

# 2024 Code of Business Conduct

*Our reputation for safety and excellence is built on the actions we take—both as individuals and as a team. Every decision matters, and when we act with integrity, respect, and sound judgment, we strengthen who we are. How we show up each day shapes not only our company but the culture we create together.*

— Mark Cooper, President and CEO

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## A Message from the President and CEO

### **At NAV CANADA, our shared purpose is keeping Canada's skies safe: Shaping the future of air navigation services.**

We make this happen by striving for excellence every day, guided by the values we live and breathe. Together, we'll care deeply, work as one, build trust, and set the standard in everything we do. Personally, these values resonate with me, and I've seen countless examples of our team embracing them—whether it's honoring commitments, appreciating each other's contributions, listening to diverse perspectives, or being transparent about decisions, risks, and challenges.

Our reputation for safety and excellence depends on all of us. Every decision matters, and when we act with integrity, respect, and sound judgment, we strengthen the trust others place in us. Holding ourselves accountable to the highest ethical standards is how we continue to grow—both as individuals and as a company.

The Code of Business Conduct is here to help. It outlines key areas like safety, respect in the workplace, diversity, privacy, and cybersecurity. It also offers guidance on handling conflicts of interest, safeguarding company information, and ensuring fiscal responsibility.

Please take time to read and understand the Code and its supporting policies. It's a resource you can rely on whenever you have questions. And if you're ever unsure or concerned, speak up. Whether it's with your manager or through our established channels, you can raise concerns confidently, knowing that we're committed to listening and addressing them without fear.

Together, by upholding these values and principles, we'll continue to create an environment where everyone can thrive and keep NAV CANADA leading the way in air navigation services.

Mark Cooper  
President and CEO

## Our Commitment to Safety

**NAV CANADA's commitment to safety is clearly stated in the Company's purpose "Keeping Canada's skies safe: Shaping the future of air navigation services." The organization's first pillar of success is "Safety at the Core" where safety is integral to everything the company does, and continues to mature as the industry evolves.**

### Safety Culture

NAV CANADA's safety culture is comprised of 5 elements which together combine to form a safety-conscious company culture:

#### **Just Culture**

An atmosphere of trust in which people are encouraged to provide essential safety-related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behaviour;

#### **Reporting Culture**

Promotes full and open reporting of potential errors (one's own or others'), hazards, and safety deficiencies;

#### **Informed Culture**

Where managers know what is going on in their organization and where decisions are made based on a sound understanding of the potential safety hazards, risks and available mitigations;

#### **Learning Culture**

Promotes learning from all incidents, big or small; learning is shared across the Company; fixes and improvements are implemented when needed; and

#### **Flexible Culture**

Adapts effectively to changing demands and allows quicker, smoother reactions to off-nominal events; incorporates strong input from subject matter expertise.

Every employee is expected to read and understand the Safety policies, standards, and Safety Management System (SMS) accountabilities that apply to their role.

#### **REFER TO:**

*Corporate Safety Policy*

*Corporate Just Culture Policy*

*Summary of SMS Responsibilities (from the suite of corporate safety policies and associated standards) review the sections that are applicable to your role*

## NAV CANADA Values

The values we live by guide our everyday actions and serve as a constant reminder of our commitments. They are integral to how we do business, linking the high standards we set for ourselves with the realities that go into making ethical conduct a way of life.

Our actions should align with our values. The following behaviours will serve as a guide in our daily interactions and decision making.

| Value                   | Description   | Behaviours supporting our values  |
|-------------------------|---|---|
| <b>We proudly care</b>  | 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. | <ul style="list-style-type: none"> <li>• Building and maintaining professional and healthy relationships</li> <li>• Following through with actions on our commitments and recognizing effort</li> <li>• Creating a supportive environment where individuals feel comfortable seeking assistance</li> <li>• Practicing self-care and proactively seeking support.</li> <li>• Seeking out and contributing ideas and perspectives</li> </ul>  |
| <b>We work together</b> | 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.                   | <ul style="list-style-type: none"> <li>• Understanding how our roles impact safety within the Shared Purpose throughout our careers</li> <li>• Demonstrating curiosity and a willingness to learn about different aspects of the business</li> <li>• Providing, receiving and acting on constructive feedback in a professional manner</li> <li>• Performing work as a team where we all do our job well and rely on our teammates do the same</li> <li>• Recognizing and appreciating the contributions of ourselves and others to the company's success</li> <li>• Communicating frequently about and seeking clarity on work expectations, while reviewing and adjusting priorities based on changing needs</li> </ul> |

|                            |   |  |
|----------------------------|---|--|
| <b>We build trust</b>      | When we trust each other, we build an even safer, more supportive place to work.  | <ul style="list-style-type: none"> <li>• Fostering a culture that encourages people to raise and address issues in a constructive and timely manner</li> <li>• Considering everyone's unique needs and opinions</li> <li>• Using intentional communication and listening to understand</li> <li>• Being transparent about the reasoning behind decisions, including potential risks or challenges</li> <li>• Doing what we say we are going to do and keeping people informed throughout</li> <li>• Using clear and straightforward language that is easily understood by all</li> </ul> |
| <b>We set the standard</b> | 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. | <ul style="list-style-type: none"> <li>• Adapting to change and learning from successes and failures</li> <li>• Building skills and expertise today for future success</li> <li>• Doing work safely that is aligned to all required processes and procedures</li> <li>• Encouraging a culture of innovation and continuous improvement</li> <li>• Maintaining what works well, while being open to share and discuss innovative ideas and best practices</li> </ul>  |

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By integrating these behaviors into our Code of Conduct, NAV CANADA reaffirms its commitment to uphold the values that define us as an organization. We recognize that our actions not only shape our Company culture but also influence our relationships with clients, partners, and the broader community.

## What is the Purpose of this Code?

**The Code is not simply a list of rules. It is intended to help us maintain the higher standard of ethical behaviour that is — and must be — expected of a company entrusted with public safety.**

While it covers many situations you might face, it cannot specifically address every potential conflict or violation. Rather, it is meant to set the tone for how we treat one another and how we conduct business at NAV CANADA.

Many of the issues covered in this Code are addressed in greater detail in specific policies. You should review all policies and determine which ones affect you in your day-to-day work. Learn them and consult them for an in-depth explanation of compliance requirements. Remember that being unaware of the relevant policy is never an excuse for a breach of policy.

## Who is Subject to the Code?

**Our *Code of Business Conduct* applies to all employees, officers and directors of the Company. Every reference made in this Code to employees, refers to officers and directors as well. NAV CANADA also expects bargaining agents, suppliers, contractors, customers and partners to respect our policies and the *Code of Business Conduct*.**

**All NAV CANADA employees, officers and directors are expected to read and understand the standards and policies outlined in the *Code of Business Conduct*, and to acknowledge this by submitting the Record of Review through Workday.**

## Our Ethical Principles

**Our reputation as an ethical company is one of our most valuable assets and is critical to our success. We hold ourselves to standards of behaviour that will stand up to the closest of scrutiny. It is a responsibility we all share. With respect to our *Code of Business Conduct*, these are some of the key ethical principles that guide our actions:**

### **We Have Integrity**

Integrity is the bedrock principle of our behaviour. It is through integrity that we earn trust. We are clear on our values and we keep our commitments — to each other and to all of our stakeholders. We do what is right and avoid even the appearance of impropriety.

### **We Treat Each Other With Respect**

We treat one another with fairness and dignity. We value diversity and encourage, respect and consider each other's opinions, perspectives and uniqueness.

### **We Are Accountable**

We bring our full energy, attention and commitment to our jobs. We are accountable for our actions. We do not deliberately mislead or deceive. We seek clarification when uncertain and raise concerns when we suspect wrongdoing or a safety breach or infraction. We do not retaliate against whistleblowers.

### **We Are Committed to Excellence**

In performing our duties, we pursue excellence and strive for continuous improvement.

### **We Use Good Judgment**

We think before we act. When gauging the appropriateness of an activity or practice, we are guided by our common sense and sound business judgment.

## **Our Responsibilities with Respect to the Code**

### **Employees**

As a NAV CANADA employee, you are expected to:

- read and understand the standards and policies outlined in the *Code of Business Conduct*, and acknowledge this by submitting the Record of Review in Workday;
- comply with the Code, NAV CANADA standards and policies, applicable laws, and commonly accepted ethical practices;
- stay informed of any changes to the Code or related developments communicated by NAV CANADA;
- seek help in the event that you have questions or are uncertain about a situation;
- raise any concern and report any potential violations without delay; and
- cooperate in internal reviews or investigations of a reported violation.

### **Managers**

Managers, in addition to their responsibilities as employees, are expected to demonstrate ethical leadership. This means:

- modelling conduct that is consistent with NAV CANADA values and ethical principles;
- demonstrating inclusive leadership: creating a work environment where all employees feel safe to be themselves;
- listening to and responding to employees' questions, concerns or reported violations promptly and confidentially;



- providing timely, sound advice and guidance to employees on ethical or compliance issues and, whenever necessary, soliciting advice from the appropriate resources and following up with the employee; and
- protecting employees who report violations from retaliation.

### Management accountabilities for internal controls

Strong internal controls reduce the likelihood that significant errors or fraud will occur and/or remain undetected. NAV CANADA managers have an important role to play and are relied upon to ensure that the Company's internal controls are functioning well. Some of the most critical internal controls for which managers are accountable include ensuring that: employees and contractors that report to them have appropriate access to business and operating systems and applications; that approvals are in accordance with the Delegation of Financial Authorities; and that expenses, overtime and leave that are submitted by their employees and contractors are accurate and in accordance with collective agreements and Company policies. Managers who fail to carry out these accountabilities could face disciplinary action, up to and including dismissal. Details of the critical internal controls for which managers are accountable are included in the Management Terms and Guidelines.

#### REFER TO:

*Management Terms and Guidelines*

### Responsibility to Report Wrongdoing

Every employee is responsible to notify the Company without delay of any violation or suspected violation of the Code, or other Company policies. Should you report wrongdoing, every effort will be made to maintain your confidentiality, although in some cases disclosure is necessary to conduct an effective and fair investigation.

In all cases, you are expected to do the right thing — both in terms of your own conduct, and when it comes to reporting wrongdoing. Your conduct both in and out of the workplace has the potential to expose NAV CANADA to legal liability and reputational and financial harm. Consequently, you are also required to notify the Company if you are charged with or convicted of activities that could reasonably expose the company, its employees, its assets, its customers or the flying public to risk. You are also required to cooperate with any investigation, either by NAV CANADA personnel or by external authorities, of alleged wrongdoing.

Report suspected or actual wrongdoing to your manager or refer to the “Reporting Violations” section below for other reporting channels.

#### CODE VIOLATIONS: CONSEQUENCES

Violations of the *Code of Business Conduct* can have serious consequences. If you do not respect and abide by the provisions of the Code or other Company policies and procedures, you could face disciplinary action, up to and including dismissal, as well as potential legal action.

## Valuing our Employees

**People are at the heart of this Company. We can only succeed through the dedication, skills and professionalism of all of us, working together in a collaborative and inclusive manner.**

At NAV CANADA, it is a business imperative to provide a safe and supportive work environment, where we treat one another with fairness, dignity and respect. Respect leads to greater understanding, appreciation and cooperation. Valuing each other's opinions, perspectives and uniqueness is the foundation upon which respect is built and flourishes.

## Building a Culture of Diversity, Equity, Inclusion and Belonging

Diversity is the variety of unique dimensions, qualities and characteristics people possess. These dimensions include ethnicity, nationality, culture, language, ability, birth sex, gender identity, sexual orientation, religion, age, immigration status, socioeconomic status, geographic region in which you live, and the infinite list of other qualities we all possess as humans. In the workplace, these differences contribute to diversity of thought and approach, which enhances innovation, creative problem solving and service delivery. By encouraging and supporting diversity in our workforce and creating an inclusive work environment where differences are positively valued and welcomed, all members of NAV CANADA's workforce are empowered to contribute to their fullest potential.

In order to reflect the diversity of the external Canadian labour market, NAV CANADA also works to improve the representation overall and also of the "designated groups" (as defined in the *Employment Equity Act*) in our workplace, while integrating inclusivity into our business practices. Under the *Employment Equity Act*, designated groups are women, Indigenous peoples, members of visible minorities and persons with disabilities.

## Preventing Discrimination

NAV CANADA supports a work environment that is free of discrimination. When people are excluded based on personal characteristics, we lose valuable contributions to innovation and problem solving, hindering our ability to achieve excellence.

The Company will not tolerate workplace discrimination or harassment based on any of the prohibited grounds in the *Canadian Human Rights Act*. These are: race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability or a conviction for which a pardon has been granted or a record suspended.

## INTERNAL REVIEW AND REDRESS MECHANISMS

*No Discrimination Policy*

*Nav Canada Grievance Process — please refer to your collective agreement*

*Discrimination* is behaviour consisting of adverse differential treatment of an individual based on any of these prohibited grounds.

We all have a responsibility to treat our co-workers fairly, regardless of individual differences, and to avoid any conduct that might constitute discrimination. You have the right to report suspected violations and are encouraged to do so by speaking with Legislated Programs and Conflict Management. In addition, there are other available reporting mechanisms interspersed throughout the Code.

## INTERNAL REVIEW AND REDRESS MECHANISMS

*NAV CANADA Official Languages Guidelines For Employees, Appendix C — NAV CANADA Official Languages Internal Complaints Procedure*

### Respecting Language Rights

NAV CANADA ensures respect for the language rights of employees, customers, and all those with whom we do business, in compliance with the *Official Languages Act*.

### Practicing Constructive Labour Relations

NAV CANADA encourages 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, long-term, ongoing processes. We believe these relationships are best advanced through open, transparent and meaningful discussion intended to continually enhance mutual understanding and trust.

NAV CANADA pursues the expeditious negotiation of collective agreements where all issues of importance are dealt with openly and discussed fully.

### Providing a Safe and Healthy Workplace

NAV CANADA is committed to assuring the psychological and physical health and safety of all employees at work. This assurance also extends to visitors and contractors on our premises and in our operations.

As part of that commitment, the Company offers a number of programs, initiatives and resources to encourage healthy lifestyle choices and support your physical and mental well-being.

## Promoting Health and Safety

The Company strives to ensure that effective policies and practices are in place to support our health and safety commitments. These include:

- providing a healthy and safe work environment to reduce the risk of illness or injury;
- supporting employee mental well-being;
- meeting or exceeding all health and safety legal requirements; and
- ensuring proper supervision, training and equipment in this area.

While we all share in the benefits of a safe and healthy workplace, each of us also has responsibilities in this regard. We can promote a safe and healthy workplace by demonstrating support and respect for one another. You can minimize the chances of anyone being hurt or injured on the job by following common sense practices and performing your work in compliance with the Company's occupational health and safety policies and procedures.

You are also expected to be attentive to hazard prevention and to immediately report to your manager any workplace accidents, injuries and unsafe practices or conditions. In extreme situations, employees are entitled to refuse to work where there is reasonable cause to believe that a hazard or unsafe condition is imminent or serious.

### INTERNAL REVIEW AND REDRESS MECHANISMS

*Internal Complaints Resolution Process — where an employee believes there is a contravention or that an accident or injury is likely.*

*Refusal To Work Procedures — where an employee has reasonable cause to believe that a hazard, condition or activity is an imminent or serious threat to the life or health of a person exposed to it before the hazard or condition can be corrected or the activity altered.*

*NAV CANADA Grievance Process — please refer to your collective agreement.*

## Preventing Workplace Harassment, Violence and Abusive Behaviour

Workplace harassment and violence means any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee, including any prescribed action, conduct or comment. Such conduct is harmful and has the potential to negatively affect safety by causing undue distress to employees and stifling essential communications.

Abusive behaviour refers to unwanted physical, verbal or other objectionable conduct by a person that is intended to ridicule, belittle, alienate or humiliate another employee, client or supplier, irrespective of the person's hierarchical position with relation to the employee, client or supplier.

Abuse of authority and unfair treatment are forms of abusive behaviour which occur when an individual improperly uses the authority inherent in a position to endanger an employee's job, undermine the performance of the job, threaten the economic livelihood of the employee or in any way interfere with or influence the career of the employee.

None of the above behaviours are tolerated at NAV CANADA.

Should you be subjected to, witness or have knowledge of such behaviours in our workplace or have reason to believe that actions constituting harassment and violence, or abuse may occur, you should promptly notify Legislated Programs and Conflict Management or your manager. Such behaviours — from an employee or anyone who enters our premises — will not be tolerated. You should promptly report to your manager (or the appropriate alternate management representative) any incident in which you were subject to, witnessed or have knowledge of workplace violence, or have reason to believe that actions that constitute workplace violence may occur.

Managers are responsible for:

- promoting a safe, respectful, harassment and violence free work environment;
- engaging Legislated Programs and Conflict Management when made aware of an occurrence of harassment and violence; and
- ensuring employees complete the required workplace harassment and violence prevention training.

#### REFER TO:

*Harassment and Violence Prevention Policy and Occurrence Resolution Process*

#### INTERNAL REVIEW AND REDRESS MECHANISMS

*Harassment Occurrence Resolution Process*

#### RESOURCES:

*OSH at a Glance*

*Wellness Programs*

*Feel Safe at Work*

*A Contractor's Handbook*

#### Ensuring our Security

NAV CANADA's Security Management System provides a consistent approach to security that encourages and is dependent on close cooperation with employees, contractors and stakeholders.

You are expected to comply with the Company's security policies and to safeguard Company property and assets against unauthorized trespass or removal, as well as against loss by criminal act or breach of trust.

If you encounter a security violation, breach or illegal activity, you should immediately advise your manager, who will take appropriate action to minimize harm and/or exposure.

Similarly, you should notify the National Security Monitoring Centre (1-866-242-0124 or [nsmcsecurity@navcanada.ca](mailto:nsmcsecurity@navcanada.ca)) if:

- you notice someone or something suspicious at your location; or

- an access point is blocked or otherwise not functioning.

In the event of an incident that disrupts, or threatens to disrupt, operations, or the maintenance of a safe work environment, such as an earthquake, pandemic, explosion, or loss of key operational systems, our Emergency Management Program (EMP) is designed to protect life and property and ensure the continuity and recovery of business-critical activities. Should emergency plans be activated in your area, you should stay calm and follow the instructions of your Emergency Management Team members and be prepared to support the response. You may also be alerted to emergencies and receive incident-related information by NAV CANADA's Emergency Notification System (ENS) via phone calls, text messages and/or emails. Being ready to respond to emergencies is a shared responsibility among all employees.

*For more information, refer to Corporate Security and Emergency Planning Policies.*

### Preventing and Addressing Substance Abuse

Our ability to perform our jobs well requires that we work in a professional manner free from the influence of alcohol or drugs.

The use, sale, unlawful possession, manufacture or distribution of controlled or illicit substances on NAV premises or workplaces is strictly prohibited. It is also strictly prohibited to be on duty or to be in control of a NAV CANADA vehicle or equipment while under the influence of alcohol or drugs, including the after-effects of such use. You must not report to, return to, or remain at work while under the influence of alcohol or drugs (including the after-effects of use). The use or presence in the body of these substances while on the job or on Company business on or off the premises is prohibited.

Similarly, alcohol must not be consumed on NAV CANADA property unless sanctioned by senior management for the purpose of official functions or events. Although cannabis is a legal substance it is not permitted on NAV CANADA property or any events at any time due to the safety sensitive nature of our business. Under no circumstances will alcohol, tobacco, cannabis or illicit substances be consumed in NAV CANADA vehicles. Additionally, employees are prohibited from operating any NAV CANADA vehicles if they have taken any alcohol, legal drug or illicit drugs that impacts their ability to work safely.

The abuse of over-the-counter or prescription drugs is also prohibited. You are responsible for knowing when their use:

- might impair your ability on the job;
- might endanger the safety of others in the workplace; or
- is inconsistent with their intended or medically prescribed purpose.

NAV CANADA's Drug & Alcohol Policy sets out expectations and aims to eliminate the risk of impaired performance due to illegal, illicit or inappropriate substance use. Violations of the Drug & Alcohol Policy are grounds for disciplinary action up to and including termination of employment for just cause. Because of the greater risk involved in performing certain functions, some positions have been designated "safety sensitive" and "business critical" and individuals holding these positions will be expected to meet additional standards as outlined in the Policy.

NAV CANADA is committed to helping any employee who is struggling with issues related to alcohol or drugs. Employees who require support are encouraged to seek assistance and can refer to the Wellness Programs for assistance.

## RESOURCES

*Drug and Alcohol Policy*

*Wellness Programs*

*Chemical Dependency Education and Rehabilitation Program*

## Behaving Responsibly

**Your first business allegiance is to NAV CANADA. This means performing your job fully and competently and steering clear of any situation or activity that may be harmful or detrimental to the Company's integrity, or its interests.**

### Avoiding Conflicts of Interest

You should be aware of and avoid any situation involving a conflict, or potential conflict, between your personal interests and those of NAV CANADA. Your conduct should always be able to withstand the closest scrutiny. Even the appearance of a conflict should be avoided, regardless of your intentions.

A conflict arises whenever an employee's personal interests or relationships compromise or appear to compromise the objectivity of their judgment, or their ability to act in the best interests of NAV CANADA.

Where an actual or potential conflict of interest may exist, you are obligated to disclose that situation. You can do this by promptly notifying your manager, completing *the Disclosure of Conflict of Interest or Potential Conflict of Interest* form and returning it to Legislated Programs and Conflict Management. Your disclosure will be brought forward to the Conflict of Interest Redress Committee, which includes representatives from Legislated Programs, Legal, and Human Resources Business Partnerships. The Committee will review your disclosure and will advise you of their assessment and, if applicable, any steps you must take to clear the conflict.

Questions or concerns should be brought to:

- your manager; or
- Legislated Programs and Conflict Management.

This section of the Code cannot anticipate every situation that might result in a conflict of interest. Rather, it is intended to serve as a guide to areas in which such conflicts most often arise.

### Outside Employment/Interests

You are expected to bring your full energy, attention and commitment to your job at NAV CANADA. As such, you must not devote time to an outside business or activity during normal business hours. If you are engaged in outside work or are considering outside work, you must submit a disclosure and must ensure that the work does not interfere with your responsibilities and duties at NAV CANADA.

Except with written approval, you must not:

- serve as a director, officer, partner, consultant, or in any other role in any business enterprise which does or seeks to do business with NAV CANADA; or
- own, control or direct a material financial interest in a supplier or contractor or in any business which does or seeks to do business with NAV CANADA.

In the above-mentioned cases, you would need the approval of both the VP & Chief Human Resources Officer and the VP, Chief Legal Officer and Corporate Secretary.

### Family and Personal Relationships

Sometimes, our personal and/or family relationships can lead to a potential conflict of interest in the workplace. For example, the Company will not allow family members to work in any direct reporting relationship with each other, nor in any situation where one family member may administer or have influence regarding a financial or non-financial benefit for another.

If one of your family members or someone with whom you have a personal relationship also works at, is seeking employment at, or is seeking to do business with NAV CANADA, make sure that all of your actions and decisions are made in the Company's best interests and not because of your relationship to that person.

When such relationships intersect at work, you should openly declare them to your manager before any potential conflict can occur. Similarly, if you or one of your family members is involved in a personal relationship with a supplier or customer, and there is a potential for any conflict of interest, you are expected to disclose this for review.

It is not always easy to determine if a situation may lead to a conflict of interest. If you are uncertain, it is wise to disclose any concerns to your manager.

Once a disclosure has been made, NAV CANADA will take appropriate steps to avoid any conflicts.

### Gifts and Entertainment

Offering or receiving gifts or entertainment might be perceived to unfairly influence a business situation, outcome or decision and could therefore result in a conflict of interest.

You should neither offer nor accept gifts, gratuities, hospitality, entertainment or other benefits that might influence or appear to influence a business situation, outcome or decision.

However, customary business practices including the offering and receiving of mementos or token gifts are acceptable, as long as they are of a nominal value and are infrequent.



Accepting regular gifts such as ball caps, gym bags, coffee mugs, expensive meals and single tickets to sporting or entertainment events **on an ongoing basis**, however, could constitute a conflict of interest and must be disclosed to your manager.

It is always prohibited to accept gifts that have a monetary value, including gift certificates, airline passes that have not been authorized by the Company, cash, services, discounts other than those offered through the Advantage Program and WorkPerks for employees, loans, paid trips or season's tickets for sporting or entertainment events.

Other situations may be less obvious and that's where judgment comes in. Some examples of factors to consider when assessing whether accepting a gift is appropriate include:

- Who is giving the gift? (current supplier/customer, prospective supplier/ customer, bank, government officials etc.)
- Who is receiving the gift and what level of decision-making capability do they have? (frontline employees, middle management, senior & executive management, Board member, union representative, etc.)
- What is the nature and/or value of the gift?
- What is the intent or expectation of the individual giving the gift?
- When is the gift being given? (during contract negotiations, evaluation period of a Request for Proposal, collective bargaining, procurement sourcing, customer consultation periods, etc.)

### Relationships with Government

Business relationships with public officials must be able to withstand the test of public scrutiny and uphold the integrity and reputation of NAV CANADA, the government and government officials. Should your position require contacts with government officials, you are not permitted to accept or provide any payments, gifts or entertainment of more than nominal value, regardless of motive.

In addition, all reporting to government must be done in an honest, accurate manner and in compliance with all applicable requirements.

#### REFER TO:

*Anti-Corruption Policy*

### Political Involvement

You have the right to take part in the political and democratic process, but participation must be on your own time, at your expense, and without conveying any endorsement on the part of NAV CANADA.

Company funds or assets must not be used to make a political contribution to any political party or candidate. Employees are free to make personal political contributions.

#### RESOURCES:

*Legislated Programs and Conflict Management*

*Family and Personal Relationships Guideline*

## Incurring Expenses, Submitting Overtime, Leave and Other Benefits

All employees are expected to use Company money and resources carefully with due regard to the interests of the Company's stakeholders.

Expenses incurred on behalf of the Company must be valid business expenses, properly submitted and approved in accordance with the Company's Delegation of Financial Authorities and in accordance with Company policies.

Travel must be pre-approved and booked in accordance with the Company's travel policies, and with the goal of minimizing cost. For example, it would be a breach of this Code to choose more expensive airlines or hotels solely for the purpose of collecting loyalty points or receiving other personal benefits.

Submissions for overtime, leave and other benefits must be accurate, properly approved and in accordance with collective agreements and Company policies.

## Protecting Privacy

Under the *Personal Information Protection and Electronic Documents Act* (PIPEDA), personal information includes any factual or subjective information, recorded or not, about an identifiable individual. It does not include the name, title, business address or business telephone number of an employee.

Privacy is a shared responsibility.

NAV CANADA is responsible for the protection of personal information in its custody or control, including its collection, use disclosure and retention, and is responsible for adequately protecting that information by ensuring that effective systems and controls are in place. When storing personal information with a third-party, it's crucial to understand that outsourcing doesn't relinquish NAV CANADA'S responsibilities. Even if a third-party service is tasked with data storage, NAV CANADA remains accountable, especially if they are the ones collecting the information initially. In essence, NAV CANADA is still the custodian of the data and must ensure its protection and compliance with relevant regulations.

Employees, for their part, have a responsibility to follow company policies, use secure communication channels and be mindful of and use common sense regarding the confidentiality of information they handle. At any time, you have the right to request and review your personnel file and may ask that it be corrected or modified if inaccurate.

All employees are responsible for the immediate notification to the NAV Canada Privacy Office ([privacy@navcanada.ca](mailto:privacy@navcanada.ca)) of a suspected or confirmed privacy breach using the Privacy Breach Report Form, including full and accurate details on the situation.

By working together, we can maintain a safe and respectful environment that values privacy.

## Protecting the Environment

NAV CANADA recognizes the importance of sound environmental management and has committed to the UN Global Compact, the world's largest global corporate sustainability initiative.

The UN Global Compact and the UN Sustainable Development Goals will be used as a high-level framework to ensure that our Environmental, Social and Governance (ESG) Strategy focuses on the principles of Environmental Action, Inclusive Society, and Strong Governance to build a sustainable and economically resilient future. The Company continues to comply with all relevant environmental laws, regulations, and standards and strives to exceed, whenever possible, the environmental performance levels required by law.

To this end, it is every employee's responsibility to respect all federal, provincial, territorial and local environmental laws, regulations and related requirements.

We are also dedicated, through NAV CANADA'S ESG Strategy and internal programs, to improve our own environmental practices across the Company by encouraging resource conservation at work, at home and in the community.

### REFER TO:

*Delegation of Financial Authorities*

*Enterprise Sourcing and Procurement Policy*

*P-Card Policy*

*NCJC Programs*

*Management Terms and Guidelines*

*Collective Agreements*

*NAV CANADA Benefits Program for Represented Employees*

*Flexplus Benefits Program for Management Employees*

*NAV CANADA Privacy Notice*

*Corporate Environmental Policy*

*Privacy Breach Management Plan Privacy Breach Policy*

*Privacy Breach Report Form*

## Maintaining our Reputation

### Corporate Disclosure and Endorsements

**As a public company whose debt trades on the public markets, we work to ensure that all reports and documents filed with regulators, as well as our regular public communications, are: Complete, Fair, Accurate, Timely, and Understandable**

It is extremely important that you understand and respect the *NAV CANADA Corporate Disclosure Policy*, which details how you can avoid the inadvertent disclosure of material information. The goal is to protect the Company from liability that could arise when such information is discussed publicly, before it has been fully disclosed through an official Company news release.

### Material Information

Material Information means any information about the Company and its subsidiaries, including any material change in the business and affairs of the Company, that, if disclosed outside the Company, could significantly affect the market price of the Company's publicly traded debt (bonds), or be considered important by investors in determining whether to buy, sell or otherwise trade in such debt.

Examples of material information could include annual and quarterly financial results, business plans, Company restructuring plans, negotiations with unions, major management changes, research and development of new technology, or confidential information provided by third parties.

Use of the Internet, e-mail or social media channels are subject to the same disclosure rules as other means of disseminating information, and therefore require your caution and good judgment. In addition, before making presentations to the public, an outside organization or an industry conference, ensure you send a copy of any such presentation material or other information to be given outside the Company to the Disclosure Committee through the Disclosure mailbox ([disclosure@navcanada.ca](mailto:disclosure@navcanada.ca)).

The Disclosure Committee will review the presentation for material information, accuracy and consistency with other public disclosures prior to the presentation.

### REFER TO:

*[NAV CANADA Corporate Disclosure Policy](#)*

### Sensitive Data and Information Classification

Data and information are among the most valuable assets owned by NAV CANADA.

NAV CANADA will ensure that sensitive data and information is protected from unauthorized access, alteration, misuse, or loss, to safeguard our corporate assets and the privacy of individuals.

All employees, regardless of their role, have a responsibility to protect the confidentiality, integrity and availability of sensitive data and information collected, processed, stored or transmitted by the Company. **Sensitive data and information** is information that has been developed, acquired or controlled by NAV CANADA and its subsidiaries that is not intended for public disclosure and is not generally available to the public. This could include, among other things: business and strategic plans, personal employee data, customer and supplier information, Company legal documents, and intellectual property.

Employees are expected to understand and apply the following sensitivity levels as prescribed in the Sensitivity Classification Standard.

### **Public (low sensitivity)**

Data and Information is of low sensitivity and can be made public with few negative implications for the Company. It is generally informational in nature, and primarily directed to NAV CANADA's customers or community. There is no limitation on distribution inside or outside of NAV CANADA.

### **Proprietary (moderate sensitivity)**

This is Data and Information intended for use within NAV CANADA and used in the normal course of business with external partners. Data and Information is restricted to management-approved access. There are no limitations on distribution or sharing of Proprietary Data or Information amongst NAV CANADA employees. This information can be shared externally if a Non-Disclosure Agreement (NDA) is in place or following a review by the Disclosure Committee.

### **Restricted (high sensitivity)**

This Data and Information classification applies to limited business or operations activities where use is on a need-to-know basis only by specified groups of personnel within the Company. Access to this Data and Information is restricted. This information includes Data and Information containing personal information. Data and information within this classification is subject to mandated safeguards within the Company, and, in some cases, to legal restrictions. Restricted information is not available to external businesses unless they are bound by contract or agreement.

## **Social Media**

Social networks, personal blogs and other online communities are useful forums for exchanging information and connecting with others. When engaging on social media, always exercise good judgment.

NAV CANADA's External Social Media Policy clearly outlines what is expected of you during and outside of working hours to the extent that it may affect the business or reputation of the Company. When posting and engaging with others online, follow these five rules and **do not**:

- Provide any unclear, misleading or inaccurate information, or opinions on any Company or employee related matters that could have a negative impact on NAV CANADA's reputation;
- Disclose any sensitive information that is owned or entrusted to NAV CANADA;
- Misrepresent your NAV CANADA role or your relationship to NAV CANADA;

- 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; and
- Create social media groups, pages or forums that can be mistaken for being an official NAV CANADA account.

Your activity online must always comply with relevant NAV CANADA policies; when in doubt, ask for help – contact [social.media@navcanada.ca](mailto:social.media@navcanada.ca).

## Media Relations

NAV CANADA's Media Relations Policy applies to all NAV CANADA employees and governs interactions with all news media. NAV CANADA's media relations are centrally managed by its Stakeholder and Industry Relations department. Employees are not to speak to media without prior authorization, and must refer all media inquiries to our Media Relations line at 1-888-562-8226, or by email at [media@navcanada.ca](mailto:media@navcanada.ca).

### REFER TO:

*External Social Media Policy Media Relations Policy*

*NAV CANADA Corporate Disclosure Policy*

*Intellectual Property and Confidential Information Policy*

*NAV CANADA Corporate Endorsement and Use of Identity Policy*

*Enterprise Data and Information Governance Policy*

*Sensitive Classification Standard*

## Corporate Endorsements

NAV CANADA does not grant 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. However, consideration of particular endorsement requests may be considered.

## Accounting and Internal Controls

NAV CANADA is required under securities laws, tax laws and generally accepted accounting principles to keep books, records and accounts that accurately reflect all transactions and to provide an adequate system of accounting and controls. The Company's accounting and financial information must be accurate, complete, objective, timely and understandable. All financial transactions must be properly approved in accordance with the Company's Delegation of Financial Authorities and properly recorded in accordance with Company financial policies and internal control procedures.

You are expected to ensure that those portions of the Company's books, records and accounts for which you are responsible or transactions you have incurred are valid, complete, accurate and supported by appropriate documentation in verifiable form.

NAV CANADA is committed to a zero tolerance approach with regards to attempts to mislead, manipulate, coerce or fraudulently influence an accountant or an auditor in order to make the financial statements materially misleading.

**REFER TO:**

*Delegation of Financial Authorities*

*Enterprise Sourcing and Procurement Policy*

*P-Card Policy*

*Accounting Policies*

## **Safeguarding Company Assets**

**All Company assets, property and resources must be handled with the strictest integrity and safeguarded against loss, theft, waste or misuse.**

### **Protection of Company Assets**

We are all responsible for the proper use and protection of the Company's assets, both tangible (such as cash, inventory, vehicles, equipment, buildings and investments) and intangible (such as corporate data and information, internally developed software and intellectual property). All employees must act in the best interests of the Company and take appropriate measures to prevent losses of the Company's assets due to willful action by others which may result in personal injury, property damage, theft, loss, abuse or unauthorized access to physical assets and intellectual property.

Using Company assets, property and resources for anything other than your NAV CANADA job related duties, requires the prior approval of a NAV CANADA manager. Examples include the personal use of company vehicles or corporate credit cards.

Travel and hospitality expenses should be consistent with the needs of the business. As a guiding principle, you should not gain or lose financially as a result of business travel or entertainment, and are expected to use Company money carefully and with due regard to the interests of the Company's stakeholders.

If you have access to NAV CANADA funds, you must respect the policies, procedures and standards established for their protection and accounting thereof. Never engage in a transaction that requires or contemplates making false or fictitious entries or representations.

## Fraud

NAV CANADA defines fraud as any intentional act to deceive the Company resulting in the Company suffering a loss and/or the perpetrator achieving a gain. Fraudulent or dishonest actions are strictly prohibited. Actions constituting potential fraudulent behaviour include, but are not limited to:

- offering or taking inducements, gifts or favours that may influence someone's behaviour;
- false accounting — dishonestly destroying, defacing, concealing or falsifying any account, record or document required for any accounting purpose;
- furnishing information that may be misleading, false or deceptive or intentionally failing to report information that is required to be reported by law or regulations for personal gain;
- intentionally submitting overtime or leave records with inaccurate information for personal gain;
- forgery or alteration of any document belonging to the Company;
- intentionally submitting benefits claims with inaccurate costs of services for personal gain or for which services have not been provided. You are responsible for claims submitted by your spouse or dependents;
- theft of company assets; and
- claiming personal expenses as business expenses.

### INTERNAL REVIEW AND REDRESS MECHANISMS

*You are encouraged to speak to your manager if you have any concerns or complaints regarding NAV CANADA's accounting, internal controls or auditing matters.*

*Procedures outlined in "Reporting Violations" can also be used for reporting suspected fraud.*

### REFER TO:

*Fraud Policy*

*NCJC Travel Program*

*Management Terms and Guidelines*

*Business Technology Usage Policy Fleet Motor Vehicle Policy*

## Anti-Corruption

Corruption includes various types of wrongful acts designed to provide an unfair advantage. It involves using improper influence to procure a benefit to which a person or company is not otherwise entitled. It includes bribery, kickbacks, illegal gratuities, economic extortion, and collusion. Common examples include:

- an employee fraudulently assists a vendor in winning a contract in a competitive bidding process by providing insider information not available to the other proponents, and receiving a payment or some other benefit from the vendor for doing so; or



- an agent working on behalf of NAV CANADA in another country receives a bribe or other compensation from a vendor in exchange for concealing the fact that the quality of the vendor's product does not meet NAV CANADA's requirements.

The use of NAV CANADA funds or facilities directly or otherwise for any illegal or improper purpose is strictly prohibited.

To this end, NAV CANADA is committed to:

- a zero-tolerance approach to bribery and corruption. Bribery and corruption are never acceptable by or on behalf of the Company and will not be tolerated in our business or in those with whom we do business;
- implementing and enforcing effective systems and controls to counter the risk of bribery and corruption; and
- abiding by and upholding applicable international and local laws and regulations, including those relating to anti-bribery and corruption.

**REFER TO:**

*Anti-Corruption Policy*

## Records Retention

NAV CANADA has an obligation to maintain business records for operational, legal, financial, historical and other purposes. These records are evidence of what the organization does, capturing business activities and transactions such as contract negotiations, business correspondence, personnel files and financial statements, to name a few.

Records may take many forms including, but not limited to: paper, electronic, cartographic and architectural items, pictorial and graphic works, photographs, films, sound recordings, and any digital and electronic medium, such as e-mail.

Appropriate policies and guidelines are in place to support you in making sure that the Company meets its obligations with respect to records management and retention. You should strive to ensure that all records under your responsibility are accurate and complete, and that you follow the guidelines for their proper storage, retrieval, retention and disposition.

**REFER TO:**

*Records Management Standard*

*Records Retention Schedule*

## Intellectual Property

Patents, trademarks, copyright and confidential information/trade secrets are all important types of intellectual property created and used by NAV CANADA in the operation of our business.

Air Navigation Service Providers around the world have come to recognize the value of NAV CANADA's NAVCANATM suite of air traffic management technology solutions. These and other technologies — including but not limited to GAATS+ and parts of CAATS — as well as their accompanying training and operating manuals are the intellectual property of NAV CANADA.

**REFER TO:**

*NAV CANADA Intellectual Property and Confidential Information Policy Statement*

The Company has spent a great deal of time, effort and expense in the creation of its intellectual property assets and considers them to be of significant importance to the success of the business. To protect these valuable assets, you must never disclose sensitive data, information or intellectual property (e.g. trade secrets, inventions, patents, software and computer programs) outside of the Company without first ensuring that the proper safeguards and legal documentation are in place. Please consult with Supply Chain and/or Legal before making any such disclosures.

You should also keep in mind that all intellectual property created as a result of your employment with NAV CANADA is the property of NAV CANADA.

**REFER TO:**

*Enterprise Cyber Security Policy*

*Cyber Security Remote Work Policy*

## Use of Technology Assets

You are expected to use sound judgment and professionalism while using Company technology. These include, but are not limited to, all devices, software, applications, platforms and infrastructure connected to NAV CANADA networks, cloud-based services or otherwise belonging to NAV CANADA. These assets should not be used for illegal activity nor to access, circulate, create or store inappropriate or offensive material.

In addition, you are responsible for conducting yourself in a manner conducive to the protection of NAV CANADA technology and digital assets while working onsite or remotely, specifically, you shall:

- limit access to and/or storage of company or private information to pre-approved devices, services and methods;
- physically secure all devices used to access NAV CANADA's network and/or cloud systems and data;
- select and apply suitable levels of control when using or managing end user computing applications;
- respect all computer software copyrights and comply with the terms of all software licenses;
- protect the confidentiality, integrity, and availability of company information;
- adhere to all applied security controls and do not circumvent security controls in any manner;
- ensure all passwords conform or exceed established standards, as prescribed in the Access Standard;

- receive approval from the appropriate authority within the Technology group to acquire and / or use cloud hosted services as prescribed in the Cloud Services Standard and Procedures; and
- only use approved software and applications on corporate devices unless an exception is granted as prescribed in the Software Asset Management Standard and Procedure.

*You are expected to use sound judgment and professionalism while using technology assets.*

## **INTERNAL REVIEW AND REDRESS MECHANISMS**

*Occurrence Resolution Process*

*NAV CANADA's Privacy Notice, Principle 10: Challenging Compliance*

## Cyber Security

NAV CANADA defines cyber security as the protection of corporate information and assets from unauthorized access, use, disruption, modification or destruction, regardless of where or how the information is stored (electronically, physically, on or off premise, or on removable media). Every effort must be made to protect our information and assets. Failure to do so can have negative impacts on safety, reputation, finances and/or the services we provide.

To protect our information and assets, certain activities are prohibited, such as:

- circumventing security measures employed on NAV CANADA technology assets;
- unauthorized exploration or hacking for information;
- knowingly transmitting any computer viruses, malware or other malicious software;
- bypassing known approval processes and changing the configuration of a computer system, and
- creating a backdoor or covert channel to our computer systems (such as unauthorized connections to the Internet or other networks and creation of wireless access points).

## Data and Information Protection

Corporate information is a valuable asset for NAV CANADA. It is used to make informed corporate decisions for the benefit of the organization. However, corporate information can be stolen or misused in a fraudulent way resulting in a financial loss to the Company or can negatively impact NAV CANADA's reputation.

You play a primary role in the protection of our data and information. Sensitive data and information must be handled through NAV CANADA sanctioned devices, services and methods, and shall follow the concept of least privileged access, commensurate with the information classification standard and privacy.

All information created, stored or accessed on NAV CANADA technology is the property of NAV CANADA. As such, your activity on the Company's computing assets should not be considered as private. NAV CANADA reserves the right to decrypt, inspect, monitor, search or disclose any electronic communication whenever it has reasonable grounds to do so.

Examples of when this might be necessary include:

- the need to evaluate or measure safety and quality;
- the need to investigate a potential violation of Company policy;
- the need to ensure the safety and protection of employees, the Company or its reputation; or
- a suspected instance of fraud, theft or undeclared conflict of interest.
- the use of technology to automatically scan and inspect digital data to help identify malicious traffic, malware, or inappropriate content.

**REFER TO:**

*Access Standard*

*Cloud Services Standard and Procedures*

*Software Asset Management Standard and Procedure*

## Reporting Violations

**The Company takes any contravention of the Code of Conduct seriously and expects its employees to report, in good faith, such instances.**

**These contraventions can be reported anonymously and confidentially through a third-party provider. The Company's use of the third-party provider ensures that all reported instances are taken seriously, are recorded and reported on and are reviewed by parties who are accountable for following up.**

**For complaints and/or concerns regarding accounting internal controls, auditing, pension plan matters, or ethical or legal concerns, please file a report in one of the following five ways:**

Online at [IntegrityCounts.ca/org/navcanada](https://IntegrityCounts.ca/org/navcanada)

By phone at 1-866-921-6714

By mail at PO Box 91880, West Vancouver, BC V7V 4S4, Canada

By email at [navcanada@integritycounts.ca](mailto:navcanada@integritycounts.ca)

By fax at 1-604-926-5668

If you choose to create an account with IntegrityCounts you will have the option to receive a statement of the action taken to deal with your concerns. (Note: IntegrityCounts will still maintain your anonymity)

unless you agree to provide your contact information to the Company.) More information about these procedures can be found here.

### Doing the right thing

**It is never wrong to raise a concern, in good faith, about a potential violation of the *Code of Business Conduct* or other policy. Taking action to bring attention to a problem can ensure the situation is corrected quickly, minimizing the possibility of more serious repercussions.**

In difficult situations, you might have concerns about coming forward. But at NAV CANADA, you can report any actual or suspected wrongdoing in confidence and with the assurance that you will not be adversely affected in any way as a result of speaking up. Anyone who attempts to intimidate, threaten or otherwise harm or disadvantage an employee for coming forward faces disciplinary action up to and including dismissal.

Ideally, you should feel comfortable bringing issues involving actual or suspected wrongdoing to the attention of your manager. That should be the first step. Knowing that in some cases it may not be possible, practical or timely to do so, NAV CANADA has established **the Internal Review and Redress Mechanisms** noted throughout this Code.

However, in instances where you do not believe your issues can be addressed through these mechanisms, or you are not satisfied with the processes or decisions, NAV CANADA has a whistleblowing mechanism called **Sentinel** for reporting violations involving actual or potential wrongdoing for final resolution. You can raise concerns through **Sentinel** anonymously; however, more can be done to fix a situation if a complainant self-identifies.

While you are encouraged to speak to your manager should you have concerns or complaints, you can alternatively file a **Sentinel** report through IntegrityCounts — either on a confidential or anonymous basis — online, by telephone, e-mail, post or fax, as follows:

#### **SENTINEL REPORTS CAN BE FILED THROUGH INTEGRITYCOUNTS:**

*Online at [integritycounts.ca/org/navcanada](https://integritycounts.ca/org/navcanada)*

*By phone at 1-866-921-6714*

*By mail at P.O. Box 91880, West Vancouver, BC V7V 4S4, Canada*

*By email at [navcanada@integritycounts.ca](mailto:navcanada@integritycounts.ca)*

*By fax at 1-604-926-5668*

#### **REFER TO:**

*Whistleblower Policy*