

Supplier Code of Conduct



November 2014

1. Introduction

Canada Post Corporation (Canada Post), a federal Crown corporation, aims to maintain the confidence of all its stakeholders by minimizing legal, financial and reputation risks. Canada Post believes that adherence to its corporate values and undertakings in social responsibility is essential. Canada Post and the other members of the Canada Post Group of Companies (Group of Companies) endeavour to deal with suppliers who share this view. The *Canada Post Supplier Code of Conduct* (Code) outlines the guidelines, principles and standards that suppliers of the Canada Post Group of Companies are expected to follow and uphold in their business and throughout their supply chain.

2. Application

The Code applies to all suppliers of the Canada Post Group of Companies, their sub-suppliers and sub-contractors, be it for the supply of goods or services. All suppliers of the Group of Companies must carefully review the guidelines in the Code and agree to abide by the guidelines as a condition of doing business with Canada Post.

3. Business integrity

Compliance with laws

In all their activities, suppliers must ensure that they conduct business in compliance with the laws, rules and regulations applicable to the goods and services they provide.

Conflicts of interest

In their relationship with Group of Companies employees, suppliers must not try to gain improper advantage or preferential treatment for other relationships they may have with Canada Post (for example, as a client); furthermore, suppliers must not inappropriately influence Group of Companies employees.

Gifts and entertainment

The inappropriate use by suppliers of entertainment and gifts with Group of Companies employees is prohibited. As such, the nature of any gifts or entertainment must not be used – whether by their quality, quantity or timing – by suppliers to gain improper advantage or preferential treatment. Canada Post expects suppliers to maintain appropriate records of gift and entertainment offers to Group of Companies employees. Suppliers are advised that Group of Companies employees must seek approval from the head of their Sourcing Management team before accepting entertainment or gifts from a supplier.

Anti-bribery and anti-corruption

It is never acceptable for any supplier to offer any bribe, kickback or other unlawful payment or benefit to secure any concession, contract or other favourable treatment.

Confidential information and information barriers

If in their dealings with Canada Post, suppliers become aware of confidential or material undisclosed information about the Group of Companies or its clients, Canada Post expects suppliers to have in place policies and procedures for the proper handling and use of such information (such as information barriers). These policies and procedures must meet applicable legal and regulatory requirements to prevent inappropriate access or disclosure of this information.

4. Responsible business practices

Privacy and information security

Suppliers must use information obtained through their relationship with the Group of Companies only for the purpose of the supply relationship.

Suppliers must store information securely, as agreed with Canada Post, and have in place appropriate information security policies and procedures.

Suppliers must notify Canada Post promptly of actual or suspected privacy breaches, security breaches or losses of Group of Companies information.

Business resumption and contingency planning

As some suppliers' goods and services are critical to the Group of Companies' businesses, suppliers are expected to have and maintain business continuity and disaster recovery plans in accordance with applicable regulatory, contractual and service level requirements.

5. Responsible treatment of individuals

Respect and dignity

Suppliers must maintain workplaces characterized by professionalism, and respect for the dignity of every individual with whom their employees interact. Suppliers must respect the diversity of their employees, clients and others with whom they interact, both in and outside the workplace, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion. Suppliers must not tolerate harassment, discrimination, violence, retaliation and other disrespectful and inappropriate behaviour.

Employment practices

Suppliers must abide by applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination or where they allow for differential treatment, suppliers are expected to be committed to non-discrimination principles and to operate in a way that does not differentiate unfairly.

Suppliers must demonstrate that, in their workplaces:

- child labour is not used;
- discrimination and harassment are prohibited;
- employees are free to raise concerns and speak up without fear of reprisal;
- appropriate and reasonable background screenings, including investigations for prior criminal activity, have been done to ensure the integrity and good character of the suppliers' employees;
- clear and uniformly applied employment standards meet or exceed legal and regulatory requirements.

Health and safety

Suppliers are expected to provide healthy and safe workplaces and comply with relevant health and safety laws. Suppliers are expected to provide all their employees with adequate information and instruction on health and safety concerns and to enable their employees to meet their responsibilities for the maintenance of a healthy and safe workplace.

6. Environment

Suppliers are required to work with Canada Post to promote environmental sustainability. Suppliers are to help reduce its collective environmental footprint.

7. Sub-suppliers and sub-contractors

Suppliers will ensure that their sub-suppliers and sub-contractors comply with a set of standards compatible with the Code.

8. Record keeping

Suppliers must not destroy records that may be relevant to any pending or threatened legal or regulatory proceeding of which suppliers become aware.

Suppliers must maintain adequate internal records to document compliance with supply requirements of the Group of Companies and the suppliers' commitments under the Code.

9. Compliance and monitoring of the Code of Conduct

Suppliers are expected to adhere to and comply with the *Canada Post Supplier Code of Conduct*. Suppliers may be required to periodically confirm in writing that they meet their obligations under the Code. In some circumstances, the Group of Companies may audit a supplier's control environment.

Failure to comply with the Code may result in the termination of a supplier's relationship with Canada Post.

Contact information

If you have any questions about the *Canada Post Supplier Code of Conduct*, contact Sarah van Hooydonk, Manager, Internal Control and Monitoring, at sarah.vanhooydonk@canadapost.ca.