

Our Code of Ethics and Conduct

CIMA+ AUGUST, 2022



Engineering
for **people**



A WORD FROM THE PRESIDENT AND CEO

Dear colleagues,

As you know, maintaining our reputation of excellence is closely related to our ability to value our employees, and to be exceptional professionals who demonstrate honesty, integrity, diligence, and transparency in their interactions with their colleagues, clients, and other business partners.

This is why, a few years ago, we implemented stringent ethical standards that govern our daily activities and interactions. Our Code of Ethics and Conduct is a testimony to our commitment to excellence in terms of ethics and integrity.

This code is a tool to support our reflection when we face ethical issues. It was designed, developed, and updated to allow us to learn about and apply the principles and rules that position us as examples of integrity and excellence in our industry. We are responsible for

ensuring compliance with these principles and rules. The code must be integrated into our daily activities, and its application must be second nature for each and every one of us.

Complementary tools supporting our Code of Ethics and Conduct are available on the [intranet](#). They propose scenarios and examples to help us identify and manage ethical issues.

This document is the result of a long reflection by the Ethics Committee. Beyond the principles and rules it sets forth, its ultimate objective is to ensure that our professional activities remain healthy and exemplary, and support CIMA+'s reputation of excellence.

Thank you for your commitment



A white, handwritten signature of Denis Thivierge, consisting of stylized initials and a surname.

Denis Thivierge, P.Eng., Partner
President and CEO

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Introduction

Our Code of Ethics and Conduct

INTRODUCTION

OUR RESPONSIBILITY

Our Code of Ethics and Conduct (hereinafter referred to as “the Code”) helps each of us adopt responsible and ethical behaviours, allows everyone to benefit from a tool designed to support ethical decision-making, and confirms the importance of complying with laws, regulations, and ethical rules applicable in Canada as well as elsewhere in the world. We must act transparently and inform our manager or the [Ethics Committee](#) of any inquiry on, or legal action against CIMA+. The information provided will be kept strictly confidential.

It is our duty to learn about the content of the present Code, and keep abreast of modifications made thereon. The electronic version of the Code is the most up-to-date one, which you need to comply with at all times. It is also our duty to know about the ethical issues specific to our profession and position, and manage them adequately.

At all times, our Code applies to all members of CIMA+ personnel, including the members of the Board of Directors, the Executive Committee, partners, associate partners, managers and employees, regardless of whether they work on a permanent, contract, temporary, full-time or part-time basis, either in person or teleworking mode, and during a paid or unpaid work period. The pronoun ‘we’ is used to underscore the inclusive nature of our Code. In addition, we encourage our suppliers, subcontractors, and business partners to become acquainted with our Code, and abide by the principles it contains.

Our behaviours must be based on CIMA+’s mission, vision and values. They must also comply with the rules we adopt and the underpinning principles thereof.

INTRODUCTION

OUR MISSION, OUR VISION, AND OUR VALUES

Mission

Provide our clients with integrated services and effective solutions, based on a culture of excellence and the empowerment of our experts, as expressed in a partnership approach.

Vision

Become one of the best private Canadian firms, recognized for the quality of our people and our innovative approaches. We work in partnership with our clients, while achieving sustainable growth.

Values

Ethics and integrity

- > Ethical behaviour and integrity
- > Compliance with laws and regulations
- > Respect for all our employees, clients and business partners
- > Transparency

Entrepreneurship and agility

- > Business savvy and profitability
- > Entrepreneurial spirit
- > Networking and business development
- > Valuing initiative and autonomy

Team spirit

- > Valuing openness and cooperation
- > Trusting relationships, communication, and fairness
- > Shared vision

Excellence, innovation and passion

- > High quality standards
- > Valuing performance and surpassing oneself
- > Team and partners dedicated to ensuring the satisfaction of the right client
- > Differentiation of best employees

Sustainable and responsible development

- > Sustainable projects on the environmental, social and economic fronts; consideration of the environmental impact of our activities
- > Health and well-being of our employees
- > Positive contribution to society

INTRODUCTION

WHAT IS THE DIFFERENCE BETWEEN A LAW, A CODE OF CONDUCT, AND ETHICS?



- > A **LAW** refers to a legal text (act or regulation) that is enforceable in a specific territory.



- > A **CODE OF CONDUCT** refers to rules outlining behaviour. It may be a corporate code of conduct, containing some of a company's regulations and guidelines or a code that is specific to a profession (engineering, urban planning, etc.).



- > **ETHICS** refers to the use of critical judgment, in a given situation, taking into account the organization's mission and vision, the values and rules involved, and the possible consequences to others, in order to determine the best course of action under the circumstances.

INTRODUCTION

WHAT IS THE DIFFERENCE BETWEEN A LAW, A CODE OF CONDUCT, AND ETHICS?

How should we integrate these three concepts into our decision-making process?

We must ensure that we always comply with all applicable legal texts and ethical rules. If the legal texts and ethical rules do not allow us to clearly determine “the best behaviour to adopt” in a given situation, we must refer to the elements that reflect our ethical culture (mission, vision, and values), in order to make decisions that are in the best interest of CIMA+. Following are some questions that can guide our thinking process when rules seem insufficient, if we are uncertain or uncomfortable in a situation, or when it is difficult to know what would be the best course of action:

STEP	TOPIC	QUESTION
01	Events and issues	> What are the exact facts and issues? What are the possible options?
02	Professional obligations	> Are there any laws, regulations or ethical rules that may apply to the situation?
03	Ethical considerations	> Is there any risk that CIMA+'s mission or vision will be compromised? > What are the possible impacts on health, safety or well-being of others (clients, general public, colleagues, suppliers, contractors, partners, etc.)? What are the possible impacts on the environment? > Which values are involved or in conflict? Which ones should take precedence? > Under the circumstances, and considering the values at stake and the possible consequences, what would be the best course of action, and why?
04	Consistency of the decision	> Would it be acceptable for another person to take the same action that I am about to take? > Will this action project a professional and responsible image of myself, my colleagues and CIMA+? > Would I feel comfortable if my decision was made public? > Would I take the same action if a loved one or friend were watching me? > Will I be able to justify my decision in accordance with CIMA+'s mission, vision and values?

Several resources are available on the [intranet](#), such as case studies and the [contact information](#) of individuals we may consult with if necessary. If we answered “no” to any of the above-mentioned questions with respect to consistency, if we have noted potentially significant consequences, or if we are unsure of our answers to these questions, before acting we must discuss the situation with one of the following individuals:

- > A colleague
- > Our immediate supervisor or a partner in our sector
- > A member of the [Ethics Committee](#)
- > The Vice President, Human Resources
- > The Vice President, Legal Affair
- > The President and CEO

The following resources can provide answers to our questions:

- > [Intranet](#)
 - > [ClearView Connects](#)
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Our key guidelines related to ethics and conduct

Our Code of Ethics and Conduct

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

AVOIDING CONFLICTS OF INTEREST

As a professional consulting engineering firm, CIMA+ attaches great importance to preserving the professional independence and objectivity of its members in the fulfillment of their duties. Therefore, we all complete our work and manage our private affairs so that the public and our clients can always rely on us in this regard.

Conflicts of interest can undermine a person's professional independence and objectivity, and unduly influence how they fulfil the responsibilities entrusted to them.

Moreover, when they come to be known by our stakeholders, conflicts of interest can greatly affect the trust they put in us, as well as CIMA+'s reputation. Stakeholders are individuals or groups who hold an interest in CIMA+'s activities. They may be members of our teams, suppliers, subcontractors, clients, non-governmental organizations, etc.

It is therefore important that we are able to identify situations that present a risk of conflicts of interest and, to the extent possible, avoid them. If they do occur, we must take the appropriate measures recommended in this Code.

A CONFLICT OF INTEREST is a situation where an individual might put their own interests, or those of people close to them (spouse, family, business partner etc.), above the interests of clients, the public or CIMA+. Even if the individual is not actually seeking to pursue their personal interests, the risk of this happening is sufficient enough, as it can undermine their credibility and that of CIMA+.

THE APPEARANCE OF A CONFLICT OF INTEREST can be just as damaging as a real conflict of interest, both for you and for CIMA+. There is an apparent conflict of interest when a relatively well-informed person could reasonably conclude that a conflict of interest exists even if this is not the case.

THE CONFLICT OF INTEREST may also be **POTENTIAL**, that is to say, it is reasonably likely that a conflict of interest will occur in a more or less distant future.

APPARENT, REAL or POTENTIAL CONFLICT OF INTEREST may also arise between the interests of CIMA+ and the interests of the public or the interests of some of our clients. For example, there may be some cases where different contracts could be obtained for the same project, or when CIMA+ would get projects from two clients whose interests are opposed. It is therefore appropriate, before accepting any new project, to confirm the absence of conflicts of interest, or to follow the measures detailed in the present Code.

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

AVOIDING CONFLICTS OF INTEREST

Examples of situations that could constitute conflicts of interest

- > Working as an employee, consultant, manager, or director for any organization, including as a self-employed individual, that is either directly or indirectly in competition with CIMA+, without prior written consent from CIMA+;
- > Engaging in any activity that involves a transfer of skills and knowledge acquired or applied in our position at CIMA+, in such a manner as to compromise the existing or potential commercial interests of CIMA+;
- > Accepting any other employment or undertaking any activity that is inconsistent with our position and professional status.
- > Using CIMA+ materials or facilities to carry out work for another organization, whether remunerated or not, or to engage in self-employment activities in this respect during or before/after work hours, unless having obtained prior authorization to do so;
- > Having a relationship (e.g. romantic, family) with individuals whom we do business with, or to whom we could grant privileges in the context of our duties.

When in doubt, we must talk with one of the contact persons identified in the present Code, and **report** any situation that can represent a real, potential or apparent conflict of interest. Visit the [intranet](#) for more examples and information on what to do in case of a conflict of interest.

See the [intranet](#) for other examples and the procedure.

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

SUPPORTING HEALTHY EXTERNAL RELATIONSHIPS

Relationships with suppliers and competitors

All relationships with suppliers and competitors must be professional.

Relationships with our competitors must be in compliance with the various laws that apply to competition. Competition must be honest and rely solely on competence, qualifications, and experience. This attitude will ensure that our clients have greater trust in us.

We can participate in and even lead a consortium, if the client approves it, to reinforce skills and provide a competitive edge, while respecting the principles of competition.

It is forbidden to discuss or enter into agreements with competitors that can result in :

- > Fraudulently fixing or controlling prices;
- > Sharing clients, markets or territories with competitors;
- > Presenting artificial bids in response to a call for tenders;
- > Presenting a bid based on previously agreed-upon conditions;
- > Abstaining from presenting a bid or retrieve a previously submitted bid;
- > Restricting competition.

These behaviours may represent a form of collusion. We also refrain from taking part in any activity that could reasonably be seen as an opportunity to obtain competitive information by illegitimate means, and we choose our suppliers and subcontractors in an objective and impartial manner.

Lobbying

Lobbying is an important activity for representing CIMA+'s interests and providing good understanding of our reality. This is done through *verbal or written communications aimed at influencing decisions made by public office holders.*

We respect the Lobbying Transparency and Ethics Act. We are transparent in our lobbying activities with public office holders and thus ensure the healthy exercise of these activities.

It is important to read the policy on lobbying before initiating any approach, and ensure compliance with all associated rules.

See the [intranet](#) for case studies.

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

SUPPORTING HEALTHY EXTERNAL RELATIONSHIPS

Corruption

We must always ensure that our relationships and operations, either local or international, are conducted in such a way as to preserve the reputation and integrity of CIMA+, as well as our own reputation and integrity, and that of our colleagues, as professionals.

CIMA+ prohibits any form of corruption, extortion or solicitation, influence peddling or laundering of the proceeds of corrupt practices, in any circumstances and under any form, in both our relationships with a leader, manager or employee of a client, supplier, subcontractor, or public office holder.

Corruption includes bribes, facilitation payments, kickbacks, influence peddling and the resulting money laundering. Corruption can also be disguised as activities that are otherwise legal, such as: contributions to political parties, charitable donations, sponsorship, gifts, hospitality, meals and tickets for cultural or sporting events. It may also take the form of privileges such as providing a job to a family member of the person we wish to influence.

We are particularly cautious in our relationships with public office holders, since they are subject to more stringent rules, regulations and laws.

By “public office holders” we mean:

- > Representatives elected or appointed by the government of a foreign country, the federal government, a provincial government or a municipal administration;
- > Civil servants, employees or representatives of a government, crown corporation, or of an agency, other entity or company under governmental control;
- > Employees of public international organizations and their related entities, such as the World Bank, the International Monetary Fund, UNESCO and the UN;
- > Representatives, employees or candidates of political parties;
- > Individuals holding a legislative, administrative, judicial, or military office;
- > Their family members.

For any questions about this, please contact the Vice President, Legal Affairs.

International relations

Some projects entrusted to CIMA+ are conducted abroad. Every country has its own laws, habits and customs. Therefore, when we participate in activities outside of Canada, we must be sure to comply with the legal and cultural framework of the countries where we work, while making sure we abide by the letter and spirit of laws that have a global reach, such as those pertaining to corruption or competition. For example, wherever they are, CIMA+'s employees and commercial representatives are required to comply with the Canadian Corruption of Foreign Public Officials Act.

The Commercial Representatives Policy provides guidelines that CIMA+ agrees to respect when we require intermediary services for the development and success of international projects.

If you have any questions, please contact the Vice President, Legal Affairs, or the Partner in charge of the international project. It is also important to read the [policy](#) on commercial representatives if this applies to you.

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

SUPPORTING HEALTHY EXTERNAL RELATIONSHIPS

Political contributions and activities

CIMA+ makes no political contribution to candidates, parties, organizations or any other political entities, and does not directly or indirectly reimburse employees who would make such a contribution. It is forbidden to make any such contributions in CIMA+'s name.

We can run as a candidate in an election or apply for any other political office, after having completed a [declaration of a conflict of interest](#). We must, however, have taken all the necessary measures to avoid any potential conflict of interest.

We can freely express our personal point of view on subjects of a social, political or public interest nature, but it must be clear at all times that we are not expressing these opinions on behalf of CIMA+. We must be cautious when expressing this point of view in front of an audience, as our words could be associated with CIMA+.

Charitable organizations, social media and networks

Charitable organizations

Committed to contributing to the well-being of society, CIMA+ is actively involved in a number of charitable activities, and encourages us to make voluntary contributions to charitable organizations. Before making a donation or granting a sponsorship, it is essential to review the related [policy](#).

Media relations

If we receive a request for information or opinion from a media representative, it must be forwarded to the Director, Marketing and Communication. Only they or the persons they designate after consulting with the President and CEO, will be allowed to answer questions from the media. This ensures that the CIMA+ message remains consistent, accurate and appropriate.

Social media and networks

Many of us have an Internet account on a social network site (e.g.: Facebook, LinkedIn, Instagram, TikTok) or express opinions by any other means. Although we use these sites outside office hours, we must keep in mind that we are still employees of CIMA+. Therefore, we must be vigilant and ensure that our public interventions on the Internet demonstrate respect and loyalty, and do not adversely impact the reputation of CIMA+ and its stakeholders in any way.

See the [intranet](#) for case studies.

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

SUPPORTING HEALTHY EXTERNAL RELATIONSHIPS

Client relationships

Client relationships and quality of services

We demonstrate professionalism, transparency and integrity in all our communications with our clients, in order to provide them with comprehensive information and advise them adequately. In the framework of all our projects, we ensure that we provide complete and honest information on the conditions associated with the services we are offering.

We do not subject clients to any undue pressure to force them to acquire a service or do business with us in the framework of a project. We are committed to observing the most stringent ethical standards when conducting our business, and ensure that we comply with the ethics policies adopted by our clients.

We also commit to protecting the confidentiality of our clients' information at all times, e.g. by paying attention to conversations we hold in public and information disclosed, or the protection of information kept on our computers and other devices.

The quality of our professional services is also one of the pillars on which CIMA+'s reputation rests, and allows it to maintain its positioning among the best consulting engineering firms in Canada. CIMA+ is counting on the cooperation of all of its staff members to deliver quality services that meet the expectations of its internal and external clients.

CIMA+ is committed to:

- > Engaging and empowering its employees and managers in terms of improving its engineering practices;
- > Providing the necessary training and tools to ensure maintenance of adequate skills;
- > Supporting a collegial work environment that fosters team work, initiative and sharing of knowledge;
- > Maintaining internal monitoring mechanisms to ensure compliance with the quality targets we have set forth.

And this, in order to ensure that the highest quality standards are reflected in all the projects we deliver.

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

CONTRIBUTING TO A RESPECTFUL WORKING ENVIRONMENT

At CIMA+ we provide our employees with a respectful and stimulating working environment. Thus, it is our responsibility to make sure we positively contribute to and maintain such an environment.

Discrimination, harassment and violence

At CIMA+, we do not tolerate any form of discrimination, physical or psychological harassment, or violence from any staff member or any person outside the organization. Everyone has the right to be fairly treated, regardless of their age, gender, religious confession or ethnic origin. We are committed to providing an inclusive, respectful and safe working environment, and to take all necessary measures to effectively resolve any problems that arise. We are also aware of indirect discrimination that may result from the use of some artificial intelligence software, or any other practice, and make decisions in an objective and impartial manner.

If we have any questions, we may refer to the [policy](#) on harassment in the workplace.

Using and protecting company property

CIMA+ expects us to demonstrate respect and integrity when using corporate property.

From an IT perspective, we must not make any attempt to bypass, alter or destroy the protection systems that are in place.

CIMA+ expects us to make judicious and appropriate use of corporate funds, as well as accounting ledgers and logs. No disloyal or fraudulent activity will be tolerated.

CIMA+'s property includes, but is not limited to:

- > Tangible items (computers and communication equipment, buildings, vehicles, etc.).
- > Intangible items (logos, information, software, funds, intellectual property, etc.) See the IT Security [Policy](#) for more details.

See the [intranet](#) for case studies.

OUR KEY GUIDELINES RELATED TO ETHICS AND CONDUCT

RESPECTING CONFIDENTIALITY

Confidential information refers to any information of a commercial or technical nature that relates to CIMA+. This includes, but is not limited to, expertise, data pertaining to the Company or its employees, processes, plans, photographs, drawings, specifications, software, as well as merger, business development or divestment projects, regardless of the format of the information (text, graphic, audio, visual or digital). The disclosure of such confidential information could be detrimental to CIMA+ or to one of its stakeholders. Confidential information also includes personal information, which CIMA+ processes according to its Privacy Policy.

With respect to confidential information, all of us, including employees, subcontractors, suppliers and business partners must:

- > > Commit to reading and complying with our Privacy Policy, which can be found on [CIMA+'s website](#), as well as on the intranet;
- > > Commit to reading and complying with our Personal Information and Company Data Security Requirements. These requirements can be found on [CIMA+'s website](#);
- > Understand the appropriate level of confidentiality that should be associated with each of the documents that we are responsible for;
- > Demonstrate restraint by only discussing the information that is in our possession with other individuals (inside or outside of the Company) who need to be apprised of the information, and only in appropriate locations (elevators and other public areas are not appropriate);

- > Ensure that confidentiality agreements are signed whenever necessary;
- > Ensure that all confidential documents we are responsible for are adequately protected, both when working in the office and teleworking;
- > Ensure that the computers or other devices we use to transmit or store confidential information are configured in such a way as to ensure the appropriate level of confidentiality.

Carrying out a project for a client results in our having access to a significant amount of confidential information, including the client's internal policies, management methods, financial situation and industrial "secrets". We must all make wise and cautious use of the information that we obtain during a project entrusted to us, and uphold the confidential nature of the information that we receive.

We sometimes work with competitors, and form consortiums in order to be awarded specific projects. A great deal of confidential information is exchanged during the preparation of the proposal. It is important to ensure that this information is transmitted in an appropriate manner, and that all necessary protective measures are taken. Information obtained from competitors must remain confidential in the same manner as any information that we may obtain from our clients.

See the [intranet](#) for case studies.

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Applying the Code

Our Code of Ethics and Conduct

APPLYING THE CODE

We must understand and comply with the Code.

To ensure this, we commit to:

- > Ensuring training and awareness of all partners, associate partners, and employees;
- > Ensuring that all partners, associate partners, and employees confirm in writing that they understand and comply with the Code, by signing a document to that effect, and annually renew this commitment;
- > Ensuring that all conflicts of interest declaration forms are reviewed and renewed annually;
- > Providing specific information sessions for managers;
- > Training staff members who are responsible for receiving reports on Code violation, investigating incidents or complaints, and determining corrective measures;
- > Conducting an objective and timely investigation following an incident or complaint;
- > Taking corrective action in a timely manner and when necessary.

As the concepts related to ethics are constantly evolving, we will make sure to update our body of knowledge on an annual basis, through continuous training and awareness.

Moreover, the [Ethics Committee](#) is responsible for overseeing the compliance program and is namely responsible for the promotion of the Code and compliance with its principles throughout the Company.

In this regard, it is important that we comply with all the values and obligations in our Code, regardless of our role and employment status.

In the event of non-compliance with the rules provided for in our Code, disciplinary measures could be taken, up to and including dismissal.

Our managers must lead by example, ensure that their team members understand the scope of the Code, and take the necessary measures to enforce it. They must follow up on any suspected potential breach of the Code.

Managers also have the responsibility to create and maintain a positive work environment which fosters Code compliance and ethical reflection. They must promote an environment conducive to honest and open communication on this subject matter, where it is easy to raise issues, discuss and solve problems without fear of reprisal. They must support and protect those who, in good faith, voice a concern or report an action or decision that is potentially not in accordance with the rules of the Code, or CIMA+'s values.

APPLYING THE CODE COMMUNICATION

An employee who has information on practices or actions that are contrary to the Code of Ethics and Conduct or the law, is invited to report such information in accordance with the instructions below. We can speak to our manager if comfortable doing so, or contact the Vice President, Human Resources, Vice President, Legal Affairs, a member of the [Ethics Committee](#), or file an anonymous report through [ClearView Connects](#).

Employees are encouraged to report these situations regardless of the identity or position of the person involved. The Company will take the necessary measures to confidentially process the information, and ensure that the employee who provided it in good faith will not be retaliated against.

We expect the full cooperation of employees in the investigation of reported violations.

The following means can be used to report to ClearView Connects situations that seem contrary to ethics:

- > Website: www.clearviewconnects.com
- > Toll-free number:
1 866 840-8802 (Canada/U.S. only)
- > Mail: P.O. Box 11017, Toronto, ON M1E 1N0 Canada

The information will be forwarded to the Vice President, Legal Affairs, the Vice President, Finance, the Vice President, Human Resources, or the President of the Ethics Committee. The author may remain anonymous.

ABSENCE OF REPRISAL

No employee will be subject to retaliation (penalty, dismissal, demotion, suspension or discrimination) for reporting a breach or possible breach of the Code (provided they do so in good faith), making inquiries about the subject or asking for advice on how to handle suspected breaches.

CIMA+ will take all necessary measures to protect an employee who reports a breach of the Code of Ethics and Conduct.

APPLYING THE CODE

CONTROL, VERIFICATION AND SANCTIONS

Control

The Board of Directors must ensure the good governance of all activities of the Company, on a continuous basis, to ensure compliance.

To this end, the Board is supported by the Ethics Committee, which must review and update this program when problems are detected, and by the Audit Committee, which ensures implementation of control measures, as well as process compliance.

Verification

The Ethics Committee ensures that the Company complies with the Code, with its own policies and with the law. It reviews and updates policies and procedures when problems are detected.

Sanctions

A violation of this Code will result in sanctions up to and including dismissal. In addition, CIMA+ reserves the right to take additional action, including prosecution, against those individuals who have engaged in illegal activities or activities that go against our Code, or who have benefited from such, in order to recover damages incurred by CIMA+.

See the [policy](#) on the management of performance gaps.

SUPERVISION

The Ethics Committee is responsible for reviewing the Code and for submitting new proposals to the Board of Directors. The application of the Code and respect for its contents are the responsibility of each and every one of us.



Engineering
for **people**

