I. SUBJECT

Finning’s performance on non-financial matters significantly affects its reputation and overall success. This policy outlines commitments that guide how we should partner with customers, develop our team, protect the environment and act ethically in all our activities.

II. OVERVIEW

The purpose of this policy is to formalize and define the sustainability principles that guide our behaviors and are aligned with our values. The commitments outlined in the policy apply to how we should partner with customers, develop our teams, protect the environment and act ethically in all our activities.

This policy applies to all Finning employees, its subsidiaries and affiliates, its Board of Directors and those authorized to speak on behalf of the Company.

III. COMPLIANCE

Failure to comply with this policy may result in disciplinary action being taken, up to and including termination of employment.

IV. DEFINITIONS

- **Finning** - Finning International Inc., including all of its affiliated entities (being entities in which Finning controls or owns, directly or indirectly, more than 50% of the outstanding shares), subsidiaries and related entities.

- **Universal Declaration of Human Rights** was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out fundamental human rights to be universally protected and was drafted by representatives with varied legal and cultural backgrounds from all regions of the world.

V. EXCEPTIONS

There are no allowable exceptions for this policy.
VI. ROLES AND RESPONSIBILITIES

Our Global and Regional Sustainability Committees are comprised of a group of diverse senior leaders that define, coordinate and monitor our sustainability strategy. Under direction of the Global Sustainability Committee, the implementation of our commitments are coordinated through each of the Regional Sustainability Committees and applicable internal departments.

VII. POLICY

For Finning, sustainability means:

- Partnering with customers to build and power a better world now, and for generations to come;
- Developing a safe and inclusive team that considers succession and organizational stability;
- Conducting our business in a manner that protects the environment; and
- Acting ethically and honoring our commitments with our partners and communities.

We believe:

- Laws and regulations set a basic foundation for the expectations our stakeholders have of us;
- All individuals have inherent rights covered by the Universal Declaration of Human Rights and companies have a responsibility to respect them;
- All workplace injuries and occupational illnesses can be prevented;
- We all have a shared responsibility to keep ourselves and those who work around us safe;
- Inclusive cultures attract a larger pool of talent and enhance performance and innovation;
- Diversity of thought, experiences and viewpoints improves our ability to generate new insights, respond to changing markets, and meet evolving customer demands;
- We have the capacity to further enhance our performance and grow everyday through a continual learning mindset;
- We have the ability to anticipate and plan for business continuity through hiring and staff development practices to ensure operational and cultural stability;
- Our commitment to our communities extends to managing the impact that our activities have on the environment;
Finning International Inc.

SUSTAINABILITY POLICY

- Climate change is a serious global challenge that requires an effort from each and every one of us to be addressed; and
- We have an important role to play in supporting our customers to minimize their environmental impact and enhance their safety through the products we sell, rent and service.

We will:

- Comply with all applicable laws and regulations in each of the countries where we operate;
- Uphold and protect human rights;
- Conduct our business in a transparent, honest, and ethical manner;
- Monitor, evaluate and disclose our performance on sustainability topics relevant to our business in our annual sustainability report;
- Maintain a high standard of environmental stewardship which supports the protection and preservation of the environment and the reduction and mitigation of any impacts we may have;
- Promote continual company-wide learning of a safety and health culture to prevent workplace injuries and occupational illnesses;
- Hire the best candidates and develop and promote talent for roles within the company, anticipate change within our industry and evolve to meet those changes accordingly;
- Incorporate sustainability principles into our decision making regarding potential new initiatives, existing operations and daily management;
- Create an inclusive workplace that values diverse talent, perspectives and ideas;
- Collaborate with our customers, Caterpillar and other suppliers to improve product performance and reduce and mitigate product environmental impacts;
- Invest in communities with a focus on progressing education;
- Keep communicating openly with our employees, contractors, communities and shareholders to advance sustainability; and
- Reduce operational and environmental risks by continually learning from and improving our sustainability performance.
VIII. REFERENCES

This sustainability policy outlines the principles we follow and sets our high level commitments. More detailed documents provide guidance in fulfilling our commitments:

- Code of Conduct
- Corporate Disclosure Policy
- Board Diversity Policy
- Code of Ethics for Senior Executives and Financial Management
- Global Anti-Bribery and Anti-Corruption Policy
- Global Political Contributions Policy
- Whistleblower Policy