



This supplement has been prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core Option. This supplement contains additional disclosures to fulfill the GRI requirements that are not contained in the body of our Sustainability Report. For more information on the GRI Standards please visit [www.globalreporting.org](http://www.globalreporting.org).



### SUSTAINABILITY GOVERNANCE AT FINNING

Our Board of Directors has ultimate accountability for sustainability, assisted by the Safety, Environment and Social Responsibility (SESR) Committee.

The Finning Leadership Team (FLT) is responsible for carrying out our sustainability strategy. To help us implement this strategy, we have global and regional sustainability committees, which coordinate and monitor our activities to advance our journey.

The Global Sustainability Committee (GSC) is composed of senior leaders who oversee the management of material sustainability topics across the organization. Regional committees collaborate on specific tasks with existing teams that follow up with implementation.

Teams across the company implement programs, track key performance indicators (KPIs) and report progress on our actions. This process fosters accountability to all our stakeholders and allows us to report externally each year.

## STAKEHOLDER ENGAGEMENT

We think of stakeholders as persons or groups who are directly or indirectly affected by our operations, decisions, and actions, as well as those who can influence our outcomes. The table below illustrates the range of stakeholders with whom we interact, how we engage with them, the concerns they have raised, and how we have responded.

| STAKEHOLDERS                                  | HOW WE ENGAGE   | KEY TOPICS RAISED   | HOW WE RESPONDED   |
|---|---|---|--|
| <b>EMPLOYEES AND UNIONS</b>                   | <ul style="list-style-type: none"> <li>• Biennial Employee Experience surveys</li> <li>• Periodic Pulse surveys</li> <li>• Townhalls with Q&amp;A sessions</li> <li>• Leadership updates via email</li> <li>• Traction intranet, communities, and forums</li> <li>• Meetings with unions</li> <li>• Social media</li> </ul> | <ul style="list-style-type: none"> <li>• Employee recognition</li> <li>• Opportunities for development</li> <li>• Challenging economy and job security</li> <li>• Business wins and collaborations</li> </ul>   | <ul style="list-style-type: none"> <li>• Supported the development of Employee Resource Groups</li> <li>• Put plans in place to address employee survey results</li> <li>• Used Pulse Surveys to test the impact of changes</li> <li>• Ensure technology-enabled access for all employees</li> </ul>   |
| <b>CUSTOMERS</b>                              | <ul style="list-style-type: none"> <li>• In-person meetings</li> <li>• “Voice of the Customer” visits</li> <li>• Industry conferences</li> </ul>  | <ul style="list-style-type: none"> <li>• Efficient parts-tracking and delivery</li> <li>• Regulatory and non-regulatory drivers to reduce emissions</li> </ul>  | <ul style="list-style-type: none"> <li>• Completed rollout of CUBIQ</li> <li>• Developed and field-tested the Sustainability Dashboard</li> <li>• Increased availability of low-carbon fuels.</li> <li>• Partnered with customers on actions to implement solutions that help customers reduce emissions</li> </ul>  |
| <b>SHAREHOLDERS</b>                           | <ul style="list-style-type: none"> <li>• Quarterly calls</li> <li>• Annual general meeting</li> <li>• Virtual and in-person meetings</li> <li>• News releases</li> <li>• Investor conferences</li> </ul>  | <ul style="list-style-type: none"> <li>• Financial performance and outlook</li> <li>• The need for continued conversations on ESG topics</li> <li>• Exposure to fossil fuel industry</li> <li>• The impact of energy transition on business operations and financial outlook</li> <li>• Low-carbon product and service offerings for our customers</li> </ul> | <ul style="list-style-type: none"> <li>• Provided regular communications on financial and operational performance</li> <li>• Published an annual sustainability report</li> <li>• Partnered with customers on actions to reduce GHG emissions</li> <li>• Report in alignment with SASB and TCFD</li> <li>• Ensured we have a diversified customer base</li> </ul>  |
| <b>CATERPILLAR®</b>                           | <ul style="list-style-type: none"> <li>• Caterpillar® conferences and training sessions</li> <li>• In-person and virtual meetings</li> </ul>  | <ul style="list-style-type: none"> <li>• Alignment on values</li> <li>• Women in leadership and non-traditional roles</li> <li>• Environment, Health and Safety (EHS) topics</li> </ul>   | <ul style="list-style-type: none"> <li>• Engaged in Caterpillar® events and shared learnings</li> <li>• Continued implementation of EHS strategy</li> </ul>  |
| <b>SUPPLIERS</b>                              | <ul style="list-style-type: none"> <li>• Industry conferences</li> <li>• In-person and virtual meetings</li> </ul>  | <ul style="list-style-type: none"> <li>• Trends in sustainable supply chains</li> <li>• Diversity, Equity and Inclusion (DEI) efforts</li> <li>• Environmental stewardship efforts</li> <li>• Ethical business practices</li> </ul>   | <ul style="list-style-type: none"> <li>• Continued use of Supplier Code of Conduct</li> <li>• Reviewed environmental sustainability opportunities in quarterly business reviews</li> </ul>   |
| <b>GOVERNMENT</b>                             | <ul style="list-style-type: none"> <li>• Virtual and phone meetings/updates</li> </ul>  | <ul style="list-style-type: none"> <li>• Challenges faced related to recruitment of the next generation of trade and technical workers</li> </ul>   | <ul style="list-style-type: none"> <li>• Continued investing in apprenticeship programs in all regions</li> <li>• Continued supporting access to STEM education</li> <li>• Offered to be a subject matter expert for policy development</li> </ul>   |
| <b>COMMUNITIES AND INDIGENOUS COMMUNITIES</b> | <ul style="list-style-type: none"> <li>• Partnerships with non-profits</li> <li>• Attended career fairs</li> <li>• Worked with high schools and technical schools</li> <li>• Engaged with Indigenous communities and businesses</li> </ul>  | <ul style="list-style-type: none"> <li>• Need to increase interest of youth in STEM careers</li> <li>• Youth desire to understand career choices</li> <li>• Alignment with Indigenous communities and businesses on support for responsible and sustainable infrastructure development</li> </ul>   | <ul style="list-style-type: none"> <li>• Indigenous awareness training for employees</li> <li>• Continued to provide funding for STEM organizations</li> <li>• Continued to provide mentorship and volunteer time with partners virtually</li> <li>• Provided advocacy as needed to demonstrate alignment on responsible and sustainable infrastructure development</li> <li>• Embedded Indigenous Guiding Principles in Canada</li> </ul> |

## MATERIAL TOPICS: BOUNDARIES

We report on the topics that are most relevant to our stakeholders and that can impact the success of our business. The list of material topics is the result of our materiality assessment. We recognize that through our business relationships, we can influence the outcomes of some of these topics. The following table shows the entities in our value chain that contribute to the impact.

| MATERIAL TOPIC                                       | SUPPLIERS | FINNING | CUSTOMERS |
|--|-----------|---------|-----------|
| Safety and health                                    |           | ✓       | ✓         |
| Diversity, equity and inclusion                      | ✓         | ✓       | ✓         |
| Employee and leadership development                  |           | ✓       |           |
| GHG emissions and energy                             | ✓         | ✓       | ✓         |
| Waste  | ✓         | ✓       | ✓         |
| Spills and wastewater                                |           | ✓       | ✓         |
| Customer performance                                 | ✓         | ✓       | ✓         |
| Product stewardship                                  | ✓         | ✓       | ✓         |
| Responsible supply chain                             | ✓         | ✓       |           |
| Community Investment                                 |           | ✓       |           |
| Ethics and anti-corruptions                          | ✓         | ✓       | ✓         |
| Data governance, cybersecurity, and customer privacy | ✓         | ✓       | ✓         |

## MANAGEMENT APPROACH TO MATERIAL TOPICS

In 2018, we developed a global Sustainability Policy that outlines our beliefs around sustainability and our sustainability commitments. The policy can be found here. The following pages summarize our management approach to our material sustainability topics.

| AREA: PEOPLE            |  |
|-------------------------|--|
| Topics covered:         | Diversity, Equity and Inclusion (DEI); Employee and Leadership Development   |
| POLICIES                | <p>Finning maintains global policies that set out minimum standards and guide our behaviour in this area. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Code of Conduct</li> <li>• Global Recruitment Policy</li> <li>• Global Respect, Inclusion, and Diversity Policy</li> <li>• Supplier Code of Conduct</li> <li>• Employee Privacy Policy</li> </ul> <p>Regions add policies as relevant and/or required by law or best practices.</p>   |
| RESPONSIBILITIES        | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• Human Resources Committee of the Board of Directors: oversees executive compensation and pay-for-performance link</li> <li>• Finning Leadership Team (FLT): approves major changes to policies or processes</li> <li>• Global Human Resources Leadership Team develops people strategy and leads execution of current people processes, policies and plans in collaboration with management</li> <li>• Workday® Process Ownership Group has global process leaders for the hire-to-retire cycle</li> </ul>   |
| PROCESSES               | <p>We have been working on centralizing all of our human resources and people processes through Workday (our human resources and people management platform).</p> <ul style="list-style-type: none"> <li>• HR processes are mapped in Workday and are visible to all HR staff.</li> <li>• The Workday Process Ownership Group comprises HR process leaders. It meets quarterly to determine what is going well and what changes need to be made to our HR processes. It reports to the HR Leadership team who reviews/modifies/approves processes and policies or sends to the FLT for approval in the case of major changes.</li> <li>• The HR Leadership Team reports to the Chief Human Resources Officer (CHRO) and through the CHRO to the FLT and the Board's Human Resources Committee.</li> <li>• Global and Regional DEI Councils, reporting to the CEO, are supported by the HR Leadership Team to monitor the quarterly progress of the implementation of a global DEI strategy, including performance against KPIs.</li> <li>• Our employees can join an employee association or trade union of their choice, consistent with national law and practice. We work to have productive relationships with the unions that represent our employees.</li> <li>• We provide training and regular communication to leaders and employees about respect, inclusion, and shared responsibility to overcome bias.</li> <li>• Global Respect, Inclusion, and Diversity Policy.</li> </ul> |
| CHECK/ADJUST            | <p>Steps to ensure the effectiveness of our management system:</p> <ul style="list-style-type: none"> <li>• Undertake annual audits, based on risk assessments.</li> <li>• Measure employee experience using surveys.</li> </ul>   |
| AREA: SAFETY AND HEALTH |  |
| Topics covered::        | Safety and health  |
| POLICIES                | <p>Finning has global policies that set out minimum standards and guide our behaviour in this area. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Global Energy Isolation Standard</li> <li>• Global Hand Protection Standard</li> <li>• Global Lifting and Hoisting Standard</li> <li>• Global Facility Door Standard</li> <li>• Global Vehicle Safety Standard</li> <li>• Global Loading and Unloading Standard</li> <li>• Global Risk Assessment Standard</li> <li>• Incident Classification, Reporting and investigation</li> <li>• Global EHS and CSR Management System based on the ISO 14001 and ISO 45001 standards</li> </ul> <p>Regions add policies as relevant and/or required by law or best practices.</p>  |
| RESPONSIBILITIES        | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• SESR Committee of the Board of Directors</li> <li>• Finning Leadership Team</li> <li>• HR Leadership Team</li> <li>• Global and Regional Environment, Health and Safety (EHS) Departments</li> </ul> <p>Safety performance is included in executive and individual performance assessments and variable compensation.</p>  |

|                 |  |
|-----------------|--|
| Topics covered: | Safety and health, continued   |
| PROCESSES       | <p>We have a formal Global EHS and CSR Management System based on the ISO 14001 and ISO 45001 standards. EHS and CSR policies are defined at the global and regional levels. The EHS and CSR management system defines the EHS and CSR plans at all levels (global, regional and branch) and covers all workers. Regions may go beyond this standard and further align or certify with external standards such as ISO 14005, OSHS 18001 or ISO 45001. In some cases, this is done to meet customer expectations or other external requirements. Our UK business and part of our South American business that serves mining customers are externally certified.</p> <p>Our management system has many elements in place to manage our safety performance.</p> <ol style="list-style-type: none"> <li><b>1. Leadership:</b> Maintain EHS and CSR committees at branch, regional and global levels.</li> <li><b>2. Competency assurance:</b> Define/develop job pre-requisites for critical roles; Develop an annual training and development program to address competence gaps in employees; Conduct induction training with every new and/or transferred employee and all visitors and contractors; Share best practices and compile toolbox meeting material in a central system.</li> <li><b>3. Risk assessment:</b> Documented job hazard analysis/pre-task assessment (JHA/PTA) procedure to be completed before every task; Ensure an EHS risk assessment is completed and updated for every facility; Involve employees in the development of the assessment; Share with all employees in the facility; Conduct occupational health surveillance programs, as required.</li> <li><b>4. Operational controls:</b> Identify, implement, monitor and maintain operational controls, including global and regional standards for: Life-saving rules; work procedures (Service Information Systems (SIS) and non-Cat); preventative maintenance programs; EHS by design; requirements for contractors and visitors; signage; contamination control program; critical equipment/facility inspections; Safety Data Sheets; engineering controls, among others.</li> <li><b>5. Legislation and other obligations:</b> To operate in compliance and in accordance with applicable regulatory requirements in all jurisdictions.</li> <li><b>6. Incident reporting and investigation:</b> Report, investigate, classify and analyze incidents as per the regional Incident Investigation Standard; Identify, implement and track corrective actions; Review conclusions of incidents with relevant stakeholders; Analyze quality of incident investigations to ensure appropriate corrective actions are taken; Share lessons learned throughout the organization.</li> <li><b>7. Emergency response:</b> Protect our people, assets; ensure business continuity</li> <li><b>8. Communications:</b> Communicate information to the organization on all critical EHS and CSR topics; Address and document all external communications; Utilize communication methods that engage employees in our business operations; Encourage employee feedback.</li> <li><b>9. Specific additional requirements regarding corporate social responsibility:</b> Ensure Finning is taking a proactive approach to being a socially responsible company in how we conduct our business, in our partnerships and in our community investments.</li> <li><b>10. Performance measurement and effectiveness reviews:</b> Measure environmental, health and safety performance in a manner that ensures consistent reporting globally; Track progress corporately towards reducing incidents; establish strategies for continuous improvement in performance; Ensure the effectiveness and continued reliability of the EHS and CSR management system; Monitor performance measurements for improvement; Test for program application in a manner that achieves the desired intent.</li> <li><b>11. Management of change:</b> Ensure Finning uses a disciplined approach to managing organizational and operational changes for the purpose of continual improvement by reducing the likelihood of introducing unintended risk.</li> <li><b>12. Assurance:</b> Define processes that ensure effectiveness of the management system, policy and standards towards meeting the intended levels of risk exposure and performance achievement for the company.</li> </ol> |
| CHECK/ADJUST    | <p>Steps to ensure the effectiveness of our management system:</p> <ul style="list-style-type: none"> <li>• Internal and third party EHS audits</li> <li>• Employee surveys</li> </ul>   |

| AREA: ENVIRONMENT |  |
|-------------------|--|
| Topics covered:   | GHG emissions, Waste, Wastewater, Spills   |
| POLICIES          | <p>Finning has global policies that set out minimum standards and guide our behaviour in this area. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• GHG Protocol Standard</li> <li>• Pollution Prevention Standard</li> <li>• Global EHS and CSR management system based on the ISO 14001 and ISO 45001 standards</li> </ul> <p>Regions add policies as relevant and/or required by law or best practices.</p>  |
| RESPONSIBILITIES  | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• SESR Committee of the Board of Directors</li> <li>• Finning Leadership Team</li> <li>• HR Leadership Team</li> <li>• EHS Departments</li> <li>• Regional Executive Committees</li> </ul>   |
| PROCESSES         | <ul style="list-style-type: none"> <li>• Our Global EHS and CSR Management System guides environmental processes.</li> <li>• Some of our business areas are externally ISO 14001 certified. All business areas, at a minimum, work to achieve alignment with this ISO standard.</li> <li>• All regions have environmental awareness and compliance training in place.</li> <li>• All regions track environmental data and have KPIs in place for material environmental topics.</li> </ul>   |
| CHECK/ADJUST      | <p>Steps to ensure the effectiveness of our management system include:</p> <ul style="list-style-type: none"> <li>• Every year we audit select aspects of environmental management through the EHS audits at each facility</li> <li>• In a three-year cycle, our facilities that are ISO 14001 certified are subject to third party audits.</li> </ul>   |
| AREA: CUSTOMERS   |  |
| Topics covered:   | Customer Safety, Value Added Dealer Solutions; Sustainable Customer Performance  |
| POLICIES          | <p>Finning maintains global policies that set out minimum standards and guide our behaviour in this area. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Safety letter completion and implementation procedures</li> <li>• Autonomous operations procedures and standards</li> <li>• Customer loyalty procedures to implement and review feedback received through customer surveys</li> <li>• Reman/rebuild reutilization guidelines</li> </ul> <p>Regions add policies, procedures or standards as relevant and/or required by law or best practices.</p>  |
| RESPONSIBILITIES  | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• OEM Team (responsible for engine and powertrain component remanufacturing/rebuilding operations)</li> <li>• Autonomous Operations Team</li> <li>• Technical teams</li> <li>• Marketing teams</li> <li>• Operational team</li> </ul>  |
| PROCESSES         | <p>We conduct the following activities to manage our performance.</p> <ul style="list-style-type: none"> <li>• Customer safety - If Caterpillar® identifies a part, component or piece of equipment that does not meet their standards, they send priority letters for issues that do not pose a safety risk but can affect reliability. The customer has 365 days to complete the service for Caterpillar® to reimburse the cost; safety letters when the issue may have safety implications. Safety letters never expire, and Finning is expected to fully complete service within 364 days after receipt of a safety letter.</li> <li>• Autonomous operations - To ensure safe operations, we provide training to our employees and to customer employees.</li> <li>• Customer loyalty - We conduct regular surveys, collect Net Promoter Score data, and follow up with customers.</li> <li>• Reman/rebuild reutilization guidelines - We have strict procedures at OEM to ensure components are reliable and safe, and meet Caterpillar® standards after being remanufactured.</li> </ul> |
| CHECK/ADJUST      | <p>Steps to ensure the effectiveness of our management system:</p> <ul style="list-style-type: none"> <li>• CPS (Cat Production System) in OEM</li> <li>• Caterpillar® Audits and Excellence Programs (applies to Safety Letters and Customer Loyalty)</li> </ul>  |

| AREA: SUPPLY CHAIN |  |
|--------------------|--|
| Topics covered:    | Responsible supply chain   |
| POLICIES           | <p>Finning maintains global policies that set out minimum standards and guide our behaviour in this area. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Global Procurement Policy</li> <li>• Supplier Code of Conduct</li> <li>• Global Expense Policy</li> <li>• Global Delegation of Management Authority</li> </ul> <p>Regions add policies or procedures as relevant and/or required by law.</p>  |
| RESPONSIBILITIES   | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• Procurement Department</li> <li>• Parts Supply Chain</li> <li>• Equipment Supply Chain</li> </ul>  |
| PROCESSES          | <ul style="list-style-type: none"> <li>• While our Procurement Policy is global, we have region-specific procurement processes based on the region that we are operating in; this will include supplier-specific onboarding procedures.</li> <li>• The procurement function in each region manages the onboarding of suppliers using specific criteria to ensure our suppliers meet and exceed our expectations that are laid out in our Supplier Code of Conduct.</li> <li>• Suppliers are required to complete a self-assessment that covers specific CSR criteria in our Supplier Code of Conduct.</li> <li>• New suppliers must meet the criteria outlined in our code; existing suppliers are asked to fill out the self-assessments.</li> <li>• Instances where a supplier has not followed the Supplier Code of Conduct are dealt with by the responsible procurement personnel and if the situation is not rectified in an appropriate manner or time frame the supplier may be requested to cease doing business with Finning.</li> <li>• Random audits of supplier self-assessments are conducted.</li> <li>• Business decisions are based on the supplier being able to showcase that they meet the criteria outlined in the supplier code of conduct; a supplier may not be considered if they are not able to meet the minimum requirements included in our procurement (RFx) documents.</li> </ul> |
| CHECK/ADJUST       | <p>Steps to ensure the effectiveness of our management system:</p> <ul style="list-style-type: none"> <li>• Supply chain functions are audited on a risk-assessed basis</li> <li>• Supplier Code of Conduct, included in our supplier onboarding process; random audits of supplier self-assessments</li> </ul>  |
| AREA: COMMUNITIES  |  |
| Topics covered:    | Community investment (STEM education and skills development)   |
| POLICIES           | <p>Finning has global policies that set out minimum standards and guide our behaviour in this area. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Sponsorship Policy (only in the UK and Ireland)</li> </ul> <p>Regions add policies as relevant and/or required by law or best practices.</p>  |
| RESPONSIBILITIES   | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• Finning Leadership Team (FLT)</li> <li>• Local Finning Branches (independently, or in collaboration with Regional Executive teams and the FLT)</li> <li>• Regional Executive Committees</li> </ul>   |
| PROCESSES          | <ul style="list-style-type: none"> <li>• Large investments and partnerships with non-profit organizations are made based on alignment with our corporate commitment to support STEM education and training, indigenous communities, women and disadvantaged or at-risk communities</li> </ul>  |
| CHECK/ADJUST       | <p>Steps to ensure the effectiveness of our management system:</p> <ul style="list-style-type: none"> <li>• Regular review of donations and partner organizations</li> </ul> <p>Recent changes to how we manage these topics:</p> <ul style="list-style-type: none"> <li>• Embedded Indigenous Guiding Principles through promoting awareness</li> </ul>   |



| AREA: ETHICS            |  |
|-------------------------|--|
| Topics covered:         | Ethics and anti-corruption   |
| <b>POLICIES</b>         | <p>Finning has global policies that set out minimum standards and guide our behaviour in this area. These are:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Code of Conduct*</li> <li>• Code of Ethics for Senior Executives and Financial Management*</li> <li>• Corporate Disclosure Policy*</li> <li>• Global Anti-Bribery and Anti-Corruption Policy</li> <li>• Global Political Contributions Policy*</li> <li>• Policy on Share Trading, Hedging and Use of Material Information*</li> <li>• Whistleblower Policy</li> </ul> <p>Policies/procedures/documents specific to the management system:</p> <ul style="list-style-type: none"> <li>• Ethics Program Charter</li> </ul> <p>Regions add policies as relevant and/or required by law or best practices.</p>   |
| <b>RESPONSIBILITIES</b> | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• The Audit Committee of the Board of Directors</li> <li>• The Global Ethics Committee oversees governance and ethics for Finning, and is chaired by our General Counsel and Corporate Secretary, who is our compliance officer</li> <li>• Each region has an Ethics Committee chaired by the head of the regional Legal department, which reports to the Global Ethics Committee</li> <li>• FLT and Regional Executive committees</li> <li>• Internal Audit and Human Resource Departments</li> <li>• Legal Departments</li> </ul>  |
| <b>PROCESSES</b>        | <ul style="list-style-type: none"> <li>• All reports of suspected violations of the Code of Conduct are consolidated into a case management system</li> <li>• Each regional Ethics Committee reviews and responds to reports (or “cases”) that arise in their regions. They report at a minimum, quarterly to the Global Ethics Committee. The Global Ethics Committee reviews and responds to reports or cases that arise at the corporate level</li> <li>• Cases are presented for closure to the Global Ethics Committee on a quarterly basis, or more frequently if required or appropriate.</li> <li>• If appropriate rigour has been applied, conclusions validated, and appropriate action taken, the case will be closed.</li> </ul>   |
| <b>CHECK/ADJUST</b>     | <p>Steps to ensure the effectiveness of our management system:</p> <ul style="list-style-type: none"> <li>• Two main mechanisms for evaluation: (1) annual self-assessment by each Ethics Committee, and (2) the Audit Committee of the Board receives quarterly reports on statistics including nature of cases, outcomes, case closure rates, and summaries of higher risk cases, and on an annual basis reviews the Ethics Program Charter, considers improvements recommended by management and suggests improvements.</li> <li>• Policies marked with a * above are reviewed annually by the Ethics Committees, and by relevant committees of the Board. Others are reviewed on an “as needed” basis.</li> </ul> <p>Recent changes to how we manage these topics:</p> <ul style="list-style-type: none"> <li>• Updated the anti-bribery and anti-corruption policy</li> <li>• Benchmarked our Whistleblower Hotline against our peers and conducted a gap analysis around reporting of harassment and discrimination complaints</li> <li>• Developed Guidelines for Investigations</li> </ul> |

## AREA: DATA GOVERNANCE AND CYBERSECURITY

|                  |   |
|------------------|---|
| Topics covered:  | Data Governance and cybersecurity   |
| POLICIES         | <p>Finning has global policies that build out our data governance program and guide our behaviour in this area. These include but not limited to:</p> <ul style="list-style-type: none"> <li>• Data Governance Statement</li> <li>• Data Breach Escalation and Management Policy</li> <li>• Records Retention Policy</li> <li>• Employee Privacy Policy</li> <li>• Data Classification Policy</li> </ul> <p>Regions add policies as relevant and/or required by law or best practices.</p>  |
| RESPONSIBILITIES | <p>Departments or teams responsible:</p> <ul style="list-style-type: none"> <li>• Information Security Department</li> <li>• Legal and the Privacy Office</li> </ul>  |
| PROCESSES        | <ul style="list-style-type: none"> <li>• Include our data governance statement in our contracts so that our customers, suppliers and partners understand how we collect, use and disclose their data.</li> <li>• Continue to review and update our consent and data authorization practices to ensure we are in-line with the applicable data protection legislation.</li> <li>• Continue to evaluate and update our security practices and controls to exceed industry standards.</li> <li>• Ongoing internal education and tabletop exercises to ensure our employees understand our practices and procedures around data governance</li> <li>• Update our framework regularly to align with current legislative requirements and stakeholder expectations.</li> </ul>  |
| CHECK/ADJUST     | <p>Steps to ensure the effectiveness of our management system:</p> <ul style="list-style-type: none"> <li>• Performing tabletop exercises with our executives to ensure cybersecurity and data governance issues are top of mind.</li> <li>• Set goals for Finning's cybersecurity and data governance journey.</li> <li>• Track performance of Finning's cybersecurity and data governance practices.</li> </ul> <p>Recent changes to how we manage these topics:</p> <ul style="list-style-type: none"> <li>• Updating and assessing our data classification practices to align with Caterpillar®</li> <li>• Updating our privacy practices to enable Finning to: (i) balance workplace safety and the privacy of employees; and (ii) implement the inclusion and diversity self-disclosure initiative.</li> <li>• Focused on updating our consent and data authorization practices with Caterpillar®.</li> </ul> |