



NFI Group Supplier Code of Conduct

Introduction

This NFI Group Supplier Code of Conduct (this “Supplier Code”) formalizes the expectation of NFI Group Inc. and all of its subsidiaries (collectively, “NFI Group”) and the principles under which suppliers of goods and/or services and their employees, agents and representatives (hereinafter, “Suppliers”) are required to conduct themselves in their business practices with NFI Group and its employees and agents.

As part of the selection process when seeking to do business with Suppliers and its criteria for continuing relationships with existing Suppliers, NFI Group requires that all of its business partners are reputable and are committed to conducting business with the highest standards of fairness, honesty and integrity and in compliance with all legal and regulatory requirements and practices, compatible with those standards and practices that NFI Group expects from its own employees and agents. For further detail regarding NFI Group’s ethical standards and requirements, please refer to the NFI Group Code of Business Conduct and Ethics (“NFI Code of Conduct”), which is available at nfigroup.com/investor-relations/corporate-governance.

If there is a conflict between applicable laws and this Supplier Code, or in the event there are no local laws or regulations that are applicable to the relationship between NFI Group and its Suppliers, the stricter standard shall apply to the extent that it does not violate applicable laws. Suppliers must contact their NFI Group representative to discuss any inconsistency between the requirement under this Supplier Code and applicable local law.

Values

NFI Group has a value system and a principled approach in conducting its business. This means that NFI Group is committed to conducting its businesses in ways that, at a minimum, meet fundamental obligations in areas of human rights, labor, environment and anti-corruption and those standards and requirements set out in the NFI Code of Conduct. Learn more about our principles at nfigroup.com/company/about.

The following principles, standards, and qualities describe the expected behavior from all NFI Group employees and agents and the behaviors we expect from all our suppliers and their respective employees:

Integrity: Adherence to our values and consistently delivering on our promises.

Dependability: Consistent behavior or performance that is deserving of trust.

Accountability: Willingness to accept responsibility and to answer for our actions.

Passionate: Strong interest and enthusiasm in achieving successful outcomes.

Responsive: Promptly and professionally reply to external and internal inquiries.

Decisive: Make decisions supported by appropriate information and take action.

Fair: Make unbiased decisions and seek to balance the interests of all stakeholders.

Ethical: Adherence to applicable laws, regulations and accepted standards and practices of social and professional behavior.



Citizenship: Socially conscious member of society and a willing participant in appropriate local, regional and industry initiatives.

Laws and Regulations

Suppliers must operate in full compliance with all of the applicable laws and regulations of the countries in which they operate and in full compliance with this Supplier Code.

Human Rights

NFI Group does not tolerate child or forced labor or any other unacceptable treatment of workers, and we will not partner or maintain partnerships with companies that employ any child or forced labor, either directly or indirectly. This means that Suppliers must not permit exploitation of children, physical punishment or abuse, or involuntary servitude in their businesses and in their own partnerships and supply chains. Any form of human trafficking, forced, debt bonded, indentured or slave labor are unacceptable, and NFI Group is committed to preventing these practices in its businesses and supply chain.

NFI Group operates in compliance with and expects that its Suppliers also comply with the California Transparency in Supply Chains Act. NFI Group's related disclosure can be viewed here: nfigroup.com/site-content/uploads/2019/08/CA-Transparency-Act-NFI-GROUP.pdf

Health and Safety

Providing a safe workplace to our employees is a priority at NFI Group. Similarly, NFI Group expects that the occupational health and safety of its own employees is a priority for the Supplier throughout all significant aspects of its activities and in all locations in which Suppliers conducts business or has employees. At a minimum, Suppliers must comply with all applicable health and safety laws, regulations and standards. Suppliers shall have and implement appropriate policies, standards, procedures, contingency measures and management systems, and take appropriate remedial action in the event of non-compliance, in order to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace to their employees.

Respect for One Another

NFI Group operates its businesses in a climate of respect, courtesy and impartiality. NFI Group expects that each of its Suppliers will extend the same fairness and impartiality to other NFI Group Suppliers that wish to compete for NFI Group's business. We expect open, honest, and timely communication from our Suppliers. NFI Group's Suppliers are expected to encourage a positive and diverse workplace and are expected not to tolerate harassment or discrimination, including discrimination based on age, race, color, physical or mental disability, religion, social status, family status, marital status, national or ethnic origin, sexual orientation and gender identity or expression.

Anti-Corruption | Gift and Entertainment

NFI Group does not participate in or condone any corrupt practices, including offering or accepting kickbacks, bribes, excessive gifts or hospitality, or facilitation payments, directly or indirectly, to any party and expects that Suppliers and their employees also conduct themselves to the same standards. For further information regarding NFI Group's anti-corruption policies and practices, please refer to NFI Group's Anti-Corruption policy at nfigroup.com/investor-relations/corporate-governance.



Collaboration

Successful business relationships are the result of mutual goals and values. We believe every Supplier relationship is an opportunity to extend our enterprise and grow our mutual businesses. Information given to us by Suppliers must be accurate, and when requested, we will always treat the Supplier's confidential information as such.

Environment

Suppliers must comply with all environmental laws and regulations in the locations in which they conduct their business. NFI Group encourages Suppliers to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations where possible.

Responsibility to Our Communities

NFI Group is committed to being a good corporate citizen. We expect our Suppliers to abide by all applicable employment, environmental, health and safety laws, regulations and policies. We also believe that Suppliers should provide wage and benefit levels to their employees that address the basic needs of people, taking into consideration all local conditions.

Adherence to Code

NFI Group expects you and your employees to adhere to this Supplier Code. If Suppliers or any of their employees believes that other Suppliers or NFI Group or any of their respective employees has violated this Supplier Code (and in the case of NFI Group and its employees and agents, the NFI Code of Conduct), please refer to NFI Group's Whistleblower policy nfigroup.com/investor-relations/corporate-governance on how to file a report regarding such alleged violation. You may file a report with our Ethics and Compliance Hotline online at: nfigroup.ethicspoint.com; by email to: ethics@newflyer.com, or by phone at:

North America Toll Free:	1-800-601-2161
United Kingdom Toll Free:	0808-234-1752
Hong Kong Toll Free:	800-93-3389