



Finning's Supplier Code of Conduct

At Finning, we value our suppliers and their contribution to our success. Our Supplier Code of Conduct applies to all suppliers and to their employees, contractors, sub suppliers and subcontractors to the extent those entities or individuals are supplying goods to or performing services for or on behalf of Finning. Finning's Supplier Code of Conduct does not comprise all of Finning's guidelines and rules and cannot cover every situation. Our Supplier Code of Conduct sets the minimum expected standard of conduct and is intended to serve as a tool to guide our suppliers' actions. It does not replace applicable legislation in the countries where we or our suppliers operate, which may be revised from time to time.

We require our suppliers to act lawfully, with integrity and in compliance with this Supplier Code of Conduct. Suppliers must cooperate with any request by Finning to audit or otherwise assess compliance with our Supplier Code of Conduct.

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.

This Supplier Code of Conduct may be amended from time to time to reflect changes in our standards and expectations. Although we will endeavour to notify our suppliers of changes to this Supplier Code of Conduct, suppliers are expected to regularly check Finning's website or our supplier portal for the current version of this policy. A supplier's continued provision of goods and/or services to us shall be conclusively deemed acceptance of the most current version of our Supplier Code of Conduct.

1. Health & Safety

At Finning, safety is a core value that influences everything we do. We expect our suppliers to prioritize employee occupational health and safety throughout all aspects of their 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's or the customer's 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 behaviors listed below:

- (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 our employees, contactors, and subcontractors in inappropriate situations. Any gifts or offers of hospitality offered to our 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 a supplier's personnel has any family/personal relationship with Finning employees, or if a Finning employee has direct or indirect (including through a family member) financial interest in a supplier.

e. Fair Competition

Finning supports fair competition among existing and potential suppliers. Suppliers are expected to adhere to anti-trust and competition laws in the countries where they operate.

f. Confidentiality, and Data Privacy and Protection

At Finning, we have rigorous processes and policies related to the data we collect, use and disclose as part of our day-to-day interactions with customers, suppliers and others with whom we do business. 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 to keep all information that Finning provides to them 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 our name, trademarks and logos, are property of Finning and are only to be used with our prior express written permission. Finning branding may not be used in any way that suggests an affiliation or endorsement.

3. Human Rights

Finning is committed to respecting human rights as described in our Code of Conduct and Sustainability Policy. We do not condone and we strive to eliminate all forms of forced labour and child labour in the workplace.

We expect our suppliers to respect human rights and operate their business ethically and without contravention of applicable human rights legislation or conventions. Additionally, we encourage our suppliers to take appropriate steps to ensure their operations and supply chains are free of any form of modern slavery, such as forced labour and child labour, including by: (i) complying with the expectations and requirements set out in our Supplier Code of Conduct; (ii) offering their employees training to help them recognize situations that may involve a risk of modern slavery; and (iii) conducting due diligence screenings of suppliers, with enhanced attention to possible human rights concerns.

a. Voluntary Employment

We expect that all work performed on a supplier's behalf is undertaken voluntarily and is not forced. Workers should have the freedom to leave their employment at any time or terminate it, subject to legal notice period requirements. Forced labour means labour or service provided or offered to be provided by a person under circumstances that: (i) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (ii) constitutes exacting work or service from someone under the menace of any penalty when that person has not offered themselves voluntarily.

b. No Child Labour

We expect our suppliers to, at minimum, abide by local child labour laws and align their practices with the fundamental labour standards outlined by the International Labour Organization (ILO) in Convention No. 138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labour. Children must be protected from harm, must have access to education, and should be free to attend school before they enter the workforce. ILO 138 establishes a minimum working age, commonly fifteen 15 years of age, but subject to variations based on a country's development status and the type of work at issue. Additionally, ILO 182 states that no one under the age of 18 should be allowed to engage in hazardous, nighttime, extended hour, or morally compromising work.

c. Compensation

We expect our suppliers to compensate their workers in accordance with relevant employment laws, including those pertaining to minimum wages, working conditions, overtime hours, and legally mandated benefits. In cases where no specific employment laws exist, workers should be remunerated fairly and at least at the minimum industry standard in the local area. Suppliers should regularly review worker compensation to evaluate whether workers earn enough to meet their basic needs and the needs of their family to disincentivize the need for such workers to resort to child labour or forced labour to supplement family income.

If we become aware of any actions or conditions in our supply chain that do not align with our expectations of our suppliers as they relate to human rights and labour practices, we retain the right to demand corrective actions from the applicable supplier. Non-compliance by a supplier may result in further actions, including the termination of our business relationship.

4. People and Communities

a. Diversity, Inclusion and Equal Opportunity

Diversity brings together different thoughts, life experiences, perspectives and learnings to create a positive impact for all. We are 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. We make efforts to engage with Indigenous-owned businesses and expect the same of our suppliers.

b. 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 our employees, subcontractors and customers as well.

5. Sustainability

a. Environmental Responsibility

We support 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 our customers' policies and practices related to environmental responsibility and sustainability, where applicable.

b. Community Engagement

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 follow applicable federal and provincial law and acknowledge and respect Indigenous peoples' rights, cultures, and interests.

c. Innovation

Longevity, rooted in sustainability, requires innovation. We look to suppliers not only to supply required goods and/or services but to provide unique solutions that increase efficiencies, create value, and ensure continued success of all parties involved.

d. Business Continuity

Suppliers are required to establish and maintain appropriate business continuity plans in accordance with applicable laws, industry standards, and contractual requirements. These plans must include risk management strategies and emergency response procedures to mitigate potential disruptions to the supply of their goods and/or services.

e. 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.

6. Reporting Breaches

Any suspected breach by a Finning supplier of this policy should be reported via our Ethics and Compliance Website at <https://cloud.clearviewconnects.com/#/> or via our Ethics and Compliance Helpline. Please see our [Code of Conduct](#) for up-to-date telephone numbers in each country for our Ethics and Compliance Helpline (identify that you are calling in connection with Finning's Supplier Code of Conduct). Our Ethics and Compliance Website and Helpline are operated by a third-party, and provide



mechanisms where reporting is confidential and can be anonymous. It is important that anonymous reports contain sufficient detail for us to investigate the matter.

If you have any questions about this policy, please reach out to us by emailing: gcm@finning.com.