

2023 Report – Fighting Against Forced Labor and Child Labor in Supply Chains.

by

Bell Textron Canada Ltd.

This report is filed by Bell Textron Canada Ltd. (“Bell Canada”) for the financial year ending December 31, 2023 (“Reporting Year”). It constitutes the first report prepared by Bell Canada in response to Canada’s Fighting Against Forced Labor and Child Labor in Supply Chains Act (the “Act”) and details steps Bell Canada has taken to prevent and reduce the risk that forced labor or child labor is used at any step in the production of its products.

1. Entity Structure, Activities, and Supply Chain

Founded in 1986, Bell Canada is a limited liability company located in the Province of Quebec that is engaged in the manufacture, sale and distribution of general aviation helicopters and equipment. Bell Canada currently employs an estimated 1,500 employees and it sources parts, assemblies, and materials globally doing business with approximately 800 suppliers located in 20 countries.

Bell Canada’s ultimate parent is Textron Inc. which is a U.S. publicly traded entity, with its corporate headquarters located in Providence, Rhode Island. Textron is a global business, with a presence in over 25 countries and employing approximately 35,000 people.

2. Steps Taken to Prevent and Reduce the Risk that Forced Labor or Child Labor is Used at Any Step of the Production of its Products

Bell Canada is committed to fair employment practices and following applicable employment law. This unwavering commitment includes complying with laws that prohibit forced labor and child labor.

The following steps were taken during the Reporting Year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of Bell Canada’s products:

- a. Reviewed and updated its Code of Conduct, commonly referred to as the Business Conduct Guidelines.
- b. Reviewed and updated its Code of Conduct for Suppliers and Other Business Partners (the “Supplier Code”).
- c. Implemented anti-forced labor and child labor contractual clauses.
- d. Reviewed and updated its Commitment to Human Rights (“Human Rights Commitment”).

3. Policies and Due Diligence Processes

a) Business Conduct Guidelines

In the Reporting Year, the Business Conduct Guidelines were reviewed and updated. The Business Conduct Guidelines serve as a code of conduct for Bell Canada and its employees. The Business Conduct Guidelines establish the expectation that our suppliers and business partners will conduct business in accordance with the highest ethical standards and in compliance with all applicable laws. This includes complying with laws

that prohibit child labor or forced labor. Breaches of the Business Conduct Guidelines are subject to disciplinary action up to and including termination of employment.

b) Code of Conduct for Suppliers and Other Business Partners

In the Reporting Year, the Supplier Code was updated. The Supplier Code sets forth Bell Canada's expectation that its suppliers will not engage in the use of illegal child labor or obtaining labor or services through coercion, physical threats or restraints, withholding of passports, identity or immigration documents, the use of false or misleading recruitment practices, or other forced labor practices. The Supplier Code directs suppliers to ensure that their directors, officers, employees, representatives, agents, and business partners, as well as the suppliers within their supply chain, adhere to the principles established by the Supplier Code.

c) Human Rights Commitment

The Human Rights Commitment, which represents Bell Canada's commitment to promoting and supporting human rights in its operations and supply chain worldwide, was also revised and updated in the Reporting Year. This Human Rights Commitment applies to all its employees, its Board of Directors and any others who may represent or act on behalf of Bell Canada.

4. Identifying Parts of its Business and Supply Chains that Carry a Risk of Forced Labor or Child Labor

Although Bell Canada has not yet initiated a formal process of identifying areas of its supply chain that carry a risk of forced labor or child labor, Bell Canada acknowledges that the risk may exist. Accordingly, Bell Canada has incorporated contractual provisions into its supply chain agreements with direct suppliers requiring compliance with the relevant laws and its Supplier Code. Additionally, Bell Canada uses a media screening tool that is intended to identify adverse media about a direct supplier, including any allegations that the supplier has used forced labor or child labor in the past. Finally, employees and suppliers are encouraged to report violations of the Supplier Code. Bell Canada is committed to creating an environment where individuals can raise questions or concerns without fear of retaliation.

5. Measures Taken to Remediate Any Forced Labor or Child Labor in its Activities and Supply Chains

No measures have been taken to remediate any forced labor or child labor in Bell Canada's supply chain as it has not yet identified any use of forced labor or child labor in its supply chain.

6. Measures Taken to Remediate the Loss of Income from Any Measures Taken to Eliminate the Use of Forced Labor or Child Labor

Bell Canada has not taken any measures that would require remediation of the lost income by any persons subjected to forced labor or child labor.

7. Training Employees

Bell Canada provides training to its employees on its Business Conduct Guidelines and requires an annual certification of compliance to be submitted by all designated employees

that they are not aware of any breach of the Business Conduct Guidelines. Breaches of the Business Conduct Guidelines are subject to disciplinary action up to and including termination of employment. In addition, Bell Canada provides periodic training on relevant compliance topics like immigration law, pay equity and on how to conduct effective workplace investigations to employees working in Human Resources. Except as specified, Bell Canada does not otherwise provide employees and management who have direct responsibility for supply chain management training on forced labor or child labor.

8. Assessing Effectiveness in Ensuring that Forced Labor and Child Labor Are Not Being Used in its Businesses and Supply Chains

Bell Canada has not taken any action to assess its effectiveness in preventing and reducing risks of forced labor and child labor in its activities and supply chains as it has not yet initiated a formal process for identifying areas of its supply chain that carry this risk.

Approval and Attestation

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Bell Textron Canada Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed.

I have the authority to bind Bell Textron Canada Ltd.

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Name: Dennis Kim

Title: Director

Date: 5/30/2024