



Code of conduct

Statement

Acting with integrity

Employees must participate in awareness activities as required and sign the annual commitment to comply with the Code of Conduct.

Employees must comply with all FCC's policies and procedures.

Employees must ensure that their actions comply with the laws and regulations applicable to their business activities.

In relationships with colleagues, customers, third parties, members of the public and federal government stakeholders, all employees must:

- deal openly, honestly and fairly in all communications and negotiations
- behave respectfully and contribute to a healthy and safe work environment
- act in the best interests of FCC and protect its reputation
- act within their duties, qualifications and delegated authority
- follow the need-to-know principle and access or share confidential and personal information only when there is a legitimate business reason to do so
- be transparent and share complete information when appropriate

Protecting FCC's assets

Employees must protect FCC assets and interests, including but not limited to:

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

Employees must not use or take advantage of FCC assets for personal benefit.

Avoiding conflicts of interest

Employees must avoid situations where their personal interests or activities conflict, or could appear to conflict, with their FCC role and responsibilities.

Employees must not give preferential treatment to any person, including family members or persons with whom the employee is in a significant personal or personal business relationship.

Employees must ensure that their business activities at FCC do not conflict with the business activities of another FCC department or division.

Pursuing outside activities

Employees must not pursue outside business activities that:

- result in a decrease in work performance or quality of work produced for FCC
- affect their ability to perform their duties and responsibilities objectively, impartially and responsibly

Giving or receiving gifts

Employees must never:

- offer, give or accept gifts, prizes, entertainment, hospitality or other benefit, directly or indirectly for themselves or for anyone else, that:
 - creates an expectation in the mind of others that special or preferential treatment will be provided in exchange
 - is cash or readily convertible to cash
 - may be reasonably perceived by a member of the public to be made in exchange for a business favour from FCC
 - may be reasonably perceived to be in bad taste or would risk embarrassment to FCC
 - over \$200 in value from or to the same individual or company more than once in any 12-month period
- solicit or seek a gift, prize, entertainment, hospitality or other benefits from a customer, business partner or contractor
- accept sponsored travel unless they are a guest speaker

Employees must complete a Declaration of Outside Activities and Gifts Over \$200 for approval to proceed in the following situations:

- pursuing any outside business activities that are or could appear to be in a conflict with FCC's activities or their roles and responsibilities at FCC
- offering, giving or accepting gifts, prizes, entertainment, hospitality or other benefits valued at more than \$200
- acquiring farmland or acreages

Conducting business during elections

Employees who meet and serve the public must not wear campaign buttons or display or promote in any manner for any political party or candidate during working hours or at any FCC office or event.

Employees must obtain the permission of the President and Chief Executive Officer before presenting themselves as candidates in elections to:

- the House of Commons
- a provincial or territorial legislature

Employees, prior to seeking public office, must submit a written request for leave without pay outlining the full particulars of the time required for the nomination procedure and the election campaign.

Reporting violations of the Code of Conduct

Employees must report violations of the Code of Conduct by other employees, Board members or third parties dealing with FCC.

Employees must not intimidate or retaliate against a person who reports a violation of the Code of Conduct.

Legal connections to policy

Public Servants Disclosure Protection Act (PSDPA)

Scope

This policy applies to all employees.

This policy also applies to members of FCC's Board of Directors except for the sections on conflicts of interest and conducting business during elections. In these matters, they must adhere to the Conflict of Interest Act and other applicable instruments.

Roles and responsibilities

All employees are accountable for:

- seeking advice on any question about the Code of Conduct or its interpretation
- behaving at all times in a way that upholds the integrity of FCC and maintains FCC's reputation as a trusted financial institution
- following the guidance of the Code of Conduct when faced with questions of what is right or wrong or how to conduct oneself when doing business
- speaking up in good faith to report suspected and actual violations of the Code of Conduct
- clearly communicating to third parties FCC's expectations with respect to conduct and integrity

All leaders are accountable for:

- modelling integrity and ethical behaviour
- ensuring business decisions meet FCC's expectations with respect to the Code of Conduct
- providing advice and guidance as needed to employees on issues related to values, ethics and conflicts of interest, with the support of the Integrity Officer
- receiving disclosure of potential violations of the Code of Conduct

The Law and Corporate Secretary division is accountable for:

- communicating FCC's expectations to employees
- managing the annual Declaration and Promise of Fidelity and Secrecy process

The Integrity Officer is accountable for:

- promoting an environment for disclosing violations of the Code of Conduct
- serving as FCC's Senior Officer for Internal Disclosures under the PSDPA by:
 - managing disclosures that could amount to wrongdoing by employees
 - supporting the President and Chief Executive Officer in meeting the requirements of the PSDPA
 - establishing an internal disclosure procedure under the PSDPA

The President and Chief Executive Officer is accountable for:

- establishing a code of conduct for FCC
- fostering a positive culture of values and ethics
- ensuring that employees
 - are aware of their obligations under the PSDPA
 - can obtain appropriate advice within FCC on ethical issues, including possible conflicts of interest
- ensuring that this PSDPA and the internal disclosure procedures:
 - are implemented effectively within FCC
 - are regularly monitored and evaluated
- ensuring the non-partisan provision of programs and services by FCC

Objective

The objective of this policy is to clearly communicate the type of behaviour FCC and our stakeholder, the Government of Canada, expect from employees.

Exceptions

No exceptions are permitted.

Additional information

This policy governs the conduct of business relationships among employees as well as between employees and customers, business partners, suppliers and contractors, competitors and Government of Canada stakeholders.

FCC is committed to conducting its affairs to the highest standards of ethics, integrity, honesty, fairness and professionalism. FCC expects employees to act professionally within and outside the workplace and reflect the corporation's values and cultural practices.

This policy is always in force when employees represent FCC. Employees are required to avoid actions and behaviours that may have a negative impact on FCC's reputation while they are:

- on business travel
- at a social event organized by FCC
- at a social event organized by a customer or contractor
- any time and place where they are, or could be perceived as, a representative of the corporation

This policy also applies when employees are on a leave of absence. This includes the need to declare outside activities or gifts and seek necessary approvals as outlined in the Code of Conduct above.

Values and Ethics Code for the Public Sector

As a federal Crown corporation, FCC is a part of the public service of Canada and is subject to the Values and Ethics Code for the Public Sector (VECPS). This Code of Conduct is a requirement under the PSDPA and serves as a guide to the values and behaviours expected from everyone who works in the public sector, in all activities related to their professional duties. These values are:

- respect for democracy
- respect for people
- integrity
- stewardship
- excellence

Employees should read the VECPS in conjunction with this policy. For the complete text of the VECPS, visit the <https://www.canada.ca/en/treasury-board-secretariat.html>

Reporting violations of the Code of Conduct

All employees are responsible for protecting FCC's reputation for integrity by asking questions and raising concerns about possible violations of the Code of Conduct. Employees can:

- report to leaders
- call the ConfidenceLine at: 1-800-661-9675
- send an email to the Integrity Officer at: IntegrityOfficer@fcc-fac.ca
- send a letter to the Integrity Officer at:

Integrity Officer
Farm Credit Canada
1800 Hamilton St. P.O. Box 4320
Regina, SK S4P 4L3

Disciplinary action following violations of the Code of Conduct

A violation of the Code of Conduct will be treated seriously and may:

- result in disciplinary action
- affect performance ratings and incentive pay

Serious violations of the Code of Conduct may result in dismissal.

Allegations of theft, fraud or incidents affecting the safety of others may be referred to law enforcement for investigation. FCC may also initiate legal action to recover financial losses as a result of employee wrongdoing.