

INCLUSIVENESS

RELEVANCE

CREATIVITY



INTEGRITY



CODE OF CONDUCT

**WORKING TOGETHER:
OUR VALUES, ETHICAL PRINCIPLES
AND EXPECTED BEHAVIOURS**

INTRODUCTION

CBC/Radio-Canada is Canada's own unique national public broadcaster and one of its largest cultural institutions. We take pride in the role we play in the daily lives of Canadians. Each of us strives to meet our commitment to integrity and ethical behaviour, to maintain a workplace that is respectful and supports the well-being of every employee, and to live up to the trust Canadians place in us.

WHO IS SUBJECT TO THIS CODE

This Code of Conduct outlines the Values, Ethical Principles and Expected Behaviours for all CBC/Radio-Canada employees, irrespective of our employee status, level of authority or duties. Each of us is expected to apply the Code, to help others do the same, and to remember that our daily decisions and actions affect our organization and our colleagues, and can have an impact on the confidence placed in us. We are also expected not to engage in activities likely to bring CBC/Radio-Canada into disrepute, even if they are not specifically mentioned in the Code.

Adherence to this Code is a condition of employment. Failure to comply with it, or other CBC/Radio-Canada policies, may result in disciplinary action, up to and including immediate dismissal.

Individuals or companies who have a contract with CBC/Radio-Canada, including freelancers, independent producers, as well as service providers and consultants working on site or on a CBC/Radio-Canada project are expected to abide by the provisions of the Code that are reasonably applicable to them.

WHAT IS INCLUDED IN THIS CODE

This Code sets out CBC/Radio-Canada's Values and Ethical Principles, and certain Expected Behaviours. You'll also find information on how to report a concern or a breach of the Code, as well as who to contact for assistance or information. It also provides tools to help us navigate certain ethical situations.

BEYOND THE RULES

The Expected Behaviours mentioned in the Code cannot cover every possible situation we might encounter at work. We trust each other to use good judgment, to refer to the Values and Ethical Principles contained in this Code as guidelines, and to seek further information or help when we need it.

Those of us who are in a position of influence or authority have a particular responsibility to exemplify the Values, Ethical Principles and Expected Behaviours contained in this Code. We are expected to maintain a work environment that fosters respect of the Code, ethical decision-making and dialogue, have conversations with our employees about ethics, and encourage employees to raise issues and concerns.

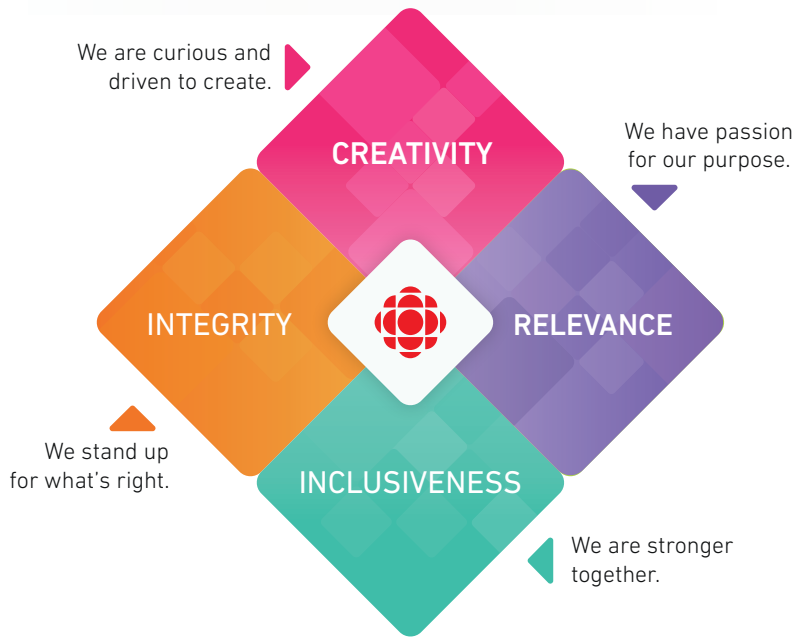
Together, we are all responsible for living our corporate values, adopting ethical practices and modelling the kind of behaviour we want from others.

VALUES

Our Values are at the core of how we work. They serve as the cornerstone for organizational policies and programs, they underpin the behaviours and culture needed to achieve our mission, and they provide the overall context and direction to behavioural standards as outlined in this Code of Conduct.

ETHICAL PRINCIPLES

As Canada's public broadcaster, we are guided and inspired by our corporate Values and the following Ethical Principles that govern our day-to-day activities. In situations with ethical implications where no clear rule applies, or where you are unsure of the proper course of action, these principles should guide your actions.



WE SERVE THE CANADIAN PUBLIC

We strongly believe in our mission of expressing Canadian culture and enriching the democratic life of all Canadians. We put the interests of the Canadian public first when making decisions and carry out our duties with independence and impartiality.

WE ARE TRUSTWORTHY

We carry out our activities in a manner that promotes and maintains trust, reflects our professionalism, takes into account the possible impacts of our actions, and can bear public scrutiny. We are accountable for our actions and our decisions, and we use our assets and resources wisely.

WE RESPECT PEOPLE AND CBC/RADIO-CANADA

Each of us contributes to building a creative, dynamic and respectful workplace where everyone can do their best work. This includes building constructive relationships with our colleagues, our audiences and our business partners. We treat each other with openness and mutual respect, and we value diversity and inclusion. We support each other in doing the right thing and in speaking up in the face of questionable behaviour. We are proud to work for CBC/Radio-Canada, and we take its role as a public institution seriously.





QUESTIONS? NEED ADVICE?

REACH OUT!

If you have questions while reading this Code, or need advice regarding certain situations you might be facing, reach out to your manager or HR representative. You can also contact the Values and Ethics Commissioner for advice and guidance, to discuss concerns you might have or for help regarding a difficult decision you must make that you believe has ethical implications.

Contact the Commissioner at:

Commissioner@cbc.ca

1-844-597-4714

ETHICS QUICK TEST

When faced with a situation that is not covered by the Expected Behaviours provided in this Code or our policies, ask yourself these questions before acting:

QUICK TEST

- ✓ Is it legal?
- ✓ Is it in line with our Values and Ethical Principles?
- ✓ Does it avoid causing harm to others?
- ✓ Would it be acceptable for everyone to act that way?
- ✓ Would trust towards you, your team and CBC/Radio-Canada be maintained if your decision was known?
- ✓ Is it really the best you can do?

If you've answered "no" to any of these questions, take time to consider other possible options, taking these questions into account, or contact the Values and Ethics Commissioner for advice.



EXPECTED BEHAVIOURS

While we trust each other to do what's right, it is nonetheless important to establish a common understanding of certain fundamental Expected Behaviours. This section of the Code of Conduct sets out CBC/Radio-Canada's standards for certain types of situations, with which we must all comply.

This Code is subject to the *Broadcasting Act*, which protects CBC/Radio-Canada's journalistic, creative and programming independence in the pursuit of its objectives and the exercise of its mandate. It respects the public broadcaster's arm's-length relationship to the government and the independence necessary for the exercise of our duties.

RESPECT

We respect human dignity and recognize the intrinsic worth of every person. We think that diversity of culture and opinion enriches our workplace and our content, making both more interesting and creative.

Respect in the workplace allows us to establish and maintain an environment where we can thrive. It is not solely built on policy; it needs to be considered and nurtured every day. We are all responsible for contributing to a workplace and relationships where mutual respect, civility and co-operation are the norm. When interpersonal conflicts and disagreements occur, we seek to resolve them in a productive and collaborative manner. Moreover, we do not tolerate, ignore or condone comments, conduct, actions or gestures that would be reasonably considered to create an intimidating, humiliating, hostile or offensive work environment.

EVEN SMALL GESTURES MATTER: THE BASICS FOR ENCOURAGING A CIVIL WORKPLACE

- ✓ Listen to and respect each other's points of view
- ✓ Recognize and value everyone's contributions and backgrounds
- ✓ Understand how tone and non-verbal communication can have a negative impact on others
- ✓ Be respectful of shared spaces

Discrimination, harassment and violence

Discrimination, harassment (including sexual harassment), bullying and violence in the workplace are not tolerated at CBC/Radio-Canada.

DISCRIMINATION IS PROHIBITED FOR REASONS OF

Race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, disability, genetic characteristics and conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered

EXAMPLES OF DISCRIMINATORY BEHAVIOURS

- ✓ Refusing to work with an individual for one of the reasons listed above
- ✓ Making unwelcome remarks, jokes or taunts based on one of the prohibited grounds
- ✓ Displaying derogatory, racist or offensive pictures or material

WHAT SEXUAL HARASSMENT MIGHT LOOK LIKE

- ✓ Making unwelcome advances, flirtations, jokes or propositions or engaging in conduct of a sexual nature
- ✓ Using sexually degrading words and displaying sexually degrading images or other offensive material



WORKPLACE VIOLENCE REFERS TO

Any action, conduct, threat or gesture of a person towards an employee that can reasonably be expected to cause harm, injury or illness to that employee

EXAMPLES OF PROHIBITED CONDUCT

- ✓ Physically intimidating someone, yelling or throwing objects
- ✓ Physical attacks or assaults
- ✓ Bullying, harmful teasing, or abusive and other aggressive behaviour contributing to workplace violence

Details on prohibited behaviours and the processes for addressing concerns and complaints on these matters can be found in the following documents: [Policy on Anti-Discrimination and Harassment](#) and [Policy on the Prevention of Workplace Violence](#).

CONFLICTS OF INTEREST

A conflict of interest occurs when an employee's personal interests, those of a family member, or those of someone with whom he/she has a close personal or business relationship affect or might affect his/her judgment or ability to carry out his/her duties with objectivity, independence and impartiality.

A perceived conflict of interest occurs when people could reasonably conclude that a conflict of interest exists, even if this is not the case. Perceived conflicts of interest can be just as harmful as real conflicts of interest; they can affect others' trust in the person involved or in CBC/Radio-Canada. Remember that, in some situations, doing nothing can lead to the perception of a conflict of interest just as much as actions can.

We have a duty to avoid or remove conflicts of interest or situations that could be perceived as such. If we find ourselves in such a situation we must immediately disclose it to our manager. Discussions between employees and their manager must be documented, as specified in the [Policy on Conflicts of Interest](#), in order to ensure that all parties are protected and that information is easily available if decisions need to be referenced afterwards.

If in doubt, ask yourself the following questions, talk to your manager about the situation or contact the Values and Ethics Commissioner for advice.

PERCEPTION OF CONFLICT OF INTEREST QUICK TEST

1. Could this situation be perceived by others, inside or outside the organization, as affecting your objectivity, independence or impartiality in the execution of the tasks related to your position, now or in the future?
2. Could it be perceived as leading you to favour your interests or those of a person close to you rather than the interests of CBC/Radio-Canada?
3. Could it be perceived as leading you, or CBC/Radio-Canada, to favour a given contractor or another organization?
4. Could the situation be perceived as you using your position for personal gain?
5. Could it be perceived as calling into question the independence, impartiality and objectivity of CBC/Radio-Canada itself in the eyes of the public or other interested parties?

IF THE ANSWER TO ANY OF THESE QUESTIONS IS YES, AVOID IT!



Personal interests

We must ensure that no conflict exists, or could appear to exist, between our personal interests and those of CBC/Radio-Canada or our official duties. Some examples of situations that must be avoided are outlined in the [Policy on Conflicts of Interest](#). They include using our position, CBC/Radio-Canada assets or confidential information to further our personal interests, or having a personal interest in one of CBC/Radio-Canada's commercial transactions, such as a contract or a partnership agreement.

Gifts, Hospitality and Events

Accepting a gift, a benefit or an offer of hospitality for oneself or for a colleague, family member or friend can lead to uncomfortable situations or to real or perceived conflicts of interest.

Because of the possible impact on their credibility, journalists and employees involved in producing journalistic content should avoid accepting gifts, benefits, free travel or hospitality, except as permitted in the [Journalistic Standards and Practices](#).

Other employees may occasionally accept unsolicited gifts, hospitality, free travel, tickets, or invitations to sports or entertainment events (e.g., hockey game, round of golf, theatre show or concert) or other benefits, but only if they have a value of \$200 or less, subject to the conditions expressed below. It is also permitted to occasionally accept a working meal of reasonable value paid for by a third party.

However, employees must not accept gifts, hospitality, free travel, tickets, or invitations to sports or entertainment events or any other benefits:

- That could influence, or be perceived to influence, their judgment and/or their performance of duties;
- That are offered by a business partner and/or supplier of goods or services involved in an active request for proposal, sole source contract procedure or contract discussions, or in the six months following such a process, or as soon as they know such a process will begin in the near future;
- That are offered by a business partner and/or supplier whose performance the employee is evaluating;
- That are cash, loans, discounts or work rendered free of charge for personal purposes;
- If the total value of what has been received from the same source within a 12-month period would exceed \$400.

See the [Policy on Conflicts of Interest](#) for more details on what can or cannot be accepted or approved. Some units may have stricter rules.

KNOW WHEN TO SAY NO

1. Does the value exceed \$200?
2. Is it cash or an equivalent (such as a loan or discount)?
3. Could it reasonably be perceived as a bribe or other improper payment?
4. Is it given to influence a decision or create an obligation on your part, now or in the future, or could it be perceived as such?
5. If subsequently disclosed to the public, could it jeopardize your credibility or the reputation of CBC/Radio-Canada?

IF THE ANSWER IS YES, SAY NO!

Gifts or tokens of appreciation may occasionally be given to third-party business partners from outside the Corporation at CBC/Radio-Canada's expense. These gifts are limited to CBC/Radio-Canada branded materials or goods with a value under \$200, except where the primary purpose is to generate revenue and develop business for CBC/Radio-Canada. See the [Directive on Duty Entertainment](#) for more details.





Outside employment and activities

CBC/Radio-Canada recognizes the importance of being engaged and contributing to our communities' well-being through volunteer activities and knows that some employees may wish to pursue other paid work outside of their duties. Such activities may, however, conflict or be perceived to conflict with our duties at CBC/Radio-Canada, undermine the independence and impartiality expected from the Corporation and its employees, or affect our ability to do our work.

Employees are permitted to engage in outside employment or activities as long as they inform their manager prior to starting such activity. The manager must assess if the activity respects the conditions mentioned in the [Policy on Conflicts of Interest](#). Discussions regarding the appropriateness of such activities must be documented. If the manager considers the activity to be inappropriate, he/she informs the employee in writing and the employee must avoid, discontinue or modify his/her participation in such activities accordingly.

Examples of activities that might sometimes be problematic include (but are not limited to) personal businesses, some forms of outside work and positions on the boards of for-profit or not-for-profit organizations. See the [Policy on Conflicts of Interest](#) for more details. Extra caution should be exercised if you are in a position of authority or are on-air personnel.

Relationships and nepotism

Being in a position where we could give, or be perceived to give, preferential treatment to a family member or someone with whom we have a close personal or business relationship can constitute a real or perceived conflict of interest. It can also affect our credibility, our relationships with others and the perceived legitimacy of decisions we make. In some situations, past relationships could also lead to a perceived conflict of interest and should be treated as such.

The [Policy on Conflicts of Interest](#) specifies what you must do in such situations.

POLITICAL ACTIVITY

Independence and impartiality are fundamental to CBC/Radio-Canada's credibility. Consequently, some employees are restricted from engaging in certain political activities, owing to the nature of their job or duties. These restrictions include, for example, running as a candidate for public office, publicly supporting a candidate or political party, attending a partisan political event, or organizing or attending a fundraiser for a candidate or political party, except as required in the performance of CBC/Radio-Canada duties. Some limitations to political contributions also exist.

See the [Policy on Political Activity](#) and the [Journalistic Standards and Practices](#) for additional information, including the processes that must be followed.



SOCIAL MEDIA

Integrity, independence and impartiality are fundamental to CBC/Radio-Canada's credibility. While it is important for us to be deeply invested in digital tools like social media to ensure we are engaging with Canadians from coast to coast, when using corporate social media accounts, we ensure we act in a way that reflects CBC/Radio-Canada's policies and values, and in particular, this Code.

It is increasingly difficult to draw clear dividing lines between personal and professional personas on social media accounts. Keep in mind that any reference made to your work, workplace or colleagues, even within a personal context, is subject to this Code of Conduct and related policies. Nothing we say or post on social media or the internet can be considered truly private. We are also responsible for ensuring that what we post will not compromise CBC/Radio-Canada's integrity, independence or impartiality nor be likely to harm CBC/Radio-Canada's reputation.

In addition, CBC/Radio-Canada brands, logos and trademarks, including services and programs, cannot be associated with personal accounts. You are not authorized to derive revenues, benefits or interest from CBC/Radio-Canada-related information that you publish.

The [Journalistic Standards and Practices](#) and our [policies on Political Activity](#) and [Conflicts of Interest](#) should be considered when using social media. For additional guidance on how to navigate your personal social media use, see our [Social Media Guidance](#).



PROTECTING PERSONAL INFORMATION

We protect the privacy of our employees, colleagues and business partners. Personal information should be collected, kept and used only if necessary for us to perform our duties. We must ensure that such information is protected as per the [Policy on Personal Information and Privacy Protection](#).

CONFIDENTIAL INFORMATION

Protecting the information used and generated in our work is crucial to our success and well-being, and should be considered part of our duty of loyalty towards CBC/Radio-Canada. Inappropriate disclosure of information can result in harm, loss of competitive advantage or other negative consequences for a given individual, entity or CBC/Radio-Canada. Remember that even when such information seems harmless, disclosure could have operational, financial or reputational impacts on CBC/Radio-Canada. Such information might also be misused or misquoted.

In order to allow productive and open co-operation, there is also an expectation that what is discussed in meetings will not be disclosed elsewhere. It is both a matter of discretion and respect for our peers.

In addition, CBC/Radio-Canada information must not be used for our personal advantage, either during or after our employment with CBC/Radio-Canada.

Examples of information that must not be disclosed includes: financial results, business plans and forecasts, strategic decisions, proposed products or services, detailed ratings, competitive information, ongoing negotiations, commercial transactions and results of surveys or focus groups that have not yet been made public. They also include internal memos, documents from or in preparation for meetings or operational decisions, embargoed information, information collected for journalistic purposes, complaints or grievances and competitive information of third parties we contract with.

MAINTAINING RECORDS

We create and maintain reliable and usable records in support of ongoing activities, and we protect the integrity of those records. Our ability to conduct business in a timely and efficient manner depends on our being able to readily locate and access our business records. This includes documents and emails regarding decisions, policies and processes that are unique to our department. How we manage records also has important implications for our ability to respond to legislative requirements.

All CBC/Radio-Canada information, regardless of its format (i.e., written, electronic, analog or digital) must be appropriately protected, stored, handled or disposed of according to the [Policy on Records and Information Management](#). We maintain accurate financial records and represent financial statements accurately and in accordance with the [Policy on Accounting and Financial Reporting](#).



PROTECTION OF INTELLECTUAL PROPERTY

We value the intellectual property of our work and protect the copyright of CBC/Radio-Canada content and materials. We are respectful of the rights of others, abide by intellectual property legislation and avoid plagiarism.

USE OF CORPORATE ASSETS AND PREMISES

As Canada's public broadcaster, we are accountable to the Canadian public for the way we use our assets. Public funds must be spent wisely, and we must safeguard our assets. When using the Corporation's assets and/or accessing Corporation-paid services, whether on or off CBC/Radio-Canada premises, we must use them in a responsible manner with due regard to their protection from theft, loss or damage, and in accordance with applicable policies. Any loss or damage should be reported immediately to your manager.

Corporation assets/paid services must only be used for CBC/Radio-Canada business. For example, unless explicitly authorized, using corporate vehicles to travel to and from your home or using camera equipment for personal reasons is not permitted. As for computers and cellphones, although limited personal use will be tolerated, subject to certain conditions such as there being little to no cost incurred by the Corporation, personal use must be lawful, in compliance with policies, and must not interfere with or detract from your assigned tasks.

In order to be able to ensure compliance to these and other corporate policies, CBC/Radio-Canada controls the use of all of its technology assets, including its networks, infrastructure, workstation computers, laptops, mobile devices, technical equipment and software, and owns the information stored within these assets.

Smoking and possession or consumption of alcohol and drugs are prohibited in all CBC/Radio-Canada occupied (owned, rented, leased) premises, including vehicles of any nature, at all times. An Executive Director may however occasionally authorize an event where alcohol is consumed, namely for a celebration or a special event.

See the [Policy on Information Security and the Responsible Use of Technology Assets](#), the [Policy on Occupational Health, Safety and Environment](#) and the [Directive on Duty Entertainment](#) for more details.

FRAUD AND THEFT

Fraud and theft are not tolerated at CBC/Radio-Canada. This includes, for example, the misappropriation or theft of assets, the intentional misrepresentation of expense claims, benefits claims, hours worked and/or the purchase of goods and/or services, and the misrepresentation of financial information. See the following policies for more details: [Policy on Fraud and Theft](#) and [Policy on Employee Related Expenses and Reimbursements](#).

PROTECTION OF THE ENVIRONMENT

We strive to contribute to the protection and preservation of the environment and seek to continuously improve our environmental performance.

Each of us takes care to adopt environmentally friendly practices and products, when feasible, including reducing, reusing and recycling, and to report to management any leaks, spills, or inadequate clean-up or improper disposal of any toxic substances or hazardous waste.

See the [Policy on Occupational Health, Safety and Environment](#) for more details.

COMPLIANCE WITH THE LAW AND OUR POLICIES

Each of us is responsible for carrying out our duties in accordance with legislation and CBC/Radio-Canada's policies and directives, including this Code, in a manner that is, and is perceived to be, independent and impartial.

Such compliance is a condition of employment. It also contributes to meeting our legal and social responsibilities, managing our assets and our risks responsibly, upholding public trust, and maintaining a workplace we can all be proud of.

Make sure you know which policies are related to your duties, and ask your manager when in doubt.





REPORT A CONCERN OR A BREACH OF THE CODE

It is important to speak up if you observe or experience inappropriate behaviour. You are strongly encouraged to immediately notify your manager of any possible breach of this Code. Your manager is responsible for then immediately notifying his/her HR representative.

If the breach involves your manager, or if you are uncomfortable raising the issues with him/her, you can instead notify the Values and Ethics Commissioner or your local HR representative directly.

If you are in a position of influence or authority, you must take action when you suspect or are informed of a potential breach of the Code. You must also take the necessary measures to ensure there are no negative consequences against employees who have raised such concerns in good faith.

Members of the public who have reason to believe that a CBC/Radio-Canada employee has not acted in accordance with this Code can bring the matter to the Values and Ethics Commissioner.

Each one of us can contribute to ensuring ethical practices. Discussing possible improvements to current practices with your manager and your team, asking for advice in situations with ethical implications, and reporting suspected breaches of this Code are ways in which you can help achieve this objective.

DISCLOSURE OF WRONGDOINGS (WHISTLEBLOWER POLICY)

Pursuant to the adoption of legislation protecting whistleblowers, CBC/Radio-Canada has adopted a [Policy on the Disclosure of Wrongdoings](#) (Whistleblower Policy). Some serious breaches of this Code may be subject to the specific provisions of the Whistleblower Policy. The policy applies to serious wrongdoings, such as acts that go against the public interest, acts with a possible impact on the confidence of the Corporation's ability to carry out its mandate, acts where the degree of recklessness or malicious intent involved is serious, acts with potential serious consequences to others, or those that occur frequently.

Serious cases of the following that could be covered by the [Policy on the Disclosure of Wrongdoings](#) include:

- A contravention of an Act of Parliament or of the legislature of a province, or of any regulations made under any such act;
- A misuse of public funds or a public asset;
- A gross mismanagement in the public sector;
- An act or omission that creates a substantial and specific danger to the life, health or safety of persons or to the environment, other than a danger that is inherent in the performance of one's duties or functions;
- A serious breach of the Code of Conduct;
- Knowingly directing or counselling a person to commit a wrongdoing set out above.

The Values and Ethics Commissioner is responsible for receiving disclosures of wrongdoing covered by this policy and for conducting investigations. You can contact the Commissioner at:

Commissioner@cbc.ca
1-844-597-4714



PROTECTION FROM REPRISALS

CBC/Radio-Canada will protect from reprisal any employee who, in good faith, raises a concern in accordance with this Code of Conduct, or other related policies such as [*Conflicts of Interest*](#), [*Anti-Discrimination and Harassment*](#), [*Political Activity*](#), [*Disclosure of Wrongdoings*](#), and [*Fraud and Theft*](#).

For example, employees will not be demoted, terminated or disciplined for making a complaint in good faith to their manager, Human Resources or the Values and Ethics Commissioner, or for participating in the related investigation process. Threatening or taking actions against an employee for these reasons is strictly prohibited and will be disciplined. However, frivolous or malicious complaints filed for the sole purpose of bringing harm or disrepute to an individual will not be tolerated. The exercise of management duties, such as assignment and performance management, shall not be deemed a reprisal when exercised in a reasonable fashion.

If you believe you have suffered such reprisals, you should make a complaint pursuant to your collective agreement, if applicable. Otherwise, you can address your complaint directly to the Values and Ethics Commissioner.

Note however that in cases of disclosures made under the [*Policy on the Disclosure of Wrongdoings*](#), legislation requires that you file complaints for reprisals with the Public Sector Integrity Commissioner (PSIC). Please see that policy or contact the Values and Ethics Commissioner, who will give you more information on how to proceed.

COLLECTIVE AGREEMENTS

Governing policies and procedures for unionized employees found in the applicable collective agreements apply if they differ from the Expected Behaviours mentioned in this Code.

CONCLUSION

We value the relationships we have with our colleagues, our work and our workplace. The purpose of this Code is to help each of us do our best, be proud of what we do and how we do it, and uphold the trust of the Canadian public. We are, each and every one of us, responsible for living up to this Code of Conduct, and ensuring that everyday we make this the very best place to work.