



Financial Transactions and
Reports Analysis Centre
of Canada

Centre d'analyse des opérations
et déclarations financières
du Canada



Code of Conduct, Values and Ethics



FINTRAC



CANAFE

Canada

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PREFACE

Non-partisanship and impartiality are at the heart of our values and ethics at FINTRAC. For more than one hundred years, these values have served as the foundation for all public sector work.

As the impartiality of public sector employees is key, it is important for us to be aware of our duty of loyalty and our responsibility to ensure that any real, apparent or potential conflict that arises between our private activities and our official responsibilities as public servants is resolved in the public interest.

At FINTRAC, our ability to detect and deter money laundering and terrorist financing contributes to the public safety of Canadians and helps to protect the integrity of Canada's financial system. The sensitive nature of this mandate requires a high level of professionalism from our employees as well as behaviour that upholds the highest ethical standards.

This new FINTRAC Code of Conduct, Values and Ethics is based on the *Values and Ethics Code for the Public Sector* as well as our business needs and takes into account feedback received from our own employees. Further, our Code outlines obligations specific to our employees regarding conflict of interest and post-employment.

Accepting and adhering to the FINTRAC Code of Conduct, Values and Ethics is a condition of your employment and it is therefore important that you understand and comply with the expectations it prescribes. You can take pride in knowing that as you do this, you are strengthening our ethical culture at FINTRAC and that of the public sector in general.



Darlene Boileau
Acting Director
Champion, Values and Ethics

INTRODUCTION

Background

For some time, the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC, the Centre) has had its own Code of Conduct and Ethics that every employee has been required to accept as a condition of employment. At the same time, employees have also historically been required to abide by the Values and Ethics Code for the Public Service, although given the Centre's standing as a separate agency outside the definition of the public service, this practice was established at FINTRAC strictly on a voluntary basis.

The [Public Servants Disclosure Protection Act \(PSDPA\)](#) now requires that the Treasury Board establish a code of conduct directly applicable to the entire public sector, including separate agencies such as FINTRAC. The PSDPA also requires chief executives of public sector organizations such as the Director of FINTRAC, to establish codes of conduct applicable to their specific work environments and mandates. These organizational codes of conduct must be consistent with the Public Sector Code.

As a result of the PSDPA requirements, a new [Values and Ethics Code for the Public Sector \(VECPS\)](#) came into effect on April 2, 2012. The VECPS immediately became a condition of employment for all FINTRAC employees alongside the existing FINTRAC Code of Conduct and Ethics.

In the interests of clarifying obligations for employees, the *Values and Ethics Code for the Public Sector* and the FINTRAC Code of Conduct and Ethics have now been streamlined into a new hybrid code for FINTRAC. This new FINTRAC Code of Conduct, Values and Ethics addresses FINTRAC's obligations under the PSDPA and the VECPS and incorporates the values and ethics obligations for FINTRAC employees into one document.

The Role of Federal Public Servants

Federal public servants have a fundamental role to play in serving Canadians, their communities and the public interest under the direction of the elected government and in accordance with the law. As dedicated professionals whose work is essential to Canada's well-being and the enduring strength of the Canadian democracy, public servants uphold the public trust.

The Constitution of Canada and the principles of responsible government provide the foundation for the role, responsibilities and values of the federal public sector. Constitutional conventions of ministerial responsibility prescribe the appropriate relationships among ministers, parliamentarians, public servants and the public. A professional and non-partisan federal public sector is integral to our democracy.

The Role of Ministers

Ministers are also responsible for preserving public trust and confidence in the integrity of management and operations within public sector organizations and for respecting the tradition of a professional non-partisan federal public sector. Furthermore, Ministers play a critical role in the ability of public servants to provide professional and frank advice.

FINTRAC Context

The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC, the Centre) was established in July 2000 as an independent agency with a mandate to collect, analyze, assess and disclose information in order to assist in the detection, prevention and deterrence of money laundering. In December 2001, this mandate was extended to include the detection, prevention and deterrence of the financing of terrorist activities.

FINTRAC regards its employees highly for the professional and personal competencies they bring to the Centre. It is expected that in fulfilling their responsibilities under the FINTRAC mandate, employees will act in a manner that at all times involves thinking through the possible impact of their actions and decisions in terms of what is right and fair and how their actions and decisions will be perceived by others, including partners, colleagues and the public.

OBJECTIVES

This Code outlines the values and expected behaviours that guide FINTRAC employees in all activities related to their professional duties and establishes responsibilities regarding conflicts of interest and post-employment. By committing to these values and adhering to the expected behaviours, FINTRAC employees will strengthen the ethical culture of the Centre and contribute to public confidence in the integrity of FINTRAC and all public institutions.

APPLICATION

Acceptance of this Code and adherence to its values, expected behaviours and responsibilities, is a condition of employment for every FINTRAC employee regardless of their level or position and includes terms, students, part-time employees and employees on leave without pay. Interchange participants, contractors and individuals from other organizations (such as Shared Services Canada) working at the Centre are also expected to comply with this Code.

A breach of this Code may result in disciplinary measures being taken, up to and including termination of employment, contracts, other service agreements, or Interchange assignments.

The FINTRAC Code of Conduct, Values and Ethics is effective June 11, 2012.

VALUES and EXPECTED BEHAVIOURS

These values are a compass to guide FINTRAC employees in everything they do. They cannot be considered in isolation from each other as they will often overlap. At FINTRAC, the manner in which we achieve our goals is as important as the results we achieve. Ethical behaviour is therefore a critical success factor.

FINTRAC employees are expected to take steps to integrate these values into their day-to-day decisions and actions, as well as the policies, processes and systems they develop. Further, they are expected to conduct themselves in accordance with the expected behaviours listed for each value. At the same time, FINTRAC employees can expect to be treated in accordance with these values by their managers and colleagues at the Centre.

1. Respect for Democracy

The system of Canadian parliamentary democracy and its institutions are fundamental to serving the public interest. FINTRAC employees recognize that elected officials are accountable to Parliament, and ultimately to the Canadian people, and that a non-partisan public sector is essential to our democratic system.

FINTRAC employees shall uphold the Canadian Parliamentary democracy and its institutions by:

- 1.1 Respecting the rule of law and carrying out their duties in accordance with legislation, policies and directives in a non-partisan and objective manner;
- 1.2 Loyal carrying out the lawful decisions of their leaders and supporting Ministers in their accountability to Parliament and Canadians;
- 1.3 Providing decision-makers with all the information, analysis and advice they need, always striving to be open, candid and impartial.

2. Respect for People

Treating all people with respect, dignity and fairness is fundamental to our relationship with the Canadian public and contributes to a safe and healthy work environment that promotes engagement, openness and transparency. The diversity of our people and the ideas they generate are the source of our innovation.

FINTRAC employees shall respect human dignity and the value of every person by:

- 2.1 Treating every person with respect, fairness and courtesy;
- 2.2 Valuing diversity and the benefit of combining the unique qualities and strengths inherent in a diverse workforce;
- 2.3 Helping to create and maintain safe and healthy workplaces that are free from harassment and discrimination, as outlined in the [Occupational Health and Safety Policy](#) and the [Policy on the Prevention and Resolution of Conflict and Harassment](#).
- 2.4 Working together in a spirit of openness, honesty and transparency that encourages engagement, collaboration and respectful communication. In particular, FINTRAC employees shall promote a team spirit, encouraging the sharing of thoughts and opinions.

3. Integrity

Integrity is the cornerstone of good governance and democracy. By upholding the highest ethical standards, FINTRAC employees conserve and enhance public confidence in the honesty, fairness and impartiality of the federal public sector.

FINTRAC employees shall serve the public interest by:

- 3.1 Acting at all times with integrity, and in a manner that will bear the closest public scrutiny; an obligation that may not be fully satisfied by simply acting within the law;
- 3.2 Never using their official roles to inappropriately obtain an advantage for themselves or to advantage or disadvantage others;
- 3.3 Taking all possible steps to prevent and resolve any real, apparent or potential conflicts of interest between their official responsibilities and their private affairs in favour of the public interest, which may mean removing themselves from certain situations or activities;
- 3.4 Acting in such a way as to maintain their employer's trust and the high degree of personal integrity and suitability required to work at FINTRAC;
- 3.5 Making decisions transparently and applying rules and regulations consistently.

4. Stewardship

FINTRAC employees are entrusted to use and care for public resources responsibly, for both the short-term and long-term.

FINTRAC employees shall responsibly use resources by:

- 4.1 Effectively and efficiently using the public money, property and resources managed by them, ensuring these are used in the public interest;
- 4.2 Considering the present and long-term effects that their actions have on people and the environment;
- 4.3 Acquiring, preserving and sharing knowledge and information as appropriate, protecting and disposing of FINTRAC information appropriately.

5. Excellence

Excellence in the design and delivery of public sector policy, programs and services is beneficial to every aspect of Canadian life. Positive engagement, collaboration, effective teamwork and professional development are all essential to a high-performing organization.

FINTRAC employees shall demonstrate professional excellence by:

- 5.1 Providing fair, timely, efficient and effective services that respect Canada's official languages;
- 5.2 Continually improving the quality of policies, programs and services they provide to Canadians and other parts of the public sector;
- 5.3 Fostering a work environment that promotes teamwork, learning and innovation;
- 5.4 Regularly assessing their strengths, weaknesses and professional needs and undertaking professional development in order to improve their contribution to the Centre.

DUTIES AND OBLIGATIONS

Treasury Board Secretariat

In support of the President of the Treasury Board's responsibilities under section 4 of the [PSDPA](#), the Office of the Chief Human Resources Officer (OCHRO) is responsible for promoting ethical practices in the public sector and may issue directives, standards and guidelines related to this Code.

The OCHRO will work together with FINTRAC to implement and promote this Code, and will provide advice to the Director and the designated senior officer for disclosure with respect to its interpretation. Further, the OCHRO will monitor the implementation of this Code at FINTRAC with a view to assessing whether the stated objectives have been achieved.

Public Service Commission

The Public Service Commission is responsible for administering certain provisions related to political activities in accordance with Part 7 of the *Public Service Employment Act* ([PSEA](#)); this part of the PSEA applies to FINTRAC.

Office of the Public Sector Integrity Commissioner

The Office of the Public Sector Integrity Commissioner of Canada provides a safe and confidential mechanism enabling public servants and the general public to disclose wrongdoings committed in the public sector. It also protects from reprisal public servants who have disclosed wrongdoing and those who have cooperated in investigations. The Office's goal is to enhance public confidence in public institutions and in the integrity of public servants.

Director of FINTRAC

As the Chief executive of a public sector organization, the Director of FINTRAC has specific responsibilities under the PSDPA, including establishing a code of conduct, and an overall responsibility for fostering a positive culture of values and ethics at the Centre.

The Director ensures that employees are aware of their obligations under this Code and that they can obtain appropriate advice within the Centre on ethical issues, including possible conflicts of interest. The Director is also responsible for ensuring non-partisanship in the provision of programs and services by the Centre.

The Director is subject to this Code and to the [Conflict of Interest Act](#).

Senior Officer for Disclosure

The Chief Human Resources Officer at FINTRAC is the designated senior officer for disclosure at the Centre. The senior officer helps promote a positive environment for disclosing wrongdoing and deals with disclosures of wrongdoing made by the Centre's employees. The senior officer is also responsible for supporting the Director of FINTRAC in meeting the requirements of the PSDPA.

The senior officer's duties and powers within the Centre also include the following, in accordance with the internal disclosure procedures established under the PSDPA:

- Provide information, advice and guidance to employees regarding the Centre's internal disclosure procedures, including the making of disclosures, the conduct of investigations into disclosures, and the handling of disclosures made to managers;
- Receive and record disclosures and review them to establish whether there are sufficient grounds for further action under the PSDPA;
- Manage investigations into disclosures, including determining whether to deal with a disclosure under the PSDPA, initiate an investigation or cease an investigation;
- Coordinate handling of a disclosure with the senior officer of another federal public sector organization, if a disclosure or an investigation into a disclosure involves that other organization;
- Notify the person(s) who made a disclosure in writing of the outcome of any review and/or investigation into the disclosure and on the status of actions taken on the disclosure, as appropriate;
- Report the findings of investigations, as well as any systemic problems that may give rise to wrongdoing, directly to the Director, with recommendations for corrective action, if any.

Champion, Values and Ethics

The FINTRAC Values and Ethics Champion serves as chair of the Values and Ethics Committee and supports the promotion of values and ethics initiatives at the Centre. The Champion also brings forward issues, concerns and proposed solutions to the Centre's Executive Committee (EXCO).

Managers

Managers have a particular responsibility to exemplify the values and behaviours outlined in this Code and to comply at all times with its requirements and spirit. Additionally, managers are expected to:

- Build an environment of trust and understanding;
- Encourage an ongoing dialogue on values and ethics in a manner that is relevant to the specific issues and challenges encountered by employees;
- Provide support and guidance to employees in the application of this Code;
- Promote a positive, confidential environment for employees to discuss ethical issues and concerns;
- Resolve issues in favour of the public interest.

Employees

All employees are expected to abide by this Code and demonstrate its values and expected behaviours in their actions. Further, employees are expected to:

- Respect the provisions and specific conduct requirements contained in FINTRAC policies as well as the statutes governing their profession and their work at FINTRAC;

- Sign a Solemn Affirmation requiring them to fully respect the confidentiality of information obtained through their positions;
- Seek help when faced with an ethical issue or dilemma.

Safeguarding of Information

[The Proceeds of Crime \(Money Laundering\) and Terrorist Financing Act](#) (PCMLTFA) strikes a careful balance between the privacy rights of Canadians and the needs of law enforcement and security intelligence agencies. It upholds the principles outlined in the [Canadian Charter of Rights and Freedoms](#) and the [Privacy Act](#), and contains numerous provisions specifically designed to protect the privacy of individuals.

Protecting the privacy of the information collected and stored by the Centre is critical to the integrity of FINTRAC. Employees are responsible for ensuring that information created, stored, transported, transmitted or disposed of is dealt with in a manner consistent with the PCMLTFA and the Centre's [Privacy Policy](#), [Policy on Security](#), and [Information Management Policy](#).

Subject to the exceptions set out in the PCMLTFA, the Centre and its employees are prohibited from disclosing any information contained in a report received or any other information used for its analysis. Further, information can only be used for the purpose of exercising official powers, duties and functions. Offences for unauthorized disclosure or inappropriate use of information are serious and the penalties associated with such offences are significant and can include up to five years in prison and/or a fine of up to \$500,000.

As an example, the policy on [Communicating with Law Enforcement, Other Government Departments, and the Public During Outreach Activities](#) states:

- *Any FINTRAC employee (with the exception of FAD Personnel) attending a meeting with law enforcement, other government institutions or agencies, FIUs or the public must ensure that the topics of discussion must be of a general nature and cannot include discussions on a specific investigation, specific person or specific disclosure.*
- *Any FAD personnel attending a meeting with a voluntary information provider and disclosure recipients must ensure that topics of discussion must be within the limits of disclosure information.*

Employees must also understand that information collected by the Centre may only be shared with another employee in the Centre where a need to know basis has been established and where the employee possesses the appropriate level of security clearance. 'Need to know' means that there is a justifiable and defensible rationale for why the employee needs the information. Simply believing that the information would be interesting to another employee is not sufficient. In addition to this general rule, compliance information is subject to specific prohibitions on use and disclosure under the PCMLTFA. Within the confines of the PCMLTFA, the [Corporate Policy on the Provision of Information between FINTRAC's Compliance Program and Financial Intelligence Program](#) provides further guidance on information sharing.

The [Access to Information Act](#) (ATI) gives Canadian citizens and permanent residents access to information held in federal government records. If an employee contravenes section 67.1 of the ATI by destroying, altering, falsifying or concealing a record, or directing anyone to do so, with the intent of obstructing the right of access, he or she could be subject to imprisonment, a fine, or both.

Publication of Material

Prior to publishing any material that relates to the mandate of the Centre or draws on information or knowledge acquired as an employee of the Centre, or in any way associates the Centre with the material to be published, employees must submit the proposed material to their manager for a determination regarding whether or not the material may be published. Examples of such material could include the following:

- Material disclosing information held by the Centre;
- Material referencing processes or equipment used by the Centre;
- Materials referencing relationships between the Centre and entities concerned;
- Academic theses;
- Co-op placement reports;
- Fictional materials;
- Promotional materials.

While not published materials as such, resumes and similar documents describing work experience at the Centre, may reach external audiences and must therefore be carefully constructed so as not to divulge sensitive information.

Publicly Commenting for FINTRAC

Only designated spokespersons may issue statements or make comments about the Centre's position on a given subject. Employees must refer any such enquiries to the Centre's Communications Unit.

Public Criticism of FINTRAC

A duty of loyalty is reflected throughout this Code and is integral to maintaining a professional and non-partisan public sector. The duty of loyalty owed by employees includes a duty to refrain from public criticism of FINTRAC and the Government of Canada in all but the most exceptional circumstances.

Employees are therefore advised not to make, through any public medium, either directly or through a third party, any public statements critical of the Centre, including its employees. Similarly, employees are advised not to make public statements on matters of current political controversy where such statements could have a negative impact on the integrity of FINTRAC.

Employees should present any criticism or concerns they may have to their manager, or, alternatively to their Assistant Director, Deputy Director, or the Chief Human Resources Officer at FINTRAC.

Off-duty Conduct

Off-duty conduct is usually a completely private matter. However, there are some circumstances where off-duty conduct is relevant to the Centre.

The Centre has a legitimate interest in knowing when employees may have engaged in conduct that could be found to be illegal as such actions could have an impact on their ability to do their job. In addition, there may be situations where off-duty conduct, while

legal, may nevertheless be inappropriate in that it may negatively affect the integrity of the Centre or impair the employee's performance. In particular, the Centre must be, and **must be seen to be**, free from corruption or taint. As an example, it would not be acceptable for an employee to have an association with members of organized crime.

It is therefore important for employees to disclose to their manager and the Manager, Security, any off-duty matter which may have an impact on the integrity of the Centre or their employment, for review and action as appropriate.

As outlined in the FINTRAC [Policy on Security](#), employees who have been or believe they will be charged with an offence under an Act of Parliament or any Provincial Act (other than an offence that is solely punishable by a fine) must immediately disclose the information to the Manager, Security.

CONFLICT OF INTEREST

A conflict of interest arises whenever an employee allows personal interests, relationships, assets, liabilities or outside activities to impair his or her ability to make decisions with integrity and honesty, in the best interests of the Centre and the public sector.

A **real** conflict of interest exists at the present time, an **apparent** conflict of interest could be perceived by a reasonable observer to exist, whether or not it is the case, and a **potential** conflict of interest could reasonably be foreseen to exist in the future.

Employees must not use their positions to influence or bypass the Centre's procedures for personal gain, or for the benefit of others, including their families, friends or colleagues.

It is each employee's responsibility to use his or her best judgement in the full context of this Code to avoid situations that may lead to a real, apparent or potential conflict of interest.

Requirement to Report

Employees are required to report in writing to the Chief Human Resources Officer at FINTRAC, all personal interests, relationships, assets, liabilities, outside employment and activities that may give rise to a real, apparent or potential conflict of interest in relation to their official duties at the Centre. Such a report is to be submitted using the [Confidential Report](#) form, and must be made within 60 days of an employee's initial appointment, transfer or assignment to the Centre.

On a regular basis thereafter, and every time a major change occurs in their personal affairs or official duties, every employee is required to review his or her obligations under this Code. If a real, apparent or potential conflict of interest exists, he or she must file a new Confidential Report in a timely manner.

Staffing

Employees who are involved in the selection and hiring of individuals must not be closely related to, or share a close relationship with any candidates or have any other ties that could, or could be seen by an objective observer to, give rise to concerns regarding preferential treatment or which could hinder their ability to treat candidates in an impartial manner.

This does not restrict the ability of individuals who are closely related to an employee or with whom the employee shares a close relationship to be considered for employment at the Centre. However, it is expected that the employee would immediately disclose the relationship to his or her manager.

Reporting Relationships

A conflict of interest would exist in circumstances where an employee is supervising or auditing the work of a person with whom he or she shares a close relationship, whether based on family status or otherwise.

Gifts, Hospitality and Other Benefits

The following provisions are designed to ensure that this Code is consistent with section 121(1)(c) of the Criminal Code, which states:

...everyone commits an offence who, being an official or employee of the government, demands, accepts, or offers or agrees to accept, from a person who has dealings with the government, a commission, reward, advantage or benefit of any kind directly or indirectly, by himself or through a member of his family or through any one for his benefit, unless he has the consent in writing of the head of the branch of government that employs him or of which he is an official, the proof of which lies on him.

Employees shall not accept any gifts, hospitality or other benefits that may have a real, apparent or potential influence on their objectivity in carrying out their official duties or that may place them under obligation or perceived obligation to the donor. This includes free or discounted admission to sporting and cultural events arising out of an actual or potential business relationship directly relating to the employee's official duties.

The acceptance of gifts, hospitality and other benefits is permissible if they:

- Are infrequent and of minimal value (e.g. low-cost promotional objects, simple meals, souvenirs with no cash value);
- Arise out of activities or events related to the official duties of the employee;
- Are within the normal standards of courtesy, hospitality or protocol;
- Do not compromise or appear to compromise in any way the integrity of the employee concerned or FINTRAC.

Aside from the exceptions noted above, employees must immediately report to their manager any gift, benefit, advantage, hospitality or favour that they or their immediate family have been offered or have received in the course of their work. The manager will assess a number of factors such as the value and nature of the gift and the circumstances in which it was made when deciding whether the gift will be politely refused or returned, donated to charity, or retained by the employee or the Centre.

Employees may not solicit gifts, hospitality, other benefits or transfers of economic value from a person, group or organization in the private sector who has dealings with government.

Duty of the Centre to Act at Arm's Length

The PCMLTFA establishes that the Centre is an independent agency that acts at arm's length from law enforcement agencies and other entities to which it is authorized to disclose information. This means that such agencies and entities must not direct or interfere or be reasonably perceived as directing or interfering with the decision-making processes and operations of the Centre.

Within this relatively broad framework, employees may find themselves faced with situations which may encroach or be perceived as encroaching on the Centre's independence. As an example, an employee may be asked by a law enforcement agency or reporting entity to provide training or expertise on a particular subject. In such cases, employees must present the request to their manager for a determination regarding the appropriateness of the activity.

Outside Activities

Employees of the Centre are expected to devote their efforts to the attainment of the goals and objectives of the Centre. Nevertheless, outside employment and involvement in outside activities are not prohibited, provided that such endeavours do not detract from an employee's capacity to perform his or her duties with the Centre, that they are not in a real, apparent or potential conflict with the mandate of the Centre and that they do not diminish the Centre's integrity. If there is any doubt, employees should seek the guidance of their manager.

The Centre is committed to being a responsible corporate citizen. This includes encouraging and recognizing the efforts of employees participating in volunteer and community-based organizations where such activities do not conflict with the mandate of the Centre and this Code.

Political Activities

As Canadian citizens, employees are entitled to express themselves freely and to participate in political activities, but as public servants, employees must use discretion and judgment in doing so to ensure the activity does not impair or is not perceived to impair, their ability to perform their duties in a politically impartial manner. Further, if taking part in political activities, employees must:

- Ensure that information received as an employee is not made public;
- Ensure that views expressed are identified as those of an individual and not those of FINTRAC.

Any employee considering involvement in political activity must refer to the FINTRAC policy on [Political Activities](#) and if applicable, seek the advice of the Chief Human Resources Officer at FINTRAC. Further information regarding employee involvement in political activities may be found on the Public Service Commission's [Political Activities web page](#).

POST-EMPLOYMENT

All employees have a responsibility to minimize the possibility of a real, apparent or potential conflict of interest between their most recent responsibilities within FINTRAC and their subsequent employment or other activities outside the Centre.

Before leaving their employment with the Centre and before making any commitments, all employees are to disclose their intentions regarding any future employment or activities that may pose a risk of real, apparent or potential conflicts of interest with their current responsibilities and discuss these possibilities with their manager.

AVENUES for RESOLUTION and DISCLOSURE

The expected behaviours identified in this Code are not intended to respond to every possible ethical issue that might arise in the course of a FINTRAC employee's daily work. When these issues arise, even if they are seemingly small, employees are encouraged to discuss and resolve the matter with their immediate manager. In cases where this is not possible, employees may seek guidance from the next level of management or from the designated senior officer for disclosure at FINTRAC.

Employees at all levels are expected to resolve issues in a fair and respectful manner and consider using informal processes such as those reflected in the FINTRAC *Policy on the Prevention and Resolution of Conflict and Harassment* as a first step.

As provided by Sections 12 and 13 of the Public Servants Disclosure Protection Act (PSDPA), if employees have information that could indicate a **serious breach** of this Code, they can bring this matter, in confidence and without fear of reprisal, to the attention of the Chief Human Resources Officer as the designated senior officer for disclosure at FINTRAC, or the [Public Sector Integrity Commissioner](#).

Members of the public who have reason to believe that a FINTRAC employee has not acted in accordance with this Code can bring the matter to the Chief Human Resources Officer as the designated senior officer for disclosure at FINTRAC or to the [Public Sector Integrity Commissioner](#) to disclose a serious breach of this Code.

COMPANION POLICIES

[FINTRAC Privacy Policy](#)

[FINTRAC Policy on Security](#)

[FINTRAC Information Management Policy](#)

[FINTRAC Policy on Political Activities](#)

[FINTRAC Policy on the Prevention and Resolution of Conflict and Harassment](#)

[FINTRAC Policy on Occupational Health and Safety](#)

[Communicating with Law Enforcement, Other Government Departments, and the Public During Outreach Activities](#)

[Corporate Policy on the Provision of Information between FINTRAC's Compliance Program and Financial Intelligence Program](#)

REFERENCES

Values and Ethics Code for the Public Sector

Public Servants Disclosure Protection Act

Proceeds of Crime (Money Laundering) and Terrorist Financing Act

Public Service Employment Act

Privacy Act

Access to Information Act

Conflict of Interest Act

Criminal Code

ENQUIRIES

General enquiries related to this Code may be directed to the [Human Resources Advisor](#) responsible for Values and Ethics at the Centre.