



Better  
infrastructure  
solutions.  
Better lives.

# Our Integrity Code



# Our Code



# About us

**This Code applies** to all our CPCS subsidiaries and CPCS People, which we consider as anyone working or having worked at, with or for CPCS regardless of their title, seniority, or location.

**This Integrity Code matters because:**

- We are ethical management consultants.
- Our work must live up to scrutiny.
- Interpretation of what is perceived as unethical can vary.
- We work on transactions and projects, and we bid on large public contracts.
- Our advisory services can impact local, regional, and national economies, people and environment.
- Our behaviour must be consistent no matter where we work around the world.

**Who we are:** CPCS is a global group of advisors helping organizations think, plan and deliver their infrastructure projects the smart way.

**Infrastructure expertise:** transportation, major projects, power, public-private partnerships, analytics, climate change.

**Our mission:** Improving lives through better infrastructure solutions.

**Governance:** The CPCS Board of Directors has reviewed and approved this Integrity Code.

Code issued on: 01/09/2023

Last reviewed: 29/07/2025

*The most recent versions of our governance documents and definitions as found on our intranet have precedence over those found at any other location (including here).*

# What forms our integrity standards

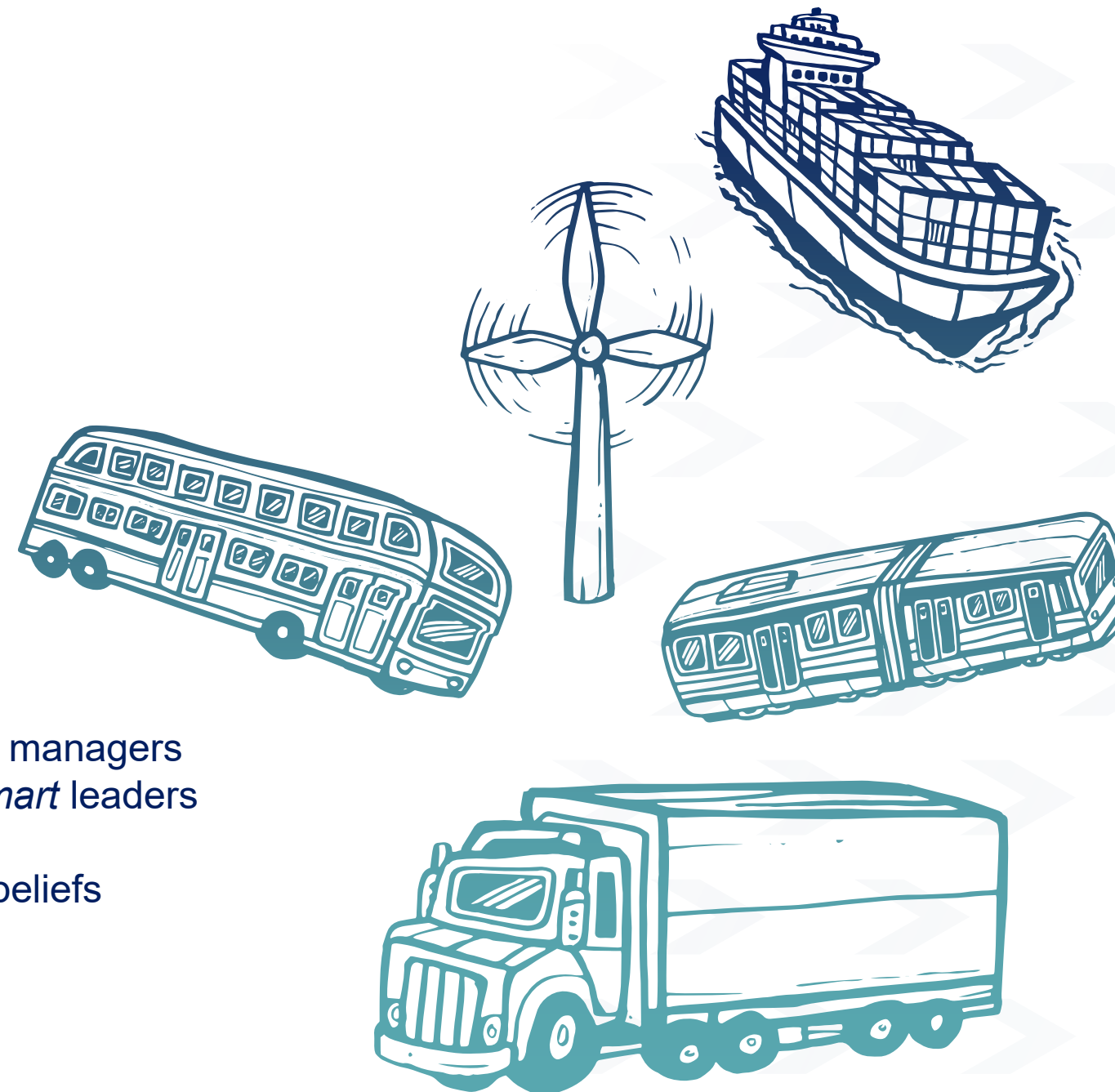


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# Intro



**6** Always act with integrity

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are *CPCSmart* leaders

**10** Corporate beliefs

A word from our Managing Partners

# Always act with integrity

CPCS is privileged to be trusted with advising infrastructure leaders worldwide.

Upholding the highest personal and professional integrity standards is the right thing to do if we want to continue to be trusted.

At CPCS, we call this being **CPCSmart**.

We hire employees who share our core **DEEPER IF** beliefs and uphold their commitment to professional integrity. We expect the same from those that work with or for CPCS.

Our Integrity Code naturally complements our 8 corporate beliefs. For example, **Impact** can't be achieved without integrity. Our **Evidence-based** advice cannot be trusted if it doesn't come from a place of integrity. And a work environment can't be **Fun** without integrity at its core.

In short, **Be CPCSmart**: Always act with integrity. Do what's right even when no one is looking. And always seek guidance when in doubt.

**Jean-François Arsenault** and **Marc-André Roy**  
Managing Partners



**Thank you for  
your personal  
commitment to  
our Integrity Code.**

A word from our Chairman

# Integrity stewardship

This Code is the focal point of the company's Integrity Program, which is a set of policies, procedures and governance principles.

If I can leave you with one thing, it's this: **Be CPCSSmart**. The firm's success and longevity depend on it.

My commitment as Chairman is this:

- Supporting and holding CPCS accountable towards its people and corporate obligations
- Encouraging the company to always reach for higher environmental, social and governance practices

CPCS is a responsible corporate citizen committed to **Excellence**. Because of this, you can expect CPCS to:

- **Act** with integrity and uphold this commitment.
- **Work** only on projects that are expected to have a positive impact.
- **Provide** a safe, secure, healthy, respectful, and productive work environment.
- **Protect** you from retaliation after raising genuine concerns.

All members of the board, managing partners and the management team are committed to lead and manage CPCS with integrity.



**Kerry Gerber**

Chairman  
CPCS Board of Directors



# What it means to *Be CPCSmart*.

## You must:

- Understand the contents of this Code.
- Protect this code, prevent and stop what could break it.
- Insist that others to *Be CPCSmart*.
- Always do what's right even when no one is looking.
- Use your best judgment and seek help when in doubt.
- Uphold your own profession's code.
- Honour your commitments and do not over promise.
- Speak up and raise concerns.



## In everything you do and say, strive to be:

- Accurate
- Fair
- Good
- Honest
- Loyal
- Respectful

# Our people managers are *CPCSmart* leaders.

## People managers must:

- Embody and strive to act according to our set of leadership competencies.
- Embrace, use and promote inclusive language and behaviours.
- Set the tone and act as an ethical role model for everyone around them.
- Maintain a respectful environment where people feel safe to ask questions and raise concerns.
- Listen carefully and escalate concerns appropriately.
- Ensure their teams are *CPCSmart* through training and leading by example.
- Promote carefulness, accuracy and a high level of professionalism.
- Take preventative measures where necessary.

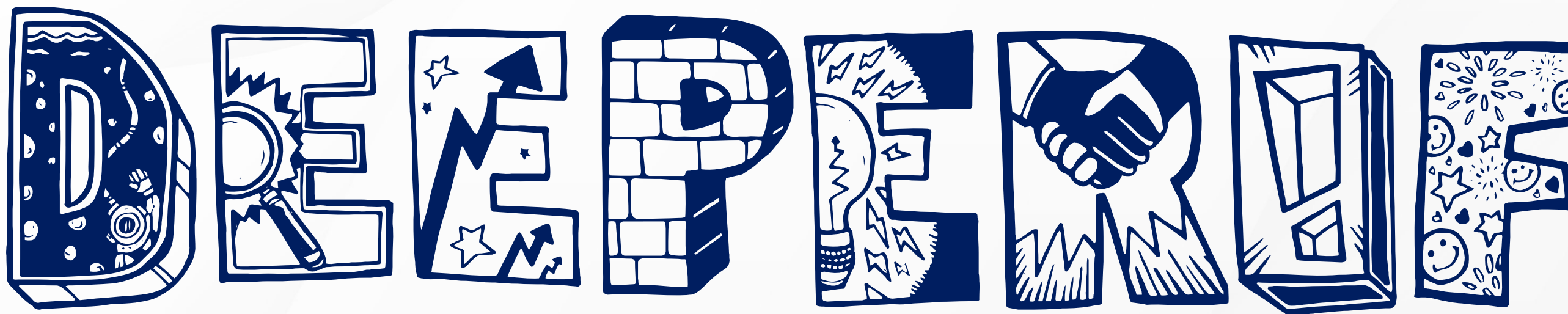


## Words like these are red flags and must be scrutinized:

- “We really can’t miss the quarter.”
- “Let’s keep this to ourselves.”
- “Nobody needs to know this.”



# Our culture of integrity complements our 8 corporate beliefs known as DEEPER IF



depth • excellence • evidence-based • pragmatic • entrepreneurial • respect • impact • fun



# Know

Understand why  
complying matters

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- 15 Decision-making tool



# Our commitment

## Demonstrating leadership

CPCS promotes good conduct, and we uphold our integrity standards in everything we do and say.

We expect external partners, collaborators, and organizations in our ecosystem to respect our values and integrity standards.

**Our Integrity Code** summarizes the guidance found in our policies and procedures. Together, they govern our behaviours and how we do business everywhere, every day.

Nothing in this Code or in any of our policies is intended to limit or interfere with your rights under law.

### How we apply this Code:

- We comply with applicable laws, rules, and regulations.
- We run an Integrity Program to uphold our Integrity Standards and preserve trust.

### We protect anyone who raises a concern

We have zero tolerance for reprisal. It's safe for you to speak up when in doubt or when you witness a situation that goes against our integrity standards.

**We do not tolerate** illegal practices of any kind or any unethical behaviours, regardless of local custom or practice.

## Integrity standards

If this policy sets higher standards than your local laws and cultural norms, you're expected to follow this Code.

**Why?** Because at CPCS we believe that integrity goes beyond what laws say.

Also, there isn't always a law or policy to follow when facing a complex situation. When this happens, refer to this Code, pause, seek clarity and guidance.

## Whom to turn for help to ask a question or raise a concern?

[Click here for contacts and channels available.](#)

# Governance

## Governing CPCS responsibly

We govern using what we call our Global Integrity Standards, which are made of this Code, policies, procedures and controls, reporting mechanisms, and other governance practices.

This Code is reviewed and approved annually by the CPCS Board of Directors, made of independent directors and CPCS representatives.

A copy of this Code is available here: <https://cpcs.ca/about/integrity/>

## Board stewardship

With the support of independent auditors, our board mandated **Audit, Risk and Integrity Committee** oversees how this Integrity Code is reviewed, interpreted, and applied.

It's also responsible for reviewing management's performance and ensuring that internal controls and procedures at CPCS are adequate and followed, including processes for compliance with laws, rules, and regulations.

## Compliance

Our Code, its underlying policies and integrity program prevail when local laws allow behaviour not permitted in this Code.

## Managing integrity

CPCS runs an Integrity Program to uphold our Integrity Standards.

We continuously improve the program, in addition to formal annual reviews.

- All CPCS People complete annually a certification to ensure they understand this Code and uphold it
- External partners and collaborators agree to uphold our integrity standards when they enter into a contractual agreement with CPCS

This program is also built on tight controls to track and detect any internal and external financial wrongdoings.

## Exceptions and deviations

You might face a situation in which you can't fully comply with our Code or one of our policies. When this happens, you must consult the Corporate Integrity Officer or General Counsel for guidance on next steps.

See our *Integrity Program* for more details on how reports/concerns are handled.

# Breaking the code

## Generally, these 5 examples of behaviours will break this Code:

- Covering your misconduct
- Facilitating or ignoring someone else's misconduct
- Pressuring someone to break this Code
- Breaking the law
- Not following this Code and wider Integrity Standards ecosystem

## More examples of Code violations:

- Bullying, racism, sexism, sexual harassment, etc.
- Circulating emails with inappropriate content
- Dismissive, passive disrespect and resistance undermining cooperation or compliance
- Bribery
- Fraud
- Stealing and lying
- Leaking proprietary information
- Misleading, making false statements or intentional omissions
- Treating others differently than we would want to be treated

## Code violations are documented in employee records:

Breaking this Code may lead to disciplinary action, including:

- Verbal and written warning
- Training and coaching
- Termination of employment
- Fines or criminal prosecution if someone breaks the law



## What falls outside this Code:

CPCS has other policies and procedures that are independent from this Code, such as employee performance and business processes. Violations that are not Code-related will be handled under the appropriate policy or procedure, in a fair and impartial manner.

# Some decisions are easy to make, others aren't.



## Ask yourself:

- 1** Is it legal?  
 
- 2** Does it uphold what's in this Integrity Code?  
 
- 3** Would you be comfortable if it was reported to a client, coworkers, or in the news?  
 

If you answered yes to all questions, then your decision is likely okay.

A “no” or even a “maybe” is a red flag! **Be CPCSmart** and seek guidance from your manager or our Corporate Integrity Officer.

# Act

It's safe, speak up for  
the good of CPCS

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# Safely raising concerns

## Contacts

When in doubt about any aspect in this Code, related policies, or any situation, contact [integrity@cpcs.ca](mailto:integrity@cpcs.ca) or speak with one of these individuals:



### Your manager:

Speak with your manager or another leader



### Our corporate integrity officer:

Contact this person if you don't feel comfortable speaking to your manager or another leader



### Our general counsel:

This person is available to provide guidance and answer any questions

## Reporting channels

You have a duty to report actual or possible misconduct that you become aware of, even your own.

- **Confidentially:**  
Your manager or a member of our talent management team.
- **Confidentially:**  
[integrity@cpcs.ca](mailto:integrity@cpcs.ca) Corporate Integrity Officer and General counsel).
- **Confidentially and anonymously to the Corporate Integrity Officer:** [use this online form](#)
- **Confidentially:**  
If you have a valid reason to believe that a report to the Corporate Integrity Officer may not be handled appropriately, you can report directly to CPCS external director, Kerry Gerber: [kgerber@cpcs.ca](mailto:kgerber@cpcs.ca)



## Our promise

- **CPCS prohibits retaliation**, because we protect those reporting genuine concerns.
- **CPCS protects** whistleblowers and witnesses because it's the right thing to do.
- **No one at CPCS** can influence or deter you from speaking up, because that breaks this Code.

# Investigation process

Even if your hunch, the hint, or concern that you bring forward is determined as unfounded, no one at CPCS will ever use this as excuse for retaliation.

- If you have a valid reason to believe that a report to the Corporate Integrity Officer may not be handled appropriately, you can report directly to CPCS external director, Kerry Gerber: [kgerber@cpcs.ca](mailto:kgerber@cpcs.ca)
- Investigations are conducted with respect and discretion. They're kept confidential to the extent permitted by law.
- CPCS may be required to report criminal or improper activity to the appropriate government, law enforcement, regulatory authorities or client. We are all considered innocent until facts uncovered during the investigation point to the contrary.

## CPCS values your help in preventing and revealing concerns.

We prohibit retaliation of any kind against anyone who speaks up genuinely or that participates in a Code investigation.



### For more information:

- [Integrity Program](#)
- [Integrity Reporting and Investigation Policy](#)



## Investigation process

# Typical process when a Code concern is reported.

1. You have the right to remain anonymous, where permitted by law.
2. If you reveal your name, we will protect your identity during the investigation.
3. We treat all reports seriously and the Corporate Integrity Officer will investigate them confidentially.
4. We expect honesty and full cooperation throughout the process.
5. To ensure consistency and fairness, investigations follow the guidelines in our Integrity Program.
6. If our investigation determines that the Code has been violated, consequences will be fair, proportionate and consistent based on guidelines in our Integrity Program, and in accordance with applicable law.



**For more information  
on our investigation  
and decision-making  
process, consult our:**

- *Integrity reporting and investigation policy*



# Care

Maintain trust by upholding our environmental, social, and other corporate obligations

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# One Team attitude

## Be CPCSmart:

- Speak up openly and welcome constructive feedback.
- Provide a safe, positive, healthy company culture that supports wellbeing.
- Protect our people's security during their professional activities.
- Advance diversity, equity, inclusion and belonging.
- Support others in the common effort to create change and to develop professionally.
- Uphold equality and fairness in all our human capital practices.



## Related policies:

- *Accessibility policy*
- *Diversity, equity, and inclusion policy*



# Treat others kindly

CPCS does not tolerate harassment nor any forms of physical, verbal or sexual violence

## What is *CPCSmart*:

- Be aware of your biases (upbringing, education, faith, profession, etc.).
- Never engage in discrimination such as racism, sexism and ageism.
- Speak up if you witness microaggressions, bullying or other disrespectful behaviours.
- Do not harass, threaten, intimidate, humiliate or attempt to instill fear in others.

### Report a concern safely:

If you think you have experienced or witnessed discrimination, harassment, or bullying at CPCS, speak up.

You can voice your concern via [someone, or a channel listed in this Code](#).

CPCS does not tolerate or permit retaliation for asking a question, making a report, or participating in an investigation.



## Related policies:

- *Accessibility policy*
- *Diversity, equity, and inclusion policy*

# Communicate for impact



## What is *CPCSmart*:

- Show mutual respect for everyone and be truthful.
- Demonstrate civility regardless of the communication method.
- Address issues openly and transparently.
- Strive to communicate accurately, in a clear, concise, and timely manner.
- Support what we say and do with research, facts, data.
- Ensure your personal online activities are appropriately private and respectful.

## Related policies:

- *Accessibility policy*
- *Diversity, equity, and inclusion policy*
- *Alcohol, drugs, and other substances policy*
- *Internet usage policy*



# Client service and delivery



## What is *CPCSmart*:

- Knowing our limits as experts
- Honour our commitments and communicate honestly if this is no longer possible
- Protect client confidentiality
- Deliver evidence-based insights and deliverables that withstand scrutiny
- Maintain trust through a robust business continuity infrastructure
- Back our work with research, facts, data
- Live up to our professional and technical excellence by obtaining and maintaining relevant individual and corporate qualifications and accreditations

## Related policies:

- *Conflict of interest management policy*
- *Business process Clockwork*



# Respecting communities and the environment

Impact through our operations and advice to clients.



## What is CPCSmart:

- Acknowledge Indigenous Peoples' unique and important interests in the lands, waters and other environments affected by our work.
- Respect the customs, traditions, cultures, and laws of the countries we operate in.
- Work only on projects that are expected to have net positive impact.
- Incorporate sustainability principles such as inclusion and equity into our services and project deliverables.
- Help our clients, partners and stakeholders meet their sustainability commitments.
- Reduce the footprint of our operations, including our carbon emissions.
- Offset unavoidable greenhouse gas emissions annually.
- Give our time and lend our people and resources through donations, investments, partnerships, and pro bono work.
- Support where possible local capacity-building through our projects aimed at increasing client institutional and technical capacity.

## Related policies:

- *Philanthropy policy*
- *Environmental and Social Responsibility policy*
- *Statement for Indigenous relations and reconciliation*

# Protect



**Maintain trust  
by managing  
risks and  
protecting  
our people and  
assets**

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# Health and Safety

## Be CPCSmart:

- Stay informed of workplace hazards, follow guidelines set to mitigate hazards, refuse unsafe work.
- Provide a safe, positive, healthy company culture that supports wellbeing.
- Immediately flag/report all incidents and near-misses.
- Report any acts of violence or harassment in the workplace. Promote a hazard-free workplace.
- Participate in health and safety related activities.



## Related policies:

- *Health and Safety policy*



# Reputation

## What is *CPCSmart*:

- Use our visual identity the right way and follow brand standards.
- Follow our external communications policy.
- Protect the reputations of your coworkers, ourselves, and CPCS.
- Exhibit professional and respectful conduct online and on social media. Know that having a disclaimer “views expressed are my own” does not protect you.
- Display professionalism when representing CPCS, whether in the office, at a client site or at any professional event – irrespective of whether CPCS is sponsoring it.



## Related policies:

- *Brand standards guide*
- *External communications policy*

Loop in the Marketing and Communications Team on all media requests and inquiries at [communications@cpcs.ca](mailto:communications@cpcs.ca)



# Information protection and security



## What is CPCSmart:

- Follow information protection and security policy to the letter, all the time
- Protect our information from unauthorized use, access, or disclosure
- Protect client and partner information (individual and corporate)
- Use strong authentication and don't bypass or disable security measures
- Use secure internet networks
- Ensure that you're using CPCS approved-only systems, devices, software
- Handle emails carefully (attachments, links) and report suspicious emails
- Collaborate with our Information and Technology help desk
- Safeguard sensitive, confidential or personal identifiable information not available to the public

## Related policies:

- *Information protection and security policy*



Investigation process

# Information protection and security



## Refer requests for confidential information:

You may receive requests from the media or others outside of CPCS for confidential information about our people, reports or performance. If this happens, don't respond. Instead, follow our External Communications Policy and immediately contact [communications@cpcs.ca](mailto:communications@cpcs.ca).

## Watch for and report leaks:

You may learn that confidential information has leaked.

If this happens, report your concerns immediately to [helpdesk@cpcs.ca](mailto:helpdesk@cpcs.ca) and your manager.

## Related policies:

- Information protection and security policy
- External communications policy



# Safeguard entrusted assets

Intangible assets include knowledge, technical and statistical information, financial and contract documentation, business processes, logos and marketing, corporate strategies and plans, and others. Tangible assets are things such as our offices, mobile equipment, and computers.

## What is *CPCSmart*:

- Know and respect the Personal Information Protection laws that govern our employees and our clients and partners' data in the geographies that you work in.
- Don't share CPCS intangible assets outside of CPCS or with non-CPCS people.
- Send work-related material from your work email.
- Take caution and check for correct email addresses before emailing any CPCS information.
- If you receive unusual requests from colleagues validate that the address is from a CPCS email account.
- Keep accurate, complete financial records, including time records and expense reports.
- Abide by all public disclosure requirements by providing full, fair, accurate, timely and understandable disclosures.
- Never allow anyone to pressure you into falsifying a record or ignoring fraud.
- Ensure that you're sharing information securely.
- Store all CPCS official documents on our intranet, not your personal drive or laptop's desktop.



## Related policy:

- *Information protection and security policy*

# Prevent

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and terrorism financing

**39** Human rights

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**41** Lobbying



# Conflicts of interest

You have a duty to avoid and report them to prevent harm to our clients and CPCS.

## Be CPCSmart:

Because we're known for our independent and impartial advisory services, it's important that we protect this principle by avoiding or mitigating all actual and perceived conflicts of interest.

. A conflict of interest arises mainly when CPCS is:

- a. Providing services to Client A and Client B in respect of the same or a different engagement where their interests are, or there is a substantial risk they will be, in conflict (Client Conflict).
- b. Providing services to Client A where CPCS's interests, or those of its Personnel or one of their immediate family members (spouse, children, parents, siblings), come into conflict, or there's a substantial risk that they may come into conflict (Own Interest Conflict).

Always report conflicts promptly to your manager or to the Corporate Integrity Officer. They will help you determine the right steps to take.

- c. Providing services to Client A where CPCS (or one or more of its personnel deployed on the engagement for Client A) holds confidential information about Client B from a previous or another current engagement that's material and relevant to the engagement for Client A (Confidentiality Conflict).



## Related policies:

- *Conflicts of interest management policy*

Other examples

# Conflicts of interest

Other examples of conflicts to disclose promptly:

- **Conflicting employment:**  
You or a family member is working or consulting for a competitor or potential competitor.
- **Hiring:**  
Hiring or supervising former CPCS employees, family members, or others with whom you have or had a close, personal relationship.
- **Business transactions:**  
Awarding CPCS business to a company owned or controlled by a CPCS employee or their family, or a close friend.
- **Serving on board of directors:**  
Serving as a board member for an outside commercial company or organization.
- **Investing in other companies:**  
Owning or having a substantial interest (more than owning shares in a large publicly traded company or fund) in a competitor, supplier, or contractor.
- **Interested party transactions:**  
Having a personal interest, financial interest, or potential gain in any CPCS transaction, separate from being a CPCS employee and shareholder.



## Related policies:

- *Conflicts of interest management policy*

# Corruption

**We conduct business with integrity and fight corruption because it's illegal and wrong.** CPCS does not buy market access, business, or policy outcomes with money, gifts, or any other financial or other advantage:

- CPCS upholds all laws to fight corruption, whether locally or internationally, wherever we work. We expect all CPCS People to do the same.
- Corruption is often observed in business transactions, including the procurement and execution of contracts.

**Watch for corruption. Chief among them are:**

- **Bribery** is offering, giving, receiving, or soliciting directly or indirectly anything of value to corruptly influence a decision in your favour.
- **Fraud** is any act or omission, including misrepresentation, that knowingly or recklessly misleads, or attempts to mislead someone to obtain financial, a benefit or to avoid an obligation.
- **Facilitation** payment is another type of illegal bribe. A common example is where a government official is given money or goods to perform (or speed up the performance of) an existing duty.
- **Kickbacks** arise when suppliers or service providers pay part of their fees to the individuals who give them the contract or some other business advantage. Paying kickbacks to win is one of the most common forms of bribery.



## Related policies:

- *Anti-corruption policy*

*Never accept or bribe someone or be involved in fraud regardless of the country you work in.*

*If you see or suspect corruption, report it using one of the channels noted herein.*

# Gifts, hospitality and entertainment

Be vigilant with business courtesies

## Be CPCSmart:

CPCS has strict rules about business courtesies known as gifts, hospitality, and entertainment.

Avoid any actions that could create a perception of favouritism or harm to our company's reputation for impartiality and fair dealing. In addition, certain gifts or favours could be construed as bribes, so due care and attention is required to avoid policy breaches or legal liability.

In the right context, CPCS People may accept occasional, modest, unsolicited business courtesies. They're acceptable and prevalent in successful working business relationships.

Never solicit, give, or receive business courtesies if it could appear to, or would, create an expectation of repaying the courtesy through a favourable business decision. Following the respective laws is also critical.



## Related policies:

- *Gifts, hospitality and entertainment policy*
- *Anti-corruption policy*

*Follow the rules in our policy for handling gifts, hospitality and entertainment courtesies carefully, and know which ones are acceptable.*

*When in doubt, seek guidance.*

# Unfair competition

Always deal fairly with others.

## Be CPCSmart:

**Discretion:** Never talk about CPCS strategies or plans with competitors or behave in ways to influence or manipulate a process unfairly. While in public, ensure you're not overheard when talking about sensitive CPCS business.

**Laws:** We follow the letter and spirit of antitrust and competition laws applicable to us.

**We compete fairly.** We don't enter in business arrangements—either written, orally, formally, or informally—that could eliminate or discourage competition or give us an inappropriate benefit or advantage.

We remove ourselves from situations that could appear as if CPCS is restricting competition unfairly.

A few examples of anti-competitive behaviours:

- **Price fixing:** Making an agreement with a competitor to raise, lower, or stabilize prices or other competitive terms.
- **Bid rigging:** Coordinating bidding activity with competitors.
- **Group boycotts:** Agreeing with a competitor to not do business with targeted individuals or businesses.
- **Market division or customer allocation:** Dividing customers, territories, or markets among competitors.
- **Output restriction:** Agreeing with a competitor to reduce output or restrict capacity.
- **Monopoly or abuse of dominant position:** Using a dominant market position to impose exclusive dealing terms on customers, such as pricing.



## Related policy:

- *Anti-corruption policy*

# Global trade compliance

All CPCS People must follow the international trade compliance laws applicable to CPCS

## ***Be CPCSsmart:***

Sanctions are laws and regulations enacted by governments (such as the government of Canada), international organizations (such as the United Nations), and supranational bodies (such as the European Union) to promote foreign policy and other objectives.

CPCS complies with relevant economic and trade sanctions laws in all jurisdictions. CPCS does not and will not tolerate any form of non-compliance with relevant sanctions regimes.

Violating sanctions can have severe consequences for both CPCS and employees involved, including possible imprisonment, monetary fines and penalties, as well as debarment of CPCS from bidding on public projects.

If there's a conflict between this Code, CPCS's policies and local trade laws, always follow the law. When in doubt, or if sanctions differ by country of CPCS subsidiary leading to a lack of clarity, contact your manager, the Corporate Integrity Officer or General Counsel.



## **Related policies:**

- *Trade compliance and economic sanctions policy*
- *Anti-corruption policy*

# Money laundering and terrorism financing

CPCS conducts business only with reputable business partners whose business activities are legal and whose funds come from legitimate sources.

## ***Be CPCSmart:***

CPCS has a firm stance against money laundering or terrorist financing, and we're committed to the highest level of openness, integrity and accountability.

- **Money laundering:** Any act or attempted act to disguise the source of money or assets derived from criminal activity.
- **Terrorist financing:** Providing funds for terrorist activity.



## **Related policies:**

- *Anti-money laundering and terrorism financing policy*
- *Trade compliance and economic sanctions policy*
- *Anti-corruption policy*

# Human rights

**Care for human rights around you and report any known or suspected abuse.**

CPCS prohibits forced labour, child labour and human trafficking. We're committed to upholding fundamental human rights.

CPCS doesn't employ or work with individuals or organizations known to have violated human rights.

**Forced labour or modern slavery** is when individuals are compelled against their will to work or provide a service through force, fraud, or coercion.

**CPCS is committed to a real Living Wage:** We are committed to ensuring that every employee receives total compensation that meets or exceeds a real living wage standard in all jurisdictions where we operate.

**Human trafficking** is the recruitment, transportation, transfer, harbouring or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability.

**Child labour:** CPCS does not employ children under the age of 18. We prohibit work that is physically, socially, or morally dangerous and harmful to children or that interferes with their schooling.



Care for human rights around you and report any known or suspected abuse.

# Political contributions

CPCS does not and will never contribute funds to candidates, political committees, political parties, ballot initiatives, referenda, measures, or other similar political organizations or campaigns.

You have the right as a citizen in your non-CPCS capacity to participate in the political process, including making political contributions on your own time and with your money, in accordance with local laws. Ensure these activities or level of activity does not affect the image or reputation of CPCS.

Never use CPCS resources for political activities or give the impression that CPCS is supporting a candidate, an initiative or that you're speaking or contributing on behalf of CPCS.



Never intervene in political decisions on behalf of the company or give the impression that you are.



# Lobbying

CPCS develops and maintains relationships with public officials, governments, policy-makers, local authorities, and agencies.

We communicate and interact with all these stakeholders in the course of our work and according to applicable laws.

Our interactions with public officials, political parties and interest groups are based on the principle of neutrality.

We don't promote our interests during decision-making processes, such as those for contracts, legislation plans and project transactions.

Be **cpcs** smart



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# Key contacts

Start with your manager – they're best positioned to understand and take appropriate action. If you feel uncomfortable speaking with your manager, contact any of the following:

- **Member of the Talent Management Team:** [hr@cpcs.ca](mailto:hr@cpcs.ca)
- **Corporate Integrity Officer:** [integrity@cpcs.ca](mailto:integrity@cpcs.ca)
- Report anonymously *to the Corporate Integrity Officer* by completing [this online form](#); or
- If you have a valid reason to believe that a report to the Corporate Integrity Officer may not be handled appropriately, you can report directly to CPCS external director, Kerry Gerber: [kgerber@cpcs.ca](mailto:kgerber@cpcs.ca)





Our Integrity Code 2023

