

# FCC Supplier Code of Conduct

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## Purpose

FCC's Code of Conduct and Ethics builds on a "common sense" approach to business. It is the ethical framework for how FCC operates, and it applies to everyone who works for and with FCC.

This FCC Supplier Code of Conduct (the "Supplier Code") provides greater detail on how FCC's new and existing suppliers are expected to conduct their business with FCC, subject to any applicable laws.

## Scope and Application

This Supplier Code outlines the minimum standards that FCC expects of its Suppliers, including Suppliers providing goods or services that do not require formal contracts. Where formal contracts are in place, they may contain additional detailed requirements that surpass the provisions in this Supplier Code, and if there are any conflicts between such contractual requirements and this Supplier Code, the requirements of the contract will govern and apply.

FCC has developed this Supplier Code that we expect each of our Suppliers to adhere to. FCC will periodically review this Supplier Code and make revisions when needed, which we will expect our Suppliers to adopt.

If, in FCC's discretion (at all times acting reasonably), any Supplier fails to conduct business in line with the Supplier Code, FCC may terminate the contractual relationship between the Supplier and FCC.

At FCC a Supplier is defined as any organization or individual, including their respective agents and sub-contractors, that provides goods or services to FCC. FCC recognizes that its Suppliers vary in size and nature and therefore will apply its discretion in interpreting this Supplier Code.

## Responsible Procurement Philosophy

FCC is a socially responsible company, and this extends to how we procure products and services and the relationships we maintain with our Suppliers. We strive to work only with Suppliers with integrity who respect and adhere to applicable municipal bylaws, provincial, federal and international laws and regulations, who hold all permits and licenses required by law, who adhere to the codes, requirements, standards and best practices of their industry, and whose activities respect and care for:

- the environment by exercising reasonable care to safeguard the environment through stewardship of land, air quality and water
- labour standards by upholding requirements set through Canada's labour laws and the labour laws in all jurisdictions that they operate, and human rights

## Conflicts of Interest

Suppliers must not attempt to inappropriately influence any FCC decision or gain any advantage or preferential treatment in their relationship with FCC employees. If a supplier has any type of relationship with an FCC employee (friend, relative, partner) during a procurement process or while a contract is in force, the supplier must disclose this to FCC.

Gifts or entertainment must not be offered to any FCC employee with the intent or prospect of influencing any FCC business decision.

## Compliance with Laws

Suppliers must maintain accurate, complete and appropriate business records and conduct business in compliance with applicable laws, rules and regulations and generally accepted standards of the goods or services they provide.

### **Anti-bribery and Anti-corruption**

Suppliers must not engage in any activities such as offering a bribe, kickback or any other unlawful benefit, to secure a contract or any other affirmative treatment.

### **Compliance with Labour, Human Rights Standards**

Suppliers must adhere to all labour and human rights standards, as set through Canadian law and the laws applicable in all jurisdictions that they operate.

### **Compliance with Environmental Legislation**

Suppliers must abide by all environmental legislation, regulations and standards applicable to their operations and employ management practices that monitor and proactively minimize any negative environmental or social impacts of their operations, including impacts that may be present within their supply chains.

### **Confidentiality and Privacy**

Suppliers must employ policies and procedures that effectively protect the confidentiality, integrity, and availability of FCC information and assets that they have obtained or have access to including ensuring appropriate technological, administrative and physical controls which are appropriate for the sensitivity of the FCC information in the custody of the Supplier.

Suppliers may only use FCC personal information obtained for the use for which it was collected and in performance of the services of their agreement with FCC. Personal information shall not be transferred, processed, accessed, maintained and/or stored outside of Canada without FCC's prior written consent.

### **Business Continuity**

It is expected that Suppliers have business continuity plans in place that meet or exceed the applicable regulatory obligations, industry standards and the service level agreements identified in their contract(s) with FCC.

### **Code Acceptance and Auditability**

Suppliers must provide written confirmation that they meet the requirements of the Supplier Code, if requested to do so by FCC.

Suppliers must co-operate with any request by FCC to audit their performance of its obligations under the Supplier Code.

### **Disclosure Requirements**

Suppliers who are not compliant with this Supplier Code or have a breach of any requirement must disclose any violation to FCC in a prompt and timely manner. Disclosures are to be made by emailing [procurement@fcc.ca](mailto:procurement@fcc.ca).

### **Inquiries**

General inquiries regarding this Supplier Code can be sent to [procurement@fcc.ca](mailto:procurement@fcc.ca).