



Contractor Code of Conduct

The Canadian Air Transport Security Authority (“CATSA”) is committed to upholding the highest ethical standards in all of its activities. We expect our employees to comply with applicable laws and to conduct themselves responsibly, ethically and with integrity. We expect the same from our Contractors.

This Contractor Code of Conduct (“Code”) outlines the principles and standards that CATSA’s Contractors are required to follow and uphold in their business dealings with CATSA.

This Code applies to all vendors, suppliers and contractors (collectively, “Contractors”) that have entered into an agreement to provide goods or services to CATSA, including each of their employees, representatives, subsidiaries, affiliates and subcontractors.

It is the responsibility of Contractors, for themselves and on behalf of such employees, representatives, subsidiaries, affiliates and subcontractors, to ensure compliance with this Code. Contractors must monitor each outsourcing and subcontracting arrangement to ensure it complies with this Code.

Compliance with this Code is mandatory for all Contractors. CATSA expects Contractors to comply with both the letter and the spirit of this Code. Conduct that is illegal, dishonest or unethical constitutes a breach of this Code, whether or not the conduct is specifically addressed in this Code.

Business Integrity

Compliance with Laws

Contractors must ensure that, in all of their activities, they conduct business in compliance with the applicable laws, rules and regulations of the jurisdictions in which they operate.

Anti-Bribery and Anti-Corruption

Contractors must comply with all applicable laws and regulations relating to corruption, bribery, fraud and other prohibited business practices. It is never acceptable for a Contractor to offer a bribe, kickback or other unlawful payment or benefit to secure any concession, contract or other favourable treatment.

Conflicts of Interest

Contractors must exercise reasonable care and diligence to prevent actions or conditions that could result in a conflict of interest or the appearance of a conflict of interest. Contractors must not try to gain improper advantage or preferential treatment as a result of a conflict of interest. Contractors must disclose to CATSA any real, apparent or potential conflict of interest in a timely manner.

Gifts and Entertainment

Gifts and entertainment must not be used by Contractors to gain improper advantage or preferential treatment. Contractors must not offer or give to CATSA employees any gifts, hospitality or other benefits that may have a real, apparent or potential influence on their objectivity in carrying out their official duties or that may place them under obligation to the Contractor.

Confidential Information

If, in its dealings with CATSA, a Contractor becomes aware of confidential information of CATSA or any of our stakeholders, the Contractor must only use such information for the purposes defined by CATSA, and must properly handle such information.

CATSA expects Contractors to have in place policies and procedures for the proper use and handling of such information that meet applicable legal and regulatory requirements to prevent inappropriate access to and disclosure of such information. Contractors must notify CATSA promptly of any actual or suspected privacy breaches, security breaches, or disclosure or loss involving such information.

Responsible Treatment of Individuals

Respect and Diversity

Contractors must maintain workplaces characterized by respect for the dignity of every individual. Contractors must respect the diversity of their employees and others with whom they interact, including respect for differences such as gender, race, colour, age, disability, sexual orientation, ethnic origin, religion and any other characteristic protected by applicable laws.

Contractors must not tolerate any harassment, violence, intimidation, retaliation, discrimination based on protected characteristics, or other disrespectful or inappropriate behaviour.

Employment Practices

Contractors must abide by applicable employment standards, labour, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, we still expect Contractors to be committed to non-discrimination principles.

Contractors must ensure that, in their workplaces: (i) forced/compulsory labour and child labour are not used; (ii) employees are free to raise concerns without fear of reprisal; (iii) required security screening of personnel has been performed; and (iv) employment standards meet or exceed legal and regulatory requirements.

Health and Safety

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

Code Compliance

As a condition of entering into an agreement with CATSA for the provision of goods or services, Contractors must indicate that they have read and understood this Code and agree to abide by its provisions during the term of the agreement.

Such agreement for the provision of goods or services may contain provisions addressing certain of the topics covered in this Code. In the event of any conflict, the provisions of the agreement shall prevail.

CATSA may require a Contractor to periodically confirm in writing that it is operating in compliance with this Code, and that it recognizes the requirement for ongoing compliance, as a condition of continuing the business relationship with CATSA. Contractors must maintain adequate internal records necessary to demonstrate compliance with their obligations under this Code. Failure to comply with this Code may result in termination of a Contractor's relationship with CATSA.

Contractors have the responsibility to report any known or suspected violations of any applicable laws and/or any non-compliance with this Code to CATSA's Vice-President, Corporate Services and Corporate Secretary in a timely manner. Contractors must not permit any retribution or retaliation against any individual who, in good faith, seeks advice or reports such a known or suspected violation. CATSA reserves the right and may be obligated to report breaches of this Code to regulators and/or law enforcement authorities.

Contractors may address all notifications under, and any questions relating to the interpretation or application of, this Code to CATSA's Vice-President, Corporate Services, General Counsel and Corporate Secretary at lisa.hamilton@catsa.gc.ca.