



Code of Conduct

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A Stronger Canada – Delivered



1. Transforming to meet Canadians’ changing needs and expectations

Canadians are expecting more from us. We are here to meet their expectations and play a meaningful role in their lives. It starts with our bold plan, **A Stronger Canada – Delivered**, to transform how we serve our great country.

Canadians want us to view our responsibility to the country through a wider lens, beyond reliable and timely services. They expect us to reflect and promote Canadians’ shared values and goals.

We will not shy away from our responsibilities – but embrace them. Our plan will ensure that our company reflects our nation’s common values and responds to Canadians’ changing service needs.

2. Our purpose

A Stronger Canada – Delivered

We will be an essential part of a stronger Canada by helping people to connect over any distance, businesses to reach their vital customers and communities to grow and thrive responsibly.

3. Our values

Our values represent the fundamental promise we make to ourselves, the expectations we have of one another and our shared duty to our country. Through these shared values, we demonstrate every day that what we do matters.

Values

We matter – as individuals
What I do helps make me, and Canada Post, safe, secure and successful.

We matter – to one another
The best outcomes are the ones we create together.

We matter – to our country
We strive to make life better for all Canadians today and for the future.

Trust

I earn the trust placed in me every day, and I trust that my safety and well-being are everyone’s top priority.

We do our best work when we trust each other.

We value the trust Canadians have in us, and understand it is earned with every decision and interaction.

Respect

I understand that respect is the foundation of a successful workplace.

We respect each other as colleagues and treat each other as we would like to be treated.

We respect our country and the communities we serve, and understand we have a responsibility to be a positive force for change.

Deliver

I challenge myself to safely deliver every day, because what I do matters.

We are a network of people, united by what we accomplish and deliver together.

Delivering a stronger Canada for Canadians is at the heart of what we do.

4. Our signature behaviours

Our four signature behaviours guide our actions and activate our core values. When we are empowered to *make the call*, we are actively engaged in the work that we do, and the company's success. When we *know the destination*, we understand how what we do every day contributes to the achievement of our goals. When we *deliver for others*, we act in a way that demonstrates caring for others and enables our collective success. And when we *ignite our pride*, we celebrate each other and the role we play in making Canada stronger.



Make the call

We're empowered to make decisions, respectfully challenge the status quo, and support others to do the same.



Know the destination

We understand Canada Post's strategy and goals and how we contribute to them, and we move forward with open minds when exploring new approaches.



Deliver for others

We take pride in doing our personal best, demonstrate care for others, and support and encourage them to reach their potential.



Ignite our pride

We play a role in making Canada stronger by celebrating who we are, the communities we serve, and issues that matter.

5. Environmental, social and governance strategy

An effective environmental, social and governance (ESG) strategy is a key part of our transformation plan. We are committed to achieving ambitious targets on environmental sustainability, accessibility, diversity and inclusion, and to playing a meaningful role in reconciliation with Indigenous peoples. Our ESG strategy will help us achieve our purpose: **A Stronger Canada – Delivered.**

Our Code of Conduct is an important part of our ESG strategy and our organization's overall governance. It guides us on key issues that are important to Canadians, our stakeholders and our customers.

Code of Conduct – Doing the right thing



6. The Code of Conduct and you

At its core, the Canada Post Code of Conduct is a set of guidelines explaining the behaviours expected of all employees, particularly with respect to their ethical, legal and commercial obligations. It reflects our values and includes associated behavioural examples as well as key elements of corporate policies and practices. Its effectiveness is a measure of good corporate governance.

Our Code of Conduct helps you translate our values into clear expectations to guide your decisions. You may make some of these decisions in your personal life outside of work. However, when you identify as a Canada Post employee, always remember the ethical expectations the people of Canada have of us and make decisions that reflect our shared values.

Making this Code of Conduct public is one way we are transparent about our expectations of each other. The Code of Conduct helps us make sure that our actions and decisions are ethical, sustainable and meet the expectations of the people of Canada.

7. The Code of Conduct applies to all employees

The Code of Conduct applies to all employees of Canada Post. We are all expected to understand the rules that apply to our work. We are each accountable for our own decisions and behaviour.

We all have the right to be respected and the responsibility to deliver the services we promise our customers in a way that maintains the trust of the people of Canada.

The programs we support and the Canada Post Community Foundation, which relies on volunteers and funding, reflect on us all. We must protect our values, our brand, and the values and brands of those we help when administering one of these programs.

Members of the [Canada Post Corporation Board of Directors](#) are expected to meet their [standards of conduct](#), which are aligned with the Canada Post Code of Conduct. Contractors such as vendors and suppliers must comply with the Supplier Code of Conduct, which is also aligned with the Canada Post Code of Conduct.

If you are a team leader, you play a critical role in ensuring ethical behaviour within the Corporation. You do so in several ways:

- setting the example by understanding and complying with the Code of Conduct;
- encouraging, expecting and recognizing ethical behaviour by your team members and colleagues;
- being proactive in preventing violations of the Code of Conduct;
- being prompt and thoughtful in responding to violations of the Code of Conduct;
- working with an open mind when helping with investigations and audits;
- supporting and protecting those who report wrongdoing or suspected wrongdoing.

All employees are expected to comply with the Canada Post Code of Conduct as well as the corporate values and policies. Violations may result in disciplinary action up to and including dismissal.

Q I am a Canada Post employee who works for, supports or otherwise deals with the Canada Post Pension Plan. Does the Code of Conduct apply to me?

A Yes, it does. When reading the Code, you should remember that your clients include members of the Canada Post Pension Plan. Canada Post has developed the [Canada Post Pension Plan Ethical Practices](#) to help. While it is highly unlikely, if you believe that your obligations under the Code of Conduct conflict with these ethical practices, you must contact your team leader immediately.

8. Avoiding conflict of interest

A conflict of interest is when personal interests or relationships interfere, or appear to interfere, with the interests of Canada Post. To know if a conflict exists, ask yourself the following questions:

- Are my personal, financial and business interests or aspects of my friendships and family relationships incompatible with my duties as an employee? Do they affect or appear to affect my ability to act in the best interest of Canada Post?
- Do I, or my friends and family, directly or indirectly benefit from my access to confidential information, corporate time, material, or facilities?
- Would I feel uncomfortable or embarrassed with the situation if it were reported to my team leader or to senior management?

If you answer yes to any of these questions or are uncertain, an actual or potential conflict of interest likely exists. If you still have doubt, review the Conflict of Interest Policy or ask your team leader for help.

It is your responsibility to do the following:

- avoid participating in the appointment, hiring, supervision (direct or indirect) or evaluation of a family member or a person with whom you recently had a close friendship or intimate relationship;

- avoid situations where a commercial relationship becomes or appears to become a personal one that could make others doubt your objectivity or could be detrimental to Canada Post;
- if you interact with suppliers, avoid these three risks:
 - meeting them outside of business hours;
 - meeting them often, without a clear business purpose;
 - meeting them alone (instead, have a colleague join you);
- avoid situations or actions that create, or appear to create, a conflict of interest or situations that may interfere with your ability to exercise sound judgment;
- avoid situations where you might benefit, or seem to benefit, from the use of Canada Post's facilities, equipment, time or materials;
- do not disclose confidential, privileged or proprietary information, or use this information to advance your own or others' interests;
- follow the advice provided by your team leader or HR in order to avoid or resolve a conflict of interest.

Q Can I develop a close friendship with my supervisor?

A You should avoid developing a close friendship or intimate relationship with any employee where there is a direct or indirect reporting relationship. A close friendship includes any person with whom you have a meaningful social or business relationship. An intimate relationship includes dating, co-habitation or sexual relations. If either applies, you must declare it in accordance with the Conflict of Interest Policy.

Q Can I accept a part-time job outside of my employment with Canada Post?

A You should not place yourself in a position where you could compete against or be in a conflict of interest with Canada Post. If you work full-time, your first business commitment is to Canada Post and not to a part-time job that could prevent you from fulfilling your employment obligations with Canada Post or conflict with your responsibilities to Canada Post. This would include interfering with your regular hours of work, having to work shifts back-to-back that could raise health and safety risks, or having competing interests. You should always check with your team leader before accepting another job.

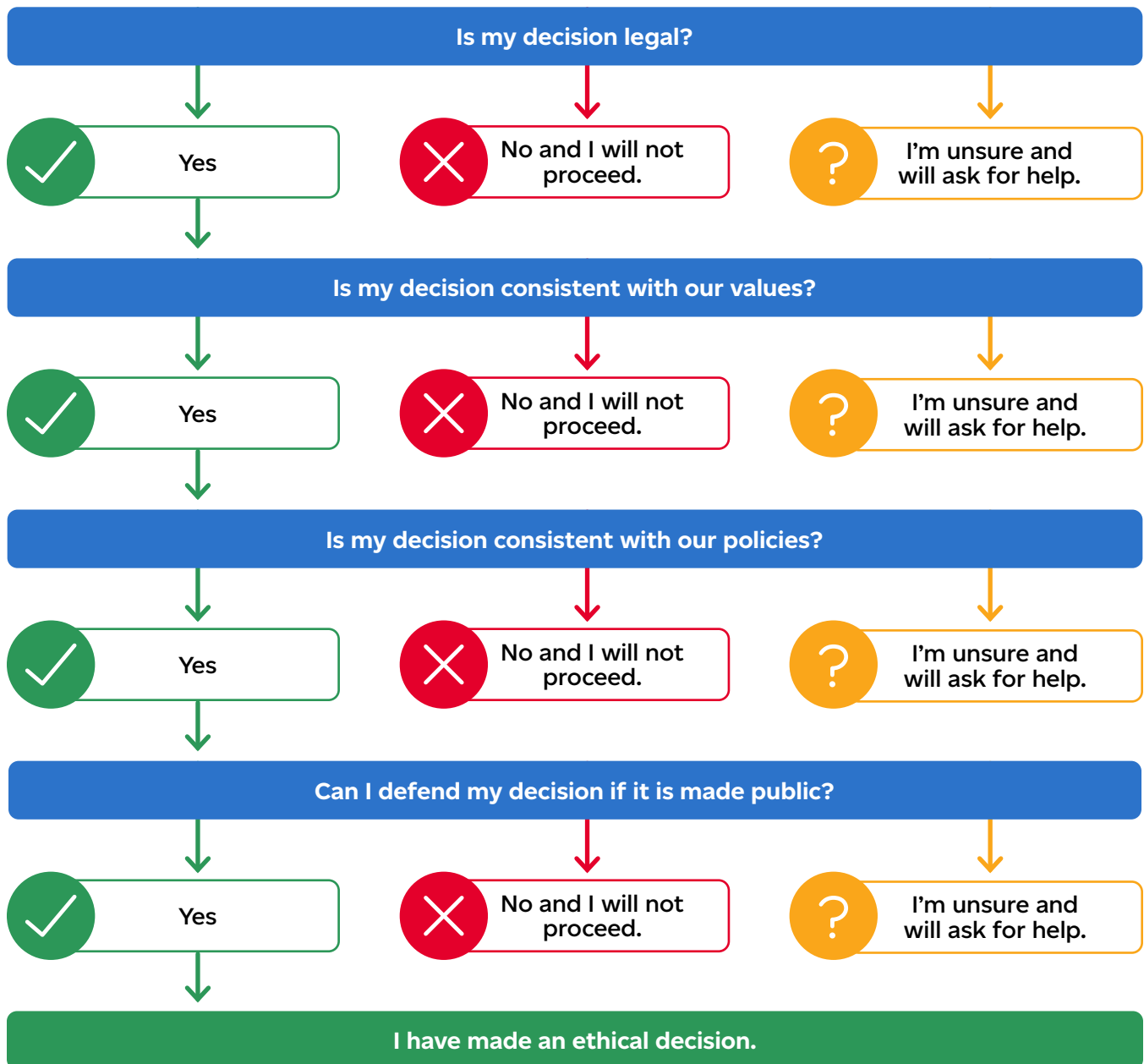
Q A current supplier has offered me a pair of hockey tickets as a gift. We have a good relationship and I have worked with this person for years. Can I accept the offer?

A No. You can accept incidental gifts, customary hospitality and other benefits of nominal value that can be reciprocated (a good rule of thumb is no more than \$100).

9. Making ethical decisions

Every decision we make has an impact. The Code of Conduct helps us make the best ethical decisions and maintain the trust of our colleagues and customers. It cannot possibly cover all scenarios, but it gives direction on specific topics, which at their core always prompt a question: what is the right thing to do? The answer is not always easy.

Ethical decisions are difficult – This model can help



10. Building trust through integrity and confidentiality

Our actions reflect on Canada Post. We need to do the right thing to build trust among our colleagues, and teams, and for the Corporation. Doing the right thing isn't always obvious. Follow these guidelines and you will be on the right path:

- Ensure close relationships, friends and family members who are also Canada Post employees do not report to the same person and avoid inappropriate influence over their career path.
- Ensure your volunteer or other non-Canada Post work and activities do not interfere with your ability to do your job.
- Only discuss information about Canada Post that is available to the general public.
- Never benefit from commercially sensitive information gained as a result of your current or former position at Canada Post.

For other guidance, consult your team leader to help you make or approve a decision.

Q Repairs to one of Canada Post's depots are required. My brother is a contractor and can do the work for a very good price. Can I hire him?

A No. All supplier arrangements must be made through Sourcing Management at Canada Post, which must manage the contracting process. If you are a Sourcing Management employee, your loyalty to your brother must not conflict, or even appear to conflict, with the interests of Canada Post. In this case, it is difficult to avoid the appearance of a conflict of interest, so you should not be involved in the decision.

Doing right by our employees



11. Mutual respect, inclusivity and diversity

Every Canada Post employee deserves a safe, respectful, inclusive and violence-free workplace that is consistent with the organization's corporate values. We represent Canada Post in everything we do. Our behaviour at work or in public should always demonstrate that we believe everyone deserves respect.

Canada Post is committed to building a workforce that is representative of Canadian society. We want our behaviours and our policies and practices to promote diversity and respect the *Employment Equity Act* and the *Canadian Human Rights Act*.

It is your responsibility to speak to your team leader, human resources business partner or human rights representative if you believe an employment decision violates the Equality in Employment Policy, the No Discrimination/No Harassment Policy or the *Canadian Human Rights Act*.

Q Some of my coworkers often make comments about the ethnic origin or sexual orientation of other employees. No one complains, but it makes me feel uncomfortable. What can I do?

A Such comments are not appropriate and are not tolerated in the workplace. Immediately inform your team leader, human resources business partner or human rights representative of the situation. Canada Post promotes a safe, healthy and respectful workplace for all people. We support a diverse and inclusive workplace environment where harassment of any employee, prospective employee or customer is unacceptable and is not tolerated.

Q One of my coworkers has posted a sexually explicit photo near the coffee machine. When I suggested to my supervisor that it was not appropriate, he said it did not matter because there are no women on our shift.

A Your supervisor was wrong to dismiss your complaint. Such photos on Canada Post property create an inappropriate and unprofessional work environment. If you have reported the photo to your team leader and the photo remains, report the incident to your human resources business partner or human rights representative.

12. Health and safety

We are all responsible for ensuring that Canada Post has a safe work environment. When we accept responsibility for our own safety and the safety of those we work with, everyone benefits.

It is your responsibility to do the following:

- follow Canada Post's safety policies, procedures and rules at all times;
- perform your work safely and monitor the safety of coworkers and visitors;
- use and wear all safety equipment required for your job;
- be alert while you are on Canada Post premises and conducting Canada Post business;
- report all incidents, injuries and unsafe conditions and behaviours in a timely manner.

Q I am a team leader, and someone on my team is struggling to perform. This is unusual for this employee and seems to be related to issues at home. What should I do?

A Ask if the employee is concerned about personal safety or well-being and needs support from you. Provide the Employee and Family Assistance Program ([EFAP information](#)). If the employee's concerns leave you feeling uncertain about your employee's safety, contact your team leader or the EFAP.

Q We are under pressure to complete an urgent job and my team leader asks me and my coworker to disregard a safety rule to help us meet our deadline. What should I do?

A Your supervisor is wrong to ignore the safety rule. Safety rules have been developed to protect people from being injured. If you feel comfortable, remind your team leader of the safety rule and of the importance of following it. Alternatively, report your concern to your local safety representative. As a Canada Post employee, you are responsible for your own safety and for the safety of your coworkers. Taking the appropriate action could prevent you or someone else from being injured.

Q I am required to wear a high-visibility vest when I work on the loading dock, but there is a contractor who wanders through every day without one. What should I do?

A Safety rules have been developed to protect people from being injured. They apply to everyone in our facilities, including contractors and visitors. Politely remind contractors of the requirement to wear a vest for their own protection. If they do not comply, report the incident to your team leader.

13. Anti-harassment and anti-violence

We do not tolerate violence, harassment and bullying in the workplace.

Harassment and discrimination are unacceptable in a workplace where people respect each other and treat one another fairly. We are committed to ensuring that our employees, our contractors and our customers experience an environment free from violence, harassment and bullying.

It is your responsibility to do the following:

- treat others as you would like to be treated;
- speak up if you feel you are being discriminated against, harassed or bullied;
- report incidents of violence, bullying and harassment.

If you are a team leader, take seriously every incident you see and any reports of violence or unacceptable behaviour. Take appropriate action promptly. Exercise your authority with care and respect.

Q My coworker is often angry at work. However, lately I heard him threaten to “teach a lesson” to another colleague. What should I do?

A This type of behaviour may turn into a dangerous situation for you and your colleagues. Immediately report this behaviour to your team leader or human resources business partner to prevent a potential incident.

Q My coworker has been having problems with her partner. She told me their fights were getting worse, and she recently came to work with a bruised face. I have noticed that her partner has been coming to work to check on her. Should I say or do anything?

A Yes, you should report your concern to your team leader. Domestic violence is not only a risk to your coworker but it can also lead to volatile situations at work and potential risk or harm to other employees.

14. We work free of impairment due to substances

Employees are expected to perform responsibly and safely to be fit to work. For this reason, Canada Post requires that they report to work free of impairment due to substances, such as alcohol and other drugs, and remain fit to work.

It is your responsibility to never use, possess, distribute or offer for sale, drugs, alcohol, cannabis or drug paraphernalia:

- while engaged in company business (including volunteer events);
- during working hours;
- on company-owned or company-leased property;
- in a company-owned vehicle, including a vehicle rented for company use.

You are also required to perform your work duties safely and without impacts arising from substance use or the after-effects of substance use that risk your health and safety, or that of other employees or the public.

Substance refers to anything that, when consumed, may impair or diminish one's skills and abilities, including drugs and medication.

Q I have noticed a coworker who smells of alcohol and seems unsteady. What should I do?

A Coming to work under the influence of alcohol puts everyone's safety in jeopardy and violates Canada Post policies and practices. Contact your team leader or, if you believe this is a criminal act in progress, the local police to report this situation.

Q I know I have a drug problem, but I am afraid I will get fired if I tell someone.

A Drug addiction is a medical condition. Contact Canada Post's confidential Employee and Family Assistance Program (EFAP) for help. EFAP staff will provide you with confidential advice and assistance.

15. Official languages

Canada Post is committed to conducting business in English and French and offering equal opportunities for employment and advancement to English- and French-speaking Canadians. We are proud to promote bilingualism.

It is your responsibility to know the language requirements of your position and know whether your office is designated bilingual. If so, you are required to serve customers in both official languages.

Be sure to greet customers in both official languages, in person and over the telephone, and serve them in the official language of their choice, if you work in a bilingual office.

If you are required to communicate with employees in both official languages, respect their official language of choice in meetings and any internal communications.

16. Technology and social media

Canada Post respects the right of employees to express themselves, including through the use of social media.

It is your responsibility to do the following:

- comply with corporate policies and practices related to the use of computing devices, technology and social media;
- ensure your personal use does not interfere with your work;
- be accountable for all information you publish online;
- reveal your relationship with Canada Post when commenting online on issues related to Canada Post;
- respect the privacy of your colleagues and Canada Post customers, and do not publish any information about them, including photos, without their consent;
- ensure the information you post is accurate.

You must understand that the following actions are unacceptable:

- ignoring or breaking the rules of social media sites;
- claiming to be someone you are not;
- speaking on behalf of Canada Post, unless you are expressly authorized to do so;
- disclosing confidential or sensitive business information about the company, its clients, stakeholders or suppliers;
- making comments, posting pictures or doing anything that could harm Canada Post's brand, reputation or commercial interests.

Q I am active on social media and always make sure my information is accurate. I know some of the things I say can irritate people but they are all true. I don't talk about Canada Post but sometimes I snap video that might have the building or a truck in the background. Is this an issue?

A If you identify yourself as a Canada Post employee, even inadvertently through your uniform or your location, you must make sure you are respecting all of the policies of Canada Post, just like you would at work. You can find information on our Social Media Policy on Intrapost.

Doing right by our customers



Canada Post's employees are proud to serve Canadians. We are committed to earning and keeping our customers' business.

You will demonstrate this commitment by providing prompt, professional service. Take appropriate personal initiative and proactively cooperate with your colleagues when you address customer needs and concerns.

When we anticipate, meet and exceed customer needs and expectations, we will earn and keep our customers' business.

Conduct yourself as a proud, professional and customer-oriented ambassador of Canada Post.

17. Protecting the environment

Canadians expect us to view our responsibility to the country through a wider lens – beyond the services we provide. Through our words and actions, we can be a leader in making Canada stronger and more inclusive and help to protect the environment.

We're building a sustainable future by reducing our [environmental](#) impact. Our energy conservation efforts aim to benefit consumers and the planet. Canada Post is committed to reducing its overall environmental footprint and complying with all environmental laws and regulations:

- You will do your part by properly handling, storing and disposing of toxic substances and hazardous waste.
- You will use all available recovery, recycling or waste disposal arrangements.
- You will immediately report leaks, spills, inadequate cleanup or improper disposal of any toxic substances or hazardous waste to your team leader or regional real estate manager.
- You will adopt environmentally friendly practices and products.
- You will reduce, reuse and recycle, when practical and feasible.
- You will turn off all lights and equipment when they are not in use, and close dock doors.

18. Lead by example – ethically

We are all expected to act ethically in our dealings with our customers, competitors, contractors and suppliers. Canada Post competes vigorously, but fairly. At Canada Post we do so by ensuring we comply with all relevant laws, regulations and codes. This behaviour builds trust.

It is your responsibility to lead by example; therefore, be sure to do the following:

- communicate Canada Post's products and services in a manner that is fair and accurate, and that discloses all relevant information;
- familiarize yourself with Canada Post's fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition;
- consult Canada Post's Legal Affairs before engaging in any new practice that may affect fair competition;
- consider the context of any gift you offer a customer and be aware that the perception of a conflict of interest or bribe can be as destructive as the real thing;
- refuse gifts from customers, competitors, contractors and suppliers that create a perceived conflict of interest;
- promptly inform your team leader or Legal Affairs of possible violations of fair competition practices.

Every employee who travels for business must act with personal integrity. You should consider yourself an ambassador of Canada Post. Conduct yourself with pride, responsibility and integrity at all times when representing Canada Post. Know and comply with corporate policies and practices related to travel and hospitality and the management of travel expenses.

Q Can I accept an invitation to lunch offered by a current supplier who comes to town two or three times a year?

A It depends. Lunch meetings that involve business discussions are acceptable and are considered as part of a normal course of business. However, if the lunches become too frequent (that is, more than twice a year) or extravagant, they could affect your business judgment or appear to do so; this would cause a conflict of interest. Where you are unsure, get the advice of Sourcing Management as sensitive business issues or requests for proposals are often involved.

It is advisable to avoid supplier interactions at any time after business hours. You may also consider having another colleague accompany you when accepting any type of invitation with a supplier.

19. Practise fair and ethical procurement

Canada Post employees maintain high standards of professionalism and business ethics when it comes to procurement decisions.

Obey laws and trade agreements that apply, as well as all relevant corporate policies and procedures in all purchasing decisions:

- treat suppliers equitably and fairly;
- declare any conflict of interest or perceived conflict of interest you may have or may be seen to have;
- protect confidential corporate and supplier information, and use it only for intended business purposes;
- do not make commercial commitments to suppliers, unless authorized to do so.

There are some key instances when you should seek help from Sourcing Management:

- if you are approached by a supplier;
- before you approach a supplier for potential business outside authorized procurement channels, such as the procurement card (P-Card) and e-procurement;
- if an issue arises in an existing commercial relationship that may change the scope, time or cost of an agreement.

Q I was recently asked to manage one of our suppliers. They don't seem to do much, should I just approve the expense?

A You are right to wonder. You need to make sure you understand your responsibilities when approving an expense (completing a "Goods Receipt"). Review the contract, and, if they have provided the service that was agreed to, then yes. If you're not sure, ask Sourcing Management for help.

20. Privacy and confidentiality – Our employees, our customers, our partners

We respect and protect the privacy of our employees, customers and business partners.

We honour the trust placed in us by our employees, customers and business partners when they provide personal information to the Corporation. This includes personal information of our employees' family members and children who benefit from various Canada Post programs, such as the Canada Post Community Foundation and the Canada Post Scholarship programs.

It is your responsibility to do the following:

- comply with our privacy policies when collecting, using, sharing or disposing of personal information;
- restrict the sharing of personal information internally to persons who have demonstrated a need to know and externally to persons with lawful authority to receive the information;
- ensure that the personal information Canada Post keeps about you is current, accurate and complete;
- report to your team leader, or the [Privacy](#) team, any breach of privacy including the loss, theft of or unauthorized access to, or disclosure of, personal information;
- contact the Canada Post Privacy Office if you have any concerns about how we manage personal information.

Q Can I request a copy of my file?

A Yes. For instance, if you want to see your employment file, ask your supervisor, who will arrange to get your file from central storage. If you want a copy of your information, you will need to submit a request in writing.

21. Privacy and confidentiality – Our corporate information

Many company documents are confidential, meaning they contain highly sensitive information that is critical to the conduct of the company's business. Depending on the type of information at stake, unauthorized disclosure or misuse of confidential information has serious consequences for Canada Post, putting it at a competitive disadvantage or affecting its financial results.

To protect confidential information, avoid discussing it in public places, or with family members or friends who might pass the information to others deliberately or unintentionally.

Information should be considered confidential if it is not generally available to the public. This includes financial results before they are announced, business plans and forecasts, strategic initiatives, contracts and proposed products or services.

It is your responsibility to do the following:

- discuss or otherwise share confidential information with other employees only when they need to know the information, are authorized to have it and have the required security clearance;
- discuss or otherwise share confidential information with customers or the public only when authorized to do so in accordance with Canada Post's Information Security Policy and Procurement Policy;

- know and follow the Information Classification Business Practice, which explains what level of security is required for different types of information;
- seek the advice of Legal Affairs to determine if business partners should sign a confidentiality agreement before you disclose any confidential information.

Q I work at Canada Post in Marketing. Can I tell my friends and colleagues about an upcoming campaign promoting Canada Post's new overseas rates?

A No, not before the formal release of the new rates.

22. Responsible records and data management

In the course of daily business, virtually everything that employees create, including documents, databases, voice messages, messages from mobile devices and photos, is considered to be a record. Documents and information created, distributed or received by computers, such as email, meeting requests, documents, graphics, spreadsheets, video and audio files are also records.

It is your responsibility to do the following:

- create and maintain reliable and useable records and protect their integrity for as long as required;
- identify and conserve records that trace policy and program decisions, have historical or archival importance, or might be used to educate people about the historical role of Canada Post;
- use official record-keeping systems to retain and file records required for business, legal, financial, research or archival purposes;
- dispose of your records by following Canada Post's Retention and Disposition Schedule.

Q I recently started a new job and have inherited files and documents. How long do I need to keep them?

A There is no single retention time for files and documents. You need to check Canada Post's Retention and Disposition Schedule. It will tell you how long you need to keep a record. The schedule is available on the Records and Information Management site on Intrapost or you can contact your team's information management champion for help.

Employees, systems and customers create, use, share and delete data every day. This data may never become a corporate record as data can be made of numbers, words, measurements, observations or descriptions. Data is often in raw form, but might also be organized, for example in a chart or table. Employees may have access to data through many channels, including through one or more central data management tools.

It is your responsibility to do the following:

- be as accurate as possible when creating data;
- only share data inside Canada Post when you have clear permission to do so;
- seek the advice of the Data Governance team if you have been asked to share data with partners outside of Canada Post.

Q A commercial customer has asked for a file from the forward sortation areas so they can do some volume planning, can I give it to them?

A Connect the commercial customer with the Commercial Products team to arrange a licenced version of the required information. Do not provide data without a confirmed licence of data sharing agreement in place.

23. Canadians' legal access to information

Under the federal *Access to Information Act*, any records under the control of Canada Post can be requested by Canadians and those who are present in Canada. Canada Post must respond within a timeline prescribed by the Act. Some information is disclosed proactively to help Canadians better understand how we work. At Canada Post, transparency is about more than disclosures; it is a deliberate approach that helps to demonstrate accountability and good governance. In addition, under the *Privacy Act*, any individual present in Canada has the right to request access to their personal information held by Canada Post.

It is your responsibility to do the following:

- cooperate fully when contacted by the Access to Information team about a request within the required timeframe;
- search information holdings thoroughly for records in response to access to information requests.

The specialists on the Access to Information team are responsible for advising senior management on what should be made public and what should stay confidential.

Q I was asked to provide records for a response to an access to information request. I know that I have to submit all records. Can I delete all the drafts and provide only the final copy?

A No. You must submit all required records that are in your possession at the time the access to information request is made, including drafts. If you destroy files after you receive the request, you could be guilty of an offence under the *Access to Information Act*. Managing your records in line with the Records and Information Management Policy can help lower the risk you will have with files that should not be there.

Doing right by our company



Our transformation plan is based on the fundamental belief that we can create a stronger Canada and reposition the company for long-term success and financial self-sustainability.

Canada Post employees and contractors create valuable work: the Corporation's intellectual property. Protecting our physical assets and intellectual property is essential to our success.

It is more important than ever to ensure we safeguard the trust Canadians place in us to deliver on and meet their expectations.

24. Protecting corporate assets

Canada Post employees and contractors create significant and valuable work, including documents, technology, data compilations and artwork, and they improve equipment, tools and processes. These creations, solutions and improvements are Canada Post's intellectual property. Protecting intellectual property maintains our technological and competitive standing.

It is your responsibility to do the following:

- understand the different types of intellectual property and find out what kind of intellectual property you might create or are exposed to in your job;
- treat our intellectual property as confidential information; if you are unsure whether something you create, have access to or use in your work is intellectual property, contact Legal Affairs;
- work with Sourcing Management to ensure suppliers and potential suppliers have signed a nondisclosure agreement before giving them information about Canada Post, specifying that they will not disclose the information to anyone else;
- work with Sourcing Management and Legal Affairs to ensure that intellectual property is addressed in contracts with third parties;
- talk to your team leader if you think your work should be protected as intellectual property.

Q I invented an electro-mechanical device that falls within the scope of Canada Post's business interests. Can I apply for a patent on this device?

A No. All intellectual property conceived or made during or after regular working hours arising from your employment with Canada Post are the property of Canada Post. You are prohibited from applying for a patent or from making use of an invention for personal gain, when an invention is within the scope of Canada Post's business interests, whether you have designed or produced it alone or with others. Talk to your team leader about your idea. Innovation is always welcome.

25. Protecting assets and mail

Protecting physical assets

Canada Post has many kinds of assets, from plants, depots, post offices and office equipment to vehicles, portable data terminals (PDTs), corporate keys, uniforms and information. Protecting all corporate assets is essential to our success.

It is your responsibility to do the following:

- take all reasonable steps to protect Canada Post assets against loss, theft, damage, vandalism, sabotage, unauthorized use or disclosure, or destruction;
- protect against accidental loss and theft all documents, records, data, equipment, supplies and other physical property provided to you by Canada Post;
- use all documents, records, data, equipment, supplies and other physical property in accordance with corporate policies and practices;
- return equipment, supplies, corporate information, and other physical property provided to you by Canada Post in good condition when you leave the company.

Protecting physical and digital mail

The trust Canadians have in us to deliver their physical and digital mail is the foundation of our business. It is central to our brand. Every employee must safeguard that trust by diligently and proactively securing all items entrusted to Canada Post.

You must comply with all corporate policies about safeguarding the mail.

You must also ensure no one tampers with (opens, keeps, steals, destroys, abandons or retains) mail from the time Canada Post receives it until it is delivered.

While conducting your day-to-day duties, you must obtain and wear your employee identification card.

If you suspect mail has been tampered with, or that some activity or person is jeopardizing the security of the mail, you must immediately notify your team leader or Security and Investigation Services.

26. Prevent and report fraud

Our ability and determination to prevent, deter and report fraud or suspected fraud strengthens our integrity as employees and as a company.

It is your responsibility to do the following:

- minimize the opportunity for fraud and mitigate the risks of fraud;
- know and follow the Anti-Fraud Policy, which has guidelines for all employees;
- report fraud or suspected fraud immediately to your team leader or Security and Investigation Services;
- cooperate fully in any investigation of suspected fraud.

Q I am a Canada Post employee and have access to a company vehicle. Can I use it to help my parents move some furniture on the weekend?

A No. We must ensure proper business use of company property. We must also protect the company's physical and intellectual property from loss, damage, theft, vandalism, sabotage, unauthorized use or disclosure, or destruction. This applies to Canada Post property no matter where it is located.

27. Report and deter illegal use of our products and services

Money laundering is the process of turning “dirty money” obtained from illegal activities into “clean money” through a series of financial transactions to obscure its source, and it is a serious crime. We take steps to ensure that our products and services are not being used to support illegal activities.

It is your responsibility to do the following:

- understand Canada Post's roles and responsibilities related to anti-money laundering, comply with relevant legislated requirements and be aware of the penalties for non-compliance;
- identify transactions that may indicate money laundering is occurring if you work in a retail post office;
- report these transactions according to corporate practices.

Q I know I'm supposed to verify ID because the transaction meets the threshold, but I know the customer personally, so can I skip this step?

A No. For large cash transactions, we must document the due diligence we've taken. This means that whether or not you know the customer, you must verify the ID.

28. Reporting violations of the Code of Conduct

This Code of Conduct covers Canada Post's fundamental principles governing ethical business conduct. It also deals with measures for overseeing and reporting violations. All employees have an individual responsibility to report in good faith any actual or potential violations of this Code or the law.

If you believe that such a violation has taken place, it is critical that you bring the matter in good faith to the attention of your team leader or your Human Resources representative. Alternatively, employees can report or express their concerns about these matters confidentially by calling Canada Post's Disclosure Line or communicating electronically by using the contact information below:

- **1-877-644-6840**
- canadapost.disclosure-report.ca

Canada Post will take all reasonable steps to respond appropriately, promptly and consistently to violations or potential violations outlined in this Code. This may include administrative and disciplinary action, up to and including termination of employment, contract termination or other legal action.

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