

***2024 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, 2024 (“Reporting Year”). It constitutes the second 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 1,600 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. Developed and implemented grievance mechanisms to address complaints in the workplace.
- d. Implemented anti-forced labor and child labor contractual clauses.
- e. Reviewed and updated its Commitment to Human Rights (“Human Rights Commitment”).
- f. Mapping activities.
- g. Mapping supply chains.

- h. Developed and implemented due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in our supply chains.
- i. Monitoring suppliers.

### **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.

Bell Canada has numerous avenues for its employees to file a grievance or ethics complaint. In addition to an in-person report, Bell Canada employees may email the Bell Ethics and Compliance Department, call the Global Human Trafficking hotline, or report issues to our HelpLine via a toll-free number from Canada or website report. These HelpLine reports may be anonymous. Bell Canada is committed to creating an environment where individuals can raise questions or concerns without fear of retaliation. Our Supplier Code also requires our suppliers to have adequate reporting avenues for their employees.

#### **b) Code of Conduct for Suppliers and Other Business Partners**

In the Reporting Year, the Supplier Code was reviewed and 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**

Bell Textron Inc. has implemented a Global Readiness Center (“GRC”) as part of its Supply Chain Department. The GRC monitors all direct aerospace products suppliers for both Bell Textron Inc. and Bell Canada. The GRC employs a third-party service that monitors publicly available information. We monitor all Tier 1 (direct suppliers), Tier 2 (subcontractors to our Tier 1 suppliers), and Tier 3 (all other suppliers that are in our approved supplier list). Tier 3 suppliers may be subcontractors further down in the supply chain or have a business relationship with Bell Canada other than being a Tier 1 or 2 supplier. Our third-party service subscribes to various databases that monitor risk. These databases include lists, government restrictions, and prohibited sources. The GRC is currently monitoring a number of lists that include entities that have violated forced and child labor laws. A number of lists are Canada-specific, but we also monitor appropriate databases worldwide to cover our world-wide supply chain. If a Bell Canada supplier matches with any of the databases and lists that we monitor, an alert is sent to GRC personnel. GRC personnel review the risk and assign the risk to be reviewed, evaluated, and managed by the appropriate Bell Canada point of contact. Reviewers include our supply chain specialists, buyers, and management.

The GRC has the ability to map all of our approved Tier 1 suppliers and the rest of our aerospace products supply chain (Tier 2 and 3 suppliers). We are also able to focus on certain risks and generate reports as required. We have an executive module which gives our upper management access to data and transparency. All of our approved suppliers, at all tiers, are continuously monitored.

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

Bell Canada has not yet identified any use of forced labor or child labor in its supply chain. Therefore, no remediation measures have been necessary.

#### **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 identified any persons subjected to forced labor or child labor in its supply chain. Therefore, no remediation measures have been necessary.

#### **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. Bell Canada Supply Chain personnel also receive ad hoc training on Bell Canada’s standard terms and conditions, including new or updated regulations. 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**

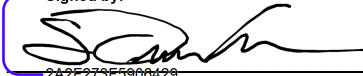
Bell Canada has started the process of identifying parts of our activities and/or supply chains that carry risks. We are continuing to mature our risk assessments. We do not currently assess our effectiveness.

#### **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.

Signed by:  
  
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Name: Dennis Kim  
Title: Director  
Date: 5/27/2025