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## NFI Group

### California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 (“CTSCA”), effective January, 2012, requires manufacturers to make publicly available information regarding their efforts to eradicate the risks of slavery and human trafficking from their supply chains. The NFI Group and its subsidiaries are committed to ensuring that its supply chain reflects its values and respect for human rights. The company is committed to acting ethically and in compliance with all laws, including applicable slavery and human trafficking laws.

The CTSCA requires the NFI Group to disclose the information below:

#### 1. Supplier verification

The NFI Group maintains procedures to identify compliance and assess potential human rights impacts across our supply chain, including the CTSCA. We incorporate supplier visits and checks into our Supplier Approval and Risk Assessment processes. Those processes are coordinated by The NFI Group sourcing staff and could be supported by other departments.

#### 2. Supplier audits

While the NFI Group does not conduct regular audits for this specific purpose of the CTSCA, our supply team regularly visits our major domestic and international key suppliers, to review their business processes and supply performance, which includes reinforcing the commitments of our Code of Conduct. Corrective action or termination will occur if lapses in their business process or code of conduct is determined.

#### 3. Supplier certification

The NFI Group Supplier requires certifications from its direct suppliers that operate in regions considered high risk for slavery, human trafficking, and child labor.

#### 4. Employee training

The NFI Group provides training specific to the risks of slavery, human trafficking, and child labor to all sourcing and procurement management personnel to ensure diligence is sustained within our supplier management processes.



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## 5. Internal accountability

The NFI Group maintains and annually trains employees on its Code of Conduct. The Code outlines employees' accountability and responsibility for ethical behavior and compliance with internal policies. Anyone aware of a violation of the CTSCA may report it to our New Flyer Ethics and Compliance Hotline by phone at +1 (844) 299-1086 (US/Canada), website: <http://www.newflyer.ethicspoint.com> or email: [Ethics@newflyer.com](mailto:Ethics@newflyer.com)

Sincerely,

**DAVID WHITE**

Executive Vice President, Supply Management