



# OUR CODE OF ETHICS

**BOMBARDIER**

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# BOMBARDIER

## INTRODUCTION

### A WORD FROM OUR SENIOR LEADERSHIP TEAM

**A**t Bombardier, we believe that good ethics make great business, and we demonstrate that in everything we do. We build trains and planes that carry millions of people around the world every day. We owe it to our customers, to our shareholders and to each other to always uphold the highest standards of ethics and business conduct.

How we conduct business is fundamental to our success and achieving our results. From major decisions made in the boardroom to day-to-day operations on our shop floors, we're committed to operating openly, honestly and with unwavering integrity.

We believe ethics and compliance is our shared responsibility. It involves performing our jobs in good faith and thinking through the potential impacts of our decisions and actions.

This Code of Ethics ("the Code") is our roadmap to carrying out business and behaving in an ethical manner while protecting Bombardier's employees, assets and reputation. Together, we can compete with integrity and succeed in a way we can all be proud of.

Thank you for your efforts in safeguarding our reputation as a trusted manufacturer of the best planes and trains in the world and as a good corporate citizen.



# → WHO MUST FOLLOW THE CODE?

Our **CODE OF ETHICS**, which sets the global standards for our business and activities, applies to all members of the Bombardier community, including the Board of Directors, management and employees at every level, in every country and from every Bombardier legal entity (including joint ventures where Bombardier has a majority/controlling interest).

Management and employees are also expected to comply at all times with all Bombardier policies, directives and procedures. Bombardier suppliers, service providers and consultants are expected to adhere to Bombardier's Supplier Code of Conduct when dealing with or acting on behalf of Bombardier.

# → HOW IS THE CODE GOVERNED?

**BOMBARDIER'S ETHICS AND COMPLIANCE OFFICE** has implemented a governance structure to ensure that the principles of this Code are observed, promoted and managed effectively throughout the organization. The Ethics and Compliance Office oversees Bombardier's efforts to promote an ethical work environment and business practices of the highest ethical standards.

All Bombardier employees holding managerial positions have a responsibility to ensure that the Code is actively distributed, understood and followed within their teams.





FOUNDATION  
OF  
**THE  
CODE**

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## COMMITTING TO THE CODE

As a Bombardier employee, you have a duty to follow the Code, regardless of your position or location. If you're a newly hired employee, you must read the Code and sign an acknowledgement that you've understood it and commit to complying with it. Every year, designated members of management are required to sign an acknowledgement that they've read and understood the Code and to indicate whether they're aware of any breach of the Code's provisions.

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**Our core values shape the culture of Bombardier and serve as the foundation of this Code. All of our actions and decisions must be guided by these common values:**

### 1 | Integrity

Honesty, transparency, legality and high standards of ethical conduct guide us in all interactions.

### 2 | Respect for others

We achieve quality work when there's mutual respect among everyone. We value professional relationships that are based on respect for all individuals and organizations we do business with. Respect is essential in maintaining a healthy and thriving work environment for everyone.

### 3 | Commitment to excellence

We're committed to the pursuit of excellence—not only in our products, but also in how we perform our duties and in our dealings with customers, shareholders, suppliers, colleagues, partners and communities.

## FOLLOWING THE LAW

As an international company, Bombardier does business in many countries around the world. That means we must follow the laws and regulations of multiple jurisdictions, including nations, provinces, states, municipalities and international bodies, as applicable to our businesses and operations. When local laws permit something that is prohibited by the Code, then our Code always prevails.

If you encounter a conflict between the laws of a country where Bombardier does business and this Code, or if you need clarification regarding applicable law, contact a Legal Services representative or the Ethics and Compliance Office.

## UPHOLDING THE WORLD'S LARGEST SUSTAINABILITY INITIATIVE

Bombardier is a signatory of the United Nations Global Compact, and we're committed to actively promoting its 10 fundamental principles addressing human rights, labour, the environment and anti-corruption through our corporate strategies and across our operations. Our Code of Ethics incorporates this commitment and guides all employees to uphold these core principles.



OUR  
**RESPONSIBILITIES**



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## What employees must do

### As a Bombardier employee or business partner, you're expected to:

- ✓ Act ethically;
- ✓ Do your part to achieve Bombardier's objectives, while making decisions in compliance with the Code — without compromise;
- ✓ Familiarize yourself with the Code;
- ✓ Ask for advice: consult your supervisor or one of the Bombardier contacts on page 14 if you have any questions about the Code or Bombardier's Ethics and Compliance Program;
- ✓ Participate in any mandatory online or classroom training on ethics and compliance;
- ✓ Speak up: know how to report a potential breach of the Code and report all potential breaches and assist with any internal reviews; and
- ✓ Refrain from acting in a way that goes against the essence of this Code and that could be damaging to Bombardier's reputation.



## What management must do

We believe that models of ethical behaviour begin with management. In addition to the employee responsibilities listed before, Bombardier's managers must also be role models and exemplify high ethical standards that meet the spirit of this Code. Every manager is responsible for ensuring that no violations of laws, internal guidelines or this Code occur within their area of responsibility.



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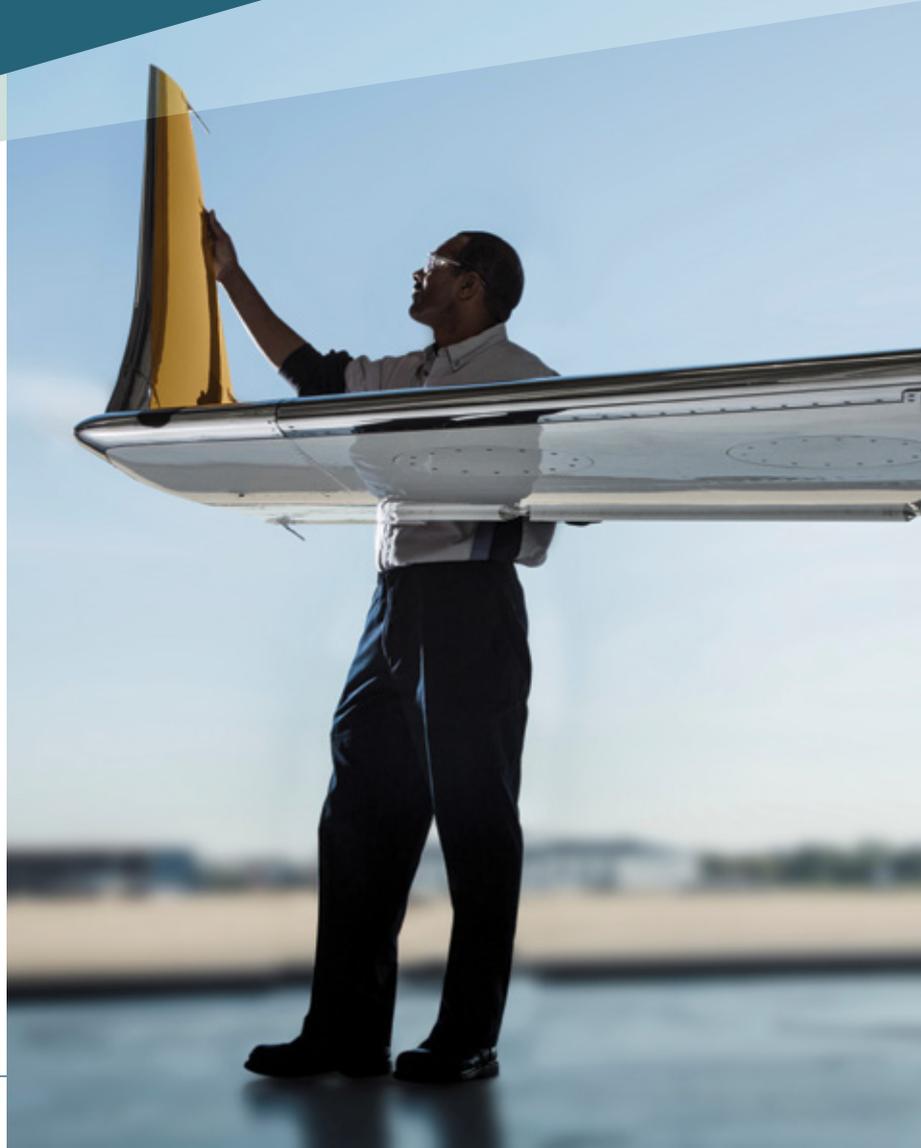
### As a Bombardier manager, you're expected to:

- ✓ **TAKE OWNERSHIP:** know the Code in detail and actively promote it in the workplace and among your team;
- ✓ **LEAD BY EXAMPLE:** act as a role model of ethical conduct;
- ✓ **CREATE** a work environment that reflects the content and the spirit of the Code;
- ✓ **COOPERATE WITH** Bombardier's Ethics and Compliance Office to distribute the Code to your employees and ensure they've read it, understood it and signed their acknowledgement as required;
- ✓ **ACTIVELY SUPPORT** Bombardier's Ethics and Compliance Office in implementing measures and activities related to the Code and to Bombardier's Compliance program;
- ✓ **ENSURE** that your employees participate in any mandatory online or classroom training on ethics and compliance;
- ✓ **BE VIGILANT** in preventing, detecting and responding to any violations of the Code;
- ✓ **PROTECT** those who report violations from reprisals;
- ✓ **DECIDE,** together with the proper resources, on the appropriate disciplinary measures in case of misconduct and ensure they're applied to resolve the matter; and
- ✓ **SEEK PROPER SUPPORT** from the Ethics and Compliance Office or from any other relevant resource when you become aware of any violation of the Code or applicable law.

## Other Bombardier policies and procedures

Policies issued by corporate office, business units or divisions are subject to this Code. You have an obligation to follow all policies that apply to you, in addition to the content of this Code. If there's any discrepancy between the Code and a policy, the Code always prevails.

Any business unit or division that wants to issue a new policy or directive must first contact Bombardier's Policy Office (**[policy\\_office@bombardier.com](mailto:policy_office@bombardier.com)**) to receive written approval and ensure coordination at a global level.





## Reporting potential violations of the Code

As a Bombardier employee, you have a duty to report potential violations of law, of this Code or of any other Bombardier policy to one of the following resources: your supervisor, a Human Resources Business Partner, a Legal Services representative, your local Ethics and Compliance Ambassador or the Ethics and Compliance Office. If you prefer to remain anonymous, you should use Bombardier's confidential reporting system.

No matter what method you choose, all reports are handled with the utmost confidentiality. When you file a report or enquire in good faith about potential violations of the Code, or you seek guidance on how to handle alleged violations, you can do so without fear of retaliation.

## Cooperating with internal reviews and investigations

Bombardier employees as well as any representative acting on behalf of Bombardier must fully cooperate with all internal reviews and investigations, when required.

## Penalties for violations

You must follow the laws and regulations of each legal system that applies to you and your work; if you do not do so, you may be held personally liable.

Employees who don't comply with the law expose both themselves and Bombardier to criminal or civil procedures. Failure to comply with the Code or relevant laws may lead to disciplinary measures that are proportional to the violation, up to and including termination of employment in addition to any penalties imposed by law.

# WHO TO CONTACT



## Ethics and Compliance Office

You can contact the Ethics and Compliance Office in any one of the following ways:

### By mail

Bombardier Ethics  
and Compliance Office  
800 Blvd. René-Lévesque West  
29<sup>th</sup> floor  
Montreal, Quebec  
Canada H3B 1Y8

### By phone

+1 (514) 861-9481

### By email

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

## Bombardier's Reporting System

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

- ✓ Online through the secure website
- ✓ By telephone: toll-free numbers are available on the website

## Ambassadors

Ambassadors act as local Ethics and Compliance representatives for their site. They're available to you for advice and guidance, or to help with any questions related to ethics and compliance. They've been selected for their motivation, trustworthiness and commitment to promoting an ethical work environment.

YOU CAN FIND OUT WHO  
YOUR LOCAL AMBASSADOR  
IS BY VISITING  
YOUR INTRANET  
OR BY LOOKING  
OUT FOR POSTERS  
AROUND YOUR SITE.





# PROMOTING A **HEALTHY** AND **SUSTAINABLE** **WORKPLACE**

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## Equal employment opportunities

Bombardier's goal is to promote a work environment that values a diverse and inclusive work force. Bombardier treats all its employees fairly, ethically, respectfully and with dignity. Bombardier offers equal employment opportunities without regard to age, gender, sexual orientation/identity, disability, race, colour, religion, language, ethnicity, country of origin, family or marital status, or any other ground protected by law, and will follow the laws and regulations of each country where it does business accordingly.

## Harassment

Bombardier is committed to providing a healthy and sustainable workplace that's free from harassment, including all forms of sexual, physical and psychological abuse. As an employee, you're entitled to—and expected to uphold—a positive, harmonious and professional work environment.



## WHAT SHOULD I DO?

**Q:** My colleague has been talking down to me a lot lately. It's odd, because he's not like that with anyone else. He's been attacking me personally more and more and it's really starting to affect me. Everyone on my team loves him and thinks I'm overreacting. I don't know what to do...

**A:** If the situation is starting to affect your work environment and your well-being, you should definitely speak up. Talk to your supervisor about what's going on. You can also reach out to your Human Resources Business Partner, contact the Ethics and Compliance Office or use Bombardier's reporting system. All cases are handled with the highest level of confidentiality. You shouldn't feel inhibited by any fear of retaliation, as Bombardier has a zero-tolerance policy for retaliation.

**HARASSMENT** is defined as any conduct, whether made verbally, non-verbally or through any other means of communication, that denigrates or shows hostility or aversion toward an individual or a group of individuals with the purpose or effect of:

- ✓ Creating an intimidating, offensive or hostile work environment; or
- ✓ Unreasonably interfering with an individual's work performance.

Harassment doesn't include the reasonable exercise of managerial authority.

## Health and safety

Bombardier considers the occupational health and safety of its employees, together with environmental protection

("HSE"), a fundamental corporate social responsibility. We will always strive to be a global leader in providing an HSE preventive culture.

To protect your own safety as well as that of your colleagues and other communities, you're required to act with a view to:

- ✓ Preventing professional illnesses and workplace accidents; and
- ✓ Reporting any situation that might be physically dangerous or harmful.

You must also commit to not working under the influence of any substance that could impair your judgement or interfere with the effective and responsible performance of your duties. Everyone must behave in a responsible manner when it comes to their health and safety, as well as to the health and safety of their colleagues and the general public.



## WHAT SHOULD I DO?

**Q:** I'm new at Bombardier and the colleague who's showing me the ropes told me today that I should throw highly toxic substances in the regular trash can near our workstation. When I asked him why, he told me that it's more convenient this way and that it didn't really matter. I'm scared this could be potentially hazardous, not only for my colleagues but also for the environment.

**A:** This type of behaviour definitely goes against our Code of Ethics and could also break environmental laws and regulations. You should tell your colleague you don't feel comfortable doing what he said, and immediately inform your supervisor and your local HSE team. You can also reach out to the Ethics and Compliance Office or use Bombardier's reporting system.

## Environment

We continually strive to improve the environmental performance of our activities, products and services by applying a "total lifecycle" approach starting from the initial conception and design stages of our projects.

Bombardier has adopted standards, procedures, contingency measures and management systems to ensure that our operations are managed safely, ecologically and in a sustainable way. We also comply with all relevant environmental laws in the countries where we have local representation.



## WHAT SHOULD I DO?

**Q:** We're under a lot of pressure to deliver the product we're working on according to schedule. My team and I found a way to meet the deadline, but it would require us to skip a few safety procedures. My team is very experienced, so we feel it wouldn't be a problem. Is it OK to speed up the process for the benefit of Bombardier?

**A:** No — you should never risk your safety or the safety of others to meet a deadline, even if the tasks involved are of a routine nature. Safety procedures are in place to protect you, as well as the company and our customers. Don't hesitate to reach out to your local HSE team for support in creating a solution that is both safe and efficient. Safety always comes first!



# SAFEGUARDING OUR PROPERTY

## Company property

You should use Bombardier's property for legitimate business purposes only. Bombardier expects all employees to take good care of the company's property and not expose it to loss, damage, misuse or theft.

## Intellectual property

Intellectual property comprises trademarks, domain names, patents, industrial designs, copyrights and trade secrets. You have a duty to protect Bombardier's intellectual property, just as you have the obligation to

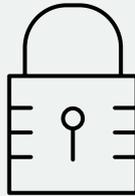
respect that of others. Subject to applicable laws, any inventions or discoveries made by employees during the course of their work are Bombardier's property. Intellectual property is considered confidential information; therefore, it is covered by the non-disclosure guidelines set out in the "Protection of confidential data and information" section of this Code.

## Protection of confidential data and information

Confidential data and information is information belonging to Bombardier that's not in the public domain.

Confidential information includes information produced by Bombardier or obtained in confidence from a third party and covered by a non-disclosure agreement.

Examples of confidential information are financial data, strategic plans, intellectual property, information on bids, personal employee information, legal documents and information on customers and suppliers. Don't divulge confidential information to anyone other than the person or persons for whom it's intended, unless you're authorized or legally required to do so. This includes confidential information



## Data privacy

Data privacy protects personal data, which is any kind of information that can personally identify an individual or single someone out as an individual. You should only process this kind of data when necessary and for legitimate business purposes. We also invite you to read Bombardier's Privacy Statement.

As a global organization, we're also committed to conducting business in a way that complies with all applicable data protection laws and regulations in every country in which we operate and to ensuring you're protected when your personal data is collected, processed and stored.

If you have any questions regarding data privacy, send an email to:

- ✓ Aviation: [dataprivacy@aero.bombardier.com](mailto:dataprivacy@aero.bombardier.com)
- ✓ Transportation: [privacy@rail.bombardier.com](mailto:privacy@rail.bombardier.com)

provided by suppliers and customers. You're required to maintain such confidentiality at all times, even after leaving the employment of Bombardier. You should also exercise caution to avoid misusing or inadvertently disclosing confidential information. This includes:

- ✓ Keeping electronic and paper documents and files that contain confidential information in a safe place, and using passwords and other measures to protect the confidential information;
- ✓ Exercising caution when discussing confidential matters on cellphones or other mobile devices;
- ✓ Not discussing confidential matters where they could be overheard, for example, in public places such as elevators, hallways, restaurants, airplanes and taxis;
- ✓ Transmitting confidential documents by electronic means, such as by e-mail, only when it's reasonable to believe this can be done under secure conditions; and
- ✓ Avoiding unnecessary copying of confidential documents.

While Bombardier will always strive to protect the confidentiality of all business communication, whether internal or external with third parties, you should always be aware, especially when communicating in writing, that there may be instances when your communication might have to be released to third parties such as regulatory authorities or law enforcement agencies in the context of investigation and/or litigation.



ACTING WITH  
**PROFESSIONALISM**  
IN OUR COMMUNICATIONS



## WHAT SHOULD I DO?

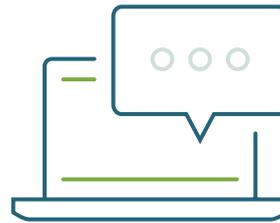
**Q:** My team and I are starting to work on a new product. I'd like to document the production from start to finish and create a very professional "how it's made" video, which I'd like to post on my blog. I'm a big fan of what we do, so the video would only contain positive things. Is that OK?

**A:** You should first reach out to your local Communications team for advice before going forward with this idea. You might inadvertently share confidential or sensitive information through your video, which would go against our Code of Ethics. Only authorized Bombardier spokespeople are allowed to share information and images of our products in our facilities with the public.

## Social media

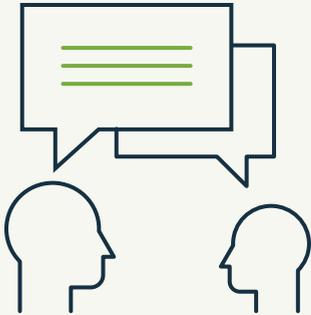
You must never openly express a personal opinion (be it positive or negative) in Bombardier's name on any social media platform. Only authorized Bombardier spokespeople are permitted to publicly represent the company. Additionally, you shouldn't create any type of blog in Bombardier's name unless you're authorized to do so by Bombardier's Communications department.

As a public issuer having shares listed on a stock exchange, Bombardier is governed by strict disclosure rules. Social media is not the place to discuss proprietary, non-public and confidential company information. Always be mindful of confidentiality when sharing anything online.



Never post or share content or comments that are discriminatory, offensive or inappropriate on social media. Always be aware of the reality of using social media: **everything shared is permanent and global in its reach.**

For more details, please refer to Bombardier's Social Media Guidelines. If you have any questions related to social media, send an email to [social.media@bombardier.com](mailto:social.media@bombardier.com).



## Communications with others

You should be truthful, straightforward and ethical in your dealings with others, and never intentionally mislead colleagues or third parties interacting with Bombardier. All employees are expected to behave with others in a respectful and professional manner by using appropriate, professional language, both in written and verbal communications.



## WHAT SHOULD I DO?

**Q:** I recently noticed people writing on social media about Bombardier. What they're saying is offensive and I know it's not true. Can I tell them they're wrong? Should I identify myself as a Bombardier employee to have more credibility?

**A:** If a situation like this comes up, you can respectfully disagree with that person. A good rule of thumb is to only reply once. Remember to be thoughtful, polite and respectful of others' opinion, even if you don't agree. You can disclose

your relationship to Bombardier but make sure you're clear that your views and opinions don't represent the official views of the company. And don't forget many of our projects, contracts and methodologies aren't public information and should not be shared online. Protecting confidential and proprietary information is everyone's responsibility. If you come across a negative comment about Bombardier, you can also always report it to our Social Media team.

## Public communication

Communication with the media, the investment community and regulators are the responsibility of designated spokespersons within Bombardier. If you receive an enquiry from any of these groups, you must refer them to an authorised spokesperson.

- ✓ Media  
[bi\\_media@bombardier.com](mailto:bi_media@bombardier.com)
- ✓ Investors  
[investors@bombardier.com](mailto:investors@bombardier.com)



⇒ If you have any questions or concerns regarding cyber-security, send an email to: [cybersecurity@bombardier.com](mailto:cybersecurity@bombardier.com)

## Cyber-security

You must actively protect Bombardier's information by ensuring cyber-security across all your activities. You must also understand and comply with Bombardier's Information Services (IS)/Information Technologies (IT) standards and follow the cyber-security principles put forth in our awareness and education program. If you witness any cyber-security incident, you have the duty to promptly report it.



### WHAT SHOULD I DO?

**Q:** I received an email earlier today that seemed a bit odd. I know I shouldn't have, but I clicked on the link that was in the body of the email, and now I'm worried that I may have compromised the security of our network. What should I do?

**A:** Not reporting the issue fast enough can put the company at risk. You should contact the Cyber-Security team immediately. The quicker we can react to these threats, the better chance we have at preventing any serious damage.



## WHAT SHOULD I DO?

**Q:** My brother and I are starting a small landscaping business. I'll be handling the accounting and publicity during my spare time. We're just starting up so we don't have any computers or software yet. Is it OK for me to use my Bombardier computer outside of business hours to work on our new business?

**A:** Even if you're using them outside of business hours, Bombardier IT resources shouldn't be used for personal purposes, especially to work on a personal side business. When in doubt, you can always ask your supervisor, IT or the Ethics and Compliance Office for guidance.



## → DO

- ✓ Set up strong passwords (8-12 characters) that can't be easily guessed.
- ✓ Always lock your workstation when you leave your desk.
- ✓ Always be mindful of your environment and be careful not to inadvertently share confidential information.
- ✓ Immediately report suspicious messages or activity to the Cyber-Security team.
- ✓ Ask questions. When in doubt, contact your Cyber-Security team.



## → DON'T

- ✓ Don't forget: passwords are personal and confidential, and not to be shared.
- ✓ Don't leave devices unattended and at risk of being lost or stolen.
- ✓ Don't install unauthorized software or modify the configuration of Bombardier equipment as this can compromise security.
- ✓ Don't disclose personal or company information to unauthorized individuals or parties.
- ✓ Don't open emails or click on links and launch attachments if you have the slightest doubt about their trustworthiness.

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## Use of Bombardier IT Resources

You must only use Bombardier IT resources, including email and Internet systems, for business purposes in support of Bombardier's activities. Any other use of our IT resources is not authorized. Remember that emails are susceptible to interception and create a permanent record.

All IT resources used for business purposes must be owned, leased or licensed by Bombardier unless otherwise approved by Bombardier. Only approved third party devices may be connected, directly or indirectly, to Bombardier IT resources (such as computers or network units).

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## WHAT SHOULD I DO?

- Q:** I just bought a great software program for my computer at home. I love it and it would help me do my job faster. Since I already purchased the license, is it OK for me to install it on my Bombardier computer?
- A:** Installing your personal software would be against Bombardier policy. In fact, you shouldn't install software from home or from any other source on your business computer without getting Bombardier's approval first. We don't allow it to prevent the installation of viruses, but also because software has strict copyright rules that are different for individual and corporate use. Installing personal software on your business computer could be considered pirating, and pirating software is equivalent to stealing, which Bombardier is liable for.



# UPHOLDING SOUND BUSINESS PRACTICES



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## Securities laws and insider trading

Subject to limited exceptions, it's illegal for anyone who has material, non-public information about a public company to buy, sell or trade in securities of that company, or to pass on undisclosed material information to anyone else.

Material, non-public information is defined as any information, generally unknown to the public, relating to a company that if disclosed could reasonably be expected to influence investors, or to affect the market price of the company's shares. Examples of this type of information include:

- ✓ Unpublished financial information, including quarterly or annual financial results not yet disclosed to the public;
  - ✓ Significant new contracts, products, patents or services, or significant losses of contracts or business;
  - ✓ Changes to the Board of Directors or executive management, including the departure of the company's CEO, CFO, COO or President (or persons in equivalent positions); and
  - ✓ Significant acquisitions or dispositions of assets, property or joint venture interests.
-

Therefore, if you have any knowledge of material, non-public information about the company, you're prohibited from trading in Bombardier securities until the information has been fully disclosed to the public and a reasonable period of time has passed for the information to be widely disseminated by way of a press release. Securities include common shares (such as Bombardier Class B shares), preferred shares or bonds. Similarly, if you have knowledge of material, non-public information about third parties, such as customers, vendors and suppliers, you're prohibited from trading in securities of that third party until the information has been fully disclosed and a reasonable period of time has elapsed. Pursuant to Bombardier's Disclosure Policy, information will not be considered to be "public" until the expiration of a period of two full trading days after the information is released to the general public.

Under no circumstances should you engage in hedging activity or in any form of transactions of publicly traded options on Bombardier securities, or of any other form of derivatives relating to Bombardier securities, including "puts" and "calls." You should also never sell Bombardier securities that you don't own (a "short sale").

You're **ABSOLUTELY PROHIBITED FROM CONVEYING UNDISCLOSED MATERIAL INFORMATION** (known as "tipping") about Bombardier to anyone, including outside professional advisors, other employees of Bombardier or members of their families, unless doing so in the necessary course of Bombardier business.

Since it may be extremely difficult to distinguish between information that is "material," as defined before, and information that's not, and in order to avoid the appearance of possible impropriety, as an employee, you're required to comply with the following rules:

- ✓ At all times, avoid recommending the purchase or the sale of the securities of Bombardier Inc. to third parties.
- ✓ If, as an employee, you wish to buy, sell or trade in securities of Bombardier Inc. for yourself or otherwise, Bombardier strongly suggests that you do so only during a "trading window" (even if you're not personally or actually aware of any material, non-public information), except trades made pursuant to and in accordance with an automatic securities purchase plan or automatic securities disposition plan (Automatic Plan)

then in force. Bombardier's Board of Directors has currently determined "trading windows" to be each period of 25 calendar days, starting the fifth working day following the publication of Bombardier Inc.'s quarterly or annual financial reports.

- ✓ At all times, even during this 25-day period, you can't trade in securities of Bombardier Inc. if you're aware of, or have access to, any material, non-public information as defined before (and, in such case, only after the expiration of a period of two full trading days after the information is released to the general public), or if Bombardier Inc. has provided notice to its employees under its corporate Disclosure Policy or otherwise that trading in Bombardier securities is prohibited.

To avoid possible inadvertent conflict with this Disclosure Policy, it's recommended that, outside of any

employee share purchase plan or Automatic Plan, no insider, employee or consultant leave with a broker any outstanding sell or purchase orders with a broker.

## Anti-corruption

In all jurisdictions, corruption is considered a criminal offense and is punishable under the relevant national and international anti-corruption laws, including by imprisonment. Under no circumstances should you or any third party acting in Bombardier's name engage in any form of corruption involving public officials or a private party. Bombardier complies with all applicable anti-corruption laws and regulations in the countries in which it operates, including the Corruption of Foreign Public Officials Act (Canada), the Bribery Act (UK) and the Foreign Corrupt Practices Act (USA).



**CORRUPTION** is the abuse of entrusted power for gain. Corruption can:

- ✓ Be passive (accepting or demanding) or active (offering or granting);
- ✓ Take many different forms such as bribes, kickbacks, secret or other illicit commissions, or other illegal or inappropriate payments; and
- ✓ Involve various actors, such as individuals, companies, government officials or agents.



## Gifts and entertainment

You must avoid giving or receiving gifts or entertainment if they're meant to improperly influence the recipient's judgement and actions or may be perceived to do so. Moreover, gifts and entertainment must never be accepted or given when prohibited by local laws or regulations or by the recipient's or donor organization's policies.

You should never accept or offer gifts, entertainment or any advantages

from/to public officials in contravention with applicable laws and regulations or other Bombardier policies. Furthermore, any attempts by third parties to improperly influence Bombardier employees by granting gifts and benefits to them, their family members or close circle must also be reported immediately via Bombardier's [reporting system](#) or to any of the resources mentioned on page 14.

A **GIFT** can be any payment, gratuity, gratification, present, benefit or advantage (monetary or otherwise) that is offered or received, such as goods, equipment, personal discounts, cash, gratuities, stocks or shares. Entertainment is considered any form of social amenity, including travelling, accommodation or invitation that is offered or received such as meals, hotel stays, airline travel or tickets to sporting, cultural or social events.



### WHAT SHOULD I DO?

**Q:** I just received a gift from a supplier that I know I can't accept. What should I do?

**A:** Advise your supervisor and, if possible, return the gift to the supplier and politely explain our policy. If the gift is something where return is not an option, place it in a common area where it can be enjoyed by everyone. You can also reach out to the Ethics and Compliance Office for advice.



## WHAT SHOULD I DO?

**Q:** We're organizing a corporate event, during which we'll serve a full meal and have entertainment for our guests. I know we're about to tender on a bid for a local public enterprise, and I thought it would be a good idea to invite some of their representatives to attend our event. Is this allowed?

**A:** In that context, offering any gifts, meals or entertainment to public officials would not be acceptable. Most countries have laws prohibiting or restricting public officials from receiving any gifts and entertainment. Your invitation could be perceived as a bribe. Offering a bribe may constitute a criminal act.

## Donations, sponsorships and requests for funds

Never promise, offer or receive any donations or sponsorships if they're meant to improperly influence the recipient's judgement or may be perceived to do so. No donations or sponsorship should be solicited, offered or given directly to public officials, their spouse, family or close circle.

It's strictly forbidden to directly communicate with suppliers, customers or partners to request donations, sponsorships, gifts or any form of financial support for an event organized for the benefit of Bombardier or its employees without prior approval from the Head of Procurement of the respective business unit or function.

## Fraud

Fraud is the wrongful or criminal use of company assets or communication devices in order to intentionally deceive, including through material omissions, third parties or the company for financial or other personal gain. Employees or third parties doing business with Bombardier who engage in fraudulent activities will have their employment or business relationship with Bombardier terminated and expose themselves to criminal and civil prosecution.



## WHAT SHOULD I DO?

**Q:** A position just opened on my team and I know my sister would be perfect for the job. She's smart, hardworking and has a lot of experience in that exact field. Can I hire her?

**A:** Hiring your sister would be a conflict of interest. You shouldn't interfere in the hiring process of a close relative, and a family member must never report to you. If your sister is interested in a career with Bombardier, you're welcome to refer her to other positions through our formal referral process.

## Conflicts of interest

A conflict of interest is any situation or arrangement where your personal activities or interests conflict with your responsibilities toward Bombardier. You must avoid conflicts of interest, whether real or perceived, in the performance of your duties.

If you find yourself in or witness a potential or actual conflict of interest, you have a duty to promptly disclose the issue to management, a Legal Services representative or the Ethics and Compliance Office as soon as possible.



## Money laundering

Bombardier maintains relationships with third parties only if their business activities are in line with what is prescribed by law and their financial assets and cash stem from legitimate sources. All of us have an obligation to strictly comply with the legal rules on combating money laundering, including the reporting of suspicious conduct by third parties with whom we conduct business. You must follow all applicable rules around recording and accounting for cash and other transactions and contracts.

## Books and records

Bombardier's books and records should at all times be complete, fair and accurate, and comply with all legal and accounting reporting requirements. Supported by Bombardier's systems of internal controls, they should accurately and truthfully reflect all assets, liabilities, transactions and events, and conform to relevant accounting principles. You must always manage, store and archive books and records—both printed and electronic—according to established policies and legal requirements.



DEALING  
RESPONSIBLY  
WITH  
**THIRD  
PARTIES**

wacom

## Competition law compliance

Bombardier complies with competition and antitrust laws wherever it does business. You must never employ or contribute to practices that unlawfully restrict competition, such as:

- ✓ Price-fixing;
- ✓ Market allocation (e.g., allocating products, services, customers and/or territories);
- ✓ Communication pricing-data (e.g., price offerings for products and services);
- ✓ Group boycotts of suppliers or service providers;
- ✓ Participating in an abusive or collusive setting of industry standards with a view to discriminating against competitors;



## WHAT SHOULD I DO?

**Q:** Last week, I participated in an industry-specific conference and another participant left confidential documents lying around relating to a bid Bombardier is also entering. The conference was held in a country where there aren't any competition laws. What am I risking if I looked at the documents and use the content to better our offering and increase our chances of winning the bid?

**A:** The information contained in those documents is not public and wasn't obtained through an official channel. Even if competition laws might not

be enforced in some jurisdictions, competition laws and international regulations have a global reach and apply to Bombardier as a global organization. Taking the documents or using the information you discovered would be considered anti-competitive. Therefore, you could face legal consequences for this decision, including jail time. This type of unethical behaviour and unfair business practice goes against our Code of Ethics. On top of the personal consequences, you should also always consider the impact your decision could have on Bombardier and its reputation.

- ✓ Excluding access to resources (including non-poaching or non-solicitation of human resources);
- ✓ Any monopolistic, collusive or conspiratorial behaviour that aims to reduce competition including bid-rigging activities; or
- ✓ Industrial espionage.

If you observe or experience any anti-competitive conduct by a Bombardier employee or any third party doing business with Bombardier, you must inform the Ethics and Compliance Office immediately.

## Customs, export control and embargo compliance

Bombardier complies with all applicable export controls and customs laws and regulations in the countries where it does business, as well as with existing economic sanctions.

Under no circumstances can sales or other transfers or retransfers of products, services or technology be made that are against applicable export controls, embargoes, economic sanctions or customs laws and regulations. Special care must be taken to avoid transactions with or disclosures to foreign persons or entities subject to export control restrictions.



## Governments and lobbying

Given its international and diversified nature, Bombardier is subject to a great variety of national and local laws and regulations. Bombardier and its employees are expected to comply with all legal and contractual obligations in dealing with the various governments and regulatory agencies. You and any third party dealing with government officials or other government representatives and negotiating contracts on behalf of Bombardier are responsible for knowing and complying with all applicable laws and regulations, including those pertaining to lobbying activities.

## Political Activities

As a Bombardier employee, you may, subject to applicable laws, engage in legitimate political activity, as long as it's carried out on your own time and without using Bombardier's property and resources. You may seek election or other political office, but you must inform your supervisor or the Ethics and Compliance Officer to discuss the impact your involvement may have on your duties at Bombardier. You may express your views on public or community issues of importance, but it must be clear at all times that the views expressed are not those of Bombardier.

Bombardier and its employees abide by all laws and regulations governing political contributions in every jurisdiction where Bombardier does business.



**BOMBARDIER**