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# **Bombardier Transportation Modern Slavery Statement**

For the Financial Year Ended December 31,  
2019 by Bombardier Transportation (Global  
Holding) UK Ltd (the “Company”)



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The Company is a subsidiary of Bombardier Inc. (“**Bombardier**”). This is the Modern Slavery and Human Trafficking Statement of the Company for the financial year ended December 31, 2019.

The statement is made pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (the “**Act**”) and describes measures in place at the Company to ensure that slavery and human trafficking is not taking place within the Company’s business and supply chains.

In accordance with the Act this statement is published on the following websites: [www.bombardier.com](http://www.bombardier.com) and [www.uk.bombardier.com](http://www.uk.bombardier.com).

### **About Bombardier**

Bombardier is a global leader in the transportation industry of both planes and trains, creating innovative and game-changing planes and trains. Our products and services provide world-class transportation experiences that set new standards in passenger comfort, energy efficiency, reliability and safety.

Bombardier is headquartered in Montréal, Canada, and has production and engineering sites in over 25 countries across the segments of Aviation and Transportation. Bombardier shares are traded on the Toronto Stock Exchange (BBD). In the fiscal year ended December 31, 2019, Bombardier posted consolidated revenues of US\$15.8 billion.

### **Bombardier’s approach**

Bombardier is a signatory of the **United Nations Global Compact** (“**UNGC**”), the world’s largest corporate citizenship and sustainability initiative. As such, we are committed to promoting, in our business activities, the 10 fundamental principles of the UNGC which address human rights, environmental protection, anti-corruption and labour rights, more specifically the elimination of all forms of forced and compulsory labour and abolition of child labour. Bombardier places substantial value upon suppliers who support and respect the internationally proclaimed human rights contained in the UNGC.

Our **code of Ethics** (“**the Code**”), reviewed in 2019, addresses ethical conduct in our work environment, business practises and relationships with external stakeholders. It requires us to uphold our core values, standards of behaviour and our commitment to the UNGC’s 10 principles across all of our global activities.



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The Code applies at all times, without exception, to all members of the Board of Directors, all management and all employees. You can see the code here: <https://www.bombardier.com/en/governance/code-of-ethics.html>.

In line with Bombardier's vision for its suppliers, Bombardier actively engages its supply chain by the adherence of its suppliers to its **Supplier Code of Conduct** that has been developed with recognition of the 10 principles outlined in the UNGC. The Supplier Code of Conduct details our expectation of suppliers in respect of human rights, legal compliance, health and safety, the environment, anti-corruption, ethics and governance. You can see the code here: <https://www.bombardier.com/en/governance/supplier-code-of-conduct.html>.

Our **Supplier Code of Conduct** specifically includes provisions prohibiting child labour and forced or compulsory labour, as follows:

#### **“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.”*

#### **“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.”*





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### Assessing and managing risk in the Company's supply chain

In 2019 the Company operated four procurement teams, Rolling Stock, Services, Indirect Goods and Services and Rail Control Systems. The teams continued to develop and deploy a number of complementary measures to guard against the risk of forced and child labour in supply chains. Those measures include the following:



While improving operational efficiency, we have strengthened our processes to reduce risks in our supply chain. Guided by our revised Third-Party Due Diligence Policy, our supply chain organisation has formalised its risk assessment procedure prior to engaging with new suppliers and conducts reviews based on their operational risk framework. We also reviewed our Supplier Code of Conduct to keep on par with international standards, especially with respect to anti-corruption, human rights and forced labour.



The **Steering Group** of senior procurement professionals created to develop, lead and maintain the Company's efforts in this area decided to meet on a regular basis to increase departmental cohesion. The Steering Group reports to the Company's Board of Directors.



Our **training program** undertook updates in 2019 to ensure that it was suitable to reach the audience intended via our online training platform. This was a success and will be deployed to the Company's employees in 2020.



Should employees or suppliers have concerns regarding slavery they have the responsibility to **report** their suspicions and we provide multiple channels for them to do so on a confidential basis:

- to colleagues including supervisors, human resources representatives, legal services representatives, internal audit representatives or next level of management;
- to Bombardier's Ethics and Compliance Office, by email or phone, open to both employees and suppliers and to dedicated Ethics Ambassadors available at all major sites; or
- via our free, independent and confidential hotline available to all employees 24 hours a day, seven days a week, anywhere in the world, accessed by phone or online.



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**Tier 1 supplier self-assessments of risk** are being undertaken via questionnaire. Suppliers are asked to confirm that they (and their supply chains) comply with our expectations and recognised CSR standards, including with respect to human rights. Results are scored to determine risk and appropriate next steps.

In 2019, we risk assessed and scored many important suppliers and conducted desktop audits.

This statement has been approved by the Board of Directors of the Company, for the financial year ending December 31, 2019.

Matt Byrne  
Director

Date

27th May 2020