



Finning's Supplier Code of Conduct

Finning values its suppliers and their contribution to Finning's success. Our Supplier Code of Conduct applies to all suppliers along with their employees, contractors, and subcontractors. Finning's Supplier Code of Conduct does not comprise all of Finning's guidelines and rules and cannot cover every situation. The Supplier Code of Conduct is intended to serve as a tool to guide our suppliers' actions. It does not replace applicable legislation within our country operations which may be revised from time to time. We require our suppliers to respect and comply with this Code of Conduct by conducting regular self-assessments and to conduct business lawfully and with integrity.

Failure to comply with this policy, or any portion thereof, could result in suspension or termination, in whole or in part, of the supplier's agreement(s) with Finning and may include removal from Finning's approved supplier list.

1. **Health & Safety**

At Finning, safety is a core value that influences everything we do. Finning expects its suppliers to prioritize employee occupational health and safety throughout all aspects of its activities, and to have appropriate policies, standards, procedures, contingency measures and management systems to support the same. At a minimum, suppliers must comply with all applicable health and safety laws, regulations, and standards in the regions where they operate. When operating on Finning property, Finning's safety standards/rules must be met or exceeded. When operating on a customer or other third party location either Finning or the customer safety standards/rules must be met, whichever is more stringent. In all cases suppliers are responsible to ensure they are familiar and comply with the relevant site specific and general requirements.

2. **Ethics and Governance**

a. **Adherence to Laws/Regulations**

Suppliers are expected to comply with all local laws and regulations in countries where they operate as well as applicable international trade laws and regulations. When there are inconsistent or different laws and regulations, the supplier is required to comply with the highest standard.

b. **Financial Integrity**

It is expected that suppliers operate with integrity in financial matters and do not allow or condone any of their employees, contractors, or subcontractors to engage in the below behaviors:

- (i) **Tax Evasion:** The illegal and fraudulent nonpayment of tax. We never engage in tax evasion or assist anyone else to do so.
- (ii) **Money Laundering:** Any act that tends to hide or conceal the illicit origin of certain goods or services that come directly or indirectly from criminal acts
- (iii) **Terrorist Financing:** Any direct or indirect act of request, collection or delivery of funds or assets, whose purpose is the commission of terrorist crime.

c. **Anti-Bribery**

All forms of bribery (including facilitation payments), corruption, extortion and embezzlement are forbidden. Suppliers must act with integrity and follow all international anti-bribery and anti-corruption laws. Care must be taken to avoid even the appearance of bribery, including avoiding

placing Finning's employees, contactors, and subcontractors in inappropriate situations. Any gifts or offers of hospitality offered to Finning employees, including invitations to social functions, meals and entertainment, should generally be low value or a customary token of appreciation.

Specific Finning Policy: Global Anti-Bribery and Anti-Corruption Policy

d. Conflict of Interest

Any supplier that is aware of any actual or potential financial or personal conflict of interest must declare it to Finning in writing. Examples include if a supplier or its personnel has any family/personal relationship with Finning employees, or if a Finning employee has financial interest in a supplier.

e. Fair Competition

Finning supports fair competition among existing and potential suppliers. Suppliers are expected to adhere to antitrust and competition laws in the countries where they operate. In addition, while Finning supports mutually beneficial reciprocal agreements, fair competition must be adhered to.

f. Confidentiality, and Data Privacy and Protection

At Finning, we have rigorous processes and policies related to the commercially sensitive data we collect, use and disclose as part of our day-to-day interactions with the customers, suppliers and partners we do business with. We expect the same of our suppliers with respect to safeguarding and protecting our information (including but not limited to financial information, personal information, trade information, and technological information), and intellectual property. This includes but is not limited to: ensuring supplier consent practices are in-line with the applicable data protection legislation locally and globally, evaluating and updating supplier practices and tools to exceed industry standards, having robust policies in place to ensure quick and efficient recovery from data breaches, and ensuring that Finning's information that is inactive or outdated is securely deleted. Suppliers are expected keep all information that Finning provides to the supplier in the course of performing its duties strictly confidential and use any such information only for the purposes of performing their duties for Finning.

Specific Finning Policy: Data Governance Statement

g. Publicity

Finning branding, including its Name, Trademarks and Logos, are property of Finning and are only to be used with prior express written permission from Finning. Finning branding may not be used in any way that suggests an affiliation or endorsement.

3. People and Communities

a. Human Rights

All employment practices must be conducted ethically and without contravention of human rights legislation, the United Nations Declaration of Human Rights (UNDHR), the International Labor Organization's (ILO) 1998 Declaration on Fundamental Principles and Rights at Work, employment laws in any region where they operate, and applicable legislation protecting human rights.

b. Diversity, Inclusion and Equal Opportunity

Diversity brings together different thoughts, life experiences, perspectives and learnings to build and power a better world. Finning is committed to building a safe, talented, and inclusive team. Suppliers should employ the most suitable individuals for posted positions, regardless of race, religion, national origin, colour, gender, gender identity, sexual orientation, age and/or physical or mental disability. Suppliers must support and obey local laws that prohibit discrimination everywhere they do business. Finning makes efforts to engage and support diverse suppliers, such as minority-owned, indigenous-owned and women-owned business, and expects the same of our suppliers.



c. Harassment

There is no place for discrimination, harassment or violence in the workplace. We all have a responsibility to ensure that harassment does not happen. Suppliers shall be committed to provide and promote a harassment free workplace, for not only their own employees, but any dealings with Finning employees, subcontractors and customers as well.

4. Corporate Social Responsibility

a. Environmental Responsibility

Finning supports the UN Sustainable Development Goals (SDGs). We encourage our suppliers to maintain the highest environmental standards to reduce or minimize environmental risks and impact. Suppliers must comply with all applicable environmental laws, including sourcing, disposal of materials, and discharge of substances into the environment. Emphasis should be placed on products that incorporate sustainability practices into the product life cycle, reducing waste and encouraging recycling within the product, its packaging and disposal. Suppliers are also expected to comply with Finning's customers' policies and practices related to environmental responsibility and sustainability, where applicable.

b. Community Involvement

Community extends much broader than where individuals and companies reside. It is where people and environments are directly or indirectly impacted by our existence. Suppliers must demonstrate an ongoing commitment to corporate social responsibility through tangible and measurable efforts. When operating on or near Indigenous communities, Suppliers must acknowledge and respect Indigenous peoples' rights, cultures, and interests.

c. Business Continuity

Longevity, rooted in sustainability, requires innovation. Finning looks to suppliers to not only supply required goods and/or services but to provide unique solutions that increase efficiencies, create value, and ensure continued success of all parties involved. Succession and business and emergency contingency plans to mitigate unseen circumstances are expected to be developed.

d. Whistleblowing

Suppliers shall have a program or policy to ensure the protection of whistleblower confidentiality and prohibit retaliation against workers. Suppliers shall provide an anonymous complaint mechanism for workers to report grievances in accordance with local laws and regulations.

If you have any questions or concerns with this policy or to report a violation; please reach out to Finning by emailing gcm@finning.com.