













Living Our Values: The Canada Post Code of Conduct

December 2005

What is the Code of Conduct?

The Code of Conduct is a set of guidelines intended to support ethical behaviour and decision making for all employees at Canada Post.

In this booklet, you will read about the values, policies and behavioural expectations that, together, comprise the Canada Post Code of Conduct. Not every situation you'll encounter is covered; some guidelines are black and white while others may have shades of grey. You are entrusted to use good judgment in your day-to-day activities, and to seek further information or assistance when you need it.

Please note that each section provides additional contact information if you have questions or would like to know more.

Message from the President

Building and maintaining trusted relationships with employees, customers, partners, suppliers and our shareholder is fundamental to our business, our reputation and our success. Managing in an ethical way, guided by a sense of social responsibility, is not just a matter of good business practice; it is the right thing to do.

Like all large organizations, Canada Post is often faced with challenges that require difficult decisions. The Canada Post Code of Conduct explains the behaviour that is expected of employees at all levels of the company, and provides information on where to find additional help.

As a Canada Post employee, you are responsible to become familiar with this guide, comply with the ethical and legal standards of conduct it describes, and to lead by example in the workplace. Regardless of position, role or location, this is our responsibility.

Thank you,

Moya Greene

President and Chief Executive Officer







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Introduction

Canada Post employees make decisions every day that affect one another, our customers and the Corporation. The actions we choose to take as individual employees reflect on us all and influence how others perceive our company.

Canada Post Corporation has been Canada's most trusted provider of postal services for over 100 years. As we look to the future, we know that each of us, through our actions, has the power to improve our workplace, build the trust of our customers, and enhance our reputation.

The Canada Post Code of Conduct does not provide answers for every possible situation you might encounter at work. It does not replace or change in any way Canada Post's policies, business practices or collective agreements. It is a guide based on our Corporate Values, and gives an overview of those key policies, practices and behaviours that define the standards of business conduct to which we hold ourselves accountable.

Please read the Code of Conduct carefully, and familiarize yourself with its contents. If you have questions, comments or concerns, you will find information throughout the document on where to go for help.

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Our Values

We Work To Earn Our Customers' Business.

We Succeed By Working Together.

We Take Responsibility For Our Actions.

We Treat Each Other With Fairness And Respect.

We Strive To Continuously Improve.

We Act With Integrity In All That We Do.

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Our Values

Canada Post's corporate values reflect the principles, beliefs and aspirations that guide our behaviour and shape our culture.

1. We Work To Earn Our Customers' Business.

Because we accept that our customers have choices. Because we must understand what customers value and how to exceed their expectations. Because we must compete profitably and fairly for their business.

We focus on flawless execution for our customers.

We make responsible business decisions based on our customers' needs.

We act with urgency to address our customers' problems.

We take appropriate action based on customer feedback.

We place priority on improving the quality of the customer experience.

We foster innovation that meets the changing needs of our customers.

2. We Succeed By Working Together.

Because we have greater power and strength when we work as a team. Because we will ultimately win or lose, achieve or fail, and celebrate success together.

We put the best interests of our company first.

We co-operate with one another across the organization.

We actively participate and support one another to succeed.

We make time for others who need our help.

We build relationships and alliances that support our common goals.

We align our behaviour and our resources to achieve team priorities.

We acknowledge and value our distinct roles and contributions.

We show loyalty to our teammates.

3. We Take Responsibility For Our Actions.

Because we must rely on the quality of one another's work. Because what we do and how we do it are equally important.

We hold ourselves accountable for the commitments we make.

We follow through on our promises; we do what we say we will do.

We are trusted by our teammates to do the right things.

We acknowledge our mistakes and learn from them.

We delegate tasks, but not our responsibilities.







4. We Treat Each Other With Fairness And Respect.

Because respect is fundamental to our culture. Because those who are treated fairly and respectfully will treat others in the same way.

We act with courtesy and sensitivity toward each other in all situations.

We embrace diversity and encourage the ideas and opinions of others.

We challenge the issues, not the people.

We communicate openly, honestly and candidly.

We share information.

5. We Strive To Continuously Improve.

Because our customers and the marketplace demand it, and because our competitors will always have new ideas. Because we know we can always do better. Because we have a responsibility to make our company a better place.

We challenge the status quo.

We look for opportunities to learn, improve, adapt and innovate.

We encourage new ideas that advance our people, processes and technologies.

We manage change effectively.

We work to win out over our competitors.

6. We Act With Integrity In All That We Do.

Because acting with integrity is always in the best interest of our company, our customers, our partners, our stakeholders and ourselves. Because the reputation of our company depends on trust.

We demonstrate honesty and the highest level of ethical behaviour.

We respect our policies, and our legal and moral obligations in our business decisions and operations.

We actively build a climate of trust and loyalty.

We give credit where it is due.

We expect full and frank disclosure.

We admit when we are wrong.

We do the right thing even when it's hard.

We honour our commitments.

What you can expect from Canada Post

Canada Post commits to providing all employees with:

- a safe, healthy, respectful and productive work environment
- fair and equitable treatment
- equal opportunities for advancement
- protection from harassment
- protection from retaliation after good faith disclosures of improper activities.

What Canada Post expects from you

Canada Post expects all employees to:

• act with integrity at all times

• be present and productive during working hours

• operate within the law

• follow the Code of Conduct, corporate policies and practices

• take personal accountability for their workplace actions

 demonstrate a sense of respect, loyalty, good faith and responsibility toward one another and the corporation

keep corporate information confidential

- exercise sound judgment in decision making
- report violations of the Code of Conduct and corporate policies and practices.









Compliance to the Code

Employees are expected to comply with the Code of Conduct and the policies and practices it represents. Violations of the Code of Conduct, policies or practices may result in disciplinary action up to and including dismissal.

Where to go for help

This Code is an overview of business conduct. It will not provide rules and regulations for all situations you may encounter as an employee. For more information, advice or assistance, visit the Policy and Practice Centre, or consult your collective agreement or your immediate supervisor.

If you've tried these resources and still need help, you should contact Human Resources.

If you need to report a wrongdoing, and don't feel comfortable going through corporate channels, you can use the independent third party hotline. Your identity is protected, and your report will be investigated.



Harassment

Every Canada Post employee has the right to a workplace free from **harassment**.

This includes harassment based on a person's race, national or ethnic origin, colour, religion, age, sex (including pregnancy and childbirth), sexual orientation, marital status, family status, disability (including previous or present drug or alcohol dependence), or pardoned conviction. All of these forms of harassment are illegal under the *Canadian Human Rights Act*.

At Canada Post, we consider it the obligation of team leaders and officers of the company to report any incidents of harassment they may witness or of which they become aware.

As a Canada Post employee:

- treat others the way you would like to be treated, with respect, courtesy, fairness and sensitivity
- don't initiate or take part in any form of harassment
- exercise authority with care, and in a way that isn't considered or seen as harassment
- don't be afraid to speak up and be assertive if you feel you are being harassed.

Harassment includes:

- threats or bullying
- unwanted or unnecessary physical contact
- demands for sexual favours in exchange for favourable treatment
- excessively offensive remarks, such as unwelcome, graphic or suggestive comments about an individual's body, appearance or dress
- obscene jokes or other inappropriate, sexually explicit or offensive language
- displaying pornographic material or sexually suggestive objects or pictures in the workplace
- using demeaning terms to refer to a person's national or ethnic origin or race

For more information, read the **No Harassment Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Diversity and Personal Rights heading).







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Equality in Employment

Canada Post makes its **employment decisions** based on each person's qualifications and abilities, and not on race, national or ethnic origin, colour, religion, age, sex (including pregnancy and childbirth), sexual orientation, marital status, family status, disability (including previous or present drug or alcohol dependence), or pardoned conviction. Basing employment decisions on these factors is illegal under the *Canadian Human Rights Act*.

Other criteria are sometimes considered, such as the requirements of collective agreements, such as seniority or special measures like the Aboriginal Development Program.

Canada Post makes reasonable individual accommodation for qualified individuals with known disabilities or other special needs.

For designated groups under the *Employment Equity Act* – women, members of visible minorities, Aboriginal Peoples and people with disabilities – Canada Post strives to have a representative workforce that reflects the Canadian labour market, while maintaining fair, equitable and accessible employment policies overall.

Employment decisions include:

- hiring
- job assignments
- promotion
- compensation
- discipline
- termination
- access to benefits and training

In compliance with the *Official Lang*uages *Act*, Canada Post ensures that English- and French-speaking Canadians have equal access to employment opportunities regardless of ethnic origin or first language learned.

As a Canada Post employee:

- speak to your supervisor or local Human Resources if you believe an employment decision violated the Equality in Employment Policy
- you are strongly encouraged to "self-identify"; that is, to let Canada Post know if you are a member of a visible minority, an Aboriginal Person or a person with a disability
- speak to your supervisor or local Human Resources if you feel you need to be accommodated in your job because of your age, family status, ethnic or cultural origin, religious beliefs, disability (including previous or present drug or alcohol dependence) or sex (including pregnancy and childbirth).

For more information, read the **Equality in Employment Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Diversity and Personal Rights heading).

Conflict of Interest

A conflict of interest occurs when your interests interfere with, or might be seen by others to interfere with, the interests of the company. Canada Post expects its employees to act in a way that preserves and enhances its reputation as a trusted provider of service. The honesty and impartiality of Canada Post employees should never be in doubt.

As a Canada Post employee:

- disclose significant private or financial interests in organizations under contract to Canada Post, including those of your spouse and dependants
- get the approval of your general manager before using corporate time and resources for non-work activities
- don't take part in activities or businesses outside of work that may be in direct competition with Canada Post or that may damage the reputation of Canada Post
- don't disclose confidential, privileged or proprietary information, or use this information to advance your own or others' interests
- don't place yourself in a position where you might benefit (or seem to benefit) from the use of the corporation's facilities, equipment, time or materials
- don't use your position in the company to advance your interests or those of your family or friends; remember that you are not allowed to have family members report to you
- do not initiate or develop special relationships, such as dating, with employees reporting to you or employees who could be perceived as being under your influence
- don't participate in political activities during working hours or use corporate facilities and resources for such activities
- do not accept gifts from customers, competitors, contractors or suppliers that could be considered to obligate you or the corporation in any way; gifts of nominal value are permitted (approximately \$100)
- tell your team leader if you think you are involved in a conflict of interest
- after leaving Canada Post, don't disclose any Canada Post information not available to the general public, don't use it for your own purposes (in particular don't use it to obtain any intellectual property registration or to secure employment), and don't derive any improper benefits as a result of your former positions at Canada Post.



For more information, read the **Conflict of Interest Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Conduct heading).







Workplace Safety and Health

Canada Post makes every effort to work with employees and bargaining agents to make our workplaces as safe and healthy as possible. The integration of safety and health considerations in all work-related activities, processes and practices is a key means to reducing the risk of injury and illness.



Canada Post provides resources and programs through Occupational Health Services and the Employee Assistance Program to foster healthy lifestyles, assist employees and family members who may be experiencing difficulties in their personal or work lives, and help to safely reintegrate disabled employees into the workforce.

We do this by respecting the health and safety obligations in the *Canada Labour Code*, the *Human Rights Act* and working with our bargaining agents to fulfill the obligations that have been included in various collective agreements. We take health and safety into account when we:

- plan and design facilities and equipment, jobs, work methods and materials
- provide first aid supplies and training for first aid attendants
- accommodate disabled employees in suitable jobs
- consider all aspects of Canada Post's day-to-day operations.

As a Canada Post employee:

- follow all safety rules related to your job
- do not endanger or put at risk the health and safety or well-being of others
- use and wear safety equipment, clothing and devices identified for your job
- keep free from the influence of alcohol or illegal drugs while on Canada Post premises or while conducting Canada Post business
- never resort to violent behaviour
- report injuries, accidents and unsafe conditions to your supervisor in a timely fashion
- take responsibility for your personal health, safety and well-being, through resources available both within Canada Post and in your community
- co-operate in the accommodation process whether you are disabled and need job accommodation, or whether you have co-workers who are being accommodated
- get immediate help for an injured or ill co-worker from a first aid attendant or supervisor, or for yourself if you are injured or ill
- get help for yourself if you are having personal or work life difficulties. Use the Canada Post Employee Assistance Program or a resource in your community
- encourage co-workers to seek help for personal or work life difficulties when appropriate; suggest the Employee Assistance Program as a resource.

For more information, read the **Safety Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Healthy Workplace heading).

Marketing and Competitive Practices

Canada Post competes vigorously but fairly in the marketplace to provide products and services of good value, generate a profit and ensure the company's future growth. We comply with all laws and regulations that apply to competition, including Canada's *Competition Act*.

As a Canada Post employee:

- familiarize yourself with Canada Post's Fair Competition Policy and Practice on Handling Competitor Contacts
- avoid conduct that may be perceived as unfair competition, including:
 - making agreements with competitors relating to markets or prices
 - setting unreasonably low prices with a view to eliminating a competitor or lessening competition substantially
 - requiring a customer to purchase a second competitive product as a condition of getting access to a first product
 - making inaccurate or misleading statements in any medium, including spoken statements, about the price or quality of our products and services. All communication about Canada Post's products and services should be fair and accurate, and should disclose all relevant information, particularly if withholding this information would be considered misleading
 - attempting to drive up prices or discouraging price discounting by intermediary customers who
 resell our products and services
 - offering different prices to customers who purchase the same quantity of the same product, with the same shipping profile, competing in the same market. This includes price differences resulting from advertising allowances and promotional offers.

For more information, read the **Fair Competition Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Competition heading).







Procurement

Canada Post gets the best value for the goods and services it purchases, within applicable laws, regulations, international agreements and conventions, internal policies and competitive tendering processes.

As a Canada Post employee:

- adhere to all applicable laws, policies, rules and procedures
- don't use any confidential information, or business opportunities made known to you as a result of your position, for personal profit
- declare any conflict of interest or perceived conflict of interest you may have, or be perceived to have, to your team leader, Sourcing Management or Human Resources



- protect confidential corporate or supplier information and use that information only for the specific business purposes for which it is intended
- don't solicit gifts, gratuities, hospitality or any other benefits from a supplier; you may accept gifts, gratuities or hospitality if they are of nominal value (approximately \$100)
- do not make any commercial commitments to suppliers unless authorized to do so by the Delegation of Authority instrument, in accordance with the Sourcing Management Process
- seek the guidance and involvement of Sourcing Management if you are approached by a supplier, before you approach a supplier for potential business outside authorized procurement channels (e.g., P-Card, e-procurement), or if an issue arises in an existing commercial relationship that may change the scope, time or cost of the contract.

For more information, read the **Contracting for Goods Practice**, available from Sourcing Management or from **Intr@post**'s Policy and Practice Centre (under the Procurement heading).

Privacy

Canada Post protects the privacy of employees, customers and business partners who share information with the corporation. We recognize and accept our responsibility to safeguard the privacy, confidentiality and security of all personal information, in compliance with the *Privacy Act*.

We maintain up-to-date inventories of the private information we hold, and manage how this information is used, by whom, and for what legitimate purpose.

We assess all new initiatives for privacy impact and ensure that all privacy concerns are addressed.

As a Canada Post employee:

- do not share the private information of any person except for the purpose for which the information was originally collected and only with those authorized to receive it
- ensure that the personal information the corporation maintains about you is updated, exact and complete
- contact your privacy co-ordinator if you have any concerns about how your personal information or anyone else's personal information is managed.

For more information, read the **Employee Privacy Policy**, available from local Human Resources or
from **Intr@post**'s Policy and Practice Centre (under
the Privacy and Security heading).

Privacy Act:

"Personal Information" is information recorded in any form about you, such as:

- your race, national or ethnic origin, colour, religion, age, marital status
- your medical and employment history, education, financial transactions, criminal record
- any identifying number or symbol assigned to you
- your address, fingerprints, blood type
- records of your personal opinions, private correspondence between you and government institutions
- records of opinions of other individuals about you

Your regional privacy co-ordinator can give you more information if you have questions or concerns.









Official Languages

Canada Post is committed to the use of both official languages in all aspects of its business.

The corporation offers and provides services to customers in their preferred official language in the National Capital Region, and in other locations where there is a significant demand or where there is a legislated requirement. Other offices may be designated bilingual to meet the corporation's business needs.

Canada Post is committed to creating a work environment conducive to the use of both English and French in bilingual regions, in accordance with the *Official Languages Act*, as well as in other regions where it makes good business sense to do so.

As a Canada Post employee:



- know whether your office is designated bilingual and if you are required to serve customers in both official languages
- in bilingual offices, greet customers in both official languages, in person and over the telephone, and serve them in the official language of their choice
- know the language requirements of your position; in bilingual regions for language of work, you may use the official language of your choice
- if you are required to communicate with employees in both official languages, respect their official language of choice in internal communications
- ensure that you give English and French equal status, and equal rights and privileges to English-speaking and French-speaking individuals.

For more information, read the **Language of Work Policy** and the **Language of Service Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Language heading).

Environment

Canada Post believes that protecting the environment is essential to the well-being of its employees, its customers and the communities it serves. The corporation is committed to comply with all environmental laws and regulations, and to go beyond them whenever it makes economic sense.

As a Canada Post employee:

- read and follow any signs, labels, instructions and work rules related to the proper handling, storage and disposal of toxic substances and hazardous waste
- scrupulously avoid disposing of toxic substances and hazardous waste in the garbage or down the sink or toilet
- use all available recovery, recycling or waste disposal arrangements, including a designated local hazardous waste contractor
- immediately report leaks, spills, inadequate cleanup or improper disposal of any toxic substances or hazardous waste to your supervisor or Regional Real Estate manager
- adopt environmentally friendly practices and products where feasible
- recycle waste such as paper, cardboard, glass, Styrofoam™ and metal where possible.



For more information, read the **Environment Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Employment heading).







Protecting the Mail

Canada Post holds a special position of trust and accountability for the mail it delivers on behalf of Canadian businesses, governments and residents. Our operations and reputation depend on the protection of all mail in our care.

As a Canada Post employee:

- ensure that no one including law enforcement authorities – tampers with (i.e., opens, keeps, steals or detains) mail from the time Canada Post receives it to the time it is delivered
- notify your immediate supervisor or Corporate Security if you know that mail has been tampered with.

For more information, read the **Protecting the Mail Policy**, available from local Human
Resources or from **Intr@post**'s Policy and Practice
Centre (under the Privacy and Security heading).



Intellectual Property

Canada Post employees and contractors create significant and valuable written works, technology, data compilations and artwork. They also identify problems and develop solutions by making improvements to equipment, tools and processes. These creations and solutions developed and owned by the corporation constitute **intellectual property**.

To maintain our technological and competitive standing, Canada Post often registers its intellectual property. This measure ensures that we clearly own our intellectual property and have all rights to its use.

In general, you should treat our intellectual property as confidential information. If you are unsure whether certain information you create, access or use in your work is considered to be intellectual property, Canada Post Legal Counsel can help you.

As a Canada Post employee:

- understand the different types of intellectual property, and find out what kind of intellectual property you might create or work with in your job, or come into contact with in your job
- before you give suppliers or potential suppliers information about Canada Post's business, ensure they have signed an agreement that they will not disclose the information to anyone else (a "non-disclosure agreement"); contact Canada Post legal and procurement authorities for help in putting any non-disclosure agreement in place
- ensure that intellectual property is addressed in contracts with third parties
- talk to your director if you think something you have created in the course of your work duties should have intellectual property protection.

For more information, read the **Intellectual Property Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre.

Intellectual property includes:

- trademarks
- trade names
- literary, dramatic, musical and artistic works
- inventions
- industrial designs
- integrated circuit topographies
- trade secrets





Management of Information and Records

Canada Post considers information and records to be valuable corporate resources that contribute to achieving our objectives and require diligent management.

The life cycle of Canada Post's information holdings includes:

- planning
- collection and use
- maintenance and protection
- retaining and disposal.

Canada Post manages these stages by assigning accountability for the effective and efficient use of information and records to specialist groups and the user community.

Remember that all messages and information sent, received or stored on Canada Post computer systems as business-related information belongs to the corporation. The corporation has the right to review the contents of e-mail and computer files, especially in situations where there is suspected misuse or impropriety.

As a Canada Post employee:

- create and maintain authentic, reliable and useable records in support of ongoing business, and protect the integrity of those records for as long as required
- identify and conserve certain types of required records, specifically those that trace policy and program decisions, have historical or archival importance, or that might be used for educational purposes to explain the historical role of Canada Post in Canadian society
- using official records systems, retain and file records required for business, legal, financial, research or archival purposes, and dispose of these records according to criteria defined in a Canada Post records retention and disposition schedule
- limit your personal use of corporate computer systems.

For further clarification and more information, read the **Records Management Policy**, available from the Records Management Centre of Excellence or from **Intr@post**'s Policy and Practice Centre.

What is a record?

Virtually everything employees document in the course of daily business, using computers, personal digital assistants, pens, cameras, or audio or video recorders, is a **record**. Documents and information created, distributed or received by computers, such as e-mail correspondence, daily agenda entries, documents, graphics and spreadsheets, are also records.



Whistleblowing

Canada Post is committed to the highest standards of business conduct. Following through on this commitment is every employee's responsibility.

Canada Post encourages employees, who know of improper activities, such as violations of Canada Post's policies and practices, to report them without fear of reprisal.

Canada Post will investigate all alleged improper activities, while maintaining the confidentiality of all information reported and disclosed during the course of the investigation to the extent reasonably practicable.

As a Canada Post employee:

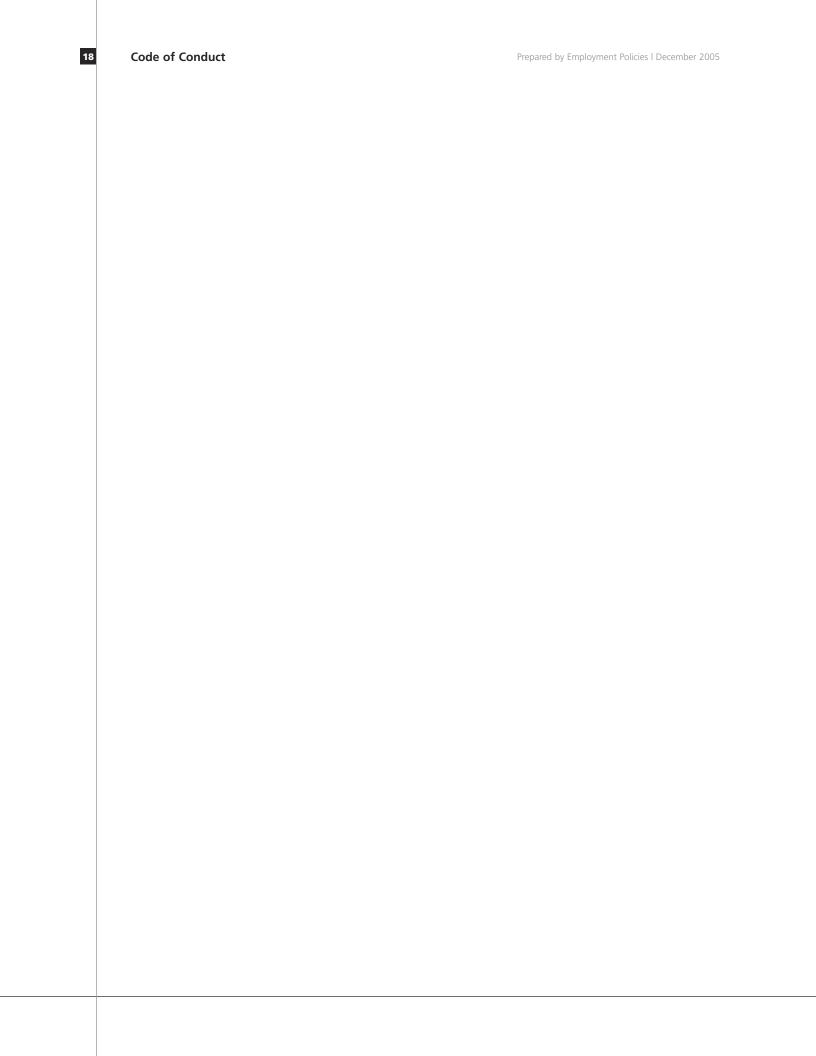
- immediately report any improper activities to your immediate supervisor (or other authorities see the Whistleblowing Policy), without fear of reprisal
- if for some reason you feel uncomfortable raising a potential improper activity with your supervisor, submit a report by phone, Internet or mail to the independent third-party reporting service (see the Whistleblowing Policy or page 4 of this Code of Conduct for contact information)
- co-operate fully in the investigation resulting from reporting a potential improper activity
- use the reporting and investigation procedures only for the types of issues described in the Whistleblowing Policy
- consult with the corporate compliance officer if you think that an activity may be improper but aren't sure.

For more information, read the **Disclosure of Improper Activities in the Workplace (Whistleblowing) Policy**, available from local Human Resources or from **Intr@post**'s Policy and Practice Centre (under the Conduct heading).









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Suggesting Changes

If you have suggestions or recommendations for changes to improve the Canada Post Code of Conduct, you are encouraged to submit them at any time.

Please state the section of the Code you would suggest changing, your proposed new wording, and any comments you have related to the change.

Send by mail to:

DIRECTOR, ETHICS AND BUSINESS CONDUCT HUMAN RESOURCES CANADA POST CORPORATION 2701 RIVERSIDE DR SUITE N0670 OTTAWA ON K1A 0B1





