Our Values
Because we care about what we do

Be an owner

Amaze our clients

Think “yes” first

Do the right thing

Believe in each other: we are better together

Celebrate both wins and failures

Ask “why?”

Be fearless in the face of change

Make a difference

Have fun every day
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**Note:** This Code of Ethics and Business Conduct includes examples that are intended to illustrate how the Code is applied. The examples are not intended to be, nor should they be interpreted as, an exhaustive list of all circumstances experienced by a CMHC employee that may create threats to compliance with the values and expected working behaviours of this Code.
Introduction

The Code is designed to assist you in fully appreciating the ethical issues that relate to your role at CMHC and to allow you to make the best possible decisions in your daily activities, which in turn helps CMHC achieve its objectives and contributes to our success as a Corporation. The Code is in accordance with and adds to the conditions outlined in the Values and Ethics Code for the Public Sector (VECEPS), which applies to all employees working in the federal public sector. The VECEPS values are a compass to guide federal public sector employees in everything they do. They cannot be considered in isolation from each other as they will often overlap. The VECEPS and the CMHC Code of Ethics and Business Conduct are important sources of guidance for employees. The following are the VECEPS values:

RESPECT FOR DEMOCRACY

The system of Canadian parliamentary democracy and its institutions are fundamental to serving the public interest. Public servants recognize that elected officials are accountable to Parliament, and ultimately to the Canadian people, and that a non-partisan public sector is essential to our democratic system.

RESPECT FOR PEOPLE

Treating all people with respect, dignity and fairness is fundamental to our relationship with the Canadian public and contributes to a safe and healthy work environment that promotes engagement, openness and transparency. The diversity of our people and the ideas they generate are the source of our innovation.

INTEGRITY

Integrity is the cornerstone of good governance and democracy. By upholding the highest ethical standards, public servants conserve and enhance public confidence in the honesty, fairness and impartiality of the federal public sector.

STEWARDSHIP

Federal public servants are entrusted to use and care for public resources responsibly, for both the short term and long term.

EXCELLENCE

Excellence in the design and delivery of public sector policies, programs and services is beneficial to every aspect of Canadian public life. Engagement, collaboration, effective teamwork and professional development are all essential to a high-performing organization.
The **CMHC Code of Ethics and Business Conduct** has been developed based on CMHC Values since we care about what we do and how we do it.

**When we say:**

“Be an **owner**.” It means, be accountable. Own the problem and propose solutions. Spend our resources like they were your own.

“**Amaze** our clients with top-notch service.” We are in business for our clients. Amaze them. Surprise them. Delivering them the highest service is how “we help Canadians meet their housing needs.”

“Think “**yes**” first.” Have a sense of urgency about clients’ needs – whether they are external or internal clients. Solve problems. Look beyond how we have done things in the past to say “yes,” instead of citing reasons to say “no.”

“Do the **right** thing.” Act with integrity and in the best interests of CMHC and our clients. Be open and clear about what we do.

“Believe in **each other: we are better together**.” Have trust and mutual respect for each other. Build an extraordinary culture of teamwork. Welcome diversity of thought and background, and our uniquely Canadian multi-culturalism.

“Celebrate **both wins and failures**.” Learn from both. Relentlessly build our tool kit every day.

“**Ask Why?**” Innovation starts with speaking up and asking the right questions.

“Be **fearless** in the face of change.” Keeping up in a changing world requires courage and conviction.

“**Make a difference.**” Because what we do matters. Don’t just talk, act! Be empowered to make things happen. Know our risks. Attend to those we understand and reduce those we don’t.

“**Have fun** every day.” Life is too short not to have fun at work.
The CMHC Code of Ethics and Business Conduct provides guidelines on expected behaviours that reflect CMHC’s values and those of the VECEPS (the ‘Values’), and provides more specific guidance from a CMHC perspective. The Code has four main sections:

- **Ethical Principles**: to help (i) clarify how the Values apply when considering the ethical implications of our work at CMHC, (ii) guide your decision making and behaviour in all activities related to your professional duties, and (iii) provide direction in situations where the right course of action may not always be evident.

- **Expected Working Behaviours**: setting out behaviours that form a part of the terms and conditions of employment of all CMHC employees, including contributing to mutual respect, civility and well-being by treating others in a courteous and professional manner and conducting ourselves in a manner that contributes to a safe, respectful environment that is free from discrimination, abuse of authority, harassment and sexual harassment, as outlined in CMHC’s Harassment Prevention Policy.

- **Ethical Decision-Making Tool**: is designed to help you achieve the best possible course of action in situations of complexity, ambiguity, unease or uncertainty.

- **Conflict of Interest and Post-Employment Policy**: while CMHC employees are required to follow all of CMHC’s internal policies, procedures, processes and business practices, adherence to this policy is of utmost importance as it preserves the public trust and ensures CMHC’s continued commitment to integrity.

This Code applies to all CMHC employees, and, as applicable, to CMHC Board members. Other individuals accessing CMHC premises or otherwise working with CMHC employees are expected to abide by all provisions of this Code as they may be applicable to their circumstances.

**Our responsibilities as employees**

- We refer to CMHC’s Values and the Ethical Principles as guidelines in our business practices.
- We apply the Expected Working Behaviours and help others to do the same.
- We resolve problematic situations through ethical decision making and dialogue.
- We seek assistance if we have questions or concerns regarding CMHC’s standard of ethics.
Our additional responsibilities as supervisors

- We set an example for our team members and those partnering with CMHC.
- We help our employees understand the scope of the Code as it applies to their respective tasks.
- We maintain a work environment that fosters Code compliance, ethical decision making and dialogue.
- We take steps to provide our employees with the opportunity to raise issues, concerns and problems.
- We follow up when we suspect or are informed of a potential breach of the Code and take the necessary measures to ensure there are no negative consequences against CMHC employees who have raised such concerns in good faith.

Judgement required

No single policy can address every potential situation in which you may find yourself and, as such, the Code is not to be construed as a comprehensive policy. CMHC trusts its employees to (i) apply common sense and good judgment in their respective work practices, and (ii) consider how their actions may be perceived and come to affect the Corporation, colleagues, clients, business partners and the public.

Where to go for help

If you have questions about this Code, are unsure of what would be the best course of action or how to conduct yourself in a given situation, or if you find yourself in an ethical dilemma, you are to seek assistance from your immediate supervisor or Employee Relations.

Improving practices and reporting breaches

CMHC recognizes that its employees are often in the best position to assist in ensuring sound ethical practices and compliance with this Code. We encourage you to raise issues or questions in order to help improve our current practices and to report any breaches or suspected breaches of this Code to your manager or Employee Relations.
Disclosure of wrongdoing

In cases of suspected wrongdoing, you may communicate your concern directly to the CMHC Disclosure Officer or to the Public Service Integrity Commissioner.

CMHC’s Disclosure Officer can be reached via email at Disclosure-Divulgation@cmhc-schl.gc.ca or by telephone at 1-888-277-0506.

In accordance with the Public Service Disclosure Protection Act (PSDPA), CMHC’s Disclosure of Wrongdoing in the Workplace policy defines “wrongdoing” as:

a) a contravention of any federal or provincial law or regulation;

b) a misuse of public funds or a public asset;

c) a gross mismanagement in the federal public sector;

d) an act or omission that creates a substantial and specific danger to the life, health and safety of persons, or to the environment, other than a danger that is inherent in the performance of the duties or functions of a federal public sector employee;

e) a serious breach of CMHC’s Code of Ethics and Business Conduct; and

f) knowingly directing or counselling an employee to commit a wrongdoing set out in any of (a) to (e) above.

Wrongdoing is not restricted to the activities of CMHC employees, but also includes any wrongdoing in or in relation to the federal public sector.
Ethical Principles

Tailored to CMHC’s mission and vision, the Ethical Principles are inspired by CMHC’s Values, our willingness to do the best we can, and the legitimate expectations of our different stakeholders, such as our clients, our business partners, our employees, the communities we serve, the general public and the Canadian government. Since the “Expected Working Behaviours” section of the Code and CMHC’s policies cannot provide for all situations that you may encounter, the Ethical Principles provide broader direction.

The “Ethical Principles” provide:

■ general guidance to be followed in any situation, particularly in grey areas when no specific rules apply;

■ a context to help you understand how to apply the Expected Working Behaviours; and

■ criteria against which to evaluate the appropriateness of your actions, before making decisions or engaging in any given behaviour.

1. SERVING THE PUBLIC INTEREST

As stewards of the public trust, we serve with fairness, equity, impartiality and objectivity. The Canadian public must be confident that CMHC programs and services are designed with this in mind.

We always put the best interests of CMHC, our clients and the Canadian public first when making decisions. All of our activities, including those that are commercial in nature, are carried out in a manner which supports our public policy objectives.
2. PROVIDING HIGH QUALITY SERVICE

We are committed to providing the highest quality service to meet the needs of our clients. This entails acting with competence, commitment and professionalism, in order to achieve the best possible results for our clients and Canadians overall. Professionalism includes providing timely and useful services, with a focus on problem solving and accountability, while also preserving the principles of integrity and mutual respect (as outlined below).

Each one of us is a crucial member of the CMHC team. However we are stronger and more useful to our clients and to Canadians when we work together by (i) soliciting help when it is needed, (ii) being receptive and open to other opinions, beliefs and ideas, (iii) participating constructively in decision making, (iv) raising issues in a timely fashion and (v) suggesting improvements as needed in order to help us achieve the highest measure of quality service.

3. ACTING WITH INTEGRITY

We seek to build and maintain the trust of our clients, our business partners, our employees and colleagues, and the communities we serve. This is essential to the successful achievement of our mission and mandate. Exhibiting competency in the design and delivery of our programs and services is crucial, but is not sufficient to maintain trust. We must also act with integrity and uphold the values cherished by the Canadian public by (i) acting honestly and with fairness, (ii) focusing on doing the right thing, (iii) taking into account the possible impacts of our decisions and actions on our stakeholders, (iv) behaving in an open and transparent manner, (v) keeping promises and commitments, and (vi) walking the talk in ethical-related matters.

4. MUTUAL RESPECT AND WELL-BEING

We believe in taking care of our well-being and that of others, and that the quality of our business and working relationships with clients, partners and colleagues is based on mutual respect. Valuing diversity and multiculturalism, fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full potential, working collaboratively and recognizing the contributions of others are key pillars to creating and maintaining a respectful and motivating workplace. We also seek to contribute proactively in matters of health and safety and to strike a healthy balance between our CMHC work and the other parts of our lives.
Expected Working Behaviours

CMHC trusts that its employees seek to do what’s right. Nevertheless, this section of the Code outlines CMHC’s expectations and provides a common understanding of minimal ethical and workplace behaviours, which all employees must adhere to.

I. SERVING THE PUBLIC INTEREST

1.1 How we conduct our business

Our clients and the Canadian public expect us to conduct our business with fairness, equity, impartiality and objectivity, putting their interests before our own and respecting the law. Therefore each of us must:

a) uphold the letter and the spirit of the law at all times;

b) follow CMHC policies, procedures, and guidelines, while respecting CMHC’s financial authorities and instruments of delegation;

c) refrain from soliciting or accepting gifts, hospitality or benefits from clients and suppliers, including invitations to attend sports, cultural or entertainment events (please see the enclosed Policy on Conflict of Interest and Post-Employment for more details);

d) refrain from offering gifts or hospitality unless they constitute a generally accepted business practice, are of a reasonable amount, respect the legal and ethical framework the receiver is subject to and are declared as business expenses;

e) avoid seeking personal advantage when faced with opportunities that might arise due to our employment at CMHC; and

f) ensure that the provisions of the Outsourcing and Procurement policies are observed whenever goods and services are purchased on behalf of CMHC, and that selection processes and tenders promote equal access, transparency and full and open competition.
1.2 Conflicts of interest

Conflicts of interest can undermine a person’s impartiality and objectivity. Moreover, when they come to be known to our stakeholders (clients, suppliers, partners, colleagues, etc.), conflicts of interest negatively affect the trust that these stakeholders have developed in CMHC.

Therefore each of us must:

a) take the appropriate steps to ensure our conduct is free of any real, apparent or potential conflict of interest, as defined in the Policy on Conflict of Interest and Post-Employment;

b) declare any real, potential or apparent conflict of interest without delay, as provided for in the Policy on Conflict of Interest and Post-Employment;

c) ensure that we abide by the provisions of the Policy on Conflict of Interest and Post-Employment if we wish to engage in secondary employment or in activities involving other organizations.

One of our suppliers has invited me to lunch. Can I accept?

A meal paid for by a third party, namely a client or supplier, can be acceptable if the value is reasonable and it is an occasional occurrence, since it is a generally accepted practice and may enable business development or contribute to building good business relationships. Restrictions may however apply if the acceptance could bring into question CMHC’s objectivity and impartiality; or if it places the employee in a real, apparent or potential conflict of interest. See the Section below and the enclosed Policy on Conflict of Interest and Post-Employment for more details, and feel free to discuss the situation with your immediate supervisor.
One of my colleagues spends a lot of time on the phone during working hours trying to solve problems related to the small business she and her husband own. She also seems to use our sector’s printer for her business. Are these practices tolerated?

Employees may have outside activities, commercial or not, as long as they don’t impair or are not seen to impair their ability to perform their official duties. Taking time during working hours to work for one’s personal company not only affects the person’s and the team’s efficiency, it may impact the quality of service to clients and means that funds allocated to that person’s salary are being wasted. As for using CMHC resources for another company’s profit, this is an improper use of the public goods entrusted to us. These practices should not be tolerated. Employees may not use CMHC resources or work time for the purpose of secondary employment or the generation of additional income. If this situation cannot be resolved by talking to the employee, in order to make the employee realize what is problematic about the improper use, or if you are not comfortable doing so, talk to your immediate supervisor or Employee Relations.
EXPECTED WORKING BEHAVIOURS

Question & Answer

I have recently accepted a position on the board of a building association. Since I don’t work in a sector where I might have access to specific information they could take advantage of, I haven’t informed anyone at CMHC of this yet. Must I declare this position to CMHC?

Yes, because there is a risk of an apparent conflict of interest, if not a real conflict, particularly regarding the different decisions that the board will have to make on a regular basis to carry out its day-to-day business. Updating a Conflict of Interest Declaration will allow CMHC to tell you what to be careful of. Mitigation measures might include, for example, recusing yourself any time the board of the association discusses CMHC programs or services.

Question & Answer

I work as an Inspector for CMHC. Can I accept a part-time job elsewhere or have my own part-time business, doing inspections? What about my colleague who is an Evaluator for CMHC? Can he?

CMHC and lenders rely on the objectivity and impartiality of both Inspectors and Evaluators: the information they provide serves to make important decisions. Doing the same kind of work for a third party or for your own business might end up influencing your judgment in some cases or, at least, be perceived by others as influencing your judgment. Each of us has a duty to not engage in any outside activity that impairs or could be perceived as impairing our ability to perform our official duties at CMHC in an objective or impartial manner. All secondary employment should be disclosed. Please refer to the enclosed Policy on Conflict of Interest and Post-Employment for specific obligations. You can also speak to your immediate supervisor or Employee Relations if you are unsure.
I have just been promoted to a position where I have privileged information on strategic directions or decisions and actions to be taken shortly by CMHC. Does this affect my responsibilities regarding conflicts of interest?

This might create new situations where you might be facing a real, potential or apparent conflict of interest, namely regarding your assets or liabilities. For example, you might have access to information regarding upcoming changes to CMHC’s insurance premiums or changes to insurance or securitization product offering, or to recommendations CMHC has made regarding some of the federal government’s programs, which have not yet been publicly announced. This type of information may potentially impact the future value of certain financial interests you may have or are considering purchasing, such as publicly traded shares. When you are promoted to a new position, it is expected that you review your private affairs to prevent any such conflicts. In case of doubt, make sure to inform Employee Relations and discuss with your immediate supervisor so that the necessary mitigation steps can be taken.

1.3 Personal trading

Employees identified by CMHC as subject to special rules with respect to personal trading and disclosure of financial interests must exercise extra care in protecting confidential or sensitive information. Please see the Personal Trading Guidelines for additional information.
The special rules mentioned above apply specifically to staff involved in or supporting internally managed investment funds. However, personal trading conflicts may be present in other contexts. For example, I often have access, in my line of work, to non-public information regarding publicly traded third parties that might have an impact on the value of their shares. How does this affect the personal trading I can do?

The Conflict of Interest and Post-Employment policy states that you must not knowingly take advantage of or benefit from information that is obtained in the course of your official duties and responsibilities and that is not available to the public. You cannot allow friends, family or other third parties to benefit from this information either. This could be, for example, information on important transactions to come, on strategic decisions or upcoming announcements, or on problems they are facing.

In addition, every CMHC employee has a responsibility to prevent real, potential or apparent conflicts of interest. If your job entails regularly analyzing, monitoring and/or making recommendations or decisions regarding such third parties, for example financial institutions, you may need to reconsider the types of investments you make. An apparent or real conflict of interest could exist in such a case, which would affect your professional credibility and that of CMHC. Please see the section on conflicts of interest above, the Conflict of Interest and Post-Employment Policy and the Personal Trading Guidelines for more details. If in doubt, contact Employee Relations to discuss the matter and see what measures should be taken.
1.4 Use of CMHC assets

CMHC facilities and resources, including computers and digital communication devices, are public assets entrusted to us. We must use them responsibly, care for them in accordance with corporate policies, and use them exclusively for the conduct of CMHC business.

Any intellectual property that is created by an employee in the course of their employment is also a public asset, and is the property of CMHC.

2. PROVIDING HIGH QUALITY SERVICE

Providing the highest quality service in meeting the needs of our clients is an important value at CMHC. In order to help us achieve this, we must:

a) maintain a high level of professional competence and the most up-to-date skills in our individual fields of competence;

b) provide services in a timely manner;

c) share knowledge willingly and document our activities properly in order to assist each other in performing our duties;

d) co-operate with each other in such a way that allows us to meet the client’s needs in an efficient and effective manner; and,

e) if being a member of a professional order is required for our job, remain a member in good standing, and comply with the additional professional obligations that may apply.
3. ACTING WITH INTEGRITY

Acting with integrity is key to trust. Even small acts lacking integrity can affect the perception of CMHC’s stakeholders, and that of our peers, as to how trustworthy we really are. Our status as a Crown Corporation, whose mandate is focused on serving the Canadian public, heightens the public’s expectations of CMHC in terms of our commitment to acting with integrity. In order to meet this legitimate expectation of integrity, it is important that we do the following:

3.1 Act honestly and in a way that maintains trust

a) Operate in an honest and open manner in the conduct of our duties.

b) Avoid any misuse of assets or misappropriation of funds.

c) Use CMHC resources only for our work at CMHC and never for the purpose of secondary employment or the generation of additional income.

d) Create and maintain authentic, reliable and usable records in support of ongoing business, and protect the integrity of those records for as long as is required.

e) Refrain from making unauthorized copies of corporate or third party software, or install or use any unauthorized or “pirated” software on corporate equipment. Please refer to IT Online to reference applicable IT policies.
f) Use official social media accounts with integrity and in a manner that bears the closest public scrutiny. For example, these accounts must never be used to inappropriately obtain a personal advantage or to advantage or disadvantage others. Please refer to the Social Media Guidelines.

g) Abide by CMHC policies on Internet usage. Note that the use of the Internet is recorded by CMHC and can be monitored at any time. Information regarding employees’ use of the Internet may be collected by CMHC and used for administrative purposes, which could include disciplinary action for a violation of CMHC’s policies and procedures.

3.2 Protect sensitive information

Discretion must be exercised in all of our activities, particularly regarding the treatment of sensitive information. The level of sensitivity assigned to CMHC information is based on the possible impact that the release of such information, to an unauthorized source can cause. In accordance with the CMHC Security of Information Classification Guide, sensitive CMHC information is divided into two categories: (i) Protected or (ii) Classified (Secret, Top Secret and Confidential).

Protected information is information that, if disclosed, may result in harm, embarrassment or other negative consequences for a given individual, entity, or CMHC. It is important to remember that such information might be misused or misquoted. Therefore even information that seems inoffensive may, if disclosed, cause harm to others. Classified information is information related to the national interest.
**Protected information** can be corporate, personal or third party in nature. This includes, but is not limited to, (i) personnel files, (ii) medical records, (iii) information concerning complaints or investigations and disciplinary action, (iv) a client’s or third party’s financial information, and (v) non-public information on a property CMHC wishes to sell. **Classified information** includes most Cabinet documents or records containing information discussed or for discussion at Cabinet meetings or by a Cabinet committee.

Therefore each of us must:

a) take appropriate measures to properly safeguard sensitive information obtained in the course of, or in activities related to, our professional duties;

b) restrict access to such information only to employees who have the appropriate security status or clearance, as well as the need to know for legitimate CMHC business purposes;

c) avoid disclosing any sensitive information that we obtain through our work for CMHC without proper authorization;

d) refrain from using sensitive CMHC information for personal gain or the benefit of friends, family or other third parties;

e) avoid using information collected for a specific purpose, such as a survey or market analysis, for other purposes without the consent of the people who participated;

f) acquire sufficient knowledge of relevant security requirements and ensure that those requirements are respected;
g) protect electronic accounts and passwords at all times, as they are issued to employees for the sole use of the individual to whom they are granted and avoid sharing passwords or access to accounts unless specifically authorized to do so. (Note: Please refer to IT Online to reference applicable IT policies).

h) refrain from engaging in any public discussion, in traditional media, social media or otherwise, about the affairs, policies or organization of the Corporation without the prior approval of the President or the Management Committee member directly responsible for your sector, unless such activities are a part of the normal fulfillment of your official duties, including participation in approved external consultations;

i) protect and safeguard all information at all times, especially when working remotely;

j) destroy or dispose of information according to security requirements and policies and procedures for document retention and destruction; and

k) in the case of breach of personal information, act in accordance with the CMHC Privacy Policy (Breach Protocol).

The obligation to protect and not disclose sensitive information continues following the end of employment at CMHC.

HELP PROTECT CONFIDENTIAL AND SENSITIVE INFORMATION

Consult sensitive information only on a need-to-know basis
Log out or shut down your computer before leaving it unattended
Avoid using the speakerphone for confidential discussions
Don’t let others use your passwords
Lock up confidential documents when not in use
Be careful when forwarding e-mails: sensitive information may be included
If a request for access to a CMHC record or any other confidential or sensitive information is made, please advise your immediate supervisor or direct the person making the request to CMHC’s ATIP office or to your Human Resources representative in the event that the request is for a personnel file.

**Protecting confidential information is everyone’s business!**

Employees must immediately report all instances of a breach of confidentiality, or unauthorized disclosure of confidential or sensitive protected information to their immediate supervisor. In the case of a breach of personal information, follow the guidelines in the Privacy Policy (Breach Protocol).

### 4. MUTUAL RESPECT AND WELL-BEING

CMHC endeavours to provide business relationships and a work environment that foster respect, equality, co-operation and that are conducive to professional growth and self-esteem. Diversity of culture and thought is viewed as enriching the workplace, making it more interesting and productive. It can also fuel innovation and help us better respond to our clients’ needs. We also promote a safe and healthy work environment.

CMHC expects every employee to contribute to mutual respect and well-being by doing the following:

- **a)** always treat others, be they clients, partners, colleagues or members of the public, in a courteous and professional manner;

- **a)** avoid discrimination. The Corporation will not tolerate discrimination by or toward employees on the following grounds: race, national or ethnic origin, colour, religion, age, sex, marital status, family status, sexual orientation, gender identity or expression, genetic characteristics, disability (physical or mental disability, including dependence on drugs or alcohol) or conviction for which a pardon has been granted or in respect of when a record suspension has been ordered;
b) abstain from uttering offensive remarks or offensive jokes, bullying, workplace violence or the threat of violence, harassment (including but not limited to sexual harassment) as described in CMHC’s Harassment Prevention Policy and Workplace Violence Prevention Policy or participation in any of these behaviours;

c) report to your immediate supervisor, Employee Relations, Security or Disclosure Officer any behaviours stated above;

d) take appropriate measures to protect the health and safety of other CMHC employees and other persons;

e) consider the impact of your behaviour on the work environment and on those around you, and avoid negatively impacting others;

f) uphold CMHC’s commitment to the promotion of Canada’s official languages and to ensuring that CMHC’s products and services are offered to the public in both official languages. See our Official Languages Policy for more information;

g) use official social media accounts with respect toward all individuals and groups as per CMHC’s Social Media Guidelines;

h) when using personal social media accounts or participating in any other public forum, remember your duty to act professionally. For example, do not make negative or inappropriate comments about other employees, CMHC programs or policies, or about clients, outside individuals, organizations or government entities with which CMHC interacts;

i) dress in a manner that respects the professional image of CMHC and the nature of the duties that you perform.

FOLLOW YOUR NOSE

Did you know that scents can trigger the symptoms of individuals with allergies and asthma or provoke headaches and/or nausea? Balancing our personal wants and other people’s needs is a key component of respect.
One of my colleagues tends to have violent outbursts and swear when he is stressed. This makes some members of our team uncomfortable, and even stressed, while others tend to brush it off as unimportant, saying that’s just how he is and that he means no harm. Is such behaviour acceptable at CMHC?

Even if there is no intent to cause harm or be disrespectful, if some people consider this disrespectful or if this causes them discomfort or stress, it disrupts the work climate and is not conducive to good relationships. In addition, people may start avoiding this person, which will have an impact on collaboration and the effectiveness of the team. If this situation cannot be resolved by talking to the person, or if you are not comfortable doing so, contact your immediate supervisor or Employee Relations for assistance.

INCIVILITY: NOT THAT BIG AN ISSUE?

Rude, insensitive or demeaning words and behaviour constitute incivility and a lack of respect. This includes talking behind someone’s back, bullying, or voluntarily ostracizing or ignoring someone. Although they may seem inconsequential compared to deviant behaviours, such as harassment or physical abuse, they have negative impacts on workplace morale, productivity, work satisfaction, team co-operation, and personal well-being.
CMHC supervisors have an important role in ensuring mutual respect and well-being at CMHC. Namely, they must use their authority wisely and with discretion and respect. They must also consider the work-life balance of employees when determining how to meet operational requirements.

**Our safety and well-being is everyone’s business!**

**If you become aware of one of the following situations, report it as soon as possible so that corrective measures may be taken:**

- Incidents of discrimination, harassment or abuse of authority must be reported to a supervisor and to the Senior Manager, Employee Relations (CMHC’s Harassment Prevention Policy).

- Incidents of workplace violence must be reported to Security and Emergency Management and to your immediate supervisor (CMHC’s Workplace Violence Prevention policy).

- Potential risks to the health and/or safety of individuals must be reported to a supervisor and, if the risk involves imminent danger to health or safety, immediately reported to Security and Emergency Management.

**5. RESOLVING INTERPERSONAL CONFLICT**

Resolving interpersonal conflicts and disagreements in a peaceful and collaborative manner helps foster a healthy work environment and maintain team spirit and motivation. When interpersonal conflicts or ethical issues on which agreement is difficult to achieve occur, CMHC employees are encouraged to discuss and resolve these matters between themselves, informally, or with their immediate supervisor. Employees can also seek advice and support from Employee Relations.

CMHC trusts its employees to try to resolve interpersonal conflict in a fair and respectful manner, with a view to resolving the issues underlying the conflict. Supervisors are responsible for encouraging and maintaining an ongoing dialogue on respect, values and ethics in their area of responsibility, and assisting their employees in conflict resolution. When informal conflict resolution is unsuccessful, Employee Relations is available to provide advice and assistance regarding methods for resolving disputes.
6. BREACH OF THE CODE

6.1 Adherence to the Expected Behaviours of the Code is a condition of employment for every CMHC employee, regardless of the position occupied within the organization, and regardless of any relationships (including family and significant personal relationships) that may exist within the workplace. A breach of this Code will result in the application of disciplinary measures, including a reprimand or suspension in accordance with CMHC’s Disciplinary Measures Policy. In the case of a serious breach or recurring breaches of the Code, employment with CMHC may be terminated.

6.2 In addition to compliance with this Code, you are required to follow all CMHC policies, procedures, processes and business practices. You are also expected to respect the requirements of legislation applicable to CMHC and its employees including the Canada Labour Code, the Canadian Human Rights Act, and the Access to Information Act, the Privacy Act, and the Public Servants Disclosure Protection Act. Conduct that is illegal, dishonest or unethical constitutes a breach of this Code, and may be subject to prosecution under the Criminal Code whether or not the conduct is specifically addressed in the Code.

6.3 CMHC reserves the right and may be obligated to report breaches of the Code to law enforcement authorities.

6.4 Any reports of a breach of this Code must be made in good faith and with an honest belief that misconduct has occurred. CMHC employees shall not attempt to malign a person or gain advantage through frivolous or unfounded complaints. Frivolous or malicious complaints, or complaints not made in good faith will be considered a serious breach of this Code.

6.5 Retaliation, in any form, toward a person who has raised issues, concerns or problems in good faith will be considered a serious breach of this Code.
7. DISCLOSURE

7.1 If a CMHC employee has information that could indicate a serious breach of this Code, they are obliged to bring the matter to the attention of their immediate supervisor. In the case of “wrongdoing” as defined in the PSDPA, employees should bring this to the attention of the CMHC Disclosure Officer, or may alternatively refer such matters to the Public Sector Integrity Commissioner.

7.2 In the case of “wrongdoing” as defined in the PSDPA, employees should bring this to the attention of the CMHC Disclosure Officer, or may alternatively refer such matters to the Public Sector Integrity Commissioner. CMHC’s Disclosure Officer can be reached via email at Disclosure-Divulgation@cmhc-schl.gc.ca or by telephone at 1-888-277-0506.

Question & Answer

Is speaking up a career limiting move?

I know that I won’t be fired if I raise concerns I have about some of our practices, but what about more subtle forms of retaliation, such as being reassigned to less desirable assignments, losing an opportunity for promotion or having to endure veiled threats or harassment from colleagues? Am I protected from those?

This Code prohibits the termination, reassignment, demotion, or any harassment of employees who raise, in good faith, any breaches of this Code or any other CMHC policy or procedure. CMHC will investigate any allegations of retaliation resulting from an employee’s reported breach and if allegations are substantiated, the individuals involved will be disciplined accordingly.
APPENDIX A

Ethical Decision-Making Tool

The purpose of this tool is to help you make the best possible decisions in situations where the Code and other CMHC policies and procedures are insufficient.

It is important that you go through the whole decision-making process before making your decision and have collected as much information as possible to properly apply the test. If you are still unsure after having used this tool, discuss the situation with a colleague, your immediate supervisor or Employee Relations before you act.

STEP 1:

FACTS AND POSSIBLE OPTIONS

What are the facts?

What verifications do you need to make to ensure you have all the relevant facts?

What are your options?

How do I feel about the situation? Do my emotions/gut feelings give me additional information?

STEP 2:

CONSEQUENCE AND VALUE ANALYSIS

What laws, CMHC standards, rules, policies and expected behaviours are applicable to this type of situation, if any?

Who are the stakeholders who will benefit from or be impacted by this decision? (clients, employees, CMHC, partners, local community, Canadian public, environment, me…)

What would be the consequences of each option on each stakeholder? (short and long term; positive and negative)

What values and CMHC ethical principles are upheld, or negatively affected, by each of these consequences?
### Rights and Fairness Analysis

<table>
<thead>
<tr>
<th>Question</th>
<th>Question</th>
<th>Question</th>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>Am I respecting fundamental human rights and human dignity with each option?</td>
<td>Am I treating everyone fairly in each option?</td>
<td>Am I treating people only as means to other ends, or as human beings with needs and goals of their own?</td>
<td>What would happen if everyone acted the same way as this option suggests?</td>
</tr>
</tbody>
</table>

### Organizational Analysis

<table>
<thead>
<tr>
<th>Question</th>
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<th>Question</th>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>Which option would be in CMHC’s best interest in the long term?</td>
<td>Will each option project a professional and responsible image of myself, my colleagues and CMHC?</td>
<td>Which option would have the best impact on public trust toward CMHC?</td>
<td>Which option is more likely to preserve trustful and harmonious relationships with our different stakeholders?</td>
</tr>
</tbody>
</table>

### Decision

| Considering all of these factors, what would be the best decision, under the circumstances and why (ethical justification)? | Is it the best I can do in the circumstances? Would either option make me feel embarrassed, guilty or ashamed if my boss, my peers or the public knew the decision I had taken? | Could I find a better solution if I was a bit more creative or if I thought things through more? | How can I minimize the residual negative impacts of this decision and take the important values I discarded in my decision into account, in the way I implement my decision? |


Canada Mortgage and Housing Corporation
ANNEX A

CMHC Conflict of Interest and Post-Employment Policy

1. INTRODUCTION AND PURPOSE

Preventing, managing and resolving conflict of interest situations is one of the principal means of maintaining public trust and confidence in the impartiality and integrity of public institutions.

CMHC’s Conflict of Interest and Post-Employment Policy ensures that, in situations of real, apparent or potential conflict of interest or situations in which there is a conflict of duties, actions are taken in a manner that upholds the public interest.

It also facilitates ethical decision-making to resolve conflicts between private and public interests and establishes measures to help prevent, manage and resolve conflicts of interest and post-employment situations that could impair either the integrity of CMHC or the public’s perception of its integrity.

Under CMHC’s Conflict of Interest and Post-Employment Policy, all employees must complete a Conflict of Interest Declaration, which serves to certify that they:

- have read and understood the Conflict of Interest and Post-Employment Policy and, as a condition of employment/appointment, will observe related guidelines;
- have disclosed all assets and liabilities, as well as outside activities that could give rise to a real, apparent, or potential conflict of interest.

2. SCOPE AND APPLICATION

CMHC’s Conflict of Interest and Post-Employment Policy applies to all CMHC employees. Adherence to CMHC’s Conflict of Interest and Post-Employment Policy is a condition of employment. A breach of CMHC’s Conflict of Interest and Post-Employment Policy may result in appropriate disciplinary actions, including dismissal.

The Senior Manager, Employee Relations, is responsible for providing advice and guidance to CMHC employees with respect to CMHC’s Conflict of Interest and Post-Employment Policy.

CMHC Board members are bound by similar conflict of interest obligations as may be adopted by the Board from time to time and as articulated in the Board of Directors declaration form. CMHC’s Board of Directors may seek advice and guidance from the Chief Legal Officer and Corporate Secretary.

3. POLICY REQUIREMENTS

All CMHC employees and Board members are required on appointment and throughout their tenure at CMHC to:

a) arrange their private affairs and take all reasonable steps to recognize, prevent, report and resolve any real, apparent or potential conflicts of interest between their official responsibilities and their private affairs;

b) perform their official duties in such a manner that public confidence and trust in the integrity, objectivity and impartiality of CMHC are maintained and enhanced;
ANNEX A – CMHC CONFLICT OF INTEREST AND POST-EMPLOYMENT POLICY

c) act in a manner that will bear the closest public scrutiny, an obligation that is not fully discharged by simply acting within the law;

d) refrain from having any private interests that would be unduly affected by CMHC actions in which they participate, or of which they have knowledge and information, unless otherwise permitted;

e) not knowingly take advantage of or benefit from information that is obtained in the course of their official duties and responsibilities and that is not available to the public;

f) refrain from hiring or supervising a family member or a significant personal relation unless prior approval is explicitly provided by the President;

g) immediately disclose when they are in, or are entering into, a family or significant personal relationship with another CMHC employee that may give rise to a real, apparent or potential conflict of interest;

h) disclose if a family member is employed by a third party, is on its board of directors, or is a shareholder or significant investor of a company doing business with CMHC;

i) refrain from using directly or indirectly, or allowing others to use, CMHC property of any kind, including any property leased to CMHC, for anything other than officially approved activities;

j) refrain from interfering with the dealings of private entities or persons with CMHC in order to inappropriately influence the outcome;

k) refrain from engaging in any outside activity that impairs or could be seen to impair their ability to perform their official duties in an objective or impartial manner; and

l) refrain from public criticism of CMHC, the Government of Canada or any political activity that could impair or appear to impair their objectivity and impartiality and that of CMHC.

4. CONFLICT OF INTEREST DECLARATION

4.1 The Conflict of Interest Declaration is one of the primary means by which employees can ensure compliance with this policy.

4.2 All employees must complete the Conflict of Interest Declaration in writing immediately upon employment/appointment, and then within sixty (60) days of their initial appointment they must complete the declaration electronically. Public perception is as important as actual fact; therefore situations that may appear to give rise to a conflict of interest should be considered when completing the Conflict of Interest Declaration. This declaration will serve to certify that employees:

a) have read and understood the Conflict of Interest and Post-Employment Policy and as a condition of employment/appointment will observe these guidelines; and

b) have disclosed all assets and liabilities, as well as outside activities, and other interests and relationships that could give rise to a real, apparent or potential conflict of interest.

4.3 Conflict of interest declarations must be reviewed and updated:

a) semi-annually, in the case of designated positions that have investment responsibilities;

b) annually, by all other employees; or

c) whenever there is a material change in the employee’s liabilities, outside activities, other interests and relationships or their official responsibilities.

4.4 Assets and liabilities subject to a conflict of interest declaration

Employees are required to consider their assets and liabilities and report in writing those assets and/or direct and contingent liabilities that, in the individual’s assessment, might give rise to a real, apparent, or potential conflict of interest with respect to their official duties and responsibilities. For greater guidance, appendix B lists those assets and liabilities that must be disclosed under this policy, as well as those assets and liabilities that are exempt from disclosure.
4.5 **Personal Trading Guidelines**

CMHC employees who have, or are authorized to obtain, access to information that is generally not available to the public about CMHC or CMHC Pension Fund portfolio holdings, trading activities or ongoing investment programs are subject to the additional requirements set out in the *Personal Trading Guidelines*.

4.6 **Use of NHA facilities**

a) Employees are entitled to use the facilities of the National Housing Act (NHA) for their own requirements on the same terms and conditions applicable to non-employees. However, because CMHC is responsible for administering the NHA, employees must disclose their interests in transactions under it where such interests might be construed as being in real or potential conflict of interest with their official duties. Disclosure also applies to any member of the immediate family or household residing with the employee.

b) Employees who by virtue of their position, directly or indirectly, are involved in the processing or delivery of any program administered by CMHC and who wish to avail themselves of such a program must divulge their intention and obtain approval from the Management Committee member directly responsible for their sector before applying to:

i. purchase or lease any housing unit owned or administered by CMHC;

ii. lease any housing unit owned by a co-operative association or by a non-profit corporation that receives NHA assistance;

iii. acquire any NHA-insured or assisted property for investment purposes;

iv. receive assistance made available as a result of an NHA program involving:
   - contributions;
   - the allowable portion of loans, the payment of which may be forgiven;
   - any other financial advantage being conferred by such a program; and
   - the purchase a residential lot in a federal-provincial land assembly project.

c) All employees must inform their Director/Senior Manager *before*:

i. applying to an Approved Lender for a loan that may be insured by CMHC; or

ii. accepting a transfer or assignment of ownership of any property on which an Approved Lender holds an NHA mortgage.

d) The use of the NHA by employees for investment purposes is subject to the requirements of disclosure and prior approval by the Management Committee member directly responsible for the employee’s sector before such transactions are entered into.

e) All such, permissions and/or disclosures shall be in writing and a copy must be forwarded to the Senior Manager, Employee Relations. Beneficial ownership of securities guaranteed by CMHC, such as mortgage-backed securities, does not constitute a real or potential conflict of interest and therefore does not require prior approval or disclosure.
5. OUTSIDE ACTIVITIES SUBJECT TO A CONFLICT OF INTEREST DECLARATION

5.1 Employees must assess their outside activities, including (but not limited to) personal businesses, secondary employment, membership in not-for-profit organizations, professional associations, etc. and declare, in a conflict of interest declaration, those activities which, in the individual's assessment, might give rise to a real, apparent, or potential conflict of interest with respect to their official duties and responsibilities.

5.2 For greater clarity, all employees must:
   a) avoid any financial, commercial, business, employment, or other interest/activity outside of CMHC where such an interest might be prejudicial or detrimental to the discharge of their official duties and responsibilities; and
   b) avoid any activity in their personal affairs that could impair or call into question their ability to perform their duties and responsibilities in an objective manner.

6. SECONDARY EMPLOYMENT

6.1 CMHC employees may be permitted to engage in secondary employment, provided that such employment does not give rise to a real, apparent or potential conflict of interest with their official duties.

6.2 An employee who wishes to engage in secondary employment must notify the Senior Manager, Employee Relations, prior to commencing such employment. The Senior Manager, Employee Relations, will consult with the Senior Vice-President, People and Strategy and other individuals as required to determine the existence of a conflict and make an assessment. In the event that the secondary employment does give rise to a real, apparent or potential conflict of interest the Senior Vice-President, People and Strategy may require that it be modified or terminated.

6.3 Employees may not use CMHC resources for the purpose of secondary employment or the generation of additional income.

6.4 All employees engaging in secondary employment must make themselves aware of applicable exclusions under CMHC's Short-Term Disability program related to injuries sustained while working elsewhere.

7. MEMBERSHIP IN ASSOCIATIONS

7.1 Employees must disclose in writing, to the Management Committee member responsible for their sector, their membership in any of the organizations listed in the electronic version of the List of Associations - Conflict of Interest and, subject to the provisions in this section, the holding of an executive position or the chairmanship of a committee in the organization. Where an executive position is held, employees shall indicate the specific title and describe the responsibilities associated with the position.

7.2 Employees may not serve as president or vice-president, or hold an equivalent position, in any of the organizations listed in the electronic version of the List of Associations - Conflict of Interest where office holding is prohibited.
7.3 Employees may also not serve as president or vice-president, or hold an equivalent position, in any of the other organizations listed in the electronic version of the List of Associations - Conflict of Interest unless the Management Committee member directly responsible for their sector so authorizes. A copy of the authorization shall be placed on the employee’s personnel file and a copy shall be forwarded to the Senior Manager, Employee Relations.

7.4 Where an employee represents CMHC as a member in any of the organizations listed in the electronic version of the List of Associations - Conflict of Interest there must be a written disclosure made to the Management Committee member directly responsible for their sector. A copy of the disclosure shall be placed on the employee’s personnel file and a copy shall be forwarded to the Senior Manager, Employee Relations.

7.5 Employees shall refrain from voting on any matter in which CMHC is, or could be, involved; thus avoiding a real, potential or apparent non-personal conflict of interest situation from arising.

7.6 In a situation where an employee believed that no conflict would arise, but one does become apparent, the employee shall immediately report the issue to the Management Committee member directly responsible for their sector and to the Senior Manager, Employee Relations.

7.7 The Management Committee member directly responsible for the employee’s sector and the Senior Vice-President, People and Strategy may require that membership in an organization be curtailed, modified, or ceased when it has been determined that a real or potential conflict of interest exists.

8. POLITICAL ACTIVITIES

8.1 Employees shall be guided by the following principles:

a) In order to ensure public trust in CMHC, employees must be, and must appear to be, both politically impartial and free of undue political influence in the performance of their CMHC duties.

b) Employees shall provide full assistance and services required by legislation and CMHC policies and programs in an impartial manner, serving everyone equitably.

c) Employees shall provide objective and impartial advice based on professional competence.

8.2 Employees must:

a) avoid directing public attention to themselves as being active supporters of a given party or candidate;

b) refrain from conduct that might compromise, or be perceived to compromise, their ability to carry out their CMHC duties in an impartial way; and

c) be mindful that, in conducting any political activities, including activities on the Internet and via social media, the perception of their political impartiality will depend upon many circumstances unique to them, such as the nature and public visibility of their political activities and their public service duties, their place of work, and their level of responsibility as CMHC employees.
8.3 Employees may engage in various political activities outside working hours and off the employer’s premises. Employees may:

a) vote;

b) attend political meetings;

c) contribute funds to a political party or candidate;

d) hold membership in a political party;

e) sign the official nomination paper of a candidate;

f) express personal views on public issues without making public statements to the media orally or in writing of a partisan political nature, thereby directing public attention to themselves as an active supporter of a political party;

g) speak as a member of the public at all candidates’ meetings and question candidates on policy issues;

h) participate in discussions relating to the development of policies of a political party without directing public attention to themselves as an active supporter of a political party;

i) seek to be elected as a delegate to a leadership convention;

j) attend, as a delegate, leadership conventions;

k) provide assistance to a candidate or party in ways that do not attract public attention to themselves and that would not be perceived as impairing their ability to discharge their public service responsibilities in a politically neutral manner; and

l) apply to the Management Committee member directly responsible for their sector for leave without pay to seek nomination as a candidate and, provided such leave is granted, be a candidate for election as a member of the House of Commons or a member of the legislature of a province or territory.

9. STANDING FOR ELECTED OFFICE

9.1 All employees who wish to stand for elected office must abide by the following requirements depending on the level of the office:

a) For federal, provincial or territorial government

i. Employees must not stand for elected office or seek nomination unless they have first obtained permission from their sector head to take leave without pay in order to do so. Management Committee members will consult with the Senior Vice-President, People and Strategy, prior to making a determination.

ii. If granted, leave without pay will be for a period ending on the day on which the results of the nomination or election are officially declared; or on such earlier day as may be requested by the employee if they ceased to be a candidate.

iii. Employment is terminated when an employee is declared to be the elected candidate.
b) For municipal government

i. Where an employee wishes to run for municipal office, which is considered to be a full-time position with salary, they will request leave without pay for the election period from the Management Committee member directly responsible for their sector. If elected, leave without pay would be extended for the term of office. Management Committee members will consult with the Senior Vice-President, People and Strategy, prior to making a determination.

ii. Where the elected position is part-time or evening work only, the employee’s intentions to seek election must be brought to the attention of the Management Committee member directly responsible for their sector for a ruling on a real or perceived conflict of interest. Management Committee members will consult with the Senior Vice-President, People and Strategy, prior to making a determination. At this time, a decision would also be made as to whether or not the employee should take leave without pay for the election and for any part-time period during normal working hours required to fulfil their municipal duties.

10. GIFTS, HOSPITALITY AND OTHER BENEFITS

Gifts, hospitality, or other benefits that could influence, or be perceived to influence, employees in their judgment and performance of official duties must be declined.

10.1 Gifts

a) Subject to the general principle set out above, an employee may accept unsolicited gifts, other than tickets to an entertainment venue, with a value of $50 or less, provided that the cumulative value of the gifts from the same source does not exceed $100 within a 12-month period. Gifts of greater value may be accepted only with the written approval of the Management Committee member responsible for the employee’s sector.

b) Cash, loans, client goods or services, discounts or work rendered free of charge for personal purposes are never acceptable.

c) In situations where declining a prohibited gift might reasonably offend the gift giver, an employee may accept the gift, but then must immediately turn it over to their immediate supervisor for appropriate disposition. CMHC may determine that the gift will be donated to charity, retained for CMHC purposes or otherwise disposed of by CMHC.

10.2 Hospitality

a) In general, an employee should not accept an invitation to an event that is sponsored by a supplier if the attendance at such an event would compromise the objectivity or integrity of the employee or that of CMHC.

b) However, CMHC recognizes that an occasional working meal (paid for by a third party), or meals provided at a widely attended function that an employee is attending on behalf of CMHC, may serve a legitimate business purpose and foster appropriate business relationships.

10.3 Sporting or entertainment events

a) An employee is not permitted to accept a ticket to, or an invitation to attend, any entertainment venue, such as hockey, golf, theatre or a concert from any supplier or potential supplier of goods or services to CMHC, unless the tickets or invitations are extended to a broad range of invitees, and the general provision of this section are respected. In such cases, the employee should consult with their immediate supervisor before accepting such tickets or invitations.
ANNEX A – CMHC CONFLICT OF INTEREST AND POST-EMPLOYMENT POLICY

11. TRAVEL, SPEAKING ENGAGEMENTS, ATTENDANCE AT CONFERENCES

11.1 Travel

When an employee is travelling on official CMHC business, the employee must exercise care to avoid real or perceived impropriety.

a) If an employee is invited to speak at a conference or other event in their capacity as a CMHC employee, they must obtain prior approval from their immediate supervisor regarding the speaking engagement and the content of the speech. The employee must ensure that the information being presented is not confidential or likely to give participants at the conference an unfair advantage in dealing with CMHC or any government entity.

b) As a speaker, an employee may accept payment or reimbursement of related expenses and may accept the hospitality extended to all participants. An employee may also accept token expressions of gratitude that fall within the provisions of the Code of Ethics and Business Conduct related to acceptable gifts. Any additional payment that an employee receives for speaking and that they are unable to decline must be immediately turned over to CMHC.

c) If an employee is invited to attend a conference as an employee of CMHC, they must seek the prior approval of their supervisor before accepting the invitation. Generally, the employee attendance-related expenses should be paid by CMHC, but exceptions may be made if those expenses are in the ordinary course of business.

12. AVOIDANCE OF PREFERENTIAL TREATMENT

12.1 Employees are responsible for demonstrating objectivity and impartiality in the exercise of their duties and in their decision making, whether related to staffing, procurement, financial awards or penalties to external parties, transfer payments, program administration or any other exercise of official responsibility.

12.2 Employees must not accord preferential treatment in relation to any official matter to family members or friends, or to organizations in which CMHC employees, their family members or friends have an interest. Care must be taken to avoid being placed, or appearing to be placed, under obligation to any person or organization that might profit from special consideration by the CMHC employee.

12.3 Employees must not, without the prior permission of the Management Committee member directly responsible for their sector offer assistance in dealing with the government to any individual or entity where such assistance is outside the official role of the employee.

12.4 Providing information that is publicly accessible is not considered preferential treatment.

13. POST-EMPLOYMENT

13.1 Employees must not take improper advantage of their previous office.

13.2 Employees must disclose in writing to the Management Committee member directly responsible for their sector or to the Senior Manager, Employee Relations:

a) all firm offers of employment that could place them in a conflict of interest situation; and

b) the acceptance of any job offer immediately thereafter.

Directors and above must disclose this information to the Senior Vice-President, People and Strategy.
13.3 Depending upon the circumstances, such disclosure could result in a “cooling off” period whereby an individual would not be permitted to be employed or provide services to certain entities. The extent of the “cooling off” period is determined through collaboration between the appropriate Management Committee member and the Senior Vice-President, People and Strategy on a case-by-case basis.

13.4 Upon departing from CMHC, employees who have had access to privileged information must not disclose or take personal advantage of any information obtained in the course of their official duties and responsibilities at CMHC until the information has become generally available to the public.

14. COMPLIANCE

14.1 In keeping with the principles described in this policy, all employees are responsible for taking such action as is necessary to prevent real, potential or apparent conflicts of interest.

14.2 Compliance with this policy will generally be achieved by the following:

a) **Avoidance**: avoiding or withdrawing from activities or situations that would place employees in a real, potential or apparent conflict of interest relative to their official duties and responsibilities.

b) **Disclosure**: disclosing those assets and liabilities, outside activities and other interests that could give rise to a real, potential or apparent conflict of interest with their official duties and responsibilities, where such activities or situations cannot be avoided.

c) **Divestment or discontinuance**: divesting of an asset or liability, placing it in a trust, or ceasing the outside activity, where continued ownership or continuance of the activity by CMHC employees does give rise to a real or apparent conflict of interest with their official duties or responsibilities.

14.3 When divestment of assets is required, divestment must take place within 120 days after appointment/employment or after notice of divestment is given. Divestment of assets is usually achieved by selling them in an arm’s length transaction or by making them subject to a trust arrangement. The trust arrangement established must not leave, in the hands of the employee, any power of management or decision over the assets placed in trust. Assets may not be transferred or sold to family members or others for purposes of circumventing the compliance measures.

15. CRIMINAL CODE OFFENCES

15.1 It is an offence under section 121 (1) (a) of the Criminal Code for an “official to demand, accept or offer, or agree to accept from any person for him/herself or another person, a loan, reward, advantage or benefit of any kind as consideration for co-operation, assistance, exercise of influence, or an act or omission in connection with:

a) the transaction of business with or any matter of business relating to Government; or

b) a claim against Her Majesty or any benefit that Her Majesty is authorized or is entitled to bestow.”

15.2 It is an offence under section 121 (1) (c) of the Criminal Code for an “official or employee of the Government to demand, accept or offer, or agree to accept from a person who has dealings with the government, a commission, reward, advantage or benefit of any kind, directly or indirectly, by himself, or through a member of his family, or through anyone for his benefit, unless he has the consent in writing of the head of the branch of government that employs him or of which he is an official, the proof of which lies on him.”
16. CONSULTATION

16.1 When assessing whether a real, apparent or potential conflict of interest exists, the Senior Manager, Employee Relations, will take into account:

a) the individual’s specific responsibilities and access to information;

b) the value and type of assets and interests involved;

c) the nature and extent of the outside activities; and

d) the actual costs to be incurred by divesting the assets and interests, as opposed to the potential that the assets and interests represent for a conflict of interest.

16.2 Each situation will be assessed on a case-by-case basis and the Senior Manager, Employee Relations, will make a recommendation, in consultation with the Sector Head, to the employee concerning appropriate mitigation measures. In cases of doubt or concern regarding the interpretation of the Conflict of Interest and Post-Employment Policy, employees are encouraged to consult with their immediate supervisor and/or Employee Relations.
17. RESPONSIBILITIES AND AUTHORITIES

<table>
<thead>
<tr>
<th>Employees</th>
<th>Comply with the principles contained within this policy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Immediate Supervisors</td>
<td>Provide advice and guidance to their employees. Consult with Director/Senior Manager and/or Employee Relations if in doubt as to real, apparent or potential conflict of interest.</td>
</tr>
<tr>
<td>Senior Manager, Employee Relations</td>
<td>Provide advice to all employees. Receive Conflict of Interest Declaration forms. Report and safeguard all information on conflict of interest involving employees. Coordinate the review of and consultation on matters of real, apparent or potential conflict. Ensure quarterly reporting on the status of Conflict of Interest declarations. Provide recommendations to the Sector Head or Senior Vice-President, People and Strategy as required in consultation with the Legal Services Division, as appropriate.</td>
</tr>
<tr>
<td>Directors / Senior Managers</td>
<td>Provide advice and guidance to their employees. Receive disclosures from employees applying to an Approved Lender for an NHA-insured loan. Receive disclosures from employees accepting transfers or assignments of property on which an Approved Lender holds an NHA-mortgage. Consult with the Senior Manager, Employee Relations.</td>
</tr>
<tr>
<td>Management Committee member responsible for the sector</td>
<td>Provide advice and guidance to their employees. Approve employees’ use of NHA facilities, secondary employment, candidacy for political office and activities involving listed associations, in consultation with the Senior Manager, Employee Relations, and other Sector Heads. Direct that a gift be returned or disposed of.</td>
</tr>
<tr>
<td>Senior Vice-President, People and Strategy</td>
<td>Render final decisions on conflict of interest situations, when required, in consultation with the Legal Services Division, as appropriate. Provide advice and guidance to Sector Heads. Provide direction with respect to membership in listed associations, the modification or termination of secondary employment and general matters of compliance with this policy. Determine the relevant post-employment cooling-off period in consultation with the Sector Head.</td>
</tr>
<tr>
<td>President</td>
<td>Approve requests for the hiring or supervising of a family member or a significant personal relation.</td>
</tr>
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</table>
18. RELATED POLICY DOCUMENTS

- Code of Ethics and Business Conduct

19. REVIEW AND APPROVAL HISTORY

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<table>
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<tr>
<td>Creation Date</td>
<td>October 7, 2016</td>
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<tr>
<td>Approval Date</td>
<td>October 7, 2016</td>
</tr>
<tr>
<td>Last Update</td>
<td>July 2017; September 2018</td>
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<tr>
<td>Review Frequency*</td>
<td>Every 2 years or as required*</td>
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</table>

*Revisions/approvals may be needed in the event of a significant change as a result of an emerging need, risk or regulatory requirement, a change in strategy or situational circumstances, a response to challenges in implementation/interpretation and identified gaps in policy coverage.

Inquiries may be directed to Employee Relations:
ER-RE@cmhc-schl.gc.ca
ANNEX B

Assets and Liabilities Disclosure

The following assets and liabilities must be disclosed where, in the individual’s assessment, they might give rise to a real, apparent or potential conflict of interest with respect to the individual’s official duties and responsibilities:

- publicly traded securities of corporations and foreign governments and self-administered registered retirement plans composed of such securities;
- interests in partnerships, proprietorships, joint ventures, private companies and family businesses, in particular those that own or control shares of public companies or that do business with the Government;
- real property that is not an exempt asset;
- commodities, futures and foreign currencies held or traded for speculative purposes;
- assets that are beneficially owned, that are not exempt assets and that are administered at arm’s length;
- secured or unsecured loans granted to persons other than to members of the CMHC personnel’s immediate family;
- any other assets or liabilities that could give rise to a real or potential conflict of interest due to the particular nature of the CMHC personnel’s duties and responsibilities;
- direct and contingent liabilities in respect of any assets described in this section;

DISCLOSURE OF INTEREST IN A MATERIAL CONTRACT

Pursuant to the principle set out in section 116 of the Financial Administration Act, any CMHC personnel who:

- is party to a material contract or proposed material contract with CMHC; or
- is a director or officer of, or has a material interest in any person who is a party to, a material contract or proposed material contract with CMHC;

must disclose in writing to CMHC the nature and extent of their interests or request to have this entered in the minutes of a meeting of the Board of Directors.
EXEMPT ASSETS

The following assets need not be disclosed:

Assets and interest intended for the private use of CMHC personnel and assets that are not of a commercial character such as:

- residences, recreational property and farms used or intended for use by CMHC personnel or their families;
- household goods and personal effects;
- works of art, antiques and collectibles;
- automobiles and other personal means of transportation;
- cash and deposits;
- Canada Savings Bonds and other similar investments in securities of fixed value issued or guaranteed by any level of government in Canada, or agencies of those governments;
- registered retirement savings plans that are not self-administered;
- registered homeownership savings plans;
- investments in open-ended mutual funds;
- guaranteed investment certificates and similar financial instruments;
- annuities and life insurance policies;
- pension rights;
- money owed by a previous employer, client or partnership;
- personal loans receivable from members of the CMHC personnel’s immediate family and small personal loans receivable from other persons where the employee has loaned the moneys receivable; and
- securities guaranteed by CMHC, such as mortgage-backed securities.