



# SUPPLIERS CODE OF CONDUCT

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### 1. BOMBARDIER'S COMMITMENT TOWARDS A SUSTAINABLE SUPPLY CHAIN

Bombardier believes that good ethics and 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 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 of Conduct (herein the "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(s) where they operate and must use their best efforts to comply with the other principles set herein, when dealing with or acting on behalf of Bombardier. Furthermore, in an effort to promote corporate social responsibility, Bombardier expects its Suppliers to apply the standards set in this Supplier Code through their own supply chain.

## **3.** OUR STANDARDS

### **3.1.** LABOUR

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

#### **3.1.1.** NON-DISCRIMINATION IN EMPLOYMENT OPPORTUNITIES

Bombardier supports diversity and employment equity. 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 by its Suppliers either. For the purpose of this Supplier Code, child labour covers all type of work carried by employees under the age of 15 years old, excluding when such employment forms the basis of vocational training or takes form of 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 the use of forced or enslaved labour or human trafficking, nor will it tolerate their use at any level in its supply chains. Suppliers must not demand any work or service from any person under the menace of any penalty. For example, Suppliers' employees must be free to leave work or terminate their employment with reasonable notice, and they are not required to surrender any government issued identification, passports or work permits as a condition of employment.

#### **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 AND DIGNITY

Suppliers must treat all of 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, as well as from any form of retaliation.

## 3.2. HEALTH & SAFETY

Bombardier expects employee's occupational health and safety to be a priority throughout all aspects of its Suppliers' activities. At a minimum, Suppliers must comply with all applicable health and safety laws, regulations and standards. Furthermore, Suppliers must a) take appropriate action, such as implementing and enforcing policies, standards, procedures, contingency measures and management systems, in order to prevent occupational illnesses and work-related accidents, and to provide a safe and healthy workplace for its employees, and b) provide Bombardier with the necessary documentation and data to help ensure the safe and healthy use by Bombardier and its stakeholders of Supplier's products.

Bombardier encourages its Suppliers to:

- communicate to its management, employees and contractors its commitment to improving health and safety, and to provide training on such commitment;
- apply for and maintain OHSAS 18001 or equivalent certification (where applicable); and
- systematically evaluate its health and safety performance through appropriate audits and report progress.

### 3.2.1. DRUGS AND 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.

## 3.3. ENVIRONMENT

Bombardier conducts its business in a sustainable way and in compliance with applicable environmental laws and regulations. Suppliers are expected to operate in a sustainable manner with environmental protection at the core of all activities. As a minimum, Suppliers must a) comply with all applicable environmental laws, regulations, in each case, applicable to a Supplier's products or operations, and b) provide data necessary for Bombardier and its customers to meet their compliance obligations. Suppliers must, in any event, 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 any appropriate policy, standard, procedure, contingency measure and management system in order to ensure that its operations are managed in a sustainable way; and
- take necessary measures to prevent pollution, to conserve natural resources required for its operations, and to implement relevant emergency response plans and procedures.

### 3.3.2. BOMBARDIER RECOMMENDS SUPPLIERS TO:

- communicate with their management, employees and contractors their commitment to improving environment, and to provide training on such commitment;
- apply for and maintain ISO 14001 or equivalent certification (as applicable); and
- systematically evaluate their environmental performance through appropriate audits and report progress.

## 3.4. ANTI-CORRUPTION

Suppliers must comply with all applicable anti-corruption laws and regulations, notably provisions prohibiting corruption, bribery and other unethical business practices. Furthermore, Suppliers must never make or approve an illegal payment to anyone under any circumstances, including, without being limited to, Bombardier employees.

## 3.5. FRAUD

Suppliers must act with integrity in all their dealings and must not engage in any type of fraudulent activities.

## 3.6. CONFLICTS OF INTEREST

Suppliers must disclose to Bombardier's Ethics and Compliance Office any perceived, potential or actual conflict of interest as soon as they have been made aware. Any activity that has been approved, despite the actual or apparent conflict, must be documented.

## 3.7. FAIR COMPETITION AND ANTI-TRUST 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. INTELLECTUAL PROPERTY RIGHTS

Suppliers must:

- respect the intellectual property rights of others;
- not share or disclose proprietary information belonging to Bombardier without its express prior written consent.

## 3.9. DATA PRIVACY

- Suppliers must abide by all applicable data privacy laws and regulations when handling any personal information concerning Bombardier's employees and its clients;
- Suppliers must immediately report unauthorized use, disclosure, or loss of Bombardier personal information to the Ethics & Compliance Office or to Bombardier's Data Privacy Officers.

## 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 to ensure Bombardier's requirements under this Supplier Code are met.

### 4.2. SELECTION CRITERION

Compliance with this Supplier Code is an important criteria 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.

## 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  
800 Blvd. René-Lévesque West, 29th floor  
Montreal, Quebec  
Canada  
H3B 1Y8

#### BOMBARDIER'S REPORTING SYSTEM

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

#### BY PHONE

+1 (514) 861-9481

#### BY EMAIL

[compliance.office@bombardier.com](mailto:compliance.office@bombardier.com)