



Canada China Business Council  
Conseil d'affaires Canada-Chine  
加中贸易理事会

**Canada – China Business Council**  
**Corporate Social Responsibility Guidelines**

Feb 26/2016

Contact: Chris Twigge-Molecey  
Email: [ctwigge-molecey@hatch.ca](mailto:ctwigge-molecey@hatch.ca)

---

Toronto  
多伦多

Vancouver  
温哥华

Montreal  
蒙特利尔

Calgary  
卡尔加里

Beijing  
北京

Shanghai  
上海

[www.ccbc.com](http://www.ccbc.com)



## CCBC Corporate Social Responsibility Guidelines

### Background and Introduction

Trade between Canada and China continues to grow.

Canada has been the recipient of considerable investment from China and a growing trade in goods and services sold into Canada. Canada also continues to be a major source of purchased materials and agricultural products as well as an investment opportunity in clean-tech, manufacturing, banking, real estate, mining and insurance.

For Chinese companies investing in Canada, or carrying out other commercial transactions in Canada, an awareness of the very different cultures, business practices, legal systems and roles of government is critical to success.

In Canada, there is a different understanding than in China of a corporation's responsibilities, objectives and relationships to society and the various levels of government.

The pages that follow have been developed by the CCBC to help potential investors in, and traders with, Canada find useful resource materials and to ask the right questions of their potential partners, acquisition targets or suppliers. Corporate social responsibility (CSR) has been interpreted very broadly here to also include issues surrounding bribery, corruption and lobbying government.

Further it has been found that publicly listed companies with well implemented CSR programs generally have superior stock performance to their peers.

There are growing expectations that companies abide by globally accepted CSR principles and practices, such as ISO 26000, and this is no different in Canada.

### How Should You Use This "Guide"?

This guide is intended to highlight key aspects of CSR that companies should consider with regards to their business in Canada, and provide tips on how to address these aspects. This is not an exhaustive list or detailed roadmap, but rather a series of questions that companies need to think about to achieve the CSR-related performance that will allow them to meet local stakeholder expectations as well as their own corporate objectives. Stakeholders in Canada can include shareholders, employees, suppliers, regulators and depending upon the business, neighbours. For most businesses the three levels of government are not involved beyond developing and enforcing laws and regulations as well as occasionally offering incentives for investment and job creation.

This guide will refer you to many resources that can help you better understand:

- the regulatory framework for CSR requirements in Canada;
- international guidelines for CSR; and
- best practices for implementing and reporting on CSR strategies.

A list of useful CSR sources is included in the appendix.



It is also important to fully understand and respect the UN Guiding Principles on Business and Human Rights, The OECD Guidelines for Multinational Enterprises, the IFC Environmental and Social Performance Standards, ISO 26000:2010 (Social Responsibility), The Extractive Industries Transparency Initiative, The Equator Principles and the Global Reporting Initiative. See appendix for specific websites.

### **Canadian Government Structure and the Court System**

In Canada, a key element of the government system is the independence of the judiciary from the government and the bureaucracy. While various levels of government can, and do, encourage investment within their jurisdiction, they have no means to stop a project that complies with all relevant regulations. However, individual citizens, citizens groups, NGOs or other companies can hold up a project or investment under certain circumstances by challenging it in an appropriate court or regulatory body. When a case is before the court the government cannot influence the outcome of the proceedings, other than, if it is a party to the lawsuit, by way of presentation of its case in the same manner as any other litigant.

While physical protests to projects are relatively rare in Canada, they typically result from poor stakeholder engagement practices. This is further discussed below. Court challenges can occur for a range of reasons, including misunderstanding of shareholder rights, in particular those of minority shareholders.

### **Jurisdiction and Overlaps**

In Canada, as in many countries, responsibilities are constitutionally allocated to either the federal government or to the provinces and territories. This can be very confusing and local legal advice is critical to ensure the appropriate licences, approvals and permits are obtained. A few examples are:

- Stock exchange regulation is a provincial responsibility. While the Canadian Securities Administrators co-ordinates initiatives on a cross-Canada basis, provincial or territorial regulators handle all complaints regarding securities violations in their respective jurisdictions.
- Environmental permitting can be federal, provincial, and/or municipal depending on the project. Permits and approvals from all three levels of government will often be required on a project.
- Building permits are a municipal responsibility with the provinces typically controlling standards and setting the policy for regional development plans. There is also a National Building Code that must be followed.
- Insurance is both a provincial and a federal jurisdiction.
- Provision of utilities is normally commercial in nature but may be provided by government owned entities ("Crown corporations").
- Most employers are provincially regulated for employment and labour law purposes.
- Immigration and work permits, with the exception of Quebec, are a federal responsibility.
- Company registration can be provincial or federal.
- All military and customs activities are federal.
- Policing can be municipal, provincial or federal.
- Foreign policy is federal.
- Competition law and foreign investment laws are federal.
- Taxation is a federal, provincial, territorial and municipal responsibility.



An added complication in some regions is the need to understand, respect and accommodate the rights of Aboriginal communities. These are discussed in a later section, but for now it is important to recognize that Aboriginal groups have constitutional rights, including property rights (title), treaty rights conferred through both historical and modern treaties, and other specific rights, including the right to hunt, fish and harvest in traditional territories. Aboriginal groups across Canada may have different rights and projects that may threaten those rights require a negotiated approach.

Tips:

- The Government of Canada, each province or territory and most cities and towns maintain websites that hold extensive information for investors, including, normally, a contact for advice about local regulations.
- Competent local legal advice is always required.
- Recognize that the culture and ways of doing business can vary substantially between provinces and territories and rely on knowledgeable local staff to guide you.

**Corporate Governance**

The roles and responsibilities of corporate directors are extensively defined by case law and regulation. Directors of a corporation are responsible for the proper governance of the entity, including all controlled overseas subsidiaries. Directors can be liable for failing to fulfill certain obligations under regulatory statutes or for the conduct of others (including the corporation) under certain circumstances. For instance, under corporate statutes, a director is liable to employees of the corporation for wages (if incurred while the director was in office). Recent regulation has made directors criminally liable for any corrupt practices by, or on behalf of the organization, both within Canada and globally. *The Extractive Sector Transparency Measures Act* requires that all payments to governments within Canada or overseas by Canadian listed companies must be properly reported if they exceed \$100,000. This includes payments to Aboriginal groups starting in 2017.

Tips:

- Check with The Institute of Corporate Directors for guidance on current roles and responsibilities of directors. They provide access to courses and literature related to corporate governance and the functions of a director.

**Labour, Employment, Environment, Health and Safety Practices**

The labour and employment laws can be very complex, especially around worker health, safety and safety training.

Labour unions in some sectors and regions are key partners in business success. The local labour regulations about union formation and procedures, roles and responsibilities must be understood, adhered to and accommodated. Minimum employment standards legislation as it applies to union and non-union employees must also be understood, adhered to and accommodated.

There is also a temporary worker program that allows companies to import key workers if it is clearly demonstrated that their skills are not available in Canada. This program is very politically sensitive currently and subject to regulatory change.



Key Questions:

- What are the legal requirements in the applicable jurisdiction for minimum pay, overtime, vacations, bonuses, benefits and environment, health and safety (EHS) performance, and what systems do you have in place to regularly review these requirements for your operations?
- What are the international and local pressures for labour and employment practices and performance in your sector, and what are the expectations from shareholders and other stakeholders with regards to EHS performance for your operations and those of your supply chain or partners?
- How can you assess EHS systems, training, and equipment?
- How can you assess current practices within your or your partner or supplier operations, with regards to working conditions, wages and overtime, benefits, etc.? Can you demonstrate acceptable, compliant operations in other countries?
- How are you tracking and communicating your labour and employment practices and EHS performance to your shareholders and other stakeholders?
- How will you work with the labour unions if required?

Tips:

- Ensure you get professional, specialized local advice.
- Invest in your CSR managers, EHS managers, Industrial Relations (IR) staff and inspectors. There are many individuals with experience in CSR, IR and EHS standards and there are also independent inspectors that can be hired. This is particularly important for construction projects.
- While paperwork may indicate the existence of appropriate systems, there is no substitute for field inspections and audits by your own staff to ensure proper implementation.
- Assessments and audits of labour and employment practices should focus on performance as well as systems in place. Instead of asking 'What Personal Protective Equipment (PPE) is used by workers?', it is more instructive to understand and document what PPE training exists for workers; what corrective measures exist for non-compliance; and the current state of PPE use and condition during audits.

**Supply Chain Management**

If you are sourcing from China or Canada or selling to Canadian buyers, you need to demonstrate your products were made in a way that is consistent with the CSR policies and values of all parties involved. That means rigorous supplier assessments and continuous monitoring of compliance with all labor standards, including EHS standards.

If you will be operating in a region with Aboriginal groups it is important to understand any agreements they may have with the local or federal government concerning the distribution of benefits from development. These will have to be integrated into your plans.

Key Questions:

- Do you have qualified staff visiting your suppliers to assess them?
- How are you tracking and verifying supplier and partner performance?
- What can you expect with regards to access to records and official documentation?
- How can you best assess a supplier's environmental practices?
- Are your inspectors adequately trained in assessing EHS performance?



#### Tips:

- **Clarify your expectations.** List the standards and norms you expect your suppliers to meet, and describe in precise detail how your inspectors can verify compliance, and what deliverables and documentation are expected to document this compliance. Insist on the right to conduct random inspections.
- **Localize your process for the Canadian regional context.** Supplier assessment and auditing questionnaires should be developed in partnership with inspectors who understand what the CSR performance requirements are, how they can assess a vendor's performance in these areas, and why this is important.
- **Ask the right questions.** Your inspection of suppliers should focus on processes instead of just results. What systems are in place to document compliance with all applicable environmental, employment and safety laws?
- **Check the payroll records.** It is important to ensure overtime and vacation pay is properly recorded and administered. It is also important to check that statutory deductions for various items, including taxes and pensions, are being remitted to the appropriate authorities as well as holiday entitlements being accrued.
- **Pictures are worth 1000 words.** Rely on photographs taken during inspections as much as official documents or certificates. Be sure to photograph the systems they use, as well as the state of critical infrastructure and equipment.
- **Look outside the gates.** Are there signs of visible pollution into the air or waterways near the supplier? Does the supplier document its disposal of hazardous or polluting substances? Check public enforcement records (which are readily available, usually on line). Check with peers and sub-suppliers or customers of the supplier you are investigating. If conducting a field audit for environmental compliance, avoid being taken on a "red carpet tour" of the facility. Insist on inspecting out of the way parts of the property. Assessments and audits should focus on both performance and systems.

#### **Stakeholder Engagement (particularly for construction and capital projects)**

Companies looking to access a new market, access land or start a new operational site in Canada have to consider stakeholder engagement as a primary task to understand the impacts of their commercial activity. Stakeholder's perceptions and first impressions, the related expectations and the evolution of relationships define a sensitive issue that can affect a company's ability to manage risk, avoid project delays and secure stability in project development.

Stakeholder engagement is not a philanthropic activity, in which the company spends money in charitable activities to later be used for marketing or public relations purposes, presenting the company as a social responsible citizen.

Stakeholder engagement is the professional approach to risk management and operational stability. Professionals work in mapping stakeholders and their relationship to the proposed activity, as well as identifying risks to the project, the environment and society. From this information, one can forecast the impacts to the project or activity and mitigating strategies can be developed and implemented. The process of stakeholder engagement should lead to sustainable solutions and relationships leading to operational efficiencies and risk mitigation that can be measured within a meaningful timeframe.

Engaging internal staff through CSR-related practices and initiatives can also boost morale and improve retention of staff. There is growing expectation that foreign enterprises support local charities and disaster relief initiatives. But, internal CSR initiatives need to be localized, and simply importing ideas



from headquarters in China may be inappropriate. For example, introducing flexible working schedules may be viewed by some Chinese human resources managers working in Canada as losing control over workers' productivity. It is very common in Canada, as is working from home in some sectors.

Key Questions:

- Do you know who your stakeholders are?
- Do you have the knowledge and resources to properly address them?
- Do you know what internal and external CSR initiatives are expected of you?
- What are the goals of your internal CSR initiatives and engagement strategies in Canada? Developing a social "licence to operate"? Retention of staff? Boosting morale? Boosting productivity? Capacity building? Meeting shareholder or other expectations? Improving government relations?
- How can you ensure buy-in, localization, ownership, and empowerment?
- Are you clearly communicating the objectives of CSR initiatives to your managers and staff?

Tips:

- Some ideas: recycling, carpooling, flex hours, disaster relief, volunteerism, education (including English or Mandarin lessons), health and wellness, raising CSR awareness.
- Establish a local committee with key representatives from Human Resources. Allow other competent staff to volunteer to join this committee. Competent, enthusiastic volunteers, as opposed to corporate appointees, will add credibility to this activity. Clearly explain the goals of internal and external CSR initiatives and explain how various initiatives have helped achieve these goals. Determine with input from committee members what the goals of CSR are for the Canadian operations, and then determine which programs will meet these goals. Establish a budget, assign roles and responsibilities, and communicate progress to all staff.

**Aboriginal Issues**

Aboriginal communities, which include First Nations, Métis, and Inuit communities, have a unique and complex social and economic status within Canada, which requires special consideration.

Aboriginal groups have constitutional rights, which may include property rights (title), treaty rights pursuant to historical or modern treaties, and other rights, including the right to hunt, fish or harvest in traditional territories. Where a government contemplates conduct that might adversely impact asserted or proven Aboriginal rights, such as the issuance of a permit or approval for a project, Aboriginal groups must be consulted and, if necessary, accommodated. While the government has the duty to consult, typically, the consultation and, if necessary, accommodation is done by industry.

Aboriginal issues may be relevant anywhere in Canada but are especially relevant for companies looking to invest in Northern Canada, as well as for companies focused on the mining and development of natural resources. As economic growth in Canada's northern region has expanded, political responsibilities in respect of onshore lands, resources, and other areas have been transferred from the federal government to local territorial governments, in a process called "devolution". As these local governments are elected by a population with a significant Aboriginal presence, Aboriginal communities have a unique and significant level of political and regulatory influence in determining the region's





economic development. Foreign investors need to learn about this process of devolution – both the opportunities it creates and the challenges it presents – in order to achieve their business objectives. It is crucial that companies familiarize themselves with Aboriginal issues by engaging with an experienced local firm, which can help navigate the relationship between Aboriginal communities, governments, and businesses. There are several issues to consider.

Key Questions:

- What Aboriginal communities will your investment likely impact, and what are the particular attributes and histories of these communities?
- Is it likely that your company will be required to consult and, if necessary, accommodate affected communities? Do you understand the respective responsibilities of the federal government, provincial or territorial government, and your company with respect to consultation and engagement?
- Are there any unsettled legal/territorial claims in the area surrounding the proposed business?
- Is there newly decided case law which addresses Aboriginal title/treaty rights?
- Are there any local Impact Benefit Agreements or equivalent with local groups that might affect your business?

Tips:

- Retain the services of local, qualified, knowledgeable counsel to ensure that the company is complying with requirements related to Aboriginal consultation and engagement.
- Designate individuals or a committee whose responsibility it is to become familiar with Aboriginal consultation and engagement processes and develop an Aboriginal engagement strategy at the outset of an investment or project. Aboriginal groups increasingly expect to engage early in the project and with senior representatives from companies, so plan for the involvement of senior executives in relationship-building with Aboriginal communities.
- For resource development projects, consider proposing agreements and partnerships with Aboriginal communities that will provide meaningful benefits to these communities. Often, agreements providing these benefits will be required to accommodate Aboriginal groups. These agreements are sometimes called Impact Benefit Agreements (IBAs), Inuit Impact Benefit Agreements (IIBAs), Participation Agreements, or Cooperation Agreements, and often include provisions relating to:
  - Revenue sharing and compensation arrangements;
  - Equity investment opportunities;
  - Employment, education, and training opportunities;
  - Contracting and business opportunities; and
  - Environmental management and monitoring.
- Consider implementing CSR strategies that other companies have successfully used to enhance their relationship with the surrounding community.





### **Corruption, Lobbying and Government Relations**

Preventing and detecting bribery in business operations has become increasingly important in recent years in light of recent regulatory changes and more active enforcement by Canadian police and regulatory agencies.

It is a criminal (not civil) offence to offer a bribe to a Canadian public official in exchange for a benefit in the course of business. A bribe can take many forms (monetary or non-monetary) and may be paid directly or indirectly (e.g. via an intermediary, an agent, or to a third party). Federal and provincial conflict of interest and ethics rules also place limits on the gifts and hospitality that can be accepted by public officials. Like the United States and the United Kingdom, Canada also has laws that make corruption of foreign officials a criminal offence for Canadian companies. Some foreign oil & gas and mining companies with operations in Canada will also need to comply with new reporting requirements related to payments made to foreign and domestic governments and government officials, for example as required by the *Extractive Sector Transparency Measures Act*. Canada also has campaign finance laws that place limits on the financial contributions that can be made to political parties and candidates.

Notwithstanding these rules, Canadian businesses regularly interact with government officials to advocate their positions on a wide variety of public policy issues. To ensure that the interactions between businesses and public officials are not corrupt and remain transparent to the general public, the federal government and the governments of several Canadian provinces have adopted rules governing these communications that impose reporting and registration requirements on individuals who lobby federal or provincial government officials.

Violating Canada's anti-corruption, campaign finance and lobbying laws can result in significant fines and imprisonment as well as serious reputational damage to the individuals and companies involved.

#### Tips:

- **Develop an Anti-Corruption Compliance Program.** A company should have an ethics policy, code of conduct and/or specific anti-corruption policy that clearly spells out that both giving and receiving bribes is prohibited. The policy should state who is responsible and accountable for the compliance systems, including periodic review and updating of the policy. The compliance systems should include the training of staff on the company's policy in a way that will help staff understand how the policy applies to their activities, and a requirement that relevant staff periodically confirm in writing that they understand and will comply with the policy. The policy should also address how books and records are to be kept and what to do with regards to reporting violations. As ethical breaches and corrupt activities are, by their nature, very hard to detect, whistleblowing by staff should be encouraged with a clear policy statement that there will be no reprisals against the whistle-blower and that those who engage in reprisals will face serious consequences, including disciplinary action.
- **Get Advice.** Canada's anti-corruption and lobbying rules can be complex, so it pays to get the advice of experienced legal counsel when developing a compliance program. Similarly, foreign companies operating in Canada should obtain guidance from their Canadian advisors before approaching any Canadian government official. Reputable government relations consultants and law firms can often assist companies in approaching government officials to advocate their positions.



- **Do your Due Diligence.** Although Canada is perceived to be a country with relatively low corruption risk, anti-corruption due diligence should nevertheless be conducted on third party business partners and suppliers that interact with government officials on your company's behalf. Due diligence is required to ensure such parties are reputable and qualified to perform the services they have been retained for and to detect historic or current corruption issues. Contracts with third party business partners or suppliers should also contain appropriate anti-corruption representations and warranties.
- **A Special Case - Mergers and Acquisitions:** The acquisition of a Canadian company by a foreign investor may require that the foreign investor comply with Canada's foreign investment review legislation. This brings into play a specialized process that, depending on the circumstances, may involve a large amount of interaction with Canadian government officials. Careful planning and the involvement of experienced advisors are essential in ensuring success in this process.

### General Regulatory Compliance and Licenses

Business licenses in Canada are relatively easy to obtain. There are very few restricted sectors (e.g., cultural industries, telecommunications, broadcasting and air transportation). Note, however, that investments (even minority stakes) can be reviewed where national security may be at risk. This is assessed on a case by case basis by Innovation, Science and Economic Development Canada. Depending on the size of a transaction and the parties, a filing with the Competition Bureau might also be required and the transaction subject to a review by the Bureau.

### Final Tips:

- Get proper local legal and technical advice before making investment decisions.
- Conduct audits frequently. The ability to audit a contractor, supplier or partner at any time is essential.

### Acknowledgements.

CCBC gratefully acknowledge the participation of the following members in preparation of this document:

Hatch Ltd.	BennettJones LLP
Cassels Brock Lawyers	O'Trade
Gowlings WLG	McCarthy Tetreault LLP
Blake, Cassels and Graydon LLP	Bridge Consultants
	Torys LLP



TOPIC	SOURCE	WHAT IS COVERED	LINK
Canadian Government Structure	The Canadian Government	The Canadian federal Government structure and its relationship to the courts and the provinces	<a href="http://www.canada.ca/en/government/system.html">www.canada.ca/en/government/system.html</a> <a href="http://www.parl.gc.ca">www.parl.gc.ca</a>
Background or Overview	The Canadian Government	Background and overview of businesses in Canada	<a href="http://www.canadabusiness.ca">www.canadabusiness.ca</a>
Corporate Governance	Commercial Websites	The basic requirements, legal obligations and responsibilities for corporate directors in Canada	<a href="http://www.icd.ca/">http://www.icd.ca/</a> <a href="http://www.leadingboards.com/en/">www.leadingboards.com/en/</a> <a href="http://www.gdrc.org">www.gdrc.org</a>
International Guidelines & Standards	United Nations Human Rights	Guiding Principles on Business and Human Rights	<a href="http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf">http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf</a>
	The Equator Principles	Standards for Global Projects Finance by Financial Institutions	<a href="http://equator-principles.com">http://equator-principles.com</a>
	Organization for Economic Cooperation and Development (OECD)	OECD Guidelines for Multinational Enterprises	<a href="http://www.oecd.org/corporate/mne/">http://www.oecd.org/corporate/mne/</a>
	International Finance Corporation (IFC) World Bank Group	IFC Social and Environmental Performance Standards: <ul style="list-style-type: none"> <li>Standards</li> <li>Guidance Notes</li> </ul>	<a href="http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/our+approach/risk+management/performance+standards/environmental+and+social+performance+standards+and+guidance+notes">http://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/ifc+sustainability/our+approach/risk+management/performance+standards/environmental+and+social+performance+standards+and+guidance+notes</a>
	International Organization for Standardization (ISO)	ISO 26000:2010 <ul style="list-style-type: none"> <li>CSR standards</li> </ul>	<a href="http://www.iso.org/iso/home/standards/iso26000.htm">http://www.iso.org/iso/home/standards/iso26000.htm</a>
	Global Reporting Initiative(GRI)	GRI's Sustainability Reporting Standards	<a href="https://www.globalreporting.org/standards/Pages/default.aspx">https://www.globalreporting.org/standards/Pages/default.aspx</a>
Environment	Government of Canada Province of Ontario	<ul style="list-style-type: none"> <li>Environmental regulations Ontario Provincial Environmental Regulations</li> </ul>	<a href="http://www.ec.gc.ca/">http://www.ec.gc.ca/</a> <a href="https://www.ontario.ca/ministry-environment-and-climate-change">https://www.ontario.ca/ministry-environment-and-climate-change</a>
Employment Standards	Ontario Ministry of Labour	Ontario Provincial Labour Laws and Standards. Each province is different	<a href="http://www.labour.gov.on.ca/english">http://www.labour.gov.on.ca/english</a>
Labour Health and Safety Practices	<ul style="list-style-type: none"> <li>Provincial Governments of Ontario, Quebec and British Columbia.</li> </ul>	Labour Regulations of Three Different Canadian Provinces and the U.S. OSHA Standards.	<a href="http://www.labour.gov.on.ca/english">www.labour.gov.on.ca/english</a> <a href="https://www.travail.gouv.qc.ca/">https://www.travail.gouv.qc.ca/</a> / <a href="http://www.labour.gov.bc.ca">www.labour.gov.bc.ca</a> <a href="https://www.osha.gov">https://www.osha.gov</a>



	<ul style="list-style-type: none"> <li>USA Department of Labor OSHA Administration</li> </ul>		
	International Labor Organization	International Labour Working Guidelines	<a href="http://www.ilo.org">http://www.ilo.org</a>
Aboriginal Engagement	<ul style="list-style-type: none"> <li>Government of Canada</li> <li>Association of Consulting Engineering Companies of British Columbia</li> </ul>	Guidance for Engaging with Aboriginal Communities	<a href="http://mpmo.gc.ca/project-description/79">http://mpmo.gc.ca/project-description/79</a> <a href="http://www.acec-bc.ca/media/24413/Aboriginal-Engagement.pdf">http://www.acec-bc.ca/media/24413/Aboriginal-Engagement.pdf</a>
	UNDRIP (United Nations)	<ul style="list-style-type: none"> <li>Declaration on the Rights of Indigenous Peoples</li> </ul>	<a href="http://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf">http://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf</a>
Supply Chain Management	<ul style="list-style-type: none"> <li>Worldwide Responsible Accredited Production (WRAP)</li> <li>International Council on Mining and Metals</li> </ul>	<ul style="list-style-type: none"> <li>Supply Chain Assessment Tools</li> <li>Compliance Auditing and Certification</li> </ul>	<a href="http://www.wrapcompliance.org">http://www.wrapcompliance.org</a> <a href="http://www.icmm.com/page/116057/demonstrating-value-a-guide-to-responsible-sourcing">http://www.icmm.com/page/116057/demonstrating-value-a-guide-to-responsible-sourcing</a>
Lobbying Governments	Government of Canada	<ul style="list-style-type: none"> <li>Registration procedures</li> <li>Guidance</li> <li>Code of conduct</li> </ul>	<a href="http://www.ocl-cal.gc.ca/eic/site/012.nsf/eng/home">http://www.ocl-cal.gc.ca/eic/site/012.nsf/eng/home</a>
Using Agents and Intermediaries	<ul style="list-style-type: none"> <li>Trace</li> <li>Veracity</li> </ul>	<ul style="list-style-type: none"> <li>Commercial Transparency</li> <li>Advisory services for Political, Corruption, and Reputation Risks</li> </ul>	<a href="http://traceinternational.org">http://traceinternational.org</a> <a href="http://www.veracityworldwide.com">http://www.veracityworldwide.com</a>
	International Chamber of Commerce	ICC Ethics and Compliance Training Handbook. International Chamber of Commerce. 2013.	Available for purchase at: <a href="http://store.iccwbo.org/icc-ethics-and-compliance-training-handbook">http://store.iccwbo.org/icc-ethics-and-compliance-training-handbook</a>
	Export Development Canada.	Briber Beware.: Guidance on Preventing Bribery in International Business.	<a href="https://www.edc.ca/EN/About-Us/Corporate-Social-Responsibility/Documents/briber-beware.pdf">https://www.edc.ca/EN/About-Us/Corporate-Social-Responsibility/Documents/briber-beware.pdf</a>
	Transparency International	<ul style="list-style-type: none"> <li>Business Principles for Countering Bribery</li> <li>Framework to Develop Anti-Corruption Programs</li> <li>Monitoring tools</li> </ul>	<a href="http://www.transparency.org">http://www.transparency.org</a>
	Xpera Risk Mitigation and Investigation	<ul style="list-style-type: none"> <li>Corruption Consulting and Investigative Services</li> </ul>	<a href="https://xpera.ca">https://xpera.ca</a>



Stakeholder Engagement	<ul style="list-style-type: none"><li>• United Nations Environmental Program, Accountability, and Stakeholder Research Associates</li><li>• Network for Business Sustainability</li></ul>	<ul style="list-style-type: none"><li>• The expectations and approaches to Stakeholder engagement</li></ul>	<p><a href="http://www.accountability.org/images/content/2/0/207.pdf">http://www.accountability.org/images/content/2/0/207.pdf</a> <a href="http://www.accountability.org/images/content/2/0/208.pdf">http://www.accountability.org/images/content/2/0/208.pdf</a> <a href="http://nbs.net/wp-content/uploads/Community-Engagement-Guide.pdf">http://nbs.net/wp-content/uploads/Community-Engagement-Guide.pdf</a></p>
Aboriginal Issues	<ul style="list-style-type: none"><li>• Government of Northwest Territories</li><li>• Government of Canada</li><li>• Aboriginal Human Resource Council</li></ul>	<ul style="list-style-type: none"><li>• Corporate Social Responsibility and Rights of Aboriginal People</li></ul>	<p><a href="http://devolution.gov.nt.ca/">http://devolution.gov.nt.ca/</a> <a href="http://www.nrcan.gc.ca/mining-materials/mining/corporate-social-responsibility/17269">http://www.nrcan.gc.ca/mining-materials/mining/corporate-social-responsibility/17269</a> <a href="https://aboriginalhr.ca/en/about/business-case-inclusion/corporate-social-responsibility">https://aboriginalhr.ca/en/about/business-case-inclusion/corporate-social-responsibility</a></p>