

FCM Code of Ethical Conduct

Foreword

The Federation of Canadian Municipalities (FCM) Code of Ethical Conduct (The Code) consolidates FCM's ethics, core values and professional conduct that guide our work on a daily basis. It also includes guidelines concerning conflicts of interest and sexual exploitation and abuse in an international context and possible resolution when such situations arise.

FCM is equally committed to providing a work environment in which all individuals are treated with respect and dignity, free of harassment, violence and discrimination. This philosophy supports our values and ensures that FCM is meeting the human rights and occupational health and safety legislation where employees, Board and committee members are free from harassment and promotes equal opportunities.

Both the Code and the Harassment Policy attach a great deal of importance on two-way communication at all levels. All employees and individuals representing FCM are expected to openly discuss the issues described in this document (or those referred to) with their direct Supervisor, Director, Project Director or the People and Culture department.

As part of the standards of practice at FCM, The Code and the Harassment Policy will be an integrated part of FCM's overall Health & Wellness Strategy, which is currently being renewed.

Introduction

Purpose

FCM's Code of Ethical Conduct sets out the expectations that guide and support the behaviour of FCM employees and representatives of FCM in their official activities. It will serve to promote and maintain a professional work environment and preserve the trust of people and organizations with whom FCM interacts. FCM's integrity and reputation for ethical practices are part of its most valued asset, are essential elements to its sustainability and ultimately depend on individual actions of each employee and representative of FCM.

Who does it apply to?

This Code applies to all persons working for FCM and those who are representing FCM in an official or unofficial capacity. FCM employees to whom it pertains include full-time, part-time, casual and fellows or interns assigned for either a fixed or indeterminate period; based in Canada or abroad.

Our Public Service Principles: FCM representing an order of government, serving in the public interest.

By definition, FCM is a non-profit, non-governmental association representing a membership body. However, FCM is unique among associations and NGOs in these respects:

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1. Our Board of Directors is exclusively comprised of officials elected by Canadian citizens;
2. We develop policies and positions that represent the interests and priorities of an elected order of government;
3. We enable dialogue between federal and municipal elected officials;
4. We deliver programs and services and represent our members and partners in order to serve the public interest - specifically; and
5. We are accountable for our actions and outcomes to our Board of Directors, who in turn are directly elected by citizens.

Employees and representatives of FCM must think about their conduct not just as employees or representatives of the organization, but as public servants. In international settings, FCM employees and representatives not only represent their organization but Canada as a whole, as well as the international development community.

Our credibility as a strong voice for our members will be enhanced and protected by a strong public service philosophy. The four Democratic Values below have been developed drawing on existing federal and provincial codes of values and ethics to assist employees and representatives in interpreting FCM's Code of Ethical Conduct and Conflict of Interest guidelines through a public service lens:

FCM's Public Service Principles:

1. **Serving in the public interest:** Employees and representatives of FCM, in fulfilling their official duties and responsibilities, shall provide advice and make decisions in the public interest. Employees and representatives of FCM shall conduct themselves in a manner in which our members' and partners' confidence and trust in the integrity, objectivity and impartiality of FCM are preserved and enhanced. If a conflict should arise between the private interests and the official duties of employees or representatives of FCM, the conflict shall be resolved in favour of FCM and the public interest.
2. **Accountability:** Employees and representatives of FCM shall give honest and impartial advice and make all relevant information available to the Board of Directors and the Management Team.
3. **Neutrality:** While at work for FCM, employees and representatives of FCM must maintain the tradition of the political neutrality and non-partisanship of FCM (See page 6: Political Activities).
4. **Value for money:** Employees and representatives of FCM shall endeavour to ensure the proper, effective and efficient use of all funds. Employees and representatives of FCM should constantly renew their commitment to serve our members and partners by continually improving the quality of service by adapting to changing needs through innovation, and by improving the efficiency and effectiveness of our policies, programs and services.

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FCM People and Culture Values

FCM employees and representatives are guided in their work and professional conduct by following values. Our People and Culture Values, live in our collective approach, habits, and reinforce how things should be accomplished. What you do everyday matters!

These core values are complemented by our collective Professional, Ethical and People conduct:

Make a Difference We act decisively to achieve results for our communities, our cities, and our workplace.	<ul style="list-style-type: none">• We are focused, we are driven by evidence and results, and we are passionate about our ideals and the achievement of our goals.• We are stewards, dedicated to our communities and cities, to sustainability, and to our work environment.• We empower communities and cities to be economically sound, socially inclusive, and environmentally responsible.• We foster a work environment that enables professional fulfillment, personal wellbeing, and a healthy and satisfying work-life balance.
Listen and Engage We aspire to be an open, inclusive and empowering organization. We are transformed by our conversations and our partnerships.	<ul style="list-style-type: none">• We listen, include, and respond to the needs, advice, and expertise of our members, colleagues, and stakeholders.• We engage diverse audiences nationally and internationally, for example, rural and urban, Anglophone and Francophone.• We are as transparent as possible and communicate the rationale for our decisions in a timely fashion, as appropriate.
Collaborate and Unite We are committed to building a diverse and strong team. We work collaboratively and respectfully to achieve our goals.	<ul style="list-style-type: none">• We collaborate across the organization and beyond, respecting each other's diverse expertise and experience, to achieve common goals.• We welcome new relationships and build partnerships that increase our reach and our impact.• We are accountable to our members, our partners, our stakeholders, and to each other.
Learn and Educate We share our knowledge and	<ul style="list-style-type: none">• We listen, motivate, and innovate to achieve results.• We take informed risks, welcome respectful dissent, and apply new and creative approaches to

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expertise and learn from others, internally and externally.	achieve our goals. <ul style="list-style-type: none">• We celebrate our successes, learn from our mistakes, and proactively plan for the future.
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EXPECTED CONDUCT

Professional Conduct: Perform work with competence, excellence, efficiency, objectivity and impartiality.

- All FCM employees and representatives of the organization, regardless of their position or experience, shall endeavour to attain high standards of conduct, competence, excellence and integrity in their work.
- FCM employees and representatives shall comply with the law.
- FCM employees and representatives shall ensure the appropriate, effective and efficient use of all funds and resources (see Finance Policies on FCM's intranet or request for a copy).
- The services provided by FCM are based on the expertise of employees and representatives in areas that require specialized knowledge or specific skills. Appropriate use of this expertise is essential.
- The professional conduct of FCM employees and representatives shall be above reproach at all times. Unsatisfactory behavior reflects negatively on their work and their ability to perform their duties.

Ethical Conduct: Act in such a way that preserves the trust of our colleagues, members and partners.

- FCM employees and representatives are required to perform their official duties and organize their personal business in such a way that preserves the trust of our members and partners in terms of the integrity, independence, objectivity and impartiality of FCM.
- Integrity is an essential quality for all employees and representatives of FCM.

Conduct When Dealing With Others: Demonstrate respect, fairness and courtesy with colleagues, members and other stakeholders.

- The exercise of authority and responsibility shall always be inspired by respect for human dignity and acknowledgement of each person's value.
- Openness, communication and respect for diversity are fundamental values for FCM employees and representatives of FCM.
- FCM's Core Values play a predominant role when recruiting, developing, evaluating and managing performance, succession planning and promotion opportunities, amongst others.

GUIDELINES RELATED TO CONFLICT OF INTEREST

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Objective

The purpose of these guidelines is to minimize the possibility of conflict between the personal interests of FCM employees and representatives and their official duties.

Definition

Conflict of interest is defined as a situation that could directly or indirectly cause an employee or representative to promote personal interests, business interests or the interests of a family member or friend before those of FCM and/or its members and/or partners as well as any situation that could be perceived in that regard.

Guidelines to avoid conflict of interest situations

FCM employees and representatives shall, among other things, avoid and prevent situations that could give rise to a conflict of interest or the appearance of a conflict. It should be noted that the appearance of a conflict of interest by an employee can be just as harmful as a real conflict of interest.

Conflicts of interest do not exclusively involve issues related to financial operations or the transfer of economic benefit. Although financial activity is an obvious aspect, it is not the only possible source of conflict-of-interest situations.

It is impossible to prescribe one solution for every situation that can result in a real, apparent or potential conflict. When in doubt, FCM employees or representatives shall ask their supervisor, the Project Director, People and Culture contact or the Chief Executive Officer (CEO) for advice and refer to the FCM Code of Ethical Conduct that will serve as a standard guide for evaluating whether or not an action complies. In FCM field offices, in case of doubt, local employees or representatives should seek advice from the Project Director.

Employees and representatives have the following responsibilities:

- To never request or accept monetary compensation for duties already compensated by FCM.
- To not act in such a way as to contract an obligation towards an individual who could benefit from a special advantage or preferential treatment, nor attempt to obtain preferential treatment from such an individual.
- To never use, to an employee's own benefit, information obtained in the exercise of his or her official duties that generally speaking, is not easily accessible to the public.
- To never directly or indirectly use FCM resources, including rented, leased or borrowed properties, or allow them to be used for purposes other than for performing FCM work.

Outside activities or employment

An employee's professional responsibility is first and foremost, to FCM. This responsibility takes precedence over all other work relationships.

An employee may have a job or participate in activities outside of FCM, but only on the condition that the job or activities do not give rise to a conflict of interest. As well, outside

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activities should be scheduled when they will not negatively impact the fulfilment of duties at FCM.

Employees can not accept outside employment or activities that directly result in any matter contributing to a proposal or contract which may require FCM consideration or approval whether of a financial nature or otherwise.

While employed with FCM, involvement in outside activities must be pre-approved if they could have a real or perceived conflict of interest with FCM. Failing to obtain pre-approval may result in disciplinary action up to and including termination of employment. When an employee has received permission to take a secondary assignment or job on behalf of FCM, he or she cannot receive payment from a third party for services rendered, for example, participating in an event or a speaking engagement.

Employees shall submit to the Senior Director, People and Culture (or to the Project Director in field offices) a confidential written memo on any job and/or outside activities that may subject them to demands incompatible with their official duties at FCM. If their ability to objectively fulfill their duties risks being jeopardized, the same process must be followed and a confidential written memo must be provided to the Senior Director, People and Culture or the Project Director. In consultation with the Department Director and the Chief Executive Officer (CEO), the Senior Director, People and Culture (or Project Director) may require the employee to reduce, modify or abandon these activities if it is determined that there is a real, apparent or potential risk of conflict of interest.

Gifts, tokens of hospitality and other benefits

Employees or representatives shall not accept or solicit any personal gift, commission, reward, advantage or benefit of any value from any person, firm or corporation which is interested directly or indirectly in any manner of business dealings with FCM, if they are not currently a service provider.

Employees or representatives shall not accept or solicit any gift, token of hospitality or other benefit that:

- is likely to have a real or apparent influence on the objectivity and impartiality of the employee in the performance of official duties; or
- that places the employee in a situation of obligation toward the donor(s).

It will however be deemed acceptable to receive a gift, token of hospitality or other benefit if:

- The value is incidental (inexpensive promotional items, light meals, souvenirs of no monetary value);
- The offer occurs during an activity or event related to the performance of the official duties of the employee or representative in question;
- It complies with the rules or practices of courtesy, hospitality or protocol (i.e. in international affairs);

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- It does not compromise or seem to compromise in any way the integrity of the employee or representative concerned or FCM.

Examples of acceptable gifts include occasional meals, tickets to events, gift baskets or candy.

Repeated offers of gifts or offers of relatively substantial gifts shall be reported to the Department Director, to the Chief Operating Officer (Senior Director, Corporate Services and Finance) and to the CEO.

When an employee or representative feels it is impossible to refuse a gift, token of hospitality or other benefit that does not meet the aforementioned acceptability criteria, the employee or representative shall consult with his or her Director or the Senior Director, Corporate Services and Finance. The employee will be notified if the item should be kept by FCM, donated, or whether it will be possible for the employee to retain.

Within the context of raising funds for charitable organizations on behalf of FCM, employees shall first obtain permission from the Senior Director, People and Culture, the Senior Director, Corporate Services and Finance, the CEO or the Project Director in order to solicit donations, prizes or contributions in kind from outside organizations or individuals. The activity may be required to be reduced, modified or abandoned if it is determined there is a risk of a conflict of interest or create a situation that imposes an obligation towards the donor(s).

Political activities

The *Canadian Charter of Rights and Freedoms* guarantees the right to freedom of expression for each and every individual. However, it is important for FCM to remain politically neutral. Therefore, it is important that FCM employees or representatives consider the repercussions of planned political activity on their ability to perform their duties for FCM with complete impartiality and the perception of impartiality whether federal, provincial, municipal or any other tier of government in the country of operation.

An important factor in the determination of acceptable political activity is whether the performance of specific duties on behalf of FCM could be affected by judgment influenced by political considerations. The higher an employee or representative's position or the closer the employee or representative works with the FCM Board of Directors and federal officials, the more care must be taken with political activities. For example, a Policy Analyst in the Policy and Public Affairs Department should not run for a Member of Parliament position in a federal election or volunteer for a municipal election candidate while in the position at FCM. This association could result in a perception the Policy Analyst is not non-partisan by Board members and federal officials to whom they provide advice. Conversely, a People and Culture, Coordinator or a member of the Finance staff could volunteer at a local municipal counsellor's office since their position does not include influencing public policy or dispensing political advice. In some countries in which FCM operates, any political affiliation may be perceived as incompatible with the fulfillment of FCM's mandate, therefore advice from the Project Director should always be sought prior to engaging in any political activity.

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An employee who intends to run as a candidate in federal, provincial or municipal elections must inform their immediate Director. Depending on the nature of the employee's position, he or she may be asked to resign their current position, take a leave of absence or inform FCM of the status of their candidacy. The employee's Director must also be notified if they are appointed to an elected position. The Director must subsequently notify the Senior Director, People and Culture. Generally speaking, the higher and more visible an employee's position, the more restricted they are in terms of political activities.

Nepotism

No employee can participate in the hiring, supervision, performance evaluation, or compensation decision for any person who is a member of their family or household, or with whom they are in an intimate relationship. No family members, members of the same household or individuals in an intimate relationship, may report directly or indirectly to each other. Family includes spouse, mother, father, mother-in-law, father-in-law, child, step-children, grandparents, siblings, aunts, uncles and cousins.

Refusal to grant preferential treatment

During the recruitment process, employees shall ensure they do not unduly influence the selection committee or grant any preferential treatment toward the hiring decision of members of their family, household or their friends.

During the decision-making process related to the awarding of financial benefits to outside parties, employees shall ensure that they do not grant preferential treatment to members of their family, former FCM colleagues or to friends. Before signing any FCM contract, the employee creating the contract and the contracting individual have a shared responsibility to disclose the existence of direct or indirect shared personal interests.

Conveying information that is easily accessible to the general public to family, friends or entities in which employees or their families have an interest is not considered preferential treatment.

GUIDELINES RELATED TO FCM INTERNATIONAL OPERATIONS

Purpose

This section of the Code of Ethical Conduct is intended to outline clear and specific expectations of conduct for anyone conducting business for or on behalf of FCM in any field office or other location. This Policy applies in situations that have been either known to have occurred, or is at the risk of occurring and would jeopardize FCM's integrity.

This Policy applies to all field offices and project locations. FCM will evaluate the behaviours of employees and representatives based on this Policy even if the local legislation in the field or project office location does not consider the behaviour to be unlawful. However, where the provisions of the local law provides for a higher ethical standards than outlined in this Policy, this Policy will comply with the local law.

Who does it apply to?

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This section applies to all Field Office employees, Canadian employees traveling internationally, interns, volunteers, members, consultants, and any other individual who is traveling to a location on behalf of FCM and/or is reasonably considered a representative of FCM. All such individuals are herein referred to as Representatives.

Sexual exploitation and abuse:

All Representatives of FCM are strictly prohibited from engaging in any of the following actions, behaviours or activities. In addition, if any Representative is aware of any such actions, behaviours or activities occurring on the part of another Representative, they are required to immediately report the information to FCM's People and Culture department or the Project Director.

- Never exploit the vulnerability of a target group such as women and children or allow an individual or other Representative to be put in a compromising situation.
- In line with international standards and Canadian legislation, never engage in sexual activity with persons under the age of 18, regardless of local legislation regarding the age of majority or consent. A lack of knowledge of the child's actual age cannot be used as a defense.
- Never exchange money, employment, goods, or services for sex, including sexual favours. All forms of humiliating, degrading, or exploitative behaviour are unacceptable.
- Not engage in sexual relations with beneficiaries. It is prohibited because it is based on unequal power dynamics and such relationships undermine the credibility and integrity of the work of FCM. This applies both during and outside working hours.
- Ensure that all confidential information, including reports of violations of these standards by Representatives obtained from beneficiaries or other Representatives is handled properly and with the utmost confidentiality.
- Ensure that reports of violations of these standards are immediately provided to Project Director and People and Culture. Those who receive these reports will investigate immediately.

Professional conduct:

Representatives while on duty or while representing the organization, must maintain a level of conduct that will not reflect negatively on themselves or on the credentials of FCM and that will not compromise the security and well-being of others.

- Representatives are required to comply with national laws and regulations, and shall not knowingly undertake, facilitate or benefit from illegal transactions or activities. Any Representative who is charged and convicted of an indictable offense must immediately notify the Project Director.
- Representatives must ensure the appropriate, effective and efficient use of all funds and resources associated with the project. Furthermore, representatives must act against any form of corruption and not offer, promise, give or accept any bribes.
- The use of illegal drugs and the abuse of other controlled substances on duty is inconsistent with the conduct that FCM expects from its Representatives at all times. If the law in the country of assignment is violated, any and all legal costs incurred will be the responsibility of the individual Representative.

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- Representatives shall comply with local security guidelines and be pro-active in informing management of potential threats. In addition, Representatives must behave in such a way as to avoid any unnecessary risk to the safety, health and welfare of themselves and others.
- Representatives are encouraged to use social media to promote project activities, however, must take appropriate measures to prevent misuse or misconduct that could inadvertently harm the reputation of FCM or relationships with stakeholders, members or partners. Any online presence and behavior must be consistent with the Code of Ethical Conduct, and FCM's Core Values. Representatives should not speak on behalf of FCM unless explicitly permitted to do so (in accordance with FCM's Spokesperson Policy).

Reporting:

Representatives should report any concerns to their Project Director(s) regarding suspect behaviours related to the honesty and integrity of FCM Representatives, suppliers, government representatives or other third parties involved directly or indirectly in negotiations with their respective programs or organization. This means reporting any situation in which they believe in good faith, that the aforementioned parties have breached or are about to break a law or regulation.

RESPONSIBILITY FOR INTERPRETING THE CODE

The People and Culture department shall assume the responsibility of interpreting the Code of Ethical Conduct and receiving and reviewing formal complaints.

RESPONSIBILITY AND AUTHORITY

Responsibilities of FCM employees and representatives of FCM:

All FCM activities shall comply with this Code. For all questions related to the compliance of activities, employees and Representatives of FCM will refer to their supervisor, to the People and Culture department or to the Project Director if an employee or Representative is in a field office.

Compliance with FCM's internal policies and with this Code is part of FCM's conditions of employment. At the time of signing an offer of employment, FCM employees acknowledge their conditions of employment, which also include the requirement to respect the confidentiality of internal documents, information and communications. A Representative of FCM will be asked to acknowledge the conditions as outlined in this Code on an annual basis or at the time of signing their contracts or terms of reference (TOR).

It is the responsibility of all FCM employees and Representatives of FCM to comply with this Code in the performance of their duties and in particular, to embody the Core Values of FCM in their actions and behaviour.

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Responsibility of the Chief Executive Officer, the Senior Director, People and Culture and Project Director:

The Chief Executive Officer shall preserve the trust of the members, partners and employees in the overall management and operations of FCM.

The Senior Leadership Team shall embody the behaviour expected by living the Core Values set out in this Code. It is their responsibility to integrate this behaviour into all aspects of their work at FCM. They shall also see that these expectations are fairly and objectively applied to all employees.

More specifically, the Senior Director People and Culture (and the Project Director in the case of field offices) shall ensure that the following are in place:

- the offer of employment, the consultancy agreement, the memorandum of understanding or any other binding legal engagement contract contains the following information: “You agree to comply with FCM Policies and Procedures, including the Employee Code of Ethical Conduct, applicable to your employment status. The policies and the Code form part of the terms and conditions of employment.”
- the People and Culture department is able to assist FCM employees resolve issues resulting from application of this policy.

POSSIBLE SOLUTIONS OR RECOURSE

All employees and Representatives may clarify issues related to this Code with their supervisor, Project Director or the People and Culture department. This Code of Ethical Conduct will reside within The Chief Executive Officer’s office, while the People and Culture department will be responsible for making amendments as necessary. Direct supervisors of employees in collaboration with People and Culture, are responsible for ensuring employees adhere to the Code of Ethical Conduct. In FCM field offices or in work carried out abroad, the Project Director is responsible for ensuring employees working in their location or other Representatives of FCM adhere to the Code.

Any employee or Representative who witnesses a wrongful act at work or who has information concerning such an act may submit the issue to the People and Culture department (or Project Director, in field offices) confidentially and without fear of reprisal. An employee or Representative who feels that they are being required to act in a manner incompatible with FCM’s Core Values and/or Code of Ethical Conduct may communicate the problem in complete confidence and without fear of reprisal to the People and Culture department.

If the problem has not been appropriately investigated at this reporting level, or if the employee or Representative feels that the departure from this Code cannot be divulged in confidence to the People and Culture department, the problem may be referred in complete confidence to a member of the Executive Leadership Team. If the problem is related to the Chief Executive Officer, the employee or Representative may contact the

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FCM President. If an allegation involves a People and Culture employee, it must be submitted to the Chief Executive Officer for handling. Those responsible for interpreting the Code may use any external legal resource deemed relevant to carry out the task. In field offices, if the issue is related to the Project Director, the employee or representative may contact FCM's People and Culture department in Ottawa, or the Director of Programs of the relevant cluster.

If an employee or Representative is not in agreement with the decision on an issue in regard to the Code of Ethical Conduct made by the first reporting level then a request can be made in writing to the Chief Executive Officer and the problem will be brought to the Senior Leadership Team who will be the final deciding body.

Consequences

Employees and Representatives who do not comply with the provisions of this Code are liable to disciplinary action up to and including termination of employment. The level of disciplinary action is based on the severity of the issue and will be determined by the Senior Director, People and Culture and the CEO.

Requests for information

All questions with respect to the Code of Ethical Conduct should be submitted to the People and Culture department.

REPORTING PROCEDURES

FCM is committed to maintaining the highest standards of ethical conduct. It is the responsibility of each employee and Representative to immediately report any alleged ethical misconduct or fraud.

If an employee or Representative is victim or witness of an alleged breach of this Code by a staff member or a Representative of FCM, they are required to report it to the People and Culture department or if in a field office, to the Project Director, who shall then notify the People and Culture department by doing the following:

1. In the event of a failure to comply with the Code, a written complaint must be submitted to the People and Culture department.
2. The complaint must include the following information:
 - the identity person in violation of the code
 - a description of the violation
 - the date or time period during which the violation occurred
 - a copy of all documents that support the allegations
3. Any situation in the field that could be interpreted as harassment must be reported to the FCM's Canadian Offices in Ottawa.

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4. If a complaint is deemed valid, the person involved shall be notified of the complaint, its contents, its allegations and the related investigation.
5. Within ten (10) business days of the lodging of the complaint, or within ten (10) business days of acknowledgement of the related facts, a report of the findings shall be submitted to the CEO by the People and Culture department; the person charged with interpreting the Code will recommend any measures deemed appropriate to take. Those involved shall be notified of any measures taken that affect them.
6. During the investigation, the People and Culture department shall be in charge of gathering all the necessary information. If the allegation involves a People and Culture employee, said allegation shall be submitted directly to the CEO. If the allegation involves any member of the Senior Leadership Team, said allegation shall be submitted to FCM's President. The President may then call upon the People and Culture department to take charge of gathering information, studying the documents pertaining to the investigation and meeting with anyone who is involved or implicated in the alleged breach, provided the complaint is not against the Senior Director, People and Culture.
7. If a situation requires immediate intervention or if serious misconduct is alleged, the employee or Representative could be relieved of his or her duties while the investigation is under way.
8. Complaints filed in relation to the violation of the Code shall not in any way impede legal recourse.

CONFIDENTIALITY

All complaints shall be handled with diligence and complete discretion. The identity of anyone who makes a complaint or claim or who provides information shall remain confidential, except where the law or the court stipulates otherwise.

No measure shall be taken against anyone who invokes the complaints management procedure in good faith, even if it is determined that the complaint is unfounded.

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DECLARATION

I, the undersigned, _____ certify that I have read the Code of Ethical Conduct, that I understand all its provisions and that I undertake to adhere it.

I am aware that failing to comply with the Code shall result in sanctions and that a serious lack of compliance could result in immediate dismissal.

In witness whereof, the undersigned has signed on this _____ day of _____ 20

Signature