

THIRD PARTY CODE OF CONDUCT

DRIVEN BY INTEGRITY | COMMITTED TO EXCELLENCE



ADVENTURE BY DESIGN

OUR VALUES

THEY MAKE OUR CULTURE UNIQUE, INFORM HOW WE ACT, AND DRIVE WHAT WE DO.

DRIVE TO DELIVER OUR COMMITMENTS

We say what we do. We do what we say. No excuses. Only sheer determination. Relentless drive and love of the ride push us ahead. **WHILE WE LIVE FOR THE RIDE, WE ALWAYS ARRIVE AT DESTINATION.**

INGENUITY TO DEFY CONVENTIONS

We're not afraid to see things differently. Constant curiosity makes us the first to uncover new solutions. We question. We innovate. We progress. **RELENTLESSLY.**

PASSION TO KEEP MOVING

Passion informs everything we do and is an integral part of every value we have. If it's not done with passion, it's not BRP. **IT'S PASSION YOU CAN FEEL.**

TRUST TO BUILD STRONG PARTNERSHIPS

We take care of our people like family. We act with integrity. People can count on us like we count on them. **IT'S THAT SIMPLE**

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1. INTRODUCTION

Bombardier Recreational Products Inc., its affiliates and subsidiaries (collectively “**BRP**”) is dedicated to maintaining the highest standards of ethical conduct and corporate citizenship and, as a signatory to the United Nations Global Compact, this commitment not only governs our internal operations, but it also extends to our global supply chain and the collaborators we work with.

BRP upholds core values in respect of human rights, labor, environmental practices and anti-corruption, within our organisation and through our business relationships. By adhering to this Third-Party Code of Conduct (the “**Code**”), which set out our expectations with regards to these values, our third parties play a key role in supporting these objectives, contributing positively to society and promoting environmental stewardship.

1.1 APPLICABILITY

This Code applies to any party, as well as anyone working for them or acting on their behalf, that supplies goods or services to BRP, sells or distributes our products, parts, accessories and apparel, collaborates with us, or acts on our behalf. This includes all third parties doing business with BRP such as suppliers, manufacturers, original equipment manufacturers, dealers, distributors, service providers, contractors, consultants, licensees, etc. (referred to collectively as “**Third Parties**”).

We expect our Third Parties to understand and uphold our values, embracing the same high standards of business conduct as we do. Third Parties must therefore ensure that the principles in this Code are implemented and communicated throughout their organization and shared with employees and subcontractors working on behalf of BRP. We also encourage our Third Parties to put similar policies and tools in place, conduct due diligence and implement management systems to identify risks among their own Third Parties.

1.2 COMPLIANCE WITH LAWS

Third Parties must adhere to all applicable laws and regulations relevant to their operations, including local laws in the countries where they operate or provide services. In some cases, this Code goes beyond compliance with applicable laws and draws upon internationally recognized standards. When differences arise between the standards included in this Code and legal requirements, the stricter standard shall apply, in compliance with applicable law.

2. HUMAN RIGHTS

2.1 CHILD LABOR

BRP prohibits the employment of individuals under the age of 15¹ or the local legal minimum working age, whichever is higher. We require Third Parties to comply with child labor laws and ensure they only employ individuals who meet the legal age requirements.

2.2 MODERN SLAVERY

BRP enforces a zero-tolerance policy for all forms of modern slavery, including human trafficking and forced labor. We do not engage with or purchase materials or services from entities that use forced or involuntary labor. Third Parties must not require workers to surrender passports, identity papers, work permits, travel documents and other personal legal documents as a condition of employment and workers must be free to leave with reasonable notice.

2.3 COMPENSATION AND WORKING HOURS

Third Parties must comply with local regulations governing employee compensation and working hours. Overtime must be voluntary and duly compensated in accordance with local laws.

2.4 HARASSMENT

BRP does not tolerate any kind of harassment in the workplace and expects the same from Third Parties we work with. Third Parties must provide employees with a work environment free from physical, psychological, sexual and verbal harassment, bullying, intimidation, or any other form of abusive conduct.

2.5 INCLUSIVE WORK ENVIRONMENT

Third Parties must foster an inclusive work environment ensuring employees (regardless of their employment status) are treated fairly, ethically, respectfully and with dignity – irrespective of their race, colour, religion, gender, age, ethnic or national origin, disability, sexual orientation or preference, gender identity, marital status, citizenship status, political preference or other personal characteristics. Employment decisions must be based on competencies and not on any personal characteristics.

2.6 FREEDOM OF ASSOCIATION

Third Parties are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of reprisal.

3. RESPONSIBLE BUSINESS PRACTICES

3.1 CONFLICT OF INTEREST

Third Parties working for or on behalf of BRP must always act in our best interests. They must avoid actual, potential or perceived conflicts of interest and promptly disclose any residual risk to

¹ In line with the standards set by the International Labour (ILO) in its Minimum Age Convention (C138)

their BRP contact before initiating negotiations, starting a business relationship or during their mandate with BRP.

3.2 GIFTS AND HOSPITALITY

Third Parties can offer gifts and hospitality to BRP employees as long as they are reasonable, appropriate and transparent, and made to maintain good business relations rather than with the intent to influence the outcome of decision making. Cash or cash equivalents (such as gift cards, gift vouchers, loans, stock, or stock options) are never appropriate. Furthermore, Third Parties must never offer or accept gifts and hospitality to/from other Third Parties on behalf of BRP.

3.3 FAIR COMPETITION

Third Parties must always engage in fair, competitive business practices and comply with antitrust and competition legislation. They must avoid illegal cooperation with competitors including bid rigging or price fixing and ensure all business dealings are accurately reflected in their books and records.

3.4 ANTI-CORRUPTION

Third Parties must never, directly or through others, request, offer, promise, give or accept any form of payment or incentive to gain an improper business advantage. Third Parties must not engage in fraud, bribery, kickbacks, money laundering, embezzlement, extortion, or any other form of corruption.

Third Parties must never make any facilitation payments on behalf of BRP or for the benefit of BRP, whether they are working directly or indirectly with BRP. This restriction applies even in countries where facilitation payments are tolerated by law.

3.5 TRADE COMPLIANCE

Third Parties must comply with all applicable trade compliance laws and regulations, including export controls, economic sanctions, embargoes and anti-boycott. Third Parties must obtain any authorizations or licenses required to import or export goods and services.

Third Parties involved in the distribution and/or sale of any BRP products must ensure these products will be used for civil purposes only. In the event the intention is to resell BRP products to any governmental body or use BRP products in any military-related purpose, Third Parties must obtain our prior approval.

3.6 INSIDER TRADING

Third Parties must ensure that material non-public information concerning BRP is used only for lawful purposes and solely for the purpose(s) for which it was obtained. Third Parties must never use material non-public information obtained during their business relationship with BRP as the basis for trading or for enabling others to trade in the stock or securities of any company.

3.7 CONFLICT MINERALS

Third Parties must ensure that any conflict minerals such as tin, tantalum, tungsten or gold in their products are sourced from conflict-free entities that in no way finance or support armed groups. Third Parties are expected, where appropriate, to perform due diligence on their supply chains with respect to conflict minerals².

3.8 PRODUCT QUALITY AND SAFETY

Third Parties must ensure they follow applicable quality and safety standards, watch for potential safety hazards and never sacrifice quality or safety to meet a deadline or a financial commitment, including never taking shortcuts (or allowing others to) when supplying BRP. This also includes showing safe practices in case of product-use related services.

4. SUSTAINABILITY

4.1 ENVIRONMENT

Third Parties must operate in a sustainable way, minimizing their impact on natural resources, protecting the environment and acting as a responsible corporate citizen within the communities in which they operate. They must ensure their operations comply with all applicable laws related to soil conservation, air emissions, water discharges, toxic and hazardous substances, packaging, and waste disposal. Third Parties must also ensure to have and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.

Third Parties understand that BRP may be required by law to collect and share certain information with respect to their environmental impacts, in which case Third Parties will use commercially reasonable efforts to measure and report on such information and share it with us. Similarly, BRP may work on initiatives to reduce consumption of resources and encourage our Third Parties to support them in this respect. Innovative developments in products and services that offer environmental and social benefits are encouraged.

4.2 HEALTH AND SAFETY

Third Parties must provide employees with a safe working environment and comply with all applicable health and safety laws and regulations in countries where they operate. BRP strongly encourages Third Parties to take several actions including:

- Protect the health and safety of employees and minimize any adverse work conditions.
- Implement safe and healthful work practices to prevent work-related injury and illness.
- Minimize occupational exposures to potentially hazardous materials and unsafe work conditions by maintaining appropriate safety systems and effective controls as well as ensuring safe handling, use, storage and disposal of hazardous materials, and where applicable comply with requirements for labeling for recycling or disposal.
- Implement an emergency response program that addresses the most likely anticipated emergencies.

² As per the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

- Reduce the risk of fire by implementing an adequate fire prevention program. When providing services on a BRP site, Third Parties must comply with all health and safety requirements implemented by this site. Fire prevention equipment must be accessible and properly maintained. Third Parties are responsible for conducting fire prevention and evacuation training.
- Train its employees at all levels to ensure their continued commitment to their own health and safety and that of their co-workers.

5. PROTECTING OUR ASSETS

5.1 INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Third Parties must safeguard BRP's intellectual property and confidential information, and that of our customers and partners, from unauthorized access or use and utilize this information solely for BRP's legitimate business purposes. The use of BRP brands and trademarks must align with BRP's guidelines and requires express written consent.

Third Parties must ensure that any product or process proposed to BRP are made, used, sold, or offered for sale without infringing another party's intellectual property rights.

5.2 DATA PRIVACY

Third Parties must comply with all applicable data privacy laws and regulations when processing personal information for or on behalf of BRP (including about BRP employee, customer or collaborators, collectively "**BRP Personal Information**"). Any loss, leak, unauthorized or accidental access, use, destruction, alteration, disclosure of exposure of BRP Personal Information must be reported immediately to BRP's Privacy Officer at compliance@brp.com.

5.3 CYBERSECURITY

Third Parties must have efficient cybersecurity programs in place to mitigate threats to their systems. BRP expects that any digital information we provide to a Third Party will be protected from unauthorized access or leaks and kept confidential. Third Parties must immediately notify BRP of any cybersecurity incident involving BRP's data, systems or assets by contacting the cybersecurity team at cybersecurity@brp.com (or 819-566-3567, option 5).

Third Parties must have systems in place to ensure the cybersecurity of products with digital elements. It must also develop cybersecurity skills and create organisational and technological tools to ensure sufficient availability of skilled professionals.

6. GOVERNANCE

6.1 COMPLIANCE WITH THE THIRD PARTY CODE OF CONDUCT

BRP may verify our Third Parties' compliance with this Code, including by way of a Third Party's self-evaluation or an audit by BRP (or an external resource designated by BRP) who may visit a

Third Party's facilities with appropriate prior notice (when practicable in the circumstances).
Third Parties are expected to collaborate for any such verifications of compliance.

6.2 SPEAKING UP

Third Parties have the responsibility to speak up to report any concerns or suspected violation of this Code, BRP's Code of Ethics or any applicable laws, rules, regulations or BRP policies by:



Emailing the Ethics and Compliance team at compliance@brp.com



Using BRP's Integrity hotline available at brp.ethicspoint.com



Writing to the Chairman of BRP's Audit Committee:

BRP c/o the Corporate Secretary
726 St. Joseph Street,
Valcourt QC J0E 2L0
Canada

All reports will be kept confidential, to the maximum extent allowable or unless required by law. BRP will not retaliate against anyone who reports, provides information or assists in the investigation process in good faith.

6.3 CONSEQUENCES FOR VIOLATING THE CODE

Third Parties who fail to comply with this Code could face significant consequences. Depending on the nature and severity of the violation, BRP may take actions including, but not limited to, issuing warnings, requiring corrective measures, suspending or terminating contracts and pursuing legal action.

