



# SUPPLIER CODE OF CONDUCT



## PURPOSE AND SCOPE

EDC's Supplier Code of Conduct ("the Code") sets out the principles and expectations that suppliers, service providers, intermediaries and independent contractors, including their employees and representatives (each, a "Supplier") must comply with when conducting business with, or providing goods and services to, or acting on behalf of EDC. EDC is committed to source goods and services from Suppliers who respect human rights, ethics, and the environment and have responsible policies and practices, and we expect Suppliers to operate in a manner that is consistent with these values. The Code establishes specific obligations for Suppliers regarding the following issues: business integrity, responsible business practices, responsible treatment of individuals, information and data management, and monitoring and compliance.

EDC may have additional requirements, which are specified during the procurement and contracting process and the ongoing management and monitoring of the relationship. Agreements between EDC and its Suppliers contain requirements which may address issues identified in the Code. In the event of a conflict or inconsistency between the Code and an agreement between EDC and a Supplier, the agreement will govern and prevail.

## BUSINESS INTEGRITY

### 1. COMPLIANCE WITH LAWS

In all their activities, Suppliers must ensure they conduct business in compliance with the applicable laws, rules, and regulations of the jurisdictions in which they operate.

### 2. CONFLICTS OF INTEREST

Suppliers must exercise reasonable care and diligence to prevent any situation in which a conflict of interest may occur in its dealings with EDC (for example, Suppliers should not employ or make payments to any employee of EDC during the course of any transaction between the Supplier and EDC, and should take care that any personal relationship is not used to influence an EDC employee's business judgment in respect of dealings between the Supplier and EDC).

### 3. GIFTS, HOSPITALITY AND OTHER BENEFITS

The nature of any gifts, hospitality or other benefits must not, by their quality, quantity or timing, be used by Suppliers to gain improper advantage or preferential treatment from EDC employees or their representatives. Suppliers should also avoid giving or receiving gifts, hospitality, or other benefits that could give the appearance of impropriety. Gifts or hospitality offered to EDC or their representatives must be normal expressions of courtesy and must not risk compromising EDC's integrity or reputation or calling into question EDC's objectivity or impartiality. Suppliers are to

comply with these rules and expectations, and maintain appropriate records of exchanges of gifts, hospitality, and other benefits.

#### **4. ANTI-BRIBERY AND ANTI-CORRUPTION**

Suppliers must comply with applicable laws related to anti-bribery and anti-corruption in the jurisdictions in which they operate. Suppliers must not engage directly or indirectly in any activities that would put EDC at risk of violating anti-bribery and anti-corruption laws. Suppliers must notify EDC if they become the subject of an investigation with respect to allegations of impropriety involving bribery and corruption.

#### **5. MATERIAL, NON-PUBLIC INFORMATION AND INFORMATION BARRIERS**

If in their dealings with EDC, Suppliers become aware of material, non-public information (MNPI) about EDC or its clients, we expect Suppliers to ensure the proper handling and use of such information (such as establishing information barriers) in a manner that meets applicable legal and regulatory requirements, in order to prevent inappropriate access or disclosure of such information. This includes but is not limited to never using MNPI or providing this information to family or friends to use, in trading activities. It also includes not allowing the information to inappropriately influence any business activities conducted on behalf of EDC.

### **RESPONSIBLE BUSINESS PRACTICES**

#### **1. PRIVACY AND INFORMATION SECURITY**

Suppliers must comply with EDC's published [Privacy Notice](#) and must use information (handle, store, use, transmit, archive, and destroy) obtained through their relationship with EDC only in accordance with EDC instructions on privacy / data protection and information security and strictly for the purpose for which it was provided. Suppliers must also safeguard EDC information throughout all stages of the information lifecycle.

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

Suppliers must notify EDC immediately of any actual or suspected privacy breaches, security (physical and cyber) breaches, or losses of EDC information. Further, the Supplier must assist EDC in managing any consequences arising from such events.

#### **2. OUTSOURCING AND SUBCONTRACTING**

Suppliers must not subcontract services they perform for EDC or outsource activities that directly impact the delivery of goods and services to EDC, without EDC's prior written approval. EDC must be informed of the locations in which work will be performed, the possibility of cross-border movement of any EDC data, and the identity of parties involved in the provision of the services. Suppliers must also monitor the outsourcing or subcontracting engagement to ensure compliance with the Supplier's contractual obligations and with the Code.

### **3. ENVIRONMENTAL MANAGEMENT**

Suppliers should seek to conduct their business in an environmentally responsible way. Suppliers must have the appropriate management procedures in place to comply with all environmental laws. And where appropriate, support EDC's efforts to reduce its adverse environmental impacts.

### **4. COMMUNICATIONS AND MARKETING**

Suppliers must not make any public statements (whether on company websites or via social media or otherwise), issue any media releases or distribute any marketing materials referencing EDC, or EDC trademarks or logos, unless EDC has approved each proposed use in advance, or such use is expressly permitted in an existing agreement with EDC.

### **5. COMPLIANCE TO INTEGRITY REGIME**

Suppliers must promptly disclose to EDC any issues of eligibility or suspension under the Canadian Government's [Integrity Regime](#) pertaining to themselves or their subcontractors.

## **RESPONSIBLE TREATMENT OF INDIVIDUALS**

### **1. RESPECT, DIVERSITY AND INCLUSION**

Suppliers must maintain workplaces characterized by professionalism, and respect for the dignity of their own employees and every individual with whom their employees interact, including respect for differences such as gender, gender identity, gender expression, race, colour, age, disability, sexual orientation, ethnic origin and religion. Suppliers must not tolerate harassment, discrimination, violence, retaliation and other disrespectful or inappropriate behaviour.

At EDC, we strive to have a diverse and inclusive supply chain. EDC expects Suppliers to embrace a diverse and inclusive supply chain by affording equality of opportunity to marginalized or underrepresented social groups, including businesses owned by women, Indigenous people, minorities/visible minorities, members of the LGBT community, people with disabilities, veterans and service-disabled veterans.

## 2. EMPLOYMENT PRACTICES

Suppliers must abide by applicable employment standards, labour, health and safety, non-discrimination and human rights legislation. Even where laws do not prohibit discrimination, or where they allow for differential treatment, we expect Suppliers to be committed to non-discrimination principles and not to operate in a way that unfairly differentiates between individuals.

Suppliers must be able to demonstrate that, in their workplaces:

- Child, forced, or compulsory labour is not used.
- Discrimination and harassment are prohibited.
- Processes are in place that enable employees to raise concerns and speak up without fear of reprisal.
- Appropriate and reasonable background screenings, including investigations for prior criminal activity, have been conducted to ensure the integrity and good character of their employees.
- Clear and uniformly applied employment standards are established, that meet or exceed legal and regulatory requirements.
- A healthy and safe workplace is provided that complies with relevant health and safety laws.

When working at EDC offices, Suppliers must adhere to EDC's emergency procedures, report any complaints, injuries, and/or near misses to EDC promptly, and work with EDC to meet responsibilities for a healthy and safe workplace.

## MONITORING AND COMPLIANCE

**Compliance:** Suppliers must maintain all information and management systems necessary to document their compliance with the Code, applicable laws, and their contractual obligations with EDC, and provide evidence to EDC upon request.

**Monitoring:** EDC reserves the right to monitor a Supplier's compliance to the Code and audit their control environment. EDC will be entitled to request information from the Supplier as to their compliance with the obligations and principles of the Code.

**Reporting Noncompliance:** Any person with reason to believe that the obligations or principles of the Code are not being respected by an EDC Supplier is asked to report in English or French to [vendormanagement@edc.ca](mailto:vendormanagement@edc.ca).

**Corrective Action:** In the case of any deficiencies identified with respect to compliance with the Code, Suppliers are expected to promptly take corrective action to address identified deficiencies. Failure to comply with the Code may result in termination of a Supplier's relationship with EDC.

## **OWNERSHIP AND REVISION DATE**

The SVP and Chief Financial Officer is the executive owner of this Supplier Code of Conduct.  
Last Revision Date: July 2020.