

# CODE OF BUSINESS CONDUCT AND ETHICS



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IMMIGRATION CONSULTANTS OF  
CANADA REGULATORY COUNCIL  
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CONSEIL DE RÉGLEMENTATION DES  
CONSULTANTS EN IMMIGRATION DU CANADA

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## Introduction

It is the policy of IMMIGRATION CONSULTANTS OF CANADA REGULATORY COUNCIL (the “Council”) to maintain the highest standard of ethics in its relations with every one of its stakeholders. The Council’s reputation in the immigration industry and in the community at large is a valued asset and maintaining its reputation for integrity and ethical conduct is integral to the Council’s success.

The reputation of the Council is ultimately built upon the actions of its Directors, officers, employees, volunteers and committee members, and how the organisation treats its stakeholders. The Board of Directors of the Council (the “Board”) has therefore adopted this Code of Business Conduct and Ethics (the “Code”) to set forth the standards the Council expects of its Directors, officers, employees, volunteers, and committee members. The provisions of this Code are mandatory and full compliance is expected of all Directors, officers, employees, volunteers, and committee members.

The Board shall be responsible for monitoring compliance with the Code as well as the periodic review and revision thereof. Waivers from the Code can be granted only by the Board or a committee of the Board established for considering waivers, and will be granted only in exceptional circumstances.

The Code supersedes and replaces the Code of Business Conduct and Ethics approved by the Board on March 15, 2011.

The Code is made up of the following principles.

- 1. Directors, Officers, Employees, Volunteers and Committee Members must comply with all laws, regulations, and Board policies applicable to the operations of the Council.**
- 2. Directors, Officers, Employees and Committee Members must comply with the Council’s Conflict of Interest Policy.**

Directors, officers, employees, and committee members must make every effort to avoid any situations in which their personal interests conflict, might conflict, or might reasonably be seen to conflict with the interests of the Council. When such situations arise, employees must immediately advise their supervisors or the CEO. Committee members must immediately advise their Committee Chair, the CEO or the Chair of the Board. Directors and officers must immediately advise the Chair of the Board.

In general terms, a conflict of interest will exist where personal activities, interests or financial affairs, may influence or threaten to influence a person’s judgment in the performance of his or her duties to the Council. Conflicting interests may be direct or indirect. For example, the interest may be that of the Director, officer, employee, or committee member him or herself, or of a family member, a relative, or a business enterprise in which any of these individuals have an interest, financial or otherwise.

- 3. Directors, Officers, Employees, Volunteers and Committee Members must maintain the confidentiality of Council information.**

All Directors, officers, employees, volunteers and committee members must keep confidential, and not use for themselves or others, all information concerning the Council or its operations that has not been disclosed to the public, unless such disclosure is authorized by a senior officer of the Council. This obligation remains in effect even after the Director, officer, employee, volunteer or committee member ceases his or her association with the Council.

**4. Directors, Officers, Employees, Volunteers and Committee Members have the obligation to report any violation of laws or this Code.**

Directors, officers, employees, volunteers and committee members must report any violation of law, the Code or any other internal policy of the Council to their supervisor, committee chair, the CEO or the Chair of the Board, as appropriate. If the responsible person is not dealing in an appropriate manner with the issues raised, the matter should be reported to the CEO or Board Chair, as appropriate.

The Code is designed to provide an atmosphere of open communication for compliance issues and to ensure that employees acting in good faith have the means to report violations. No one will be subject to retaliation because of a good faith report of a suspected violation. All reported violations will be promptly investigated and treated confidentially to the extent possible. Directors, officers, employees, volunteers and committee members are expected to cooperate fully in internal investigations of violations.

**5. Directors, Officers, Employees, Volunteers and Committee Members must provide an environment free of discrimination and harassment.**

The Council is committed to providing an environment free of discrimination and harassment. Harassment may occur in a variety of ways and may, in some circumstances, be unintentional. However, once conduct interpreted as harassment has been brought to a Director, officer, employee, volunteer or committee member's attention, any repeat of such conduct is not acceptable.

**Questions About The Code**

Any volunteer who has questions regarding the application of a principle of the Code should seek the advice of the CEO or the Chair of the Board. Any employee who has questions regarding the application of a principle of the Code should seek the advice of his or her supervisor or the CEO. Any officer who has questions regarding the application of a principle of the Code should seek the advice of the CEO or the Chair of the Board. Any committee member who has questions regarding the application of a principle of the Code should seek the advice of his or her Committee Chair, the CEO or the Chair of the Board. Any Director who has questions regarding the application of a principle of the Code should seek the advice of the Chair of the Board.