?

Rude, insensitive or demeaning words and behaviour constitute incivility and a lack of respect. This includes talking behind someone's back, bullying, or voluntarily ostracizing or ignoring someone. Although they may seem inconsequential compared to deviant behaviours, such as harassment or physical abuse, they have negative impacts on workplace morale, productivity, work satisfaction, team co-operation, and personal well-being.

CMHC people leaders have an important role in ensuring mutual respect and well-being at CMHC. Namely, they must use their authority wisely and with discretion and respect. They must also consider the work-life balance of employees when determining how to meet operational requirements.

Our safety and well-being is everyone's business!

Responsibility to report an occurrence (CMHC Work Place Harassment and Violence Prevention Policy)

If you become aware of or are subjected to an occurrence of harassment or violence, you must report it to your people leader or to Employee Relations. An alternative method of anonymously reporting an occurrence is available through ClearView Connects™.

Any people leader who witnesses or becomes aware of an occurrence of work place harassment or violence, must report the occurrence to Employee Relations.

Responsibility to Report an Emergency

Should you experience or witness an occurrence which constitutes an emergency and requires immediate intervention, you should dial 911 directly and request assistance. This occurrence is to be reported to the National CMHC Security Control Centre at 613-748-2911 as soon as possible after the occurrence.

5. RESOLVING INTERPERSONAL CONFLICT

Resolving interpersonal conflicts and disagreements in a peaceful and collaborative manner helps foster a healthy work environment and maintain team spirit and motivation. When interpersonal conflicts or ethical issues on which agreement is difficult to achieve occur, CMHC employees are encouraged to discuss and resolve these matters between themselves, informally, or with their people leader. Employees can also seek advice and support from Employee Relations.

CMHC trusts its employees to try to resolve interpersonal conflict in a fair and respectful manner, with a view to resolving the issues underlying the conflict. People leaders are responsible for encouraging and maintaining an ongoing dialogue on respect, values and ethics in their area of responsibility, and assisting their employees in conflict resolution. When informal conflict resolution is unsuccessful, Employee Relations is available to provide advice and assistance regarding methods for resolving disputes.

6. BREACH OF THE CODE

- 6.1** Adherence to the Expected Behaviours of the Code is a condition of employment for every CMHC employee, regardless of the position occupied within the organization, and regardless of any relationships (including family and significant personal relationships) that may exist within the workplace. A breach of this Code will result in the application of disciplinary measures, including a reprimand or suspension in accordance with CMHC's *Disciplinary Measures Directive*. In the case of a serious breach or recurring breaches of the Code, employment with CMHC may be terminated.
- 6.2** In addition to compliance with this Code, you are required to follow all CMHC policies, directives, procedures, processes and business practices. You are also expected to respect the requirements of legislation applicable to CMHC and its employees including the *Canada Labour Code*, the *Canadian Human Rights Act*, and the *Access to Information Act*, the *Privacy Act*, and the *Public Servants Disclosure Protection Act*. Conduct that is illegal, dishonest or unethical constitutes a breach of this Code, and may be subject to prosecution under the Criminal Code whether or not the conduct is specifically addressed in the Code.
- 6.3** CMHC reserves the right and may be obligated to report breaches of the Code to law enforcement authorities.
- 6.4** Any reports of a breach of this Code must be made in good faith and with an honest belief that misconduct has occurred. CMHC employees shall not attempt to malign a person or gain advantage through frivolous or unfounded complaints. Frivolous or malicious complaints, or complaints not made in good faith will be considered a serious breach of this Code.
- 6.5** Retaliation, in any form, toward a person who has raised issues, concerns or problems in good faith will be considered a serious breach of this Code.



Question & Answer

I've noticed that some training at CMHC is designated as mandatory training. What are the consequences of not completing this training?

CMHC takes care to limit the amount of mandatory training that employees are required to complete. Training that is required as a term and condition of employment, such as the Code of Ethics and Business Conduct training, or that is legislatively required, such as harassment and violence prevention training or privacy training, is mandatory for all CMHC employees. Failure to complete such mandatory training is a breach of this Code and is subject to appropriate disciplinary measures per Section 6.1.

7. DISCLOSURE

- 7.1** If a CMHC employee has information that could indicate a serious breach of this Code, they are obliged to bring the matter to the attention of their people leader.
- 7.2** In the case of “wrongdoing” as defined in the *Public Servants Disclosure Protection Act*, employees should bring this to the attention of the CMHC Disclosure Officer, or may alternatively refer such matters to the Public Sector Integrity Commissioner. CMHC’s Disclosure Officer can be reached via email at Disclosure-Divulgestion@cmhc-schl.gc.ca or by telephone at 1-888-227-0506.



Question & Answer

Is speaking up a career limiting move?

I know that I won’t be fired if I raise concerns I have about some of our practices, but what about more subtle forms of retaliation, such as being reassigned to less desirable assignments, losing an opportunity for promotion or having to endure veiled threats or harassment from colleagues? Am I protected from those?

This Code prohibits the termination, reassignment, demotion, or any harassment of employees who raise, in good faith, any breaches of this Code or any other CMHC policy, directive or procedure. CMHC will investigate any allegations of retaliation resulting from an employee’s reported breach and if allegations are substantiated, the individuals involved will be disciplined accordingly.

Roles and Responsibilities

Role	Responsibility
President and VP, People and Culture	<ul style="list-style-type: none"> • Ensure a workplace that complies with the Code of Ethics and Business Conduct.
People Leaders (all levels)	<ul style="list-style-type: none"> • Provide advice and guidance to their direct reports. • Act as role models and in a way that demonstrates compliance with expected working behaviours, ethical principles, CMHC values, etc. • Ensure direct reports have completed their Conflict of Interest Declarations and any mandatory training. • Consult with Employee Relations as needed.
Employee Relations	<ul style="list-style-type: none"> • Provide advice and guidance to CMHC employees and People Leaders on matters relating to this Code, including but not limited to expected working behaviours, workplace conflicts, conflict of interest and ethics, secondary employment and post-employment. • Respond to complaints or notices of incidents relating to work place harassment and violence. • Communicate and raise awareness on matters related to the Code and conflict of interest. • Ensure compliance with the Code and make recommendations on disciplinary measures in the event of a breach of the Code, as appropriate. • Provide recommendations to the Sector Head or VP, People and Culture on matters related to this Code in consultation with the Legal Services Division, as required.
Employees	<ul style="list-style-type: none"> • Familiarize themselves with this Code and comply with the requirements outlined herein. • Consult with their People Leader and/or Employee Relations when in doubt regarding requirements and expectations relating to this Code. • Complete all mandatory training, as requested.

Reference Documents

- *Access to Information Act*
- *Canada Labour Code*
- *Canadian Human Rights Act*
- *ClearView Connects(TM)*
- *CMHC Information Security Placemat*
- *CMHC's Procedure Document for Disclosure of Wrongdoing*
- *Code of Ethics and Business Conduct and Conflict of Interest – Avenues for Resolution*
- *Conflict of Interest and Post-Employment Policy*
- *Disciplinary Measures Directive*
- *Ethical and Responsible Use of Personal Information Directive*
- *Ethics and Business Conduct Scenarios*
- *List of Associations – Conflict of Interest*
- *Official Languages Policy*
- *Vendor Risk Management Policy*
- *Procurement policies and Guidelines*
- *Personal Trading Directive*
- *Privacy Act*
- *Privacy Incident Management Protocol*
- *Public Servants Disclosure Protection Act (PSDPA)*
- *Security Acceptable Use Directive*
- *Social Media Guidelines for Employee Use*
- *Values and Ethics Code for the Public Sector*
- *Work Place Harassment and Violence Prevention Policy*

APPENDIX A

Ethical Decision-Making Tool

The purpose of this tool is to help you make the best possible decisions in situations where the Code and other CMHC policies, directives and procedures are insufficient.

It is important that you go through the whole decision-making process before making your decision and have collected as much information as possible to properly apply the test. If you are still unsure after having used this tool, discuss the situation with a colleague, your people leader or Employee Relations before you act.

STEP 1: FACTS AND POSSIBLE OPTIONS



<p>What are the facts?</p>	<p>What verifications do you need to make to ensure you have all the relevant facts?</p>	<p>What are your options?</p>	<p>How do I feel about the situation? Do my emotions/gut feelings give me additional information?</p>
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STEP 2: CONSEQUENCE AND VALUE ANALYSIS



<p>What laws, CMHC standards, rules, policies, directives and expected behaviours are applicable to this type of situation, if any?</p>	<p>Who are the stakeholders who will benefit from or be impacted by this decision? (clients, employees, CMHC, partners, local community, Canadian public, environment, me...)</p>	<p>What would be the consequences of each option on each stakeholder? (short and long term; positive and negative)</p>	<p>What values and CMHC ethical principles are upheld, or negatively affected, by each of these consequences?</p>
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STEP 3: RIGHTS AND FAIRNESS ANALYSIS

			
Am I respecting fundamental human rights and human dignity with each option?	Am I treating everyone fairly in each option?	Am I treating people only as means to other ends, or as human beings with needs and goals of their own?	What would happen if everyone acted the same way as this option suggests?

STEP 4: ORGANIZATIONAL ANALYSIS

			
Which option would be in CMHC's best interest in the long term? Which one would be most consistent with our mission and mandate?	Will each option project a professional and responsible image of myself, my colleagues and CMHC?	Which option would have the best impact on public trust toward CMHC?	Which option is more likely to preserve trustful and harmonious relationships with our different stakeholders?

STEP 5: DECISION

			
Considering all of these factors, what would be the best decision, under the circumstances and why (ethical justification)?	Is it the best I can do in the circumstances? Would either option make me feel embarrassed, guilty or ashamed if my boss, my peers or the public knew the decision I had taken?	Could I find a better solution if I was a bit more creative or if I thought things through more?	How can I minimize the residual negative impacts of this decision and take the important values I discarded in my decision into account, in the way I implement my decision?

Reference: D. Girard, Ethical Decision-Making Framework, 2004, rev. June 2015 ©

