

Supplier Code of Conduct

NAV CANADA



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NAV CANADA's Supplier Code of Conduct

Our Commitment

NAV CANADA is committed to acting responsibly in all business dealings to ensure compliance with applicable national and international legislation, including laws regarding anti-corruption, anti-trust, anti-bribery, fair competition and human rights. NAV CANADA will forgo business opportunities rather than act in an unethical manner and/or in violation of applicable law. Preserving an ethical workplace is critical to our continued success and we strive to hold ourselves to the highest ethical standards, and we expect the same of all of our Suppliers.

Business Conduct and Ethics

NAV CANADA Suppliers must commit to, and enforce, the highest standards of ethical conduct and fair business practices, including:

Business Integrity: The highest standards of integrity are to be upheld in all business interactions. Supplier shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Supplier's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

No Improper Advantage: Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Supplier commits to complying with all applicable laws relating to bribery and anti-corruption. Supplier agrees that it will not cause NAV CANADA or one of its customers to be in breach of any such laws, and will maintain programs to prevent and detect violations of such laws. Supplier will report to NAV CANADA an allegation of bribery or corruption made in court, arbitration or in administrative proceedings against NAV CANADA or Supplier and will

reasonably assist NAV CANADA in the investigation required by a government agency with regard to a breach of any such laws.

Disclosure of Information: Information regarding Supplier labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are strictly prohibited.

Intellectual Property: Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer information is to be safeguarded.

Fair Business, Advertising and Competition: Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available.

Protection of Identity and Non-Retaliation: Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers* are to be maintained, unless prohibited by law. Supplier should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

Privacy: Supplier acknowledges that NAV CANADA is subject to the *Personal Information Protection and Electronic Documents Act* of Canada. Supplier commits to, protecting and ensuring the confidentiality, privacy and security of NAV CANADA information, including personal information of suppliers, customers, consumers, employees and contingent workers, and has appropriate policies and procedures in place to ensure they can comply with this requirement. Supplier will promptly report to NAV CANADA any unauthorized disclosure, alteration or any loss of NAV CANADA information, including any personal or confidential information of NAV CANADA or suppliers, customers, consumers, employees and contingent workers.

Supplier performs services in accordance with applicable anti-spam legislation. Where electronic messages are sent from or received in Canada, or computer

programs are installed on computer systems in Canada, Supplier complies with all requirements of the Canada Anti-Spam Legislation (“CASL”). Supplier promptly reports to NAV CANADA any CASL related compliance problems or incidents, or if the Supplier receives notice from any Governmental or Regulatory Authority relating to failure to comply with applicable anti-spam legislation.

Health and Safety

Suppliers must ensure safe working conditions and a healthy work environment for their workers. At a minimum Supplier will ensure that the following health and safety standards are followed and adhered to:

Occupational Safety: Workers' exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall be encouraged to raise safety concerns.

Emergency Preparedness: Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

Occupational Injury and Illness: Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

Industrial Hygiene: Workers' exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, workers' health is to be protected by appropriate personal protective equipment programs.

Physically Demanding Work: Workers' exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

Machine Safeguarding: Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

Sanitation, Food, and Housing: Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Workers' dormitories provided by the Supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

Health and Safety Communication: Supplier shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

Drugs and Alcohol: Suppliers' personnel are strictly prohibited from performing work on NAV CANADA premises, be in control of a NAV CANADA vehicle or operate NAV CANADA equipment while under the influence of alcohol or drugs, including the after-effects of such use. The possession, distribution, sale, or consumption of cannabis is explicitly banned at all times while on NAV CANADA property. Furthermore, the use, possession, presence in the body, or distribution or sale of illicit and/or illegal drugs while performing work on NAV CANADA premises, in NAV CANADA vehicles or while using NAV CANADA equipment is strictly prohibited.

Environment

Suppliers are to demonstrate good stewardship of the environment while working to reduce the environmental impacts of their operations. Suppliers are expected to:

Environmental Permits and Reporting: All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

Pollution Prevention and Resource Reduction: The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Hazardous Substances: Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Wastewater and Solid Waste: Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures should be implemented to reduce generation of wastewater. Supplier shall conduct routine monitoring of the performance of its wastewater treatment systems.

Air Emissions: Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems.

Materials Restrictions: Supplier is to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific

substances in products and manufacturing, including labeling for recycling and disposal.

Storm Water Management: Supplier shall implement a systematic approach to prevent contamination of storm water runoff. Supplier shall prevent illegal discharges and spills from entering storm drains.

Energy Consumption and Greenhouse Gas Emissions: Energy consumption and greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Supplier is to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

Human Rights and Labor

NAV CANADA Suppliers are expected to support and respect the protection of human rights of employees and must treat all employees with dignity and respect. NAV CANADA's Suppliers will:

Support Freely Chosen Employment: Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used either by Supplier or by any of its contractors, suppliers or subcontractors. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in a language which they understand that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers or agents'

recruitment fees or other aggregate fees in excess of one month's salary. All fees charged to workers must be disclosed and fees in excess of one month's salary must be returned to the worker.

Comply with Young Workers Regulations: Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Supplier shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

Maintain Appropriate Working Hours: Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Provide Appropriate Wages and Benefits: Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

Ensure Humane Treatment: There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers or threats for their family; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Implement Non-Discrimination Policies and Processes: Supplier should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

Not Prevent Freedom of Association: In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

Diversity and Inclusion: NAV CANADA is committed to fostering a diverse and inclusive work environment where diverse ideas and perspectives are valued, respected and protected. Likewise, NAV CANADA expects its Suppliers to treat their clients, employees, agents, contingent workers, subcontractors and others in a manner that is consistent with these values. It is NAV CANADA's belief that including a range of diverse parties and perspectives is important to our future business success and, for that reason, we seek to work with high-performing Suppliers who are also able to add a diverse perspective to our business.

Suppliers are strongly encouraged to identify, adopt, and integrate the principles of diversity and inclusion into their business practices and processes.

Monitoring and Compliance

NAV CANADA's Suppliers will demonstrate that it has established or maintains an appropriate management and monitoring system to ensure compliance with the Code as set forth below.

Corrective Action: Suppliers are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with the Code.

Compliance: Suppliers will keep all information necessary to document their compliance with the Code. NAV CANADA requires all of NAV CANADA Suppliers to confirm their compliance with the Code on an annual basis, as well as acknowledge that they are complying with all applicable laws in the country or countries in which they are doing business. Further and upon prior written notice, NAV CANADA may, through itself or a third party, at NAV CANADA's cost, audit Suppliers books, records and facilities to ensure Supplier's compliance with this Code.

Reporting Noncompliance: Suppliers, their employees and/or their subcontractors should report to NAV CANADA any questionable behavior by NAV CANADA employees or by its suppliers, supplier employees and/or their subcontractors. Non-compliance can be reported in English and French by email at navcanada@integritycounts.ca, by phone at 1-866-921-6714, by mail at PO Box 91880, West Vancouver, BC, Canada, V7V 4S4, or by fax at 1-604-926-5664.

Management System: Supplier shall demonstrate, adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable

laws, regulations and customer requirements related to the Supplier's operations and products;

(b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system should contain the following elements:

Legal and Customer Requirements. A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

Risk Assessment and Risk Management. A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Supplier's operations, and the determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

Training. Programs for training managers, workers and those who have a direct responsibility for supply chain management to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

Audits and Assessments. Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

Accountability Standards and Procedures. Maintain internal accountability standards and procedures for employees or contractors failing to meet the standards set forth in this Supplier Code of Conduct.