CODE *of* ETHICS



VANCOUVER
INTERNATIONAL
AIRPORT

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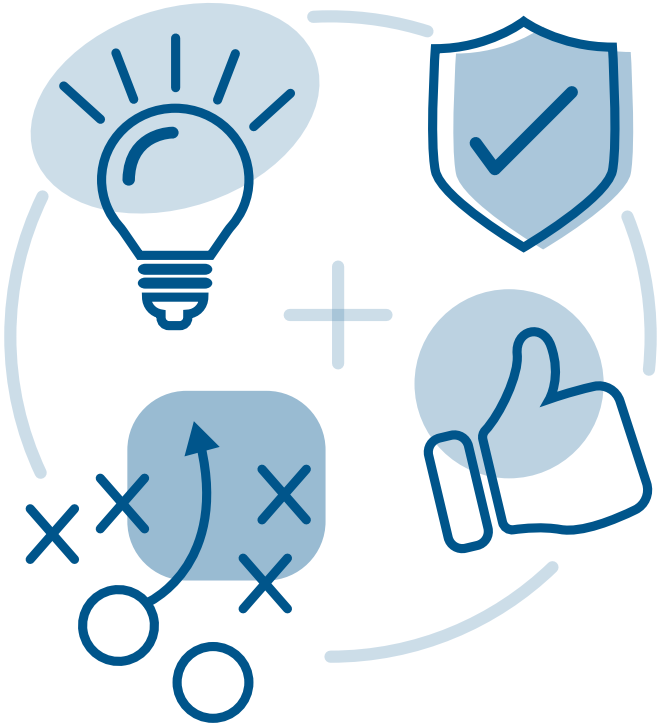
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1 OUR VALUES, YOUR VALUES

Vancouver Airport Authority (the "Airport Authority") is a community-based, not-for-profit company that manages, operates and develops Vancouver International Airport ("YVR"). Our success in making YVR one of the world's top-rated airports is driven by the strength of our employees.

Our core values are safety, teamwork, accountability and innovation. These values guide us in our operational decisions at the airport level and within your own department. But what guides you? What values guide your own decision making? How do you measure your own conduct and build and maintain personal and business relationships? Ethics.

Ethics are a set of core principles that should guide all decision-making and interactions in the workplace. The Airport Authority's *Code of Ethics* (the "Code") could be drafted as follows: Do what is right. If it feels wrong, it probably is. We will expand on this because often your ethics in the workplace are challenged by competing factors: a desire to succeed, pressures to perform, hierarchy, friendships or other social pressures - and any other pressures that are personal to you.

DO WHAT IS RIGHT.

if it feels wrong, it probably is!

2 PURPOSE AND APPLICATION OF THIS CODE

We are committed to upholding our standards, principles and reputation in everything we do - in operating the Airport, being part of the community and acting as an employer to people we hold important. To achieve this, we must act with honesty and integrity at all times.

What does this Code do? This Code is intended to be an "umbrella policy" that acts as a reference guide for key issues like ethics, business judgment and general conduct. It is our hope that this Code will assist all persons carrying out duties for the Airport Authority to act ethically and to carry out his or her duties with integrity, all with the goal of performing to the highest standards and being part of a winning team. While this Code references a number of our corporate policies, it is not exhaustive and is not meant to act as an index to the Airport Authority's various corporate policies.

Who does this Code apply to? All Airport Authority employees, the Airport Authority's Board of Directors, and any party conducting work for or acting on the Airport Authority's behalf.

As with all guidelines or principles, you are expected to use your own judgement and discretion, keeping in mind the core principles set out above to determine the best course of action in a given situation.

Want to know more? All policies referenced in this Code are available on the "Corporate Policies" page of the Airport Authority's intranet site (myYVR). Although we try to address as many topics as we can, we simply can't address them all. We ask you to take initiative to find answers to your questions by reading this Code and the referenced policies or by speaking with the people identified in each section, who will do their best to assist you.



3 COMPLIANCE WITH THE LAW AND THIS CODE

In carrying out your duties for the Airport Authority, you must comply with all applicable laws, including employment, human rights, health, safety, privacy, competition and environmental laws. No employee has the authority to violate any law or to direct another employee or any other person to violate any law.

You must also follow this Code. It reflects general principles to guide you in making ethical decisions and is not intended to address every specific situation. You must perform your work with honesty and integrity in any areas not specifically addressed by this Code.

A violation of any law or this Code may result in disciplinary action including termination. We strongly encourage dialogue among employees and their managers to make everyone aware of situations that may violate any laws or this Code and to consider acceptable ways of handling those situations. Nothing in this Code restricts the Airport Authority from taking disciplinary action on any matter whether or not it is expressly discussed in this Code.

If you become aware that another employee has violated any laws or this Code, or if you are asked to violate any laws or this Code, you must report it to your manager or union representative, or by using the YVR Confidence Line. You will not face any kind of discipline or retaliation for reporting an honest complaint or concern, so long as you are reporting in good faith and have not been engaging in criminal activity or been intentionally unsafe or negligent.

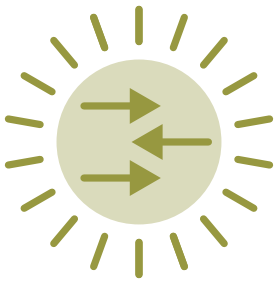
Want to know more? See our *Non-Punitive Reporting Policy* and *Other Reporting Obligations—Non-Punitive Reporting*, below.

4 CONFLICTS OF INTEREST

A. WHAT IS A CONFLICT OF INTEREST?

A "conflict of interest" is a situation in which an employee's personal interests and the duties and responsibilities of that employee at the Airport Authority are at odds with one another. A conflict of interest means that an employee may have another motivation or desired outcome – which can blur the lines between honest business decision-making aligned with the Airport Authority's core values and decisions made for other reasons.

You are expected to avoid actual, potential and perceived conflicts of interest, or in simpler terms: Honesty is the best policy. The Airport Authority conducts all of its business in an honest and ethical manner and we are committed to acting professionally, fairly and with integrity in all of our business relationships. Although actual and potential conflicts are very serious, perceived conflicts of interest can be equally damaging to the Airport Authority and the strong reputation that we have worked hard to build. If a conflict of interest does arise, it will be resolved in the best interests of the Airport Authority.



HOW DO YOU KNOW

if you have a conflict of interest?

ASK YOURSELF: "Do I have anything personal to gain or lose?"

If an actual, potential or perceived conflict of interest arises at any point, you must immediately contact the Airport Authority's Conflicts Officer to disclose the conflict. The Conflicts Officer is designated by the CEO and is currently the Vice President, Legal. The Conflicts Officer will offer guidance and assistance, keeping intact the integrity of the Airport Authority as a priority and guideline.

Conflict of Interest Declarations which you can use to report actual, potential or perceived conflicts of interest are available on myYVR. The Airport Authority also requires that employees and contractors in the following groups complete Conflict of Interest Declarations on an annual basis: Management, Supply Management, Finance, Engineering, Commercial Services, Internal Audit, Project Managers, budget holders, and invoice approvers.

Want to know more? See our *Conflict of Interest Declaration (Employees).*

B. GIFTS, HOSPITALITY AND BENEFITS

You may accept incidental gifts, customary hospitality or other benefits of minor value arising in the ordinary course of your duties at the Airport Authority, but they must not be beyond a normal expression of courtesy, bring suspicion on your objectivity or impartiality, or risk harming the Airport Authority's integrity.

If you receive a gift, hospitality or other benefit either with a value that is reasonably estimated to be equal to or over $250 OR any amount during contract negotiations or a tendering process, you must notify the Conflicts Officer. The Conflicts Officer may require you to file a confidential report and/or require that the gift be returned or disposed of by the Airport Authority. It is not appropriate to receive any gifts, hospitality or benefits during business negotiations or competitive bidding processes as it may appear to unsuccessful proponents that the Airport Authority unfairly favoured one proponent over others as a result of the gift, hospitality or benefit.

Along the same lines, you may attend events as the guest of various suppliers (in accordance with this Code), but if you are asked by multiple suppliers to the same event, we encourage you to either sit at the Airport Authority table or rotate the suppliers you sit with from one event to the next. Our aim is to avoid the appearance of favouring one supplier or contact over another.

If you plan on giving a gift, hospitality or other benefit in the course of your employment with the Airport Authority, please note that this type of activity is generally not appropriate for government officials. Before extending invitations, giving gifts or other actions that could be viewed as providing benefits to government officials, you must consult with the Conflicts Officer.

Want to know more? See *Appropriate Business Practices,* below, and our *Anti-Corruption Policy.*



C. FINANCIAL INTERESTS

If you have any personal assets or liabilities that could give rise to a conflict of interest, you must disclose them to the Conflicts Officer. Examples include having an interest in a partnership, proprietorship, joint venture or private company that does business with the Airport Authority. Your interest includes any financial interest held by you or your spouse, common-law partner, "significant other" (i.e. your boyfriend or girlfriend) or immediate family member, but also may include financial interests of good friends.

How do you know if you have any financial interests? If you need to make a decision in the course of your duties and the decision could somehow financially benefit you, your spouse, your common-law partner, your "significant other", a family member or even a good friend, you must disclose it.

i. Insider Information

In the course of your work, you may have access to various forms of "insider information", like airline strategies, upcoming industry announcements, vendor financial information and other important information not available to the public. Many of the companies that we deal with are public companies, meaning that their shares are freely traded on stock exchanges.

Using insider information to buy or sell securities of publicly-traded companies is a criminal offence. You also may not pass along any insider information to people who wouldn't otherwise have access to it, like family or friends.

D. SUPPLIERS AND PROPONENTS

The Airport Authority has hundreds of suppliers and enters into contracts for services on a daily basis. If you are involved in the Airport Authority's procurement processes (e.g., requests for expressions of interest, requests for qualifications, requests for proposals, tender issues, etc.), you must ensure that the key documents for your particular matter contain conflict notice provisions. These provisions require that a potential supplier identify any possible conflict of interest arising from their relationship with current or former employees of the Airport Authority or members of the Board. If a supplier or potential supplier identifies a possible conflict of interest and it has occurred within the previous 36 months, the Conflicts Officer must take the steps set out in the *Purchasing Conflicts of Interest Policy.*

We must also use the same ethical decision-making skills for everyday purchases, like office supplies or catering services. Choosing to purchase supplies at higher prices or that do not meet our sustainability objectives simply because you have a close relationship with the vendor usually does not make for good business decisions. Holding all suppliers, regardless of their relationship to any employee, to the same high ethical standard ensures that the Airport Authority is making the right business decisions for our organization.

If a supplier contacts you and asks questions about an active competitive process or wants to discuss their bid or contract, do not answer their questions and promptly direct them to the Manager, Supply Management. We must ensure that all proponents are treated fairly and none receive information that has not been provided to all.



DO NOT ACCEPT GIFTS

from potential suppliers or proponents during or in advance of active negotiations (RFPs, contracts, etc.)

E. OTHER EMPLOYMENT AND ACTIVITIES

We understand that everyone has busy lives and different priorities. However, as an Airport Authority employee, we need to know that your various outside employment and activities, as well as those of your partner, children or other "related parties", are not interfering with your work at YVR or placing demands on you that conflict with your duties and responsibilities to the Airport Authority. To ensure that any potential conflicts are identified and managed, we require that employees and contractors in a number of groups annually file with the Conflicts Officer a list of offices and directorships held and the nature of any business done with the Airport Authority by both the employee and their related parties.

Additionally, aside from the minor and infrequent uses below, you cannot use Airport Authority time, facilities, resources, or supplies for outside employment or activities, like:

- printing flyers for a garage sale on our printers
- directing the delivery of personal goods to work (e.g. Amazon, eBay)
- bringing waste from home and dumping it at work (e.g. recyclables, general waste)
- soliciting your coworkers for either your business or the business of your family or friends (use myYVR's MARKETPLACE instead)

Having said that, we don't mind if you use our printers, scanners or other resources for the occasional personal matter, provided the use is minor and infrequent. In doing so, we ask that you be reasonable and use good judgment.

Want to know more? See the *Conflict of Interest Declaration (Employees).*

F. AIRLINE UPGRADES OR REDUCED TICKET RATES

You must not request or receive a ticket for travel either upgraded at no charge or at less than the current price offered to the general public for you or your spouse, common-law partner, significant other, your child, any relative that lives with you, any company of which you own 10% or more of the shares, any business partner of yours, or any trust or estate of which you are a substantial beneficiary (collectively, referred to as your "Associates") unless:

- the airline offers the upgraded or reduced fare to all persons holding a Restricted Area Identification Card (a "RAIC") at YVR or working on Sea Island; OR
- you or your Associate are eligible for an upgraded or reduced fair because of your former employment with that airline or your Associate's current or former employment with that airline; OR
- you have received written permission from the Conflicts Officer.



G.FRIENDS AND FAMILY

The Airport Authority not only permits the employment of your qualified family members, domestic partners, significant others, and friends, we even have an Employee Referral Program to encourage it! Keep in mind, however, that these individuals cannot be placed or transferred into a role that creates a real or perceived conflict of interest or favoritism in the workplace. For example, they cannot work in a department where they directly or indirectly report to you or where you have input into their performance evaluation, salary, work hours, or other conditions of employment (or vice versa).

Additionally, you must not give preferential treatment in connection with any Airport Authority matter to your family members, friends, or an organization you or any of your family members have an interest, except where promoted or permitted by the Airport Authority. Additionally, you must not put yourself in a position where you either are, or give the impression that you are, under any obligation to any person or organization that might profit from special consideration given by you as an employee of the Airport Authority.

H. CONFLICT OF INTEREST DECLARATIONS

If you need to complete a Conflict of Interest Declaration, we will do our best to preserve confidentiality with respect to communications between you and the Conflicts Officer during the preparation and submission of the Declaration. However, please note that there may be circumstances in which the Conflicts Officer needs to disclose information to relevant Management personnel on a need-to-know basis.

If you do not comply with the conflict of interest provisions in this Code, the Conflicts Officer must report to the Chair of the Board, who, in consultation with the President and the Governance Committee of the Board, will determine what further action is required, including disciplinary action or termination.

I. POLITICAL INVOLVEMENT

You are free to participate in the political process on your own time as an individual and you are free to make political contributions to whichever parties you support. However, you may neither fundraise at YVR nor use any Airport Authority funds, assets or services for the benefit of any political party or their candidate(s). For example, you may not communicate with employees, vendors, or other contacts (using mass emails or otherwise) that you have access to through your employment in order to promote or fundraise for any political candidate, including yourself.



J. REAL-LIFE CONFLICT OF INTEREST SCENARIOS

We've discussed various ways in which conflicts of interest can arise in the workplace, so let's put your knowledge to the test!

WITHOUT CREATING AN **ACTUAL OR PERCEIVED** CONFLICT OF INTEREST, CAN YOU . . .

 DATE A CO-WORKER?	**YES unless** they are your manager or a direct report.
 HIRE YOUR SPOUSE'S COMPANY FOR A CONTRACT POSITION?	**NO unless** you receive written approval from the Conflicts Officer prior to hiring.
 GO TO A HOCKEY GAME AS THE GUEST OF A SUPPLIER DURING AN RFP PROCESS?	**NO.** This can create a perceived conflict of interest where it appears the Airport Authority has favoured this supplier over others because of the hockey game invite.
 ATTEND A CELEBRATORY DINNER HOSTED BY A SUCCESSFUL PROPONENT AFTER THE RFP PROCESS HAS ENDED?	**YES.** Once the RFP process has ended and the proponent has been selected, there is no longer a concern that the dinner is influencing you to choose them over another.
 ACCEPT A FREE UPGRADE TO FIRST CLASS FROM AN AIRLINE CONTACT?	**NO.** Thank the contact and advise them you are not permitted to accept the upgrade.
 BUY SHARES IN A COMPANY AFTER YOU LEARNED AS PART OF YOUR JOB THAT THEY PLAN TO MAKE A MAJOR ANNOUNCEMENT IN THE NEXT FEW WEEKS (NOT YET PUBLIC)?	**NO.** You may not purchase shares based on information that has not gone public, as you are using insider information. You may purchase the shares once the announcement has been made publicly.

What if I'm still not sure? If you're not sure whether your activities constitute a conflict of interest, see the Conflicts Officer to discuss further. It may be that you can continue what you're doing, with the addition of some boundaries to ensure that neither you nor the Airport Authority will be part of an actual or perceived conflict of interest.

5 CREATING AN INCLUSIVE, SAFE, HEALTHY AND RESPECTFUL WORKPLACE

A. EMPLOYMENT EQUITY

We are fortunate to live in one of the most cosmopolitan regions in the world, and the Airport Authority strives to create a workplace that reflects the rich diversity of the communities we serve. We value the contribution of all members of our Airport Authority community and are committed to employment equity and diversity. We support the *Employment Equity Act*, which requires us to take actions to ensure the full representation within the Airport Authority of women, aboriginal peoples, persons with disabilities and members of visible minorities.

We ask that you be respectful in your daily interactions at YVR and support an inclusive environment.

If you have any questions or concerns regarding employment equity at the Airport Authority, please contact an Employment Advisor or any of our HR managers.

BEING SUPPORTIVE of different views and inclusive of different backgrounds makes us all members of the same winning team!



B. HEALTH, SAFETY, SECURITY AND ENVIRONMENT

The Airport Authority is committed to excellence in safety, security and environmental management. Our commitment is supported by a collaborative process between our Executive Team and our employees who work together to continually review and improve our operating performance.

Airport Authority employees must comply with all applicable environmental, health and safety laws and regulations. You must also comply with the Airport Authority's own standards, protocols, procedures, policies and guidelines. These include, but are not limited to, the Airport Authority's *Airport Operations Directives*, *Safety Management System (SMS)*, *Safety Eyewear Policy* and *High Visibility Garment Policy*, which are available on myYVR.

We encourage you to self-report on unintentional errors and near misses in the workplace so that safety can be improved for you and your fellow co-workers.

Want to know more? See our *Safety, Security & Environment Policy*, *Non-Punitive Reporting Policy* and *Reporting Obligations—Non-Punitive Reporting*, below.

i. Restricted Area Access Control

Maintaining the safety and security of YVR is our top priority. Under the Canadian Aviation Security Regulations, the Airport Authority is required to institute, maintain and carry out a Restricted Area Access Control Program, which includes the RAIC system.

All employees must comply with the Airport Authority's *Restricted Area Access Control - Operations Directive S01* (available on myYVR), and all regulations, measures and conditions of issuance for RAIC holders.

HOW CAN YOU HELP YVR

to be one of the safest airports in the world? It's as easy as 1-2-3!



(1)
Identify hazards and threats to safety, security or the environment

(2)
Report the identified hazards or threats, and, if possible, rectify the issue

(3)
Repeat!

C. RESPECT IN THE WORKPLACE

The Airport Authority is committed to providing a work environment where everyone is treated with dignity and respect. Everyone contributing to YVR has the right to work in an atmosphere that is free from personal and sexual harassment, bullying, discrimination, violence, and the effects of alcohol and drug usage.

i. Harassment, Bullying, Sexual Harassment and Discrimination

We do not tolerate harassment, bullying, sexual harassment or discrimination at the Airport Authority, whether by management, staff, contractors, or anyone visiting YVR. We encourage everyone to report incidents of harassment, bullying, sexual harassment and discrimination in accordance with our *Respect in the Workplace Policy.*

What is harassment or bullying? Using unwelcome words or behaving in a manner that can cause discomfort, offence or humiliation to another person and has the purpose or effect of interfering with a person's work performance or creating an intimidating, hostile or offensive work environment.



What is sexual harassment? Any conduct, comment, gesture or contact of a sexual nature that is likely to cause offence or humiliation or that might reasonably be perceived as placing a condition of a sexual nature on employment or opportunity for training or promotion.

What is discrimination? Treating a person negatively, in respect of employment, whether by using words or other conduct, because of their race, national or ethnic origin, colour, religion, age, sex, marital status, family status, disability, criminal conviction for which a pardon has been granted, sexual orientation, gender identity or expression, in the absence of a bona fide occupational requirement as provided for by the *Canadian Human Rights Act*. These factors are referred to as "prohibited grounds".

What's excluded? Sometimes our jobs require that we do things that may not be comfortable or enjoyable, but that doesn't mean that they constitute harassment, bullying, sexual harassment or discrimination. Here are a few examples:

- Coaching and directing employees
- Making decisions regarding work duties, deadlines or transfers
- Giving work instructions, feedback, evaluations, or disciplinary actions

"BUT I DIDN'T MEAN TO!"

The standard for determining if harassment, bullying, sexual harassment or discrimination has occurred is if a reasonable person would have expected the words or behaviour to cause offence, discomfort or humiliation.

ii. Violence in the Workplace

Your safety and security is our top priority. We do not tolerate any violence or threats of violence at the Airport Authority.

What is workplace violence? Any action, conduct, threat or gesture of a person toward an employee or any other person in the workplace that can reasonably be expected to cause harm, injury or illness to that person, including threats, harassment, assault and stalking.

The most effective way to prevent aggressive behaviour is to identify the early signs of unacceptable conduct and attempt to de-escalate the situation before disputes occur.

iii. Complaints and Concerns about Harassment, Bullying, Sexual Harassment, Discrimination or Workplace Violence

If you have been harassed, bullied, sexually harassed, discriminated against, or if you have concerns about or have witnessed violence in the workplace, immediately report the incident in accordance with the *Violence in the Workplace Policy.*

Want to know more? See our ***Respect and Violence in the Workplace Policies.***



WE'RE SERIOUS ABOUT YOUR SAFETY AND SECURITY.

Report concerns to your manager, an HR manager or union rep.

iv. Alcohol, Drugs and other Substances

The Airport Authority is committed to ensuring the safety of our employees, our business partners and the public. It is your responsibility to ensure that you arrive to work fit for duty and able to perform your job safely and properly without the use of any alcohol, illicit drugs, non-prescription drugs or any other substance. If you believe that any medication you are taking may have an adverse effect on your performance, you must advise your manager who, in consultation with the union and management, will make appropriate accommodations.

You may not return to work after consuming any alcohol during the course of your workday, including at business lunches or other events. If you do consume alcohol at any point during your workday, and your manager is unaware, you must promptly notify your manager, who will advise you on next steps, as appropriate.

YOU ARE NOT PERMITTED

to return to work after consuming alcohol

We respect the dignity and privacy of our employees, and place a priority on treatment, successful recovery and re-entry into the workplace of those who may have a dependency problem. We encourage those employees looking for additional support to use our professional and confidential Employee and Family Assistance Program (EFAP).

No employee with an alcohol or drug problem will be disciplined for requesting help in overcoming their problem or because of involvement in their rehabilitation effort. However, if you violate the provisions of this Code, or as a result of substance use do not meet standards of safety or work performance, appropriate disciplinary action will be taken.

Airport Authority Events: Hosts or sponsors of our events may only serve alcohol if it is approved in advance by the departmental Vice President, and must ensure:

- the event begins after the work day has ended for employees, OR if the event is during the work day, the employees are not required to return to work; and
- a professional licensed services provider is available to serve liquor if the event is hosted on Airport Authority property; and
- taxi reimbursements or other forms of safe transportation are made available to all attendees.

Hosts or sponsors are encouraged to hold the event at a commercial establishment (i.e., not in Airport Authority boardrooms or other Airport Authority office areas).

Want to know more? See our *Workplace Impairment Policy.*

6 APPROPRIATE BUSINESS PRACTICES



A. PROTECTION AND USE OF INFORMATION AND PROPERTY

i. Privacy

All employees must protect personal information that they receive during their work at the Airport Authority.

What is personal information? Any information about an identifiable individual, including their name, date of birth, health, financial and employment information, photographs, and audio and video recordings.

Personal information does not include business contact information (name, position/title, work address, work phone number or email address) used to contact an individual in relation to their employment, business or profession.

Want to know more? See our *Employee Privacy Policy, Privacy Policy, and Privacy Breach Reporting Policy.*

ii. Confidentiality

While working at the Airport Authority, you may gain knowledge or information that is generally sensitive, secret or confidential, meaning that it has not been or should not be disclosed to the public (i.e., anyone outside of the Airport Authority).

You must not disclose this type of information to the public unless you have permission from the Airport Authority to do so, regardless of whether the information belongs to the Airport Authority or anyone else. You must act diligently to prevent unauthorized access to such information. These rules continue to apply even after your employment with us has ended.

Here are examples of information that must be kept confidential, unless you have permission from the Airport Authority to disclose it:

- Marketing strategies, employee personal information, Human Resources information, and other Airport Authority corporate information
- Research and development or technical information about our processes
- Airport security details that must be kept confidential for safety purposes



EMPLOYEE PHOTOS

Q&A: Do I need consent to use photos of our employees for Airport Authority/YVR marketing materials?

No. Employee consent is implied, and the employee can withdraw their consent by notifying their manager or a Director, Communications.

For any photos of non-employees (e.g. family members, friends), you must obtain consent of each non-employee before using their photo.

iii. Protection of the Airport Authority's Assets and Opportunities

a) Intellectual Property

What is intellectual property? Intellectual property is a broad concept, but it basically refers to the result of original, creative thought, such as: ideas, inventions, designs, trademarks, copyrights, procedures, processes and research methods.

All intellectual property created or modified during your work with the Airport Authority belongs to the Airport Authority and you may not use it without our consent. The same rule also applies to any intellectual property developed by you outside of your work at the Airport Authority using information you gained during your time here.

In addition to protecting our own intellectual property, we also respect the intellectual property rights of others. You may not use, steal or misappropriate anyone else's intellectual property.

b) Use of Airport Authority Property

You may only use Airport Authority property if it is necessary for doing your job. Borrowing, taking or using Airport Authority property for personal use is generally unacceptable, except where allowed under Use of Airport Authority Technology, below. For any other exception, you must obtain prior written approval from a department director or manager.

USE OF AIRPORT AUTHORITY IP

Q&A: If I no longer work at the Airport Authority, can I use the intellectual property that I worked on when I was an employee?

No. You are not allowed to use our intellectual property for purposes other than your work at the Airport Authority. You must not copy, take or destroy any Airport Authority intellectual property when your employment with us ends.



B. ENTERING INTO CONTRACTS ON BEHALF OF THE AIRPORT AUTHORITY

If you are a signing authority as set out in the *Vancouver Airport Authority Signing Authorities* document (available on myYVR), you must take necessary steps to protect the Airport Authority's interests by ensuring that the contract is either on an Airport Authority-approved template or reviewed by our legal department (LCS). Our in-house lawyers are available to assist you, as well as to conduct contract reviews and provide legal advice. If you feel that the terms or conditions of any Airport Authority-approved template require modifying for your matter, you must consult one of our in-house lawyers before signing on behalf of the Airport Authority.

UNLESS YOU ARE LISTED in the *Vancouver Airport Authority Signing Authorities*, you may NOT enter into contracts on behalf of the Airport Authority.

C. BOOKS, RECORDS AND ACCOUNTS

i. Keeping Accurate Records

All corporate records must be completely accurate. If you are responsible for any of the Airport Authority's books, records and accounts, you must ensure that you can support your work with verifiable documents.

Here are a few examples of prohibited conduct when dealing with the Airport Authority's books, records and accounts:

- Advising vendors to accelerate or delay invoicing to meet financial budgets
- Maintaining any undisclosed or unrecorded funds or "off the book assets"
- Signing any documents that you believe to be inaccurate or untruthful, or where you do not have the signing authority to do so

If you become aware of an Airport Authority employee doing any of the above or any improper transaction or accounting practice, you must immediately report the matter to your manager, any Manager, Financial Reporting or the Conflicts Officer.

Want to know more? See our *Non-Punitive Reporting Policy* and *Reporting Obligations—Non-Punitive Reporting,* below.



ii. Document Retention

It is both expensive and unmanageable to store all Airport Authority documents indefinitely, so we periodically discard documents. However, we are required by law to keep certain records for specific periods of time. Ask your manager if you are unsure about whether your document should be retained.

If we determine that certain documents will be required in connection with a lawsuit or government investigation, all possibly relevant documents must be retained and cannot be modified. If you want to know whether your documents should be preserved for a lawsuit or investigation, please contact the Vice President, Legal.

Want to know more? See our *Data Retention and Disposal Policy (currently under construction)* or speak with our in-house lawyers.

iii. Expense Reimbursement Policy

You may need to incur expenses in the course of your work, including for travel, professional development, or safety boots. We expect that you will act reasonably when incurring expenses, meaning that you will use common sense and good judgment. Think about it this way: would you be willing to stand in front of the President and CEO and explain the expense? If in doubt, speak with your department's Vice President before incurring the expense.

Want to know more? See our *Expense Reimbursement Policy.*

D. COMMUNICATIONS

i. Communications with Media

Our credibility and reputation in the community is vital to our success. News media and publicity can directly impact our reputation. If you are contacted to speak or provide information to the media, please refer them to the Media Relations Line (604-880-9815) or media_relations@yvr.ca.

ii. Use of Airport Authority Technology

Electronic, computing and communication devices provided by the Airport Authority ("ECC Devices") include, but are not limited to, the following:

- CCTV
- internet
- fax
- tablets
- cameras
- email
- cellphones
- laptops
- VPN access
- webmail
- printers
- computers

ECC Devices and their contents are the property of the Airport Authority. The Airport Authority has the right for any reason and without permission to retrieve the contents of any ECC Device at any time (including websites, chat and news groups, material downloaded or uploaded from the internet, and e-mails).

You are permitted to use your ECC Device for personal reasons and in a reasonable manner so long as it does not interfere with your job performance, the ECC Device or the Airport Authority's networks and systems. **However, you should not have an expectation of privacy in anything you create, store, send or receive on an ECC Device.**

Want to know more? See our ***Technology Use Policy.***

iii. Recordings in the Workplace

With the popularity of smartphones and ever-improving technology, we are now able to carry cameras and audio/video recorders with us wherever we go. In fact, most Airport Authority-issued cell phones and laptops have these recording devices included as a standard feature. As prevalent as these devices are, secretly recording your colleagues raises ethical concerns and can result in a loss of trust in workplace relationships. Once lost, trust is very hard to rebuild - and it is essential to maintaining a safe, secure and high-functioning airport.

For these reasons, you may not record your coworkers without their knowledge and consent for any reason, regardless of your role or the circumstances, even if you are a party to the conversation.

If you are having an issue with a colleague, speak to your manager, a Human Resources manager or your union representative. Any Airport Authority employee who is found to have recorded another employee without that employee's knowledge and consent may face disciplinary measures, up to and including termination.

ONLY DESIGNATED SPOKESPERSONS can speak to the media on behalf of the Airport Authority.

iv. Off-Duty Conduct

We take great pride in our reputation and integrity, and we work hard to achieve it. As part of your employment, we expect that you will refrain from behaviour that negatively impacts, or is likely to negatively impact, the Airport Authority's business.

If you do or say something in the public domain, including on social media (e.g., on Facebook, Instagram, Twitter, etc.) that relates to your work with the Airport Authority, then this Code and the Airport Authority's policies apply.

This is still the case outside of work hours or if using your personal laptop or smartphone. We may monitor social media, and if you have posted something that violates our rules or policies, you may be subject to disciplinary action, including possible termination.

YOU'RE STILL A YVR AMBASSADOR after you leave for the day!

YOUR OFF-DUTY CONDUCT MUST comply with this Code.

E. ANTI-TRUST AND COMPETITION LAWS

Our federal government, the U.S. government, the European Economic Community and many other foreign governments have enacted "antitrust" or "competition" laws. These laws prohibit "restraints of trade," which is certain conduct involving competitors, customers or suppliers in the marketplace.

COMPETITION LAWS ARE IMPORTANT – violations can lead to civil or criminal liability

Why have competition laws? To ensure that markets for goods and services operate competitively and efficiently, so that customers enjoy the benefit of open competition among their suppliers, and sellers similarly benefit from competition among their purchasers.

All business dealings on behalf of the Airport Authority must be conducted in an honest and straightforward manner that preserves our integrity and reputation. You must avoid using unfair practices when dealing with customers, suppliers, competitors and other employees.

Want to know more? See our *Competition Compliance Policy (currently under construction)* or see our in-house lawyers.

F. UPHOLDING OUR INTEGRITY INTERNATIONALLY

When you travel on behalf of the Airport Authority, you are our ambassador! Be aware of foreign legal requirements and take the time to familiarize yourself with local customs, especially those relating to respect and conducting business.

G. ANTI-BRIBERY AND ANTI-CORRUPTION

i. Relationships with Public Officials

If you do business with federal, provincial or local government agencies as part of your work at the Airport Authority, you must know and comply with the rules and regulations governing relations with public agencies. You must always act in a manner that avoids any perception that you or the Airport Authority are attempting to improperly influence public officials in the performance of their official duties.

You must also comply with the Corruption of Foreign Public Officials Act ("CFPOA") whenever you conduct business on behalf of the Airport Authority both from within and outside of Canada. The requirements of CFPOA are very broad. You must read, understand and comply with the Airport Authority's *Anti-Corruption Policy,* or ask any of our in-house lawyers.

Want to know more? See *Conflicts of Interest - Gifts, Hospitality and Benefits,* above, and our *Anti-Corruption Policy.*

ii. Bribery, Kickbacks and Fraud

You must not offer to or actually pay, loan, or otherwise disburse as bribes or "kickbacks" any funds, Airport Authority assets or other benefits to influence someone else. Similarly, you must not accept any funds, assets or other benefits from another party for assisting that party in doing business with the Airport Authority.

Want to know more? See *Conflicts of Interest - Gifts, Hospitality and Benefits,* above, and our *Anti-Corruption Policy.*



7 SUPPORTING OUR COMMUNITY AND THE ENVIRONMENT



A. FUNDRAISING

The Airport Authority invests in our community through donations, sponsorships and in-kind contributions that lead to long-term growth and success. We provide financial support to a number of charities and community organizations, with a focus on First Nations, environment and accessibility, and the greater YVR community.

Fundraising by employees, tenants or other third parties is generally not permitted within the public areas of the terminal (except for the Royal Canadian Legion's annual poppy sales). Employees are not permitted to solicit pledges for events or organizations from airport tenants or passengers. You may solicit pledges from or sell fundraising goods (e.g. cookies, chocolates, etc.) to your co-workers, however, we ask that you be aware of possible power imbalances and avoid placing your colleagues in uncomfortable positions.

Requests for donations to specific organizations can be submitted through the Community Investment Program.

Want to know more? See our *Community Investment Guidelines.*

B. ENVIRONMENTAL RESPONSIBILITY

The Airport Authority is committed to the vision of a sustainable airport for the future of British Columbia. For us, sustainability means operating YVR in a way that improves the quality of life of our employees and passengers while integrating and co-existing with our natural environment. It also means complying with all relevant environmental legislation and adhering to our Environmental Management Plan and all environmental policies available on myYVR.

If you know of or suspect anyone of violating any environmental laws or doing anything that may result in a discharge or emission of hazardous materials, you must report it immediately.

Want to know more? See our *Non-Punitive Reporting Policy* and *Other Reporting Obligations—Non-Punitive Reporting.*

8 OTHER REPORTING OBLIGATIONS

A. CRIMINAL OFFENCES OR LOSS OF DRIVER'S LICENSE

If you are charged with a criminal offence or you lose your BC driver's license, you must tell your manager immediately. Your manager will then inform Human Resources and the Airport Authority may make accommodations, as appropriate, and will decide whether any disciplinary action will be taken, including termination.

B. NON-PUNITIVE REPORTING

We strive to foster an environment where employees are encouraged to report safety, security and environment concerns (including unintentional errors and "near misses" in the workplace), and unethical or illegal behavior (including any non-compliance with this Code or any of our policies).

The Airport Authority's *Whistleblower Policy* allows employees to make confidential and anonymous submissions. You will not face any kind of discipline or retaliation for reporting an honest complaint or concern, so long as you are reporting in good faith and have not been engaging in criminal activity or been intentionally unsafe or negligent.

Want to know more? See our *Non-Punitive Reporting Policy.*

9 QUESTIONS?

We are always working to improve the ways in which we operate, which means that this Code may change from time to time. Please refer to the current version of the Airport Authority's *Code of Ethics* posted on myYVR.

If you have questions or concerns regarding the Airport Authority's practices or this Code, please contact our Vice President, Legal at:

P.O. Box 44638 YVR Domestic Terminal RPO
Richmond BC Canada V7B 1W2

argiro_kotsalis@yvr.ca

1-877-276-6759


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