

FinDev  
Canada



# Code of Conduct



# Message from the CEO



**Lori Kerr**

Chief Executive Officer,  
FinDev Canada

At the time of this writing, I am still fairly new to my role as FinDev Canada's Chief Executive Officer. Many aspects drew me to join this amazing organization — and I could not be more excited about our future.

In just a few years, FinDev Canada has already made its mark as an effective development finance institution, making a difference in emerging economies around the world. Last year alone, we doubled the size of our team yet *tripled* our portfolio's commitments to financial institutions (to almost \$90 million) and *quadrupled* the number of jobs supported by our clients — with over 40 percent of those jobs going to women. Our efforts in 2020 also doubled the sustainable energy production of our portfolio companies, delivering clean energy to an additional 1.5 million people.

Whilst these are exciting achievements in their own right, they represent a strong foundation for our future growth and ongoing success. In the months and years ahead, FinDev Canada will continue to lead impact — supporting more private investment, expanding our portfolio, and making a difference to people around the world and to our environment.

Our shared excitement about this journey is also central to the reason I am writing this letter. As FinDev Canada grows and maximizes impact, it is more vital than ever that we maintain the public's trust and continue to protect our reputation as an organization that upholds the highest standards of ethical and responsible business.

This is no simple task. The work that we do is complex. It also happens at the intersection of public and private sector interests, and, of course, development financing. Our business attracts a high degree of scrutiny, from governments, media, and civil society, which translates into a clear fact that how we do business is just as important as *what* business we do. The world is watching, and its expectations are high.

All of this is why our Code of Conduct is so critical. The Code provides the rules and approaches that govern our ethical behaviour. No matter what your role at FinDev Canada, it is critical that you take time to know and understand the Code.

As we continue to expand, our work is going to become only more complex. It is up to all of us to do everything we can to support FinDev Canada's objectives for making a difference, for growing businesses in developing markets, empowering women and protecting our planet. Understanding and respecting our Code of Conduct helps to ensure we all make that happen.

Thank you for your attention to the Code, and for your efforts to protect what FinDev Canada does by ensuring how we work meets the high expectations of the world we are trying to help.

A handwritten signature in black ink, appearing to be 'Lori Kerr' with a stylized flourish at the end.

# Message from the Board Chair



## **Mairead Lavery**

*President & CEO Export  
Development Canada*

*Board Chair, FinDev Canada*

One of the many privileges of holding the dual roles of CEO for Export Development Canada and Chair of FinDev Canada, has been having a front row seat on the evolving relationship of these two organizations. One, the parent, with the role of growing Canadian trade around the world; the other, its progeny, helping to grow investments in developing economies, advancing quality of life for women around the world, and protecting our environment.

On paper, FinDev Canada is still a subsidiary of the older, more established EDC. In fact, it is emerging as its own distinct enterprise, with a unique mandate and an already impressive track record of having impact all its own.

Since taking on the Chair's role I have also seen the emergence of a distinct identity and pride in this young organization. FinDev Canada is making its mark, and others are noticing. In the last year we have undergone the successful review of our operations from Global Affairs Canada, and received recognition in the last Federal Budget in the form of approval of \$300 million recapitalization. Of course, we've also seen our investments making an important difference for people and communities around the world. And we've done it all carrying our nation's flag and representing the brand of Canada.

This is yet another privilege all of us in both companies share — we represent our country and its values. And like all privileges, this comes with responsibilities.

Our Code of Conduct is an important tool. It provides guidance, sets the expectations, and answers our questions concerning our ethical conduct. It is a document EDC and FinDev Canada both share, because it speaks to the values and standards we hold in common.

As FinDev Canada charts its own course through the next phase of its evolution, it will continue to grow in size, expand its relationships and influence, and attract new opportunities and attention. As our profile rises with our impact, the stakes are increasing. It's more important than ever that we all work together to ensure the attention we attract is always for the right reasons.

By understanding and respecting our Code of Conduct, we all are doing our part to protect this organization's reputation, and our ability to continue its important mission.

Thank you for making that effort.

*Mairead Lavery*

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SECTION 1

# We Stand for Ethics and Integrity

## We Understand and Honour Our Code

Our Code of Conduct (Code) serves as the foundation for how we do business and helps define our culture and reputation for ethical excellence. Our ethics and integrity permeate every interaction we have—with customers, each other, our shareholder and society—and our Code helps us navigate the complexities of our business.

Our Code touches many areas of operation and employment. It cannot however address every circumstance, legal requirement or cultural sensitivity we may face, which is why we should review the relevant policies and other resources available on [LiveWire](#).

## We Lead by Example

All of us play a role in upholding and improving our ethical culture and demonstrating our commitment to the Code. We also expect leaders to be role models to others and set an example by their own actions. We are all responsible for:

- Embracing our responsibilities under the Code by taking initiative, ownership and accountability for our decisions and actions.
- Safeguarding our reputation by considering how others, including the public, may perceive our actions and decisions.
- Participating in our compliance requirements by reading and understanding the Code, as well as completing any training and certification.
- Speaking up when we have questions or concerns.

Leaders play a critical role in meeting our commitments. With leadership comes a heightened level of responsibility for:

- Never leaving the impression that it is acceptable to compromise our integrity or reputation to accomplish business goals.
- Actively listening and encouraging healthy debate of all views & opinions, collaborative thinking, ethical decision making and raising concerns.
- Respectfully listening to concerns and escalating issues and conflicts through proper channels such as a leader, the Senior Officer for Internal Disclosure or other [Code Resource](#).
- Helping to create a climate where employees feel safe to say what they think by encouraging employees to speak up and listening to their candid opinions, concerns and suggestions, ensuring a zero-reprisal environment.



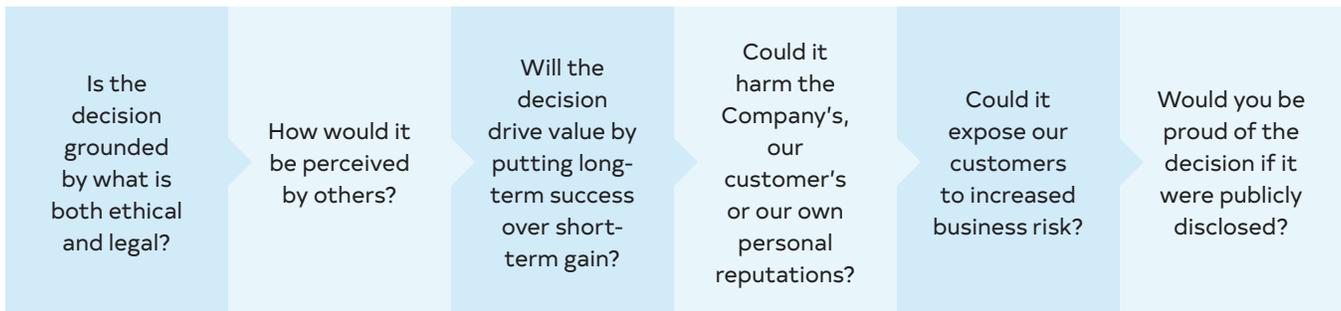
### WE SUCCEED BY:

- Understanding that all employees, permanent and contract, including those on secondment to or from EDC with other organizations, are expected to honour and comply with our code, policies and applicable laws, wherever we do business.
- Knowing that each of us are held accountable not only to our code but also to the standards detailed in the [Values and Ethics Code for the Public Sector](#).



## We Make Business Decisions Based on Integrity and Sound Judgement

We are encouraged to make decisions that benefit our customers. With this comes a responsibility to place our ethical compass at the core of each and every choice we make. All of us must ensure that the decisions made and actions we take are within the confines of our responsibilities and delegated authority. Never assume that our decisions and actions won't be open to public scrutiny. In instances where the direction we should take is not clear, we should ask ourselves the following questions:



Making ethical decisions begins and ends with each of us. When in doubt, we should seek clarity and guidance from a [Code Resource](#) which are listed on page 27.

## We Speak Up When We Have Questions or Need to Report Concerns

Speaking up, asking questions or sharing concerns when something doesn't seem right is important and keeps us on track. Every single one of us, regardless of our role, has a personal duty and obligation to ask questions and raise concerns in good faith. If there are any concerns of something not right, we should talk to a [Code Resource](#) with whom we feel comfortable. The Company takes all concerns raised seriously and will look into all matters that are raised as promptly as possible.

## We Have Zero Tolerance for Reprisal Against Others

Everyone should feel comfortable speaking up without fear of any form of reprisal. If there are concerns that someone has been the target of reprisal as a result of speaking up it should be raised to a [Code Resource](#). Any reporting of acts of reprisals committed against another individual will be reviewed and may lead to disciplinary action up to and including termination of employment.

## We Cooperate in Investigations

At times, we may be called upon to assist with an internal or external investigation. The details of the investigation will be kept confidential wherever possible, consistent with resolving the issue and in compliance with applicable laws. Regardless of whether an investigation is conducted by external or internal parties we are expected to cooperate fully with the investigators.

## We Are Accountable for Our Actions

We are all accountable for our actions and decisions and have an obligation to adhere to our Code, policies, standards, guidelines and procedures and applicable laws. Despite our strong commitment to ethical conduct, violations of our Code, our policies and other standards can occur. If a violation is found, then we will take appropriate action. Depending on the severity of the violation, this can include enhanced controls, coaching, communication, training or disciplinary action up to and including termination of employment. In circumstances that warrant, situations may be referred to external authorities.

*Reprisal occurs when someone is subjected to an action or mistreatment for speaking up or raising a concern in good faith or cooperating in an investigation. Complaints of reprisal will be taken seriously. Examples of reprisal include disciplinary action, demotion, termination of employment, actions that adversely affect employment or working conditions—or a threat to do any of those things or to direct someone to do them. Reprisal is not tolerated.*



### WE SUCCEED BY:

- Cooperating in investigations in a truthful and honest manner while maintaining the confidentiality of the situation.
- Immediately contacting Legal Services and/or the Vice-President and Chief Compliance & Ethics Officer if we receive a request from a regulator, an authority or are issued a notice of legal action or subpoena.
- Ensuring that no one is subject to reprisal of any form for cooperating in an investigation.
- Reporting questionable behaviour and concerns as soon as reasonably possible.

# Inclusive business for a sustainable future



## SECTION 2

**We Stand for Trust with Our Customers and Other Stakeholders**

## We Drive Growth with Integrity

We are committed to growing our business while serving our current and future customers with passion, perseverance and integrity. We have built our reputation on how we serve our customers and we strive to build on our foundation of trust in order to retain current customers and serve new customers. We achieve our success by aligning our business goals with our customer's priorities and conducting business with integrity.



### WE SUCCEED BY:

- Achieving our targets with honesty and professionalism.
- Understanding our customer's business risks and ensuring that we provide solutions that take into consideration our customers' long-term business sustainability in addition to the customer's short-term business objectives.
- Communicating clearly with our customers to ensure they understand the risks they are exposed to and how our products and services can meet their needs.
- Addressing complaints from customers promptly and with the utmost professionalism.

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

## We are Responsible When Giving or Receiving Gifts, Hospitality & Other Benefits

Giving or receiving of gifts or hospitality may be common business practices, but too often can be misinterpreted or suggest the appearance of something improper, even when there is no inappropriate intent. We are committed to doing business based strictly on the value of the services we offer and not on gifts, hospitality or other benefits we extend or accept.

### Before offering or accepting any gifts, hospitality or other benefit, ask the following questions:

Is it considered a normal expression of courtesy, and consistent with local standards and customs, without the appearance of favourable treatment?	Yes
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Could it call into question your or the Company's objectivity or impartiality?	No
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Could it compromise the Company's integrity or reputation?	No
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Can it influence anyone's judgement or performance?	No
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If your answers are not the same as the above, the exchange could be damaging to both yourself and the Company. You must not proceed without consulting a [Code Resource](#) first.



### WE SUCCEED BY:

- Avoiding giving or receiving gifts, hospitality or other benefits that could give the appearance of impropriety.
- Being aware that attempts at gift giving or making a gesture of hospitality to a government official can be illegal and that we must contact Legal Services for advice in these situations.
- Advising our third parties of our policies regarding the exchange of gifts and hospitality.
- Making certain that the exchange cannot impact anyone's objectivity or good judgement—or even have the appearance of doing so.
- Being aware and sensitive that others may have their own gifts and hospitality policies.
- Only giving or accepting gifts in accordance with our [Policies and Guidelines and disclosing](#) gifts, hospitality or other benefits through EDC's [Disclosure Hub](#).

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

## We Have Zero Tolerance for Bribery and Corruption

We are dedicated to conducting our business responsibly, free of any form of bribery or corruption and in compliance with all applicable anti-bribery and anti-corruption laws and regulations. All of us should strive to know our customers better. We should not hesitate to raise concerns or ask questions if something does not seem right.

**Nearly anything of value can be considered a bribe if it is used to benefit someone personally and influence a business decision. This includes:**

- Payment of travel expenses—especially when there is no clear business purpose for the trip
- Gifts and hospitality including, cash, gift cards or gift certificates
- Personal services—such as a personal chef
- Political contributions

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

## We Take Measures to Prevent Money Laundering and Terrorist Financing

We recognize the role that we can and should play in combatting financial crime. We do not tolerate, aid, or support money laundering or terrorist financing in any part of our business. We are committed to complying with all applicable laws relating to this global problem and to taking measures to preventing our products and services from being used to further money laundering and terrorist financing.

***Money laundering** is the process by which the funds or proceeds of criminal activity, such as drug trafficking, are moved through legitimate businesses in order to hide all traces of their criminal origin. Terrorist financing refers to funding for terrorist activities and can come from legitimate or criminal sources.*

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).



### WE SUCCEED BY:

- Performing the necessary due diligence to ensure that we do not knowingly engage in, or support any transaction that involves, any form of bribery or corruption.
- Raising concerns to leaders if we, in good faith, suspect any illicit or unethical activity by parties involved in business ties to EDC or its subsidiaries.
- Raising potential concerns of bribery to Financial Crimes or a [Code Resource](#).



### WE SUCCEED BY:

- Knowing our customers by conducting due diligence.
- Raising any situation that looks unusual or may indicate that someone is using or wants to use their transactions for money-laundering.
- Escalating unusual situations to Financial Crimes or a [Code Resource](#) for further review.

## We Safeguard the Information in Our Care

We all have access to confidential information about the Company, our colleagues, our customers, and/or other third parties. We are entrusted to protect this information and safeguard it from any breach or unauthorized access/ disclosure. Inappropriate use or mismanagement of information threatens the public trust and can result in a violation of law and contracts. We should only access confidential information if we have a legitimate business reason to do so and only share it with those in EDC and FinDev Canada that have a need to know. We also hold any outside party who is given access to this information accountable for protecting it.

**Although not everything is confidential customer information, customer information can only be shared with others when we have written consent to do so.**

When in doubt it is important to contact a [Code Resource](#) before sharing or using confidential information for any purpose.

Some types of confidential information include:

- Customer or other third-party information
- EDC information
- FinDev Canada information
- Personal information
- Government sensitive information

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).



### WE SUCCEED BY:

- Presuming that any information we receive is confidential.
- Seeking clarity on what constitutes confidential information from a [Code Resource](#).
- Only collecting, using and disclosing personal information in accordance with our [Policies and Guidelines](#).
- Honouring any confidentiality agreements and other contractual terms that apply to our relationships.
- Being careful when discussing or working with confidential information so that others cannot overhear or see it.
- Protecting the intellectual property of EDC, FinDev Canada and others, and avoiding any infringement, including copying the information of others for our own use. Intellectual property includes copyrights, patents and trademarks of EDC, FinDev Canada and others.
- Reporting any suspected or actual breaches immediately to a [Code Resource](#).
- Remembering that our confidentiality obligations continue after our employment ends.

## We Do Not Tolerate Insider Trading

Through our work, we have access to material, non-public information (MNPI) about other companies and we must never use this information, or provide "tips" to our family members or friends, in trading activities. This applies to transactions or trades conducted by, or on behalf of EDC or FinDev Canada, or in our personal accounts or any other account over which we have direct or indirect control. Having access to MNPI makes an individual an Insider.

**Insider Trading is when an individual has MNPI and trades stocks or other securities.**

MNPI is any information that has not been made public that an investor would value. Examples include:

- Information about financial results, a merger, purchase, sale or joint venture
- Changes in orders or information about major contracts
- Important management changes
- Gain or loss of a significant customer or supplier



### WE SUCCEED BY:

- Safeguarding MNPI and not sharing it with anyone else, including coworkers, family members or friends.
- If we choose to conduct personal trading activity, ensuring that we do so in full compliance with applicable securities laws and our Policies, Standards, Guidelines and Procedures.
- Understanding that the consequences for violations of security laws can be severe, including civil and/or criminal penalties regardless of value.
- Ensuring that all necessary disclosures or approvals are completed when related to our personal assets and liabilities.
- Not allowing the information we have to inappropriately influence any business activities conducted on behalf of EDC and/or its subsidiaries.

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

## We Work with Third Parties Who Honour Our Commitments

We set high standards of performance for ourselves and the products and services we offer. We base our relationships with our third parties on lawful, fair, and ethical business practices.

We expect our third parties to adhere to all applicable laws and principles of ethical business conduct, as set out in more detail in the EDC Supplier Code of Conduct and Agreement on Principles of Conduct.



### WE SUCCEED BY:

- Selecting third parties after conducting appropriate due diligence and by following our information protection and procurement rules.
- Making decisions based on objective criteria such as the quality, price and reliability.
- Raising concerns of any activity that could be in breach of contractual obligations to Vendor Management or a [Code Resource](#).

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).



SECTION 3

# We Stand for Accountability

## We Recognize and Disclose Actual, Potential and Apparent Conflicts of Interest

We are trusted to act in the best interest of EDC, its subsidiaries and our customers. On the business side, this means making sure that all business decisions are free from any actual, potential, or apparent, conflicts of interest. Our business decisions must be based on sound judgement, objectivity and impartiality.

Conflicts of interest may also arise when we put our personal interests ahead of our commitments to EDC and FinDev Canada. Examples can include outside employment and personal or close financial relationships with parties within or connected to EDC or FinDev Canada.

Having a conflict of interest is not necessarily a violation of our Code, however, failing to disclose one is.

### When evaluating a potential conflict of interest, ask the following questions:

Could it be a real, apparent or potential conflict of interest?

Would it interfere with our performance at the Company or decrease the quality of our work?

Can it impact our capacity, or be perceived to influence, our ability to perform our jobs objectively and impartially?

If we answered "yes" to any of the above questions, we must seek guidance from a [Code Resource](#) and disclose the situation.



### WE SUCCEED BY:

- Knowing that recognizing, avoiding and disclosing potential conflicts of interest is critical to protecting our reputation.
- Removing ourselves from any decision which could give the appearance of partiality or bias.
- Understanding that outside employment and activities can represent conflicts of interest and impact our ability to perform in our roles.
- Not allowing these activities to interfere with our impartiality (or be perceived as such), with our obligations to protect the confidentiality of information or our roles at EDC and FinDev Canada.
- Remembering that actual and apparent conflicts of interest must be disclosed through the [Disclosure Hub](#) and managed under our [Policies, Standards, Guidelines and Procedures](#).

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

## We Are Conscientious When We Create Business Documents

When we create any business document, we are committed to ensuring that they are complete and truthful. These documents are used to make responsible business decisions and to provide honest information to our customers, regulators and other stakeholders. Recording information accurately is critical to running our business and satisfying our legal disclosure and retention requirements.

## We Use Technology Responsibly

To ensure our success, we are all given access to technology resources such as laptops and smartphones. When using these resources, as well as other Company assets, we must be prudent and responsible and use them in ways that advance our business purpose. By following the recommended security controls and measures that have been established, we strengthen our human firewall, protecting the Company and customer information from accidental or unauthorized disclosure, misuse, improper alteration or destruction.

Our technology resources include EDC and FinDev Canada network, internet access, intranet access, email and instant messaging, as well as EDC issued mobile phones, computers and tablets.

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).



### WE SUCCEED BY:

- Being honest and accurate in all documentation including expense reports, business reports and transaction records.
- Creating business records and other documents including e-mail in a professional manner.
- Remembering that any record created, collected or obtained through our work is the property of EDC and/or FinDev Canada and can be accessed publicly under applicable laws.



### WE SUCCEED BY:

- Using our technology resources primarily for business use.
- Exercising sound judgement at all times when using our technology in order to protect the integrity of EDC and FinDev Canada.
- Ensuring that our networks and systems remain secure by setting strong & unique passwords and not sharing them with others.
- Taking care to compose all emails, text messages and other electronic communications in a professional manner.
- Not expecting that the information we send or receive is private and understanding that activity may be monitored.

## We Communicate with Transparency and Honesty

The way we communicate with the public is important. It sets the tone for the organization and is essential to maintaining a positive reputation. All communications about our business must be honest, accurate and consistent. We are also bound by very specific rules about how and when information about EDC, and its subsidiaries, is released to the public. Unless we have been specifically authorized by EDC or FinDev Canada, we should never disclose any information about our customers or business activities to anyone outside the organization.



### WE SUCCEED BY:

- Protecting confidential information from disclosure to any unauthorized party without appropriate approval and written consent.
- Forwarding any requests from the media to Corporate Communications and Public Affairs.
- Using discretion when using social media for personal use considering the potential consequences to EDC and FinDev Canada.

***Social media** can be an effective way to stay current with friends and family. While we encourage employees to support our brand and trade insights with their social networks, we should take care to promote only information that is already publicly available through official social media channels.*

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).



SECTION 4

**We Stand for Respect  
with Each Other**

## We Promote Inclusion, Diversity & Equity

We value and promote inclusion, diversity and equity in every aspect of our business and at every level of our organization. This means ensuring everyone — including Black people, Indigenous Peoples, people of colour, and those of various genders and abilities — feels welcomed and included, and is treated fairly, with dignity and respect. We know that through collaboration and inclusiveness we are able to provide the best solutions for EDC, FinDev Canada and our customers and that they often come from the individual differences, unique perspectives, and beneficial contributions that each one of us brings to our business. In addition to being the right thing to do, maintaining a welcoming and respectful work environment enables us to combine our individual talents and skills to best serve our customers.

## We Provide a Work Environment Free from Harassment and Discrimination

We are committed to maintaining a safe and positive work environment where the principle of equality of opportunity enables personal fulfillment and shared success. Cultivating a positive and engaging work environment requires that we instill an environment that is free from harassment, discrimination and intimidation. We do not tolerate or behave in a manner or act in a way that harasses, degrades or discriminates against others.

**Discrimination** is any distinction, exclusion or preference based on 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.

**Harassment** is any behaviour that has the effect of demeaning, humiliating or embarrassing a person and which a reasonable person should know is unwelcome. Such behaviours can include written or verbal comments, unwanted sexual behaviour or physical assault.



### WE SUCCEED BY:

- Focusing solely on a person's qualifications, abilities, experience and performance when making employment related decisions.
- Being aware of how our actions and words may make others feel.
- Avoiding actions that someone else might interpret as intimidation, bullying or favouritism.

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

## We Strive to Create a Healthy and Safe Workplace

We are committed to ensuring a healthy and safe work environment. As individuals we also take accountability for our own health and wellness and are expected to take steps to protect the safety of others.



### WE SUCCEED BY:

- Complying with relevant health and safety policies and applicable laws.
- Raising a concern to a Code Resource if a situation appears unsafe or if asked to perform a task that we feel is unsafe.
- Performing our work responsibilities while not impaired by alcohol or drugs.
- Knowing that threats, intimidation, aggression, harassment or violent behaviour of any kind will not be tolerated.

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

FinDev  
Canada

The logo consists of a stylized 'F' and 'D' intertwined, with a 'C' shape around them, all in a circular arrangement.

SECTION 5

**We Stand for  
Strengthening Our Society**

A circular icon representing Sustainable Development Goal 17 (Partnerships for Sustainable Development), showing a globe with colorful segments.

**2021**

A stylized graphic of the year '2021' with horizontal stripes.

## We Respect Human Rights

We embrace the role we play in the global environment through our involvement as an organization as well as evaluating the impact of the transactions we support. We are committed to upholding our legal and international obligations, and actively working to implement the United Nations Guiding Principles on Business and Human Rights and promoting individual health and welfare.

## We Are Dedicated to Corporate Social Responsibility

We strive to carry out our business in a socially responsible manner with a focus on longer term business success and sustainability for our customers, for EDC and FinDev Canada. We integrate values such as honesty, respect, fairness and integrity into our daily business practices. We recognize that our day-to-day operations have a number of direct and indirect impacts on society and the environment. By fostering a culture of broader business risk awareness, we position our customers to help mitigate and manage negative impacts of their business, setting them up for longer term success and business sustainability.

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).



### WE SUCCEED BY:

- Treating others with dignity and respect and upholding human rights.
- Striving to strengthen the communities where we live and work by engaging our employees and partnering with organizations to assist the most vulnerable.
- Identifying and assessing the impact that our transactions may have on the human rights of individuals and structuring our potential support to prevent and mitigate these impacts as much as possible.



### WE SUCCEED BY:

- Reviewing and understanding the environmental and social impacts of the transactions and businesses we support.
- Conducting our business in a transparent manner as possible, in order to maintain stakeholder trust and confidence.
- Adopting initiatives that foster sustainable business and environmental responsibility.



SECTION 6

# We Stand for Our Reputation

GO CREATIVE  
PARTENARIATS  
AGENCE COLLABORER  
ASPIRE  
CONCRÉTISER  
CHANGEMENT  
WOMEN'S  
EMPOWERMENT  
WOMEN  
AGENCY  
COLLABORATE  
LIFE  
EAU  
LEADERSHIP  
ALLEZ  
CANADA  
MOBILISATION  
PURPOSE  
TECHNOLOGY  
RISK  
TAKING  
CLIENT  
CENTRIC  
ASPIRER  
JOBS  
CROISSANCE  
AUTONOMY  
EMPOWER  
SMES  
MAKING  
IT REAL  
AFFAIRES  
CLIMATE  
SUSTAINABLE  
CENTRÉE SUR  
LE CLIENT  
AGILITÉ  
POSITIVE  
COURAGE  
MOBILIZATION  
RESPECT  
TECHNOLOGIE  
FEMMES  
CHANGE  
BUSINESS  
DIVERSITÉ  
BUTS  
PAIX  
AGILITY  
INNOVATION  
LEADERSHIPS  
AXÉE SUR  
LE  
LEGALITÉ  
FORT  
DES  
SEXES  
AUDACE  
PRIS  
RISQ



## We Know that Speaking Up Protects Our Reputation

We take pride in being a part of and helping to protect the reputation of EDC and FinDev Canada. Integrity starts with our individual actions and decisions — we act on behalf of all stakeholders when we uphold our ethical standards. When we need further guidance on a provision in our Code, or we see something that raises concern or could be a potential wrongdoing, we have a duty and obligation to speak up. Any employee who engages in intimidation, retaliation or reprisal will be subject to disciplinary action. It takes courage to speak up, however, doing so is working for the good of EDC, FinDev Canada, our colleagues, customers and our reputation.

Raising a concern in good faith simply means that we have raised a concern that we believe to be true and the information was reported with no malicious intent.

An additional external option to raise concerns about wrongdoings is the [Public Sector Integrity Commissioner of Canada \(PSIC\)](#).

Our related policies, standards, guidelines and procedures are available on [LiveWire](#).

## Our Code Resources

### QUESTIONS OR ADVICE

- your leader
- any other EDC or FinDev Canada leader
- Legal Services
- Compliance & Ethics [CodeofConduct@edc.ca](mailto:CodeofConduct@edc.ca)
- Employee Relations
- Vice-President and Chief Compliance & Ethics Officer
- EDC and FinDev Canada's Senior Officer for Internal Disclosures (SOID)

### OPTIONS FOR REPORTING CONCERNS

- Chief Internal Auditor and SOID
  - By telephone: 613-598-6836
  - By email: [smadhok@EDC.ca](mailto:smadhok@EDC.ca)
- your leader
- Third Party Confidential Disclosure Line
  - 1-866-335-2053 (to be used within Canada and the USA)
  - 1-647-439-9463 (to be used as a collect call outside Canada and the USA)
  - or via the web at [www.clearviewconnects.com](http://www.clearviewconnects.com)

### DISCLOSING A POTENTIAL, ACTUAL OR APPARENT CONFLICT OF INTEREST

- Visit the [Disclosure Hub](#)
- Your Leader

