



Supplier Code of Conduct

BOMBARDIER

CONTENTS

1. Bombardier's commitment to a sustainable supply chain

2. Legal compliance

3. Our standards

4. Governance

5. Reporting a concern or issue

1. Bombardier's commitment to a sustainable supply chain

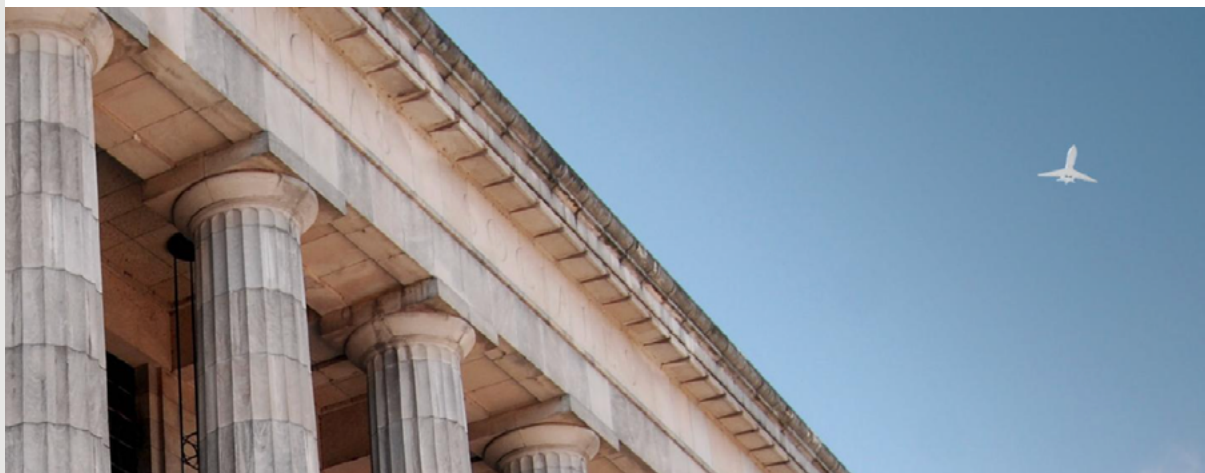
Bombardier believes that good ethics, a strong commitment to corporate responsibility and sustainable business practices are essential for managing the challenges and opportunities of a rapidly changing global environment. To honour this commitment, Bombardier has been a signatory of the United Nations Global Compact (UNGC) since 2007 and is thus committed to actively promoting the 10 UNGC fundamental principles addressing human rights, labour, the environment and anti-corruption. Our Supplier Code of Conduct (herein the "Supplier Code") integrates these principles.

It is in this spirit that Bombardier wishes to actively engage its supply chain by the adherence of all its suppliers to its Supplier Code.

This Supplier Code applies to Bombardier's product and services suppliers, consultants, agents and representatives (each a "Supplier" and collectively the "Suppliers").

2. Legal compliance

Bombardier's Suppliers must comply with the mandatory provisions of this Supplier Code and with all applicable laws and regulations in each jurisdiction where they operate, and must use their best efforts to comply with the other principles set out herein, when dealing with or acting on behalf of Bombardier. Furthermore, to promote corporate social responsibility, Bombardier expects its Suppliers to apply the standards set in this Supplier Code through their own supply chain.



CONTENTS

1. Bombardier's commitment to a sustainable supply chain
2. Legal compliance
- 3. Our standards**
4. Governance
5. Reporting a concern or issue

3. Our standards

3.1. Labour

Suppliers must comply, at a minimum, with all applicable local labour and employment laws and regulations in the jurisdictions where they operate. Furthermore, Suppliers must comply with the following principles:

3.1.1. Non-discrimination in employment opportunities

Bombardier supports diversity, inclusion and employment equity and expects its suppliers to do the same. Suppliers must offer equal employment opportunities and fair compensation (e.g., minimum wage, maximum hours of work, days of rest) without any discrimination.

3.1.2. Child labour

Bombardier will not engage in nor support the use of child labour and will not tolerate the use of child labour at any level in its supply chain. For the purpose of this Supplier Code, child labour covers all types of work carried out by employees under the age of 15 years old, excluding when such employment forms the basis of vocational training or takes the form of an educational program. However, for employment or work which by its nature or circumstances is not suitable for a person under the age of 18 years old, child labour shall mean employees under the age of 18 years old.

3.1.3. Forced labour / Modern slavery / Human trafficking

Bombardier will not engage in any form of human trafficking or use any type of forced labour or modern slavery, nor will it tolerate their use at any level in its supply chain. Suppliers must not demand any work or service from any person under the menace of any penalty. For example, Suppliers' employees (regardless of their employment status) must be free to leave work or terminate their employment with reasonable notice, and they must not be required to surrender any government issued identification, passports or work permits as a condition of employment.

CONTENTS

1. Bombardier's commitment to a sustainable supply chain
2. Legal compliance
3. **Our standards**
4. Governance
5. Reporting a concern or issue

3.1.4. **Freedom of association**

Suppliers must acknowledge and respect the principle of freedom of association and the right to collective bargaining of their employees.

3.1.5. **Respect & dignity**

Suppliers must treat all their employees (regardless of their employment status) fairly, ethically, respectfully and with dignity. Suppliers must protect their employees from harassment, bullying and victimization in the workplace, including all forms of sexual, physical and psychological abuse. Suppliers should allow their employees to raise concerns about safety, the law or ethical issues without fear of retaliation.

3.2. **Health & safety**

Bombardier expects employee's health safety and well-being to be fully integrated into all aspects of its Suppliers' activities. It is the responsibility of the Supplier to ensure that its facilities are designed and safely operated in compliance with all applicable health and safety laws, regulations and standards. The Supplier commits to establishing and implementing a robust health and safety management system using a risk management approach that aims to prevent work-related injury and illness and to promote wellbeing by providing safe and healthy working conditions.

We strongly encourage our Suppliers to:

- Take appropriate actions to protect the health, safety and well-being of their employees.
- Systematically evaluate health and safety performance through appropriate audits, and report progress.
- Continuously improve their health and safety management system.
- Communicate to their employees and contractors their commitment to improving health and safety and provide training on such commitment.
- Apply for and maintain ISO 45001 or equivalent certification (as applicable).

3.2.1. **Drugs & alcohol**

Suppliers must ensure that each of their employees working on Bombardier mandates and/or at Bombardier's facilities comply with all applicable local laws and regulations pertaining to the use of drugs and alcohol.

CONTENTS

1. Bombardier's commitment to a sustainable supply chain
2. Legal compliance
3. Our standards
4. Governance
5. Reporting a concern or issue



3.3. Environment

Suppliers are expected to operate in a sustainable manner with environmental protection at the core of all activities. At a minimum, Suppliers must a) comply with all applicable environmental laws and regulations applicable to their products or operations, and b) provide data necessary for Bombardier and its customers to meet their compliance obligations. Suppliers must strive to reduce the impact of their activities and products on the environment and work towards a “total life-cycle” view in product design.

3.3.1. Suppliers must:

- Adopt an appropriate policy, standard, procedure or contingency measure as part of an environmental management system in order to ensure that their operations are managed in a sustainable way.
- Take necessary measures to prevent pollution, to conserve natural resources required for their operations, and to implement relevant emergency response plans and procedures.

3.3.2. Bombardier recommends that suppliers:

- Communicate with their management, employees and contractors their commitment to improving the environment, and to provide training on that commitment.
- Apply for and maintain ISO 14001 or equivalent certification (as applicable).
- Systematically evaluate their environmental performance through appropriate audits and report progress.

CONTENTS

1. Bombardier's commitment to a sustainable supply chain
2. Legal compliance
- 3. Our standards**
4. Governance
5. Reporting a concern or issue

3.4 **Anti-corruption & fraud**

Suppliers must act with integrity in all their dealings, must not engage in any type of fraudulent activity and must compete strictly based on the merits of their products or services. Suppliers must comply with all applicable anti-corruption laws and regulations, notably provisions prohibiting corruption, bribery and other unethical business practices. Suppliers must not offer bribes, kickbacks, gifts or any other benefits to anyone to retain business or obtain an unfair or improper advantage. Furthermore, Suppliers must never make or approve an illegal payment to anyone including, without being limited to, Bombardier employees.

3.5. **Insider trading & tipping**

Material non-public information (MNPI) is any information, generally unknown to the public, relating to a public company that if disclosed could reasonably be expected to influence a reasonable investor's investment decisions, or affect the market price or value of the public company's shares or other securities. Anyone who obtains MNPI through working with Bombardier is forbidden from buying, selling or trading in securities of the company to which the MNPI relates, until the information has been fully disclosed to the public by way of press release and a reasonable period of time has passed in order for the information to be widely disseminated (at least two full trading days after the issuance of the press release). MNPI should also not be disclosed to any third party and should only be used or shared in the necessary course of the work being done for Bombardier.

3.6. **Conflicts of interest**

Suppliers shall avoid conflicts of interest or situations giving the appearance of a conflict of interest when doing business with Bombardier. Suppliers must promptly disclose to Bombardier's Ethics and Compliance Office any instances of perceived, potential or actual conflicts of interest.

CONTENTS

1. Bombardier's commitment to a sustainable supply chain
2. Legal compliance
3. Our standards
4. Governance
5. Reporting a concern or issue

3.7. **Fair competition & antitrust laws**

Suppliers must act in accordance with national and international competition laws and not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

3.8. **Trade control (imports/exports/sanctions)**

Suppliers must comply with all applicable laws, policies and regulations governing imports and exports, including sanctions and embargoes. Suppliers are expected to obtain any authorizations that are required for the importing and exporting of goods and services. These rules apply equally to the transmission of technical data and payments.

3.9. **Counterfeit parts**

Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products to Bombardier.

3.10. **Conflict minerals & ethical sourcing**

Suppliers must commit to using only ethical sourcing. They must ensure that any conflict minerals such as tin, tantalum, tungsten or gold in their products are sourced from conflict-free entities that in no way finance or support armed groups. Suppliers are expected, where appropriate, to perform due diligence on their supply chains with respect to conflict minerals and to provide their results to Bombardier upon request.

3.11. **Intellectual property rights & sensitive Information**

Suppliers must:

- Respect the intellectual property rights of others.
- Not share or disclose proprietary or confidential information ("Sensitive Information") received from Bombardier or its representatives without Bombardier's express prior written consent.

CONTENTS

1. Bombardier's commitment to a sustainable supply chain
2. Legal compliance
- 3. Our standards**
4. Governance
5. Reporting a concern or issue

3.12. **Data privacy**

Suppliers must comply with all applicable data privacy laws and regulations when handling any personal data concerning Bombardier, including employee and customer data.

Suppliers must immediately report unauthorized access, use, disclosure, loss or theft of Bombardier personal data to Bombardier's Data Protection Officer at dataprivacy@aero.bombardier.com.

3.13. **Cybersecurity**

Suppliers must have cybersecurity programs in place to mitigate threats to their systems. Bombardier expects that any digital information provided to a Supplier will be protected from unauthorized access or leaks and kept confidential. Suppliers must immediately notify Bombardier of any cybersecurity incident involving Bombardier's data, systems or assets by contacting the cybersecurity team at cybersecurity@bombardier.com.

If required by virtue of the nature of the work being performed for Bombardier, Suppliers and their employees (including additional or temporary personnel) and sub-contractors must complete the Bombardier third-party security awareness training.



CONTENTS

1. Bombardier's commitment to a sustainable supply chain
2. Legal compliance
3. Our standards
- 4. Governance**
5. Reporting a concern or issue

4. Governance

4.1. Compliance with the Supplier Code

Bombardier may verify its Suppliers' compliance with this Supplier Code. Such verification can be conducted by way of a Supplier's self-evaluation or an audit by Bombardier (or an external resource designated by Bombardier) who may visit a Supplier's facilities with appropriate prior notice (when practicable in the circumstances).

Bombardier encourages its Suppliers to implement policies, procedures, tools and indicators necessary to ensure compliance with the principles listed above. Furthermore, Suppliers are expected to manage, monitor and develop their own supply chains in such a manner as to ensure Bombardier's requirements under this Supplier Code are met.

4.2. Selection criteria

Compliance with this Supplier Code is an important criterion that is taken into consideration in Bombardier's Supplier selection process.

4.3. Corrective measures

Whenever a situation of non-compliance is identified, Bombardier may work with its Suppliers to develop and implement a corrective plan to improve and remedy the situation.



CONTENTS

1. Bombardier's commitment to a sustainable supply chain

2. Legal compliance

3. Our standards

4. Governance

5. Reporting a concern or issue

5. Reporting a concern or issue

For any questions, concerns, or if any ethical or compliance issues arise, Suppliers have the responsibility to bring them forward by contacting Bombardier's Ethics and Compliance Office (or as per the notification provision found in the applicable supply contract with Bombardier):

BY MAIL

Bombardier Ethics and Compliance Office
400, Côte-Vertu Road West,
Dorval, Quebec Canada
H4S 1Y9

BY PHONE

+1 (514) 855-5001

BY EMAIL

compliance.office@bombardier.com

BOMBARDIER'S REPORTING SYSTEM

You can file a report confidentially and anonymously through Ethics Line, Bombardier's online reporting system, which is available 24 hours a day, 7 days a week, 365 days a year, via a secure [website](#).

