

Code of Conduct

FinDev Canada

Table of Contents

Section 1: We Stand for Ethics and Integrity 4

We Understand and Honour Our Code 5
We Lead with Our Values 5
We Lead by Example 6
We Make Business Decisions Based on Integrity and Sound Judgement 7
We Speak Up When We Have Questions or Need to Report Concerns 7
We Have Zero Tolerance for Reprisal Against Others 8
We Cooperate in Investigations 8
We Are Accountable for Our Actions 8

Section 2: We Stand for Trust with Our Customers and Other Stakeholders 9

We Drive Growth with Integrity 10
We are Responsible When Giving or Receiving Gifts, Hospitality & Other Benefits 11
We Take Measures to Prevent Bribery and Corruption 12
We Take Measures to Prevent Money Laundering and Terrorist Financing 13
We Are Vigilant for Signs of External Fraud. 14
We Comply with Relevant Sanctions 14
We Safeguard the Information in Our Care . 15
We Take Measures to Prevent Insider Trading 16
We Work with Third Parties Who Honour Our Commitments 17

Section 3: We Stand for Accountability 18

We Recognize and Disclose Actual, Potential, and Apparent Conflicts of Interest 19
We Are Conscientious When We Create Business Documents 20
We Use Information & Technology Responsibly 21
We Communicate with Transparency, Honesty and in Alignment with our Values .. 22
We Engage Responsibly with Social Media .. 22

Section 4: We Stand for Respect with Each Other 23

We Promote Inclusion, Diversity , Equity, and Accessibility 24
We Provide a Work Environment Free from Harassment and Discrimination 25
We Create a Healthy and Safe Workplace ... 26

Section 5: We Stand for Strengthening Our Society 27

We Respect Human Rights 28
We Are Dedicated to Environmental, Social, and Governance (ESG) Practices 28

Section 6: We Stand for Our Reputation and Values 29

We Know that Speaking Up Protects Our Reputation 30
Our Code Resources 30

Message from the President and CEO



At FinDev Canada, we support development through the private sector and achieving our objective requires us to cultivate trusting relationships. Our Code of Conduct helps bring this to life with guidance that reflects who we are and how we work. As a values-based organisation, we lead with Collaboration, Impact, Agility, and Respect. These values are the foundation of our ethical culture and guide our decisions, behaviours, and relationships both internally and externally.

Ethical conduct is how we bring our values to life. Truly embodying these values requires going beyond compliance to turn these principles into a mindset. Acting with integrity, treating others with empathy, and fostering trust are essential to achieving our shared goals and creating sustainable impact in the markets we serve.

This Code of Conduct ensures that as we grow and evolve, we remain grounded in our values and accountable to the highest standards of ethical behaviour. It empowers each of us to contribute to a more inclusive and sustainable world — one decision at a time.

Please take the time to review the Code and reaffirm your commitment to following it and behaving with integrity. By doing so, you acknowledge and support the standards expected of all of us.

Lori Kerr
President and Chief Executive Officer

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



SECTION 1

We Stand for Ethics and Integrity

We Understand and Honour Our Code

Our Code of Conduct (Code) applies to all employees and serves as the foundation for how we do business and helps define our culture and reputation for ethical excellence. Our ethics, values, and integrity permeate every interaction we have—with customers, each other, our shareholder, and members of the public —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 review the relevant policies and other resources available on SharePoint Main Hub and seek assistance when needed.

WE SUCCEED BY:

- Understanding that all employees, permanent and contract, including those on secondment or leave, and any locally engaged staff engaged in EDC work 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.
- Putting integrity above business results - even when there is pressure to do otherwise.

We Lead with Our Values

While our organization has always been grounded in strong values, leading with those values means placing them at the heart of everything we do. They define who we are, guide our decisions, and empower us to make a meaningful impact. Our values are:



Collaboration
We build partnerships and work together to achieve shared goals and foster an environment of trust.



Impact
We are passionate about our mandate and strive to create positive sustainable impact with our clients and in the markets we serve.



Agility
We see challenges as opportunities, we adapt to changing circumstances, and we seek creative solutions.



Respect
We act with integrity, treat others with empathy and we value diversity to cultivate a supportive and inclusive environment.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



We Lead by Example

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 our Code, as well as completing all mandatory training and attestation on time.
- Speaking up when we have questions or concerns.

Leaders play a critical role in meeting our commitments. Our leaders are role models to each other and their teams and set an example through their own actions. With leadership comes a heightened level of responsibility. Our leaders succeed by:

- Actively listening and encouraging healthy debate of all views and opinions, collaborative thinking, ethical decision making, and raising of concerns.
- Respectfully listening to concerns and escalating issues and conflicts through proper channels such as a leader, the Senior Officer for Internal Disclosure (SOID), Employee Relations, 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 .
- Never leaving the impression that it is acceptable to compromise our integrity or reputation to achieve business goals.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Make Business Decisions Based on Integrity and Sound Judgement

While making decisions that benefit our customers, we have a responsibility to place our ethical compass at the core of every choice made. We ensure our decisions and actions are within the confines of our responsibilities and delegated authority and are open to public scrutiny. In instances where the direction we should take is not clear, we ask ourselves the following questions and seek assistance as required from a Code Resource:

Would you be proud of the decision if it were publicly disclosed?
Is the decision grounded by what is both ethical and legal?
How would it be perceived by others?
Will the decision drive value by putting long-term success over short-term gain?
Could it harm EDC's or FinDev Canada's, our customers', or our own personal reputations?
Could it expose our customers to increased business risk?
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 30.

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 is a concern that something is not right, we disclose the matter to a Code Resource with whom we feel comfortable. We understand that all concerns raised will be taken seriously, considered, and where action is required, will be addressed as promptly as possible.. We also understand there are secure and confidential processes in place to report concerns, which will be reviewed fairly and in an impartial manner.

We Have Zero Tolerance for Reprisal Against Others

Everyone should feel comfortable speaking up without fear of any form of reprisal or retaliation. If there is a concern that someone has been the target of reprisal because of speaking up, we contact the SOID, Employee Relations, or any other Code Resource with whom we feel comfortable, for assistance. Any report of an act of reprisal committed against another individual will be reviewed and may lead to disciplinary action up to and including termination of employment.

> ***Reprisal*** *or* ***retaliation*** *occurs when someone is the subject of an action, penalty, or mistreatment for speaking up or raising a concern in good faith or cooperating in an investigation. Examples of reprisal include intimidation, isolation, coercion, undesirable tasks, 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.*

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 cooperate fully with the investigators. Where necessary, leaders ensure capacity to enable team members to fully cooperate with and participate in investigations.

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, 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, appropriate action will be taken which, depending on the severity of the violation, may include enhanced controls, coaching, communication, training, or disciplinary action up to and including termination of employment. Where warranted, situations may be referred to external authorities.

WE SUCCEED BY:

- Cooperating in investigations in a truthful and honest manner while maintaining the confidentiality of the situation.
- Immediately contacting Legal Services if we are issued a notice of legal action or subpoena, and the Chief Compliance & Ethics Officer if we receive a request from a regulator or any other regulatory authority.
- 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.

Our related policies, standards, guidelines and procedures are available on ***SharePoint Main Hub****.*



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 SUCCEED BY:

- Conducting business with integrity when aligning our business goals with our customers' priorities.
- Achieving our targets with honesty and professionalism.
- Understanding our customers' business risks and ensuring we provide solutions that take into consideration both their short-term business objectives and long-term business sustainability.
- Communicating clearly with our customers so that 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 **SharePoint Main Hub**.*

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

Giving and receiving gifts and 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 being offered 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
Could it call into question your or EDC's / FinDev Canada's objectivity or impartiality?	NO
Could it compromise EDC's / FinDev Canada's integrity or reputation?	NO
Can it influence anyone's judgement or performance?	NO

If your answers are not the same as the above, the exchange could be damaging to both you and EDC / FinDev Canada. You must not proceed without consulting a Code Resource first.

WE SUCCEED BY:

- Always complying with the restrictions and approval obligations outlined in our policies and standards, and only giving or accepting gifts or hospitality in accordance with these requirements.
- Adhering to all disclosure and approval requirements. Disclosure (through the **Disclosure Hub**) is required for all gifts and hospitality of $50 or more, or more than $200 aggregate in the year from a single source. Regardless of value, some gifts are not permitted under our policies and standards.
- Avoiding giving or receiving gifts, hospitality, or other benefits that could give the appearance of impropriety. We must never use our position to solicit personal benefits from customers, suppliers or partners.
- Not accepting external hospitality from current and/or prospective suppliers.
- Advising third parties of our policies regarding the exchange of gifts and hospitality and being aware of and sensitive to the gifts and hospitality policies of others.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



We Take Measures to Prevent Bribery and Corruption

EDC and FinDev Canada are committed to conducting our business with the highest ethical standards and strong governance practices. This means acting with integrity in all interactions—both externally and within our organization. We strive to understand our customers better, and we speak up when something doesn't seem right.

Nearly anything of value can be considered a bribe if it's used to personally benefit someone or influence a business decision. This applies equally to interactions with external parties and internal colleagues. Examples include:

- Paying travel expenses without a clear business purpose.
- Giving or receiving gifts, such as cash, gift cards, or certificates.
- Providing or accepting lavish entertainment or hospitality.
- Offering personal services, such as home renovations or private catering.
- Making political contributions intended to influence business outcomes.
- Falsifying or omitting information at the request of a customer.

WE SUCCEED BY:

- Performing the necessary due diligence to ensure that we do not knowingly engage in or support any transaction or internal arrangement that involves any form of bribery or corruption.
- Being vigilant in our work to detect and prevent bribery and corruption in our interactions with others and in the transactions we support. Examples of this may include: questioning unusual payment methods, seeking clarity around how contracts were awarded, or investigating potential conflicts of interest indicators.
- Raising concerns to the Compliance & Ethics Financial Crime team, leaders, or a Code Resource if we, in good faith, suspect any illicit or unethical activity by parties with whom we work—whether colleagues or external partners--including concerns of bribery or corruption.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Take Measures to Prevent Money Laundering and Terrorist Financing

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

We recognize and play our role in combatting financial crime. We do not tolerate, aid, or support money laundering or terrorist financing in any part of our business. We comply with all applicable laws and regulations relating to this global problem and we take measures to prevent our products and services from being used in connection with money laundering and terrorist financing.

WE SUCCEED BY:

- Understanding that we are all responsible to detect, deter, and protect against financial crime.
- Knowing our customers by conducting due diligence and assessing identified risks.
- Referring and escalating unusual activity, anomalies, or other concerns that may be indicative of money laundering to appropriate internal teams to action.

Risk Indicators of Money-Laundering

The following are examples of money laundering risk indicators:

- The customer is apprehensive to answer Know Your Customer (KYC)/due diligence questions.
- The customer asks probing questions about our processes and financial crime controls.
- The transaction does not appear to make business sense (e.g., the goods are being sold for significantly over or under current market value).
- The parties appear to be related or do not operate at arms-length.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Are Vigilant for Signs of External Fraud

We recognize and guard against fraudulent activity such as identity theft or customer impersonation, forgery of documentation or intentional misstatements. We are committed to protecting EDC and FinDev Canada from criminals who intend to use our products and services while employing deception, misappropriation of property or company assets in the process of circumventing regulations, laws, or company policy for financial or personal gain.

WE SUCCEED BY:

- Raising any unusual situations that suggests someone may be deliberately misrepresenting information through misstatements or omissions, or through forgery of documentation.
- Being vigilant for signs of external fraud including:
  - Financial statements that have omissions, overstated assets or understated liabilities, or other unusual alterations to transaction documentation.
  - Unusual questions, communications with excessive grammar and spelling errors, unusual methods of communication, missing contact information, or a lack of an online presence.
  - The corporate structure is opaque and does not correlate with the line of business.
- Escalating unusual situations to the EDC Compliance & Ethics Financial Crimes team or, to the FinDev Canada Compliance team for further review.

We Comply with Relevant Sanctions

We recognize the importance of economic or financial sanctions as instruments used by governments and multinational bodies, and export controls that are applied by governments to regulate, and in certain cases prohibit trade in certain goods or services. We are committed to complying with all applicable economic or financial sanctions, requirements, export controls or trade embargoes.

WE SUCCEED BY:

- Ensuring business is conducted following all due diligence procedures.
- Confirming sanctions declarations are made where necessary.
- Escalating unusual situations to the ESG Advisory team, the EDC Compliance & Ethics Financial Crime team or, to the FinDev Canada Compliance team for further review.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Safeguard the Information in Our Care

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

We understand that customer information can only be shared with third parties in limited circumstances and, in most cases, when we have written consent to do so.

When in doubt, it is important to contact the Privacy & Information Risk Team before sharing or using confidential information for any purpose. Some types of confidential information include:

- Customer or other third-party information.
- Corporate information created by or about EDC or FinDev Canada.
- Personal information.
- Government sensitive information.

WE SUCCEED BY:

- Presuming that any information we receive is confidential (unless the contrary is clear). When needed, seeking clarity on what constitutes confidential information from a Code Resource.
- Storing confidential information only in EDC's and FinDev Canada's approved repositories and managing access on a need-to-know basis.
- Only collecting, using, disclosing, and disposing of personal information in accordance with our policies and standards.
- 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 custody of assets by following clean desk responsibilities in accordance with internal practices.
- Protecting intellectual property and avoiding any infringement, including copying the information of others for our own use. Intellectual property includes copyrights, patents, and trademarks.
- Immediately reporting any suspected or actual confidential information breaches to Privacy & Information Risk (P&IR@edc.ca) and any cybersecurity incidents to Enterprise Information Security or a Code Resource.
- Understanding that our confidentiality obligations continue after our employment ends.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Take Measures to Prevent Insider Trading

In our professional activities, we often encounter material, non-public information (MNPI) about other companies.

MNPI refers to any material information that has not been disclosed through an appropriate public channel and is likely to be considered valuable by an investor in making an investment decision. Simply having access to MNPI makes an individual an Insider. Examples of MNPI 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.

> ***Insider trading*** *occurs when an individual possesses MNPI and engages in the buying or selling of stocks or other securities based on that privileged information.*

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 Standards and Procedures.
- Ensuring proper handling and safeguarding of MNPI and never using MNPI for personal gain.
- Never providing "tips" or recommendations, or circulating rumors to anyone, including family members or friends.
- Never engaging in any trading activity involving a company's securities while in possession of MNPI about that company. This applies to transactions or trades conducted by, or on behalf of EDC / FinDev Canada, or in our personal capacity, on our personal accounts or any other account over which we exercise influence or control.
- 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 in our care to inappropriately influence any business activities conducted on behalf of EDC or FinDev Canada.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



We Work with Third Parties Who Honour Our Commitments

We maintain high standards of performance and business ethics for ourselves and when working with suppliers, partners, and other third parties. This means we comply with all applicable laws and trade agreements when participating in purchasing decisions. We base our relationships with our third parties on lawful, fair, and ethical business practices. We declare any related personal interests or relationships with third parties that may pose a conflict of interest or appear to place us in conflict. Unless authorized, we do not make procurement commitments to third parties, and we consult with our Procurement colleagues as required.

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

WE SUCCEED BY:

- Always consulting the Procurement team before approaching a third party to discuss potential business sourcing options.
- Following all procurement rules to ensure appropriate due diligence in the selection of third parties.
- Basing all procurement decisions on objective criteria such as the quality, price, and reliability.
- Unless in accordance with our policies and procedures, declining any third party request for a reference or endorsement.
- Raising concerns of any activity that could be in breach of contractual obligations to the Procurement team or a Code Resource.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



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 / FinDev Canada and our customers. This means ensuring all our 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 arise through personal outside interests or activities. Examples can include political activity, outside employment, and personal or financial relationships with parties within or connected to EDC / FinDev Canada.

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

Evaluating Conflicts of Interest

When evaluating a potential conflict of interest, ask the following questions:
Could it be an actual, apparent, or potential conflict of interest?
Would it interfere with our performance or decrease the quality of our work?
Can it impact our capacity or be perceived to influence our ability to perform our job 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 formally in our internal disclosure system (Disclosure Hub).

WE SUCCEED BY:

- Recognizing, avoiding, and disclosing potential conflicts of interest which is critical to protecting our reputation.
- Ensuring our outside activities do not interfere, or appear to interfere with our impartiality, and 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.
- Raising concerns when we observe or find ourselves in situations that may present conflicts of interest or call into question our impartiality, and seeking guidance when unsure.
- Remaining impartial and taking care to avoid sharing any confidential information while engaged in these outside activities.
- Understanding that actual and apparent conflicts of interest must be disclosed through the Disclosure Hub and managed under our Policies, Standards, and Procedures.
- Recognizing that conflicts of interest can arise post-employment, and we are required to notify our leader where employment is offered to us that may pose an actual, potential, or apparent conflict of interest.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



We Are Conscientious When We Create Business Documents

We ensure the business documents and records we create are complete and truthful to ensure responsible business decisions and to provide correct 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 always write in a professional manner, ever mindful that much of what we record can be accessed by the public and media under access to information laws.

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 all written communications in a professional manner.
- Understanding that, with limited exceptions, Canadians have a legal right of access to information under our control.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Use Information & Technology Responsibly

We are enabled to achieve success with access to technology resources such as laptops and smartphones. When using these resources, as well as other corporate information and technology assets, we are prudent and responsible and use them in ways that advance our business purpose while preserving confidentiality, integrity, and availability of our information and technology. We build information and technology security controls into the design of our digital business, follow security best practices, and continue to strengthen our human firewall, to achieve better protection of the information and technology in our care from accidental or unauthorized access, disclosure, misuse, improper alteration, or destruction.

WE SUCCEED BY:

- Using EDC / FinDev Canada business information for business purposes only, and always through approved technologies and systems.
- Understanding that corporate assets are provided to execute on our business commitments and verifying that any specific personal use of corporate assets is permitted under our internal policies (e.g. use for personal commercial endeavors is generally prohibited).
- Always exercising sound judgement when using our information and technology to protect our integrity.
- Ensuring that our networks and systems remain secure by setting strong and unique passwords, updating them frequently, and not sharing them with others or using them for personal applications, accounts, or subscriptions.
- Taking care to compose all emails, text messages, and other electronic communications in a professional manner.
- Being attentive to impersonation or fraud attempts, and immediately reporting suspicious activity or improper use of business information or technology.
- Not expecting that the information we send or receive using corporate assets and systems is completely private and understanding that our activity may be monitored.

Our information technology resources include our network, systems, and applications, internet and intranet, email, accounts, and collaboration tools, as well as issued mobile phones, computers, and tablets.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Communicate with Transparency, Honesty and in Alignment with our Values

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 specific rules about how and when our information is released to the public. Unless we have been specifically authorized or are legally required to do so, we never disclose any information about our customers or business activities to anyone outside the organization.

As representatives of a Canadian Crown corporation, we are expected to reflect the public service values of integrity, equity, fairness, and impartiality in our communications. This includes ensuring that both the content and tone of our communications align with EDC and FinDev Canada's values, strategy, and objectives.

WE SUCCEED BY:

- Protecting confidential information from disclosure to any unauthorized party without appropriate approval and written consent.
- When representing EDC / FinDev Canada, ensuring that opinions we express are consistent with corporate commitments and values.
- Forwarding any requests from the media to Corporate Communications.

We Engage Responsibly with Social Media

> ***Social media*** *is an effective way to stay current with friends and family. While we are encouraged to support our brand and promote our professional insights through our social networks, we take care to share only information about EDC / FinDev Canada that is already publicly available.*

When expressing personal views on our social media accounts or through other means, we are mindful of our duty to act and communicate with integrity, and in a manner that bears the closest public scrutiny. Even when we are acting in our personal capacity, on our personal social media accounts, we have a duty of loyalty to EDC / FinDev Canada and an obligation to demonstrate respect for honesty, integrity, democracy, and accountability.

- Applying our values and integrity when using social media for personal use considering the potential consequences for EDC / FinDev Canada and the Government of Canada.
- Being clear in our social media posts that the opinions expressed are our own personal views.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



SECTION 4

We Stand for Mutual Respect



We Promote Inclusion, Diversity , Equity, and Accessibility

We promote inclusion, diversity, equity, and accessibility in every aspect of our business and at every level of our organization. We create a welcoming and accessible environment where everyone is included and feels they belong. We know that we can provide the best solutions for our customers when we combine our individual talents, skills, perspectives, and contributions.

WE SUCCEED BY:

- Focusing solely on a person's qualifications, competencies, relevant experience, and performance when making employment-related decisions.
- Taking care to see, hear, value, and empower each other to succeed.
- Being aware of how our actions and words may make others feel.
- Avoiding actions that are or could be interpreted as intimidation, bullying, incivility, or favouritism.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*

We Provide a Work Environment Free from Harassment and Discrimination

We maintain a safe and positive work environment free from incivility, harassment, discrimination, intimidation, and violence where everyone has an equitable opportunity to succeed. 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*** *refers to any behavior that a reasonable person would recognize as unwelcome or offensive, and has the effect of degrading, demeaning, or embarrassing another individual. It may occur as a single incident or a pattern of conduct, and can include verbal or written remarks, unwanted sexual advances, or physical aggression.*

WE SUCCEED BY:

- Recognizing our success depends on valuing different ideas, strengths, interests, and cultural backgrounds.
- Caring for people, for their wellbeing and growth, beyond business.
- Treating everyone with professionalism, consideration, and respect.
- Listening to other points of view, keeping in mind that we achieve better results when we work collaboratively together.
- Fostering inclusion where individual differences are valued, and all ideas and opinions are welcomed with respect.
- Encouraging everyone to speak freely, ask questions, and raise concerns.
- Speaking up when we witness or experience harassment, discrimination, or workplace violence—making it clear that such behavior is unacceptable. We report any unwelcome conduct we observe or become aware of to a Code Resource.
- Reporting any retaliation we experience or witness in response to a constructive challenge or a concern raised in good faith.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



We Create a Healthy and Safe Workplace

We are committed to ensuring a healthy and safe work environment at any place where our employees are engaged in our work. We also take accountability for our own physical and mental health and overall wellness and take steps to protect the health, wellness, and safety of others.

WE SUCCEED BY:

- Complying with relevant health and safety policies and applicable laws.
- Consulting information and resources for support as made available to all employees through the HR Hub.
- Raising a concern to a leader, the Safety & Security Services team, a representative of the Health & Safety Committee , Employee Relations, or any 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 are not tolerated.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



SECTION 5

We Stand for Strengthening Our Society

We Respect Human Rights

We take thoughtful and deliberate action in our workplace and communities to promote inclusion, diversity, and equity and respect human rights. We demonstrate respect for the rights of our employees through our commitments in our Code and various human resources policies, standards, and procedures. Our Human Rights Policy guides our transactional due diligence to manage risks on the rights of people we might be connected to.

WE SUCCEED BY:

- Treating others with dignity and respect and upholding human rights.
- Conducting human rights due diligence in accordance with our Human Rights Policy to prevent and mitigate the potential human rights impacts of the business we support.

We Are Dedicated to Environmental, Social, and Governance (ESG) Practices

We understand that good environmental, social, and governance (ESG) practices are key to the long-term growth and success of our customers and Canada's prosperity. We recognize that our business decisions and activities have the potential to impact the environment and local communities where we do business. By fostering a culture of broader business risk awareness, we position our customers to prevent and mitigate negative impacts of their business, setting them up for longer term success and business sustainability.

WE SUCCEED BY:

- Understanding and reviewing the environment, social, and governance impacts of the transactions and business we support.
- Conducting our business in as transparent a manner as possible, to maintain stakeholder trust and confidence.
- Adopting initiatives that foster sustainable, responsible, and inclusive business.

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



SECTION 6

We Stand for Our Values and Reputation

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 misconduct, 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; it is not always easy. 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.

Our Code Resources

Questions or advice

- Your leader or any other leader with whom you are comfortable
- The Ethics team **CodeofConduct@edc.ca**
- The FinDev Canada Compliance Team **Compliance@FinDevCanada.ca**
- The Employee Relations team **EmployeeRelationsTeam@edc.ca**
- Vice-President and Chief Compliance & Ethics Officer-
- The Privacy & Information Risk team **P&IR@edc.ca**
- The C&E Financial Crime team **compliance&ethics-financialcrime@edc.ca**
- The Chief Security Officer
- Senior Officer for Internal Disclosure (SOID) **soid@edc.ca**

Options for reporting concerns

- Your leader or any other leader with whom you feel comfortable
- Senior Officer for Internal Disclosure (SOID) **soid@edc.ca**
- The Employee Relations team **EmployeeRelationsTeam@edc.ca**
- Mitratech (previously ClearView Connects), EDC's anonymous third party reporting system which notifies the SOID
  1-866-335-2053 (Canada and the US)
  1-647-439-9463 (outside Canada and the USA)
  Or via the web at **http://clearviewconnects.com**

Options for reporting reprisal

- Senior Officer for Internal Disclosure (SOID) **soid@edc.ca**
- The Employee Relations team **EmployeeRelationsTeam@edc.ca**

Disclosing a conflict of interest (actual, potential, or apparent)

- Your leader for discussion.
- The Ethics for assistance in assessing a conflict **CodeofConduct@edc.ca**
- Disclosure Hub to formally submit a disclosure

*Our related policies, standards, guidelines and procedures are available on **SharePoint Main Hub**.*



FinDev Canada

FinDev Canada
5 Place Ville-Marie, bureau/Suite 600
Montreal, Quebec H3B 5E7