

NAV CANADA Code of Ethical Conduct 2026

Formerly Code of Business Conduct

Approved July 2026 by NAV CANADA Board of Directors

Reviewed yearly

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1. About the Code

1.1 Message from Mark Cooper

Keeping Canada's skies safe is an immense responsibility. We carry that weight every day.

To meet that responsibility, we need more than just operational excellence. We need an environment where everyone acts with integrity, makes sound decisions and feels empowered to ask the hard questions – or to admit when they have made a mistake.

That is what this Code of Ethical Conduct is about.

Think of it not as a list of rules, but as a practical guide for real-world moments. You will face grey areas or feel competing pressures. When that happens, use this Code as your baseline. It is here to help you explain the "why" behind your decisions and navigate the difficult conversations we cannot avoid to lead well.

If you are ever unsure or if you see something that does not align with who we are, I am asking you to speak up. Raising a concern in good faith will not result in retaliation, that's the foundation of our just culture.

Please take the time to read it. Use it to guide your decisions every day. When we hold each other to these standards, we protect the excellence that makes our skies safe, and we ensure NAV CANADA remains an incredible place to work.

Mark Cooper

President and CEO

1.2 We are guided by a core commitment

1.2.1 Safety is the foundation of everything we do

As an air navigation service provider, we support the safe movement of millions of passengers and crew each year across 18 million square kilometres of Canadian airspace. The trust placed in us by the aviation community is significant, and we uphold that trust through our actions and decisions.

We contribute to a workplace where people are treated with respect. People feel able to raise questions, concerns, and safety issues. We value openness and recognize that understanding risk depends on it. When issues are identified, we focus on understanding what happened and why, so that we can improve. We hold ourselves and each other accountable in a fair and consistent manner.

We are expected to identify, address, and report hazards, risks, errors, and safety concerns in our own work and in the work of others. Speaking up helps prevent harm and protects people, property, and the integrity of our operations.

We are committed to learning and continuous improvement. Open reporting and reliable data help us better understand risk, identify trends, and strengthen our systems. By learning from experience and using evidence to improve, we enhance safety, build resilience, and continuously improve our performance.

Together, we enable NAV CANADA to continue to be one of the world's safest and most respected air navigation service providers.

Find out more

[Just Culture Policy](#)

[Quality Management System Policy](#)

[Safety Policy](#)

1.2.2 Four core values guide our everyday actions

NAV CANADA has four core values that define how we work and uphold our commitments every day. These connect the high standards we set for ourselves to real-life situations, helping us make ethical conduct part of everything we do.

We proudly care	We create a safe and trusting environment where we look out for one another, no matter what is going on. Keeping 18 million square kilometres of Canadian airspace safe is more than a job, it's a calling. No matter our role, everything we do keeps our skies safe.
We work together	We can't do alone what we can achieve as one team. Whatever needs to be done to safely land the future of navigation, we'll do it together.
We build trust	When we trust each other, we build an even safer, more supportive place to work.
We set the standard	We're experts in navigating Canada's skies. Whatever our role, we Look Up and clear the way for the next generation of airspace innovation.

Find out more

[Behaviours supporting our values](#)

1.3 We have clear responsibilities

The Code of Ethical Conduct applies to all of us. Employees at all levels of the organization, members of the Board of Directors, and contract workers are required to comply with it. Bargaining agents are also expected to respect the Code and our policies.

Here are our responsibilities:

Responsibilities	Additional manager responsibilities
Read, understand and comply with the Code, all policies and enabling documents.	Ensure everyone we supervise, including contract workers, complies with the Code.

Comply with all commonly accepted ethical practices and applicable laws.	Lead by example and foster a workplace environment that supports ethical behaviour.
Review the Code when required by NAV CANADA and stay up to date on changes.	Receive and follow up on questions, concerns or reported violations, promptly and with appropriate confidentiality and discretion. Get advice from the appropriate resources when needed.
Ask for guidance when we have questions about an ethical issue or are uncertain about a situation.	
Report potential violations without delay.	
Cooperate in any investigation of alleged wrongdoing.	
Notify NAV CANADA promptly if we are charged with a criminal offence or if we know that charges are pending.	

1.4 Violations have consequences

Respecting our ethical commitments matters. The responsibilities, expectations and ethical actions and behaviours set out in the Code are enforceable rules. Violating those rules or any other NAV CANADA policies or procedures can lead to administrative or disciplinary action, or sanctions. Not being aware of a rule, policy or procedure is never an excuse for a violation.

NAV CANADA uses progressive discipline to address violations, up to dismissal. In certain situations, legal action can also be taken. However, depending on the facts or seriousness of the situation, NAV CANADA may combine or skip steps in the progressive discipline process.

2. Speaking Up and Reporting Violations

[Wrongdoing](#) includes any act or failure to act that breaks the law, violates our policies or Code, or goes against our ethical commitments.

While the Code covers many situations we might face, it cannot address every potential conflict or violation. Many of the issues covered in the Code are addressed in greater detail in the policies and enabling documents.

If in doubt when we face an ethical dilemma or a potential violation, we must ask for guidance or raise a concern.

Taking action helps us address unacceptable behaviour, improve NAV CANADA's training and policies, and build a stronger, more resilient organization. We all have a part to play.

Failure to report wrongdoing, whether our own or others', is a violation of the Code.

2.1 Who to contact for guidance and where to report concerns

Managers	Managers can support and direct us to the right person based on the situation.
Local Human Resources Business Partnership (HRBP) team	HRBP teams can also help assess ethical questions or give advice.
Expert resources for specific issues	Circuit To access all the reporting and guidance resources ARGUS To confidentially report system safety issues and risk management deficiencies Notification of Occurrence form To confidentially report incidents of harassment and violence Hazardous Occurrence Investigation report

	To report hazards in the workplace relating to health and safety
Sentinel Whistleblowing mechanism	We can also report wrongdoing confidentially and anonymously through Sentinel, an independent whistleblowing service run by Integrity Counts. We can access Sentinel in multiple ways: Intranet: Sentinel program page Public website: integritycounts.ca/org/NAV CANADA Phone: 1-866-921-6714 Mail: P.O. Box 91880, West Vancouver, BC V7V 4S4, Canada

2.1 What happens when we report

When we report wrongdoing, NAV CANADA personnel will review the report and conduct an investigation that is appropriate to the circumstances. Every effort is made to maintain confidentiality, although in some cases disclosure may be necessary to conduct the investigation or to comply with legal obligations.

We must report in good faith, with an honest belief in the accuracy of the information and the occurrence of wrongdoing, and we are protected from reprisals when we do so.

Anyone who reports wrongdoing in bad faith, or who intimidates, threatens, or otherwise harms or disadvantages another for coming forward may face administrative or disciplinary action, or sanctions, up to dismissal.

3. Ethical Requirements We are Committed To

3.1 We provide a safe and healthy workplace

3.1.1 Fostering a safe workplace

Safety is the foundation of everything we do. We protect the psychological and physical health and safety of our colleagues, visitors, and contractors on our premises and in our operations.

As part of that commitment, NAV CANADA offers resources to support our physical and mental well-being.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We comply with NAV CANADA's approved occupational safety and health practices as well as security policies.
- We [report workplace accidents, hazards, near misses, injuries](#) and unsafe practices or conditions.
- We [report](#) any known or suspected security issues, breaches or vulnerabilities.
- We meet or exceed all health and safety training requirements.
- We promote a culture where seeking help for health matters is supported and free from stigma.
- We promote a psychologically safe environment where employees can speak up without fear of reprisal.

Consider this

We are all entitled to refuse work where we reasonably believe that a hazard, condition, or activity presents an imminent or serious threat to life or health.

Find out more

[Collective Agreements](#)

[Contractor's Handbook](#)

[Corporate Security Policy](#)

[Emergency Management Policy](#)

[Environmental and Occupational Safety and Health Policy](#)

[Wellness Programs](#)

3.1.2 Maintaining an alcohol and drug-free workplace

We are entrusted with the safety of the flying public, and we uphold the same commitment to safeguarding our colleagues and customers. Therefore, we always report to work free from the influence of alcohol and drugs.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive.

- We all report to work fit for duty, free from the influence of alcohol or drugs, including cannabis, and remain so throughout the workday or shift.
- We use over the counter and prescription medications strictly in accordance with their intended purpose, provided they do not impair our ability to perform our duties safely or place others at risk in the workplace.
- We report our use of prescription medication, cannabis, alcohol or recreational drugs to a physician or Civil Aviation Medical Examiner (CAME) as required.
- We never consume, possess, manufacture, or distribute unlawful, controlled or illicit substances, including cannabis, on NAV CANADA premises or in NAV CANADA vehicles.
- We inform a manager if we believe that an individual is not fit for duty and under the influence of alcohol or drugs while at work.

Consider this

NAV CANADA's Chemical Dependency Education and Rehabilitation Program (CDERP) is available to any employee who is struggling with substance use dependency. The program is dedicated to supporting individuals in achieving and maintaining sobriety and empowers them to build healthy lives free of substance dependence.

Find out more

[Chemical Dependency Education and Rehabilitation Program](#)

[Drug and Alcohol Policy](#)

[Wellness Programs](#)

3.2 We are accountable

3.2.1 Submitting all claims honestly

We submit legitimate and accurate claims. In doing so, we demonstrate accountability.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive.

- We submit business expenses, overtime, leave, travel and other benefit claims honestly and accurately. We do so in accordance with collective bargaining agreements and NAV CANADA policies.
- All expenses we incur on behalf of NAV CANADA are business related and consistent with its needs.
- We always ensure that travel expenses are necessary, reasonable, and represent a responsible use of resources.
- We never engage in transactions solely to accumulate loyalty points or to gain financial or personal benefit or privilege.

Consider this

This is an example of a strictly forbidden action: An employee intentionally submits claims with inaccurate costs or costs that have not been incurred. This also applies to benefit claims submitted by dependents, for which we remain responsible.

Find out more

[Delegation of Financial Authorities Policy](#)

[Management Terms and Guidelines](#)

[NCJC Travel Program](#)

[Travel Card Policy](#)

3.2.2 Protecting the environment

We recognize the importance of sound environmental management and climate action. We comply with all applicable standards and take accountability for our environmental impact. We are actively implementing a Climate Action and Environment Strategy and supporting the goal of net-zero emissions by 2050.

What is our Climate Action and Environment Strategy?

Our Climate Action and Environment Strategy focuses on our greenhouse gas (GHG) emissions inventory and efforts to reduce the impact of our operations on the environment. The Strategy was developed as part of our sustainability efforts and supports our commitment to the UN Global Compact and Sustainable Development Goals.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive.

- We encourage resource conservation and recycling where possible.
- We familiarize ourselves with NAV CANADA's Climate Action and Environment Strategy and find opportunities for positive environmental impact.

Find out more

[Climate Action and Environment Strategy](#)

[Environmental and Occupational Safety and Health Policy](#)

[UN Global Compact](#)

3.3 We treat people with dignity and respect

3.3.1 Building a culture of diversity, equity, inclusion and belonging

We are committed to creating an inclusive and psychologically safe workplace where everyone is treated with dignity and respect, regardless of identity, experience, or background. We strive to ensure that all people have fair and equitable opportunities to participate, contribute, and thrive, with a genuine sense of belonging. We do this by removing barriers to equity, inclusion and participation and by fostering an environment where differences are valued as a strength. Our commitment applies to everyone.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive.

- We treat colleagues, customers, contractors and partners with fairness, dignity and respect.
- We prioritize psychological safety, inclusion and accessibility in how we act, communicate and interact with others by respecting their identities and experiences.
- We uphold language rights of employees, customers, and all those with whom we do business, by communicating in an individual's official language of choice.
- We apply fair and equitable people management practices, including hiring, retention, development, progression, and advancement.
- We remain attentive to barriers, bias, microaggressions, and exclusionary conduct, whether intentional or unintentional.
- We speak up when concerns arise, using appropriate channels, including Legislated Programs and Conflict Management.

Discrimination, harassment and violence undermine inclusion and belonging and are addressed in the "Preventing interpersonal misconduct" section of this Code.

Consider this

We may not intend to exclude or hurt others, but intent does not outweigh impact. When our actions, language or decisions have a negative effect, we are responsible. Taking accountability for that impact, learning from it, and changing our behaviour demonstrates respect, integrity, and inclusion.

Find out more

[Diversity, Equity, Inclusion and Belonging Policy](#)

[Official Languages Policy](#)

3.3.2 Preventing interpersonal misconduct

We are committed to a safe and respectful workplace, free from interpersonal misconduct. We all share responsibility for preventing and reporting it. Interpersonal misconduct under this Code of Ethical Conduct means: mistreatment of others, including harassment and violence as defined in the Canada Labour Code, discrimination contrary to the Canadian Human Rights Act, abuse of authority, and any other abusive or demeaning behavior towards others.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We do not tolerate discrimination based on the prohibited grounds set out in the Canadian Human Rights Act (CHRA), nor harassment and violence.
- We promote a safe, respectful, harassment and violence-free workplace.
- We do not engage in harassing or violent behaviours – verbal, physical or threatening – including of a sexual nature.
- We never make or distribute recordings of meetings or workplace conversations.
- We never take or distribute photographs, videos or other representations of coworkers in circumstances that could compromise privacy, dignity or trust in the workplace.
- We speak up and support others, reporting any concerns to our manager or an alternate management representative, and notify [Legislated Programs and Conflict Management](#)
- We do not abuse our authority or improperly use the authority inherent in our position to endanger an employee's job, threaten their economic livelihood or in any way interfere with or influence their career.

Additional responsibility specific to supervisors and managers:

- We engage [Legislated Programs and Conflict Management](#) when issues arise.

Discrimination, harassment and violence are inconsistent with our commitment to diversity, equity, inclusion, and belonging.

Find out more

[No Discrimination Policy](#)

[Harassment and Violence Prevention Policy and Occurrence Resolution Process](#)

[Collective Agreements](#)

[Disability Accommodation Policy](#)

3.3.3 Practicing constructive labour relations

We are committed to fostering meaningful and constructive consultation in the workplace, where relationships are measured by the quality of the discussions and interactions that take place.

Labour-management relationships are important and are best advanced through open, transparent and meaningful discussions that are intended to continually enhance mutual understanding and trust.

We pursue the expeditious negotiation of collective agreements where all issues of importance are dealt with openly and discussed fully.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We work collaboratively with our bargaining agents to find interest-based solutions to workplace issues.

Find out more

[Collective Agreements](#)

3.4 We prevent conflicts of interest

3.4.1 Disclosing outside activities, family and personal relationships

Outside activities and family and personal relationships with colleagues can create conflicts of interest. Both are permissible, but we must disclose them as soon as they arise and they must not interfere or conflict with our work and duties to the Company.

Outside activities include another job, ownership interest in a business, volunteer work, or active political activities and appointments.

Family or personal (consensual romantic) relationships refer to relationships with other NAV CANADA personnel, whether pre-existing or formed during our employment.

What is a conflict of interest?

A conflict of interest exists when a personal interest or relationship affects, or could appear to affect, our judgment or our decisions. There are three kinds of conflicts:

- **Real conflict** — one that is currently affecting our decisions or ability to fulfill employment obligations to NAV CANADA.
- **Potential conflict** — one that is likely to arise in the future.
- **Perceived conflict** — one that may not exist in fact but appears so to an outside observer.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We promptly and transparently [disclose our outside activities and any family and personal relationships](#) with colleagues to enable appropriate mitigation, if required. Where mitigations are required, we implement them in good faith.
- We disclose and obtain approval before serving as a director, officer, partner, consultant, or in any other role with an organization that does, or seeks to do, business with NAV CANADA, or when we or a family member has a material financial interest in such an organization.
- We do not devote time to outside activities during our normal NAV CANADA work hours, nor do we use NAV CANADA resources or assets for those activities.
- We never use NAV CANADA resources or assets to make a political contribution to any political party or candidate.
- We only participate in political activities on our own time, at our own expense, and without conveying any endorsement on the part of NAV CANADA.
- We use good judgment and seek guidance when we are unsure.

Consider this:

Perceived conflicts of interest, may still undermine trust and our credibility in the workplace even if no actual conflict exists since they may signal to others that our decisions might be influenced by our personal interests.

Find out more

[Legislated Programs and Conflict Management](#)

[Disclosure of Conflict of Interest or Potential Conflict of Interest form](#)

[Family and Personal Relationships Policy](#)

3.4.2 Receiving and offering gifts

Receiving or offering gifts on behalf of NAV CANADA might be perceived to influence a business decision. For this reason, we review whether a gift is appropriate before offering or accepting it.

Generally accepted gifts include infrequent and low-value gifts, such as modest meals, single-event tickets, or branded items.

Always unacceptable gifts include valuable or redeemable gifts, such as gift cards, cash, services, hospitality, gratuities, discounts, loans, paid trips or season tickets. Giving or accepting these may constitute corruption or fraud as explained later in this Code.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We always exercise ethical judgment when considering whether to offer or receive a gift (refer to “Consider this” below to help assess appropriateness).
- We only receive or offer gifts that are acceptable. This applies equally to employees whose roles require interactions with government officials.
- We disclose without delay when we consider that the exchange of a gift may lead to a real, potential or perceived conflict of interest, using the [Disclosure of Conflict of Interest or Potential Conflict of Interest form](#).

Consider this

To evaluate if a gift could be seen to influence an action or a decision, we consider the following:

1. What is the giver's relationship with NAV CANADA?
2. What is the receiver's level of decision-making?
3. What is the nature or value of the gift?
4. What is the intent or expectation of the giver?
5. When is the gift being given?
6. What is the frequency of the gesture?

Find out more

[Legislated Programs and Conflict Management](#)

[Disclosure of Conflict of Interest or Potential Conflict of Interest form](#)

3.5 We protect NAV CANADA's resources

3.5.1 Safeguarding assets

We all play a key role in safeguarding NAV CANADA assets. By working together, we help foster a secure workplace. The misuse or loss of assets could disrupt operations or negatively impact NAV CANADA.

What are assets?

Tangible assets are physical assets that the Company owns or controls and that have a material, touchable form such as cash, inventory, vehicles, equipment, infrastructure, investments, etc. They support operations and business activities and can be physically safeguarded.

Intangible assets are assets that the Company owns or controls that do not have a physical form but support how the business operates, creates value, or manages risk such as information and intellectual property.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We use NAV CANADA assets only for legitimate business purposes.
- We protect assets by preventing their loss, damage, unauthorized access, theft, misuse, trespass, tampering or removal.
- We handle information using approved devices, services, and secure communication methods.
- We exercise ethical judgment when using email, the Internet, or social media to avoid any breach of security.
- Before disclosing information, we ensure that appropriate safeguards are in place, such as legal agreements, or we consult with Legal, Supply Chain or the Disclosure Committee to get authorization to proceed.

Consider this

All data and information we create in the course of our employment belongs to NAV CANADA.

Find out more

[Enterprise Data and Information Governance Policy](#)

[Enterprise Cyber Security Policy](#)

[Corporate Disclosure Policy](#)

[External Social Media Policy](#)

[Enterprise Risk Management Policy](#)

3.5.2 Maintaining confidentiality

Maintaining confidentiality is a fundamental aspect of protecting NAV CANADA's interests, which includes the interests of our colleagues. We safeguard information and exercise discretion in all communications. We protect the privacy of individuals.

What is confidentiality?

Confidentiality means keeping sensitive information private and only sharing it when specifically authorized to do so. Sensitive information at NAV CANADA that is subject to our confidentiality obligations includes:

- **Business and financial information**, such as business plans, budgets, forecasts, financial results
- **Personal information** about employees, customers, or other identifiable individuals
- **Intellectual property**, such as internally developed software, proprietary tools, technical documentation, trade secrets
- **Legal and contractual information**, such as contracts, legal documents, information subject to non-disclosure agreements
- **Customer, supplier, and partner information** that is not publicly available
- **Security sensitive information**, such as system details, vulnerabilities, or security controls

Ethics in action

- We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:
- We take reasonable measures to prevent the unauthorized disclosure of sensitive information. To do this, we access, transmit, and store this information only using pre-approved devices, services and methods.
- We access sensitive information on a “need to know” basis. For example, just because we have access, does not mean we should access the information.
- We understand and apply appropriate sensitivity classifications when handling information: Public (low sensitivity), Proprietary (moderate sensitivity) or Restricted (high sensitivity).
- We exercise sound judgment, consistent with NAV CANADA policies when using email, the Internet, or social media, and in our public and private conversations, to avoid breaches of confidentiality.
- We seek input and, where required, approval, from Legal, Supply Chain, or the Disclosure Committee when disclosing any sensitive information externally, and ensure the appropriate safeguards are in place.
- We promptly [report](#) any suspected or confirmed privacy breaches.

Consider this

Unauthorized access to, or disclosure of, sensitive information could affect strategic decisions, increase liability, cause financial losses, compromise the privacy rights of individuals or lead to irreversible harm to them.

We remain accountable to protect personal information even if the information is processed by a third party. Outsourcing does not transfer information protection responsibilities when it comes to personal information.

Find out more

[Employee Privacy Policy](#)

[Enterprise Data and Information Governance Policy](#)

[Corporate Disclosure Policy](#)

3.5.3 Using technology safely and wisely

In this Code, “technology” includes all devices, software, applications, platforms and infrastructure connected to NAV CANADA networks, cloud-based services or otherwise belonging to the Company.

Therefore, we use sound judgment consistent with NAV CANADA policies, and conduct ourselves in a manner that protects NAV CANADA technology and digital assets while working onsite or remotely.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We physically secure all devices used to access NAV CANADA's networks or cloud systems and ensure passwords meet or exceed NAV CANADA's Access Standard requirements.
- We proactively ensure that our technology remains secure by avoiding negligence in preventing the introduction of malware or viruses and by responsibly protecting against and addressing security vulnerabilities.
- We never use technology for illegal purposes or to access, create, store, or circulate inappropriate or offensive material.
- We report any risks, including accidental unauthorized access or errors that could result in an issue.
- We never create unauthorized access to systems (such as backdoors, covert channels, or wireless access points), bypass or circumvent security controls or approval processes, or alter system configurations without authorization.

Additional actions specific to artificial intelligence (AI)

- We maintain oversight of AI, ensuring that we provide only appropriate and approved types of data to AI, and that its outputs are used to inform—not replace—human judgment.
- We only use approved software and applications, including AI, in our work, and do not download, install, run, or access unapproved software or applications on corporate devices.
- We use AI tools responsibly, in accordance with NAV CANADA policies, and only when authorized.
- We take reasonable steps to verify outputs for accuracy, bias, and appropriateness, and ensure that AI-generated content does not contain or disclose sensitive information.

Consider this

Our activity on NAV CANADA's technology assets should never be considered private. The Company may exercise its rights to review and verify our access to and use of its technology assets when there are reasonable grounds to do so.

Find out more

[Business Technology Usage Policy](#)

[Artificial Intelligence Usage Policy](#)

[Enterprise Cyber Security Policy](#)

[Program and Project Delivery Policy](#)

[Access Standard](#)

[Software Asset Management Standard & Procedure](#)

[Cyber Security Remote Work Standard](#)

3.5.4 Maintaining accurate records

We maintain accurate records in compliance with applicable legislation and regulations. To this end, we work to ensure that records are properly managed and protected throughout their lifecycle. NAV CANADA's operating licence depends on it.

What are accurate records?

Records are data and information that serve as evidence of NAV CANADA's business activities, decisions, and transactions.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We accurately record business activities, decisions, and transactions.
- We maintain records in accordance with NAV CANADA record-keeping requirements to ensure their reliability, usability, integrity, and authenticity.

Consider this

"Records" span many formats and mediums. Examples are digital and electronic files, email, publications, website content, images and graphics, voice, video, paper and microfiche.

Find out more

[Delegation of Financial Authorities Policy](#)

[Procurement Policy](#)

[Enterprise Data and Information Governance Policy](#)
[Retention Schedule](#)

3.5.5 Preventing fraud

We are committed to a zero-tolerance approach to fraud. To support this commitment, we implement and enforce robust systems and controls.

What is fraud?

Fraud occurs when an act is committed intentionally to deceive NAV CANADA, resulting or intending to result in a loss for the Company or a gain for the perpetrator.

Corruption is a form of fraud and includes any act in which a person misuses authority, position, or resources entrusted to them to obtain an improper benefit, for themselves or others.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We ensure all NAV CANADA financial, accounting or other official documents are authentic and unaltered.
- We never knowingly furnish information that may be misleading, false or deceptive.
- We never intentionally fail to report information that must be reported by law or regulation for personal gain.
- We never steal NAV CANADA assets.
- We immediately report concerns regarding NAV CANADA's [accounting](#), [internal controls](#) or [auditing matters](#). This includes suspected or actual [fraud](#), stealing, bribery, extortion, kickbacks or any other act for improper benefit.

Consider this

This is an example of a fraudulent action: an employee receives something of value from a vendor in exchange for concealing the fact that the quality of the vendor's product does not meet NAV CANADA's requirements, or for providing the vendor with insider information that is not available to the other proponents.

Find out more

[Fraud Policy](#)
[NCJC Travel Program](#)
[Anti-Corruption Policy](#)
[Delegation of Financial Authorities Policy](#)
[Charitable Contributions and Sponsorships Policy](#)

3.6 We represent NAV CANADA responsibly

3.6.1 Acting responsibly in public

We represent NAV CANADA responsibly at all times, both inside and outside the workplace and online, including on social networks, public forums, or personal blogs.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- When engaging in person or on social media, we must always exercise ethical judgment.
- We take care to never provide misleading or inaccurate information that could negatively affect NAV CANADA's reputation or that of our co-workers.
- We never misrepresent our role with, or relationship to, NAV CANADA.
- We never create social media groups, pages or forums that can be mistaken for being an official NAV CANADA account.

Find out more

[External Social Media Policy](#)

[NAV CANADA Corporate Endorsement Policy](#)

3.6.2 Protecting NAV CANADA's image and reputation

Preserving NAV CANADA's image and reputation includes three aspects: the management of media relations, the management of NAV CANADA's identity or trademark, and our relationships with public officials.

Ethics in action

We follow these examples of ethical actions and behaviour, knowing that the list is not exhaustive:

- We refer all media inquiries to our Stakeholder & Industry Relations Department.
- We never speak to the media without prior authorization.
- We obtain appropriate approvals before granting external parties the right to use or license NAV CANADA's visual identity or use any corporate or employee endorsement for any commercial or non-commercial purposes.
- We never use the NAV CANADA name, logo, tagline or other NAV CANADA imagery in a way that can mislead others into believing they are visiting an official NAV CANADA account.

- Our dealings with public officials always withstand public scrutiny and uphold the integrity and reputation of NAV CANADA, the government and public officials.
- We report to the government in an honest, accurate manner and in compliance with all applicable requirements.
- We report all oral and arranged communications with designated public office holders (DPOH) monthly.

Find out more

[Media Relations Policy](#)

[Corporate Endorsement Policy](#)

[Charitable Contributions and Sponsorships Policy](#)