



# **TELUS Supplier Code of Conduct**

Last updated 2022



## Introduction

We value our relationships with our suppliers because they help us achieve our business objectives and contribute to our overall success as an organization. We strive to award business to suppliers who demonstrate a strong commitment to sustainable development by adopting ethical, labour, health and safety, environmental principles and compliance practices that align with ours, and ensure the well-being of their employees, contractors and communities.

Consistent with the TELUS Code of Ethics and Conduct that applies to our employees and contractors, this Supplier Code of Conduct (the Code) is based upon generally accepted standards of ethical business conduct and applies to all TELUS suppliers. In addition to compliance with this Code, our suppliers must comply with all applicable laws and regulations wherever they operate. In the event of a discrepancy between this Code and such local laws or regulations, our suppliers must comply with the stricter requirements. This Code goes beyond legal compliance, drawing upon internationally recognized standards to advance social and environmental responsibility and business ethics, and is aligned with TELUS' commitment to be a leading corporate citizen.

Our suppliers must meet or exceed the requirements set forth in this Code and cause their, and their affiliates', suppliers, employees and contractors to perform obligations to TELUS in a manner consistent with the standards set out in this Code.

For clarity, the obligations set out in this Code are in addition to, and do not limit, suppliers' obligations under any agreements with TELUS.

## A - Ethics

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To meet social responsibilities and achieve long-term success in the marketplace, our suppliers must uphold high ethical standards, including:

- 1) **Business Integrity:** Our suppliers must maintain high standards of courtesy, professionalism, ethics, and honesty in all their interactions with customers, shareholders, suppliers, employees, governments and the community, and comply with all applicable federal, provincial, state and local laws. Our suppliers must also comply with all applicable laws in the jurisdiction in which they operate, and refrain from engaging in any form of bribery, corruption, including kickbacks, extortion, or the promising, offering, approving, giving or accepting of payments or gifts that are, or could be viewed as, an attempt to influence an individual's actions, business decision or creating a sense of obligation. TELUS does not permit facilitation payments to be made, even if they may not be illegal in a particular jurisdiction. "Facilitation payments" are typically small, unofficial payments, made to secure or expedite the performance of a routine government action by a government employee or official, such as providing routine police protection or processing permits.



- 2) **No Improper Advantage:** Our suppliers must familiarize themselves with the TELUS Code of Ethics and Conduct that provides guidance to TELUS team members on offering or accepting gifts, gratuities, rewards, favours or benefits, particularly by those TELUS representatives with selection, negotiation, purchasing or contract management roles. Our suppliers must refrain from placing TELUS team members in a position where they are, or may be perceived to be, in breach of the TELUS Code of Ethics and Conduct.
- 3) **Privacy:** Our suppliers must respect the privacy of our customers and team members, and be demonstrably accountable for personal information entrusted to them by TELUS, including personal information the supplier collects or creates for TELUS. Suppliers must collect, use and disclose personal information only as directed by TELUS or required by law. Our suppliers must assist TELUS in meeting privacy obligations set out in applicable laws, contracts and TELUS' own high privacy standards. This includes facilitating access requests and fulfilling other individual rights, informing TELUS of actual or suspected data breaches, supporting TELUS responses to inquiries, complaints and investigations, implementing effective retention processes and ensuring the responsible, appropriate and accountable use of Artificial Intelligence (AI) in accordance with the [TELUS Trust Model](#). Supplier's AI must be explainable, transparent and avoid unintended harms and bias. Our suppliers must do everything reasonable to support TELUS in living up to the commitments made in the [TELUS Privacy Commitment](#) and the [TELUS Business Privacy Policy](#) and similar policies when applicable.
- 4) **Information Security:** Suppliers must appropriately safeguard all TELUS information entrusted to them, and be committed to the highest level of cybersecurity in their own operations and activities and in those of any subcontractors or suppliers. Unless disclosure is authorized or legally mandated (for example, by court order), our suppliers must protect confidential and restricted information, in compliance with all applicable laws and contractual obligations. To this end, suppliers must perform their work in a way that protects TELUS' information and operations by working with their TELUS business prime to request for TELUS' security policies and controls and ensure compliance. Suppliers must not bypass, circumvent, or otherwise compromise TELUS' security policies and controls.  
Should a supplier become aware of a cyber incident or potential breach that could impact TELUS or the security of TELUS' operations or data, such supplier must immediately report it to their TELUS business prime and, if requested, provide a detailed written report, including any potential impacts on TELUS data or systems.
- 5) **Intellectual Property:** Our suppliers must respect the intellectual property rights of TELUS and others, and comply with their contractual and other obligations pertaining to intellectual property rights.
- 6) **Fair Business, Anti-Spam, Advertising and Competition:** Our suppliers must adhere to fair business practices, and comply with all applicable laws in the jurisdiction in which they operate relating to marketing/anti-spam, competition standards and advertising.



- 7) **Responsible Sourcing of Materials:** Our suppliers must evaluate the origin or source of their materials throughout their supply chains to reasonably ensure that they have not been obtained in an illegal or unethical manner and are in compliance with [TELUS' Sustainable Paper & Packaging Policy](#). Where applicable, our suppliers must have a policy regarding conflict minerals to reasonably ensure that the tantalum, tin, tungsten, gold and/or other rare earth minerals in their products do not directly or indirectly finance or benefit groups that are perpetrators of human rights abuses. Relevant suppliers must exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to TELUS upon request.
- 8) **Supplier Diversity:** [TELUS' supplier diversity program](#) takes active measures to provide access to a supply base that reflects the diversity of where we live, work and serve by encouraging economic development for culturally diverse organizations. Our suppliers shall:
  - a) Make a reasonable effort to continuously identify and partner with diverse suppliers,
  - b) Implement, or expand and increase, their own supplier diversity program,
  - c) Disclose supplier diversity program goals, plan and objectives to TELUS on an annual basis, and report progress every quarter against the targets agreed upon between supplier and TELUS, and
  - d) Give notice to TELUS in case of any changes to such diversity program.
- 9) **Non-Retaliation:** Our suppliers must refrain from retaliating against anyone who files a report or complaint, in good faith, relating to the supplier, including with respect to a violation of this Code with the supplier internally (such as a whistleblower), with TELUS, or with any government agency. Our suppliers must maintain whistleblower confidentiality.
- 10) **Conflicts of Interest:** Our suppliers are naturally involved in business relationships with people and organizations in addition to TELUS. These relationships must not, and must not reasonably appear to, compromise suppliers' relationship with TELUS or suppliers' ability to make impartial and objective business decisions in connection with the supply of goods and/or services to TELUS.
- 11) **TELUS Property:** Our suppliers must take reasonable technological, administrative and physical measures to safeguard TELUS property, including TELUS proprietary, confidential and restricted information, facilities, equipment, vehicles, funds, communication networks and information systems and material in their possession or under their control. This also applies to access controls, such as passwords, identification keys, cards and hand-held user authentication devices.
- 12) **Community Investment:** Our suppliers are encouraged to meaningfully engage and invest in the communities in which they live, work and serve to foster social and economic development.
- 13) **Accessibility:** Our suppliers are expected to recognize that access and usability of products, services, solutions, or environments by persons of all abilities is integral to being a leading service provider and promoting accessibility and inclusion within our workplace and the communities we serve. To the greatest extent possible, suppliers are expected to incorporate universal and



accessible design principles by removing or by avoiding the introduction of barriers that may impede a person from independently experiencing and using products, services, solutions, or environments, including but not limited to consulting with persons with disabilities throughout the design process.

## B - Labour

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Our suppliers must uphold the human rights of workers, and treat them with dignity and respect in compliance with internationally accepted laws and standards governing working conditions, such as the core conventions of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights. Our suppliers' workers must be legally entitled to work in the country in which they live, and must be granted the protections and rights granted to legal workers in that country. These requirements apply to all workers including temporary, migrant, student, contract, direct employees, apprenticeship program participants, and any other type of worker. Our suppliers must take appropriate actions against any violations of the labour standards expressed in this Code:

- 1) **Freely Chosen Employment:** Our suppliers must ensure that all work being performed on behalf of our suppliers is voluntary, and workers are free to leave at any time or terminate their employment. Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. While workers may be asked to provide government-issued documentation as identification, they must not be required to surrender government-issued identification, passports or work permits as a condition of employment.
- 2) **Child Labour Avoidance:** Our suppliers must not use child labour in any part of their business operations. The minimum age for employment or work shall be 15 years of age (or 14 where the laws of the country permit) or the age for completing compulsory education in that country, whichever is higher. If any child labour is detected, the supplier shall immediately stop such child labour and improve the supplier's child labour avoidance practices.
- 3) **Working Hours:** Our suppliers must manage operations such that workweeks do not exceed the maximum number of hours set by local law. Where there are no applicable laws in the jurisdiction in which they operate, our suppliers are expected to refrain from requiring work in excess of 60 hours per week, including overtime, and no more than 6 consecutive days without a rest day away from work, except in emergency or unusual situations.
- 4) **Wages and Benefits:** Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Where no wage law exists, it is expected that workers will be paid at least the minimum local industry standard. Deductions from wages as a disciplinary measure shall not be permitted. It is expected



that the basis on which workers are being paid is provided in a timely manner via pay stub or similar documentation.

- 5) **Non-Discrimination:** Our suppliers must maintain a work environment, and recruitment practices (screening, hiring and retaining) free of harassment and discrimination and must not engage in discrimination based on race, national or ethnic origin, religion, age, sex, gender identity or expression, sexual orientation, marital status, family status, genetic characteristics, disability, or conviction for which a pardon has been granted or in respect of which a record suspension has been ordered.
- 6) **Freedom of Association and Collective Bargaining:** Our suppliers must respect the rights of workers to freely join labour unions, seek representation and join workers' councils, and to bargain collectively in accordance with local laws. Our suppliers must enable workers and their representatives to openly communicate and share ideas and concerns with our suppliers' management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.
- 7) **Legal Eligibility to Work:** Our suppliers must ensure that any foreign workers who act on behalf of TELUS or support TELUS activities in one of our offices, facilities, or customer premises, have the appropriate work permits and comply, at all times, with local immigration laws and regulations.

## C - Health & Safety

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Our suppliers must comply with all applicable health and safety laws and perform all services in a diligent manner in respect of health and safety matters. Where appropriate, our suppliers must implement and train their workers on policies, programs and procedures to address the following health and safety matters:

- 1) **Occupational Health and Safety:** Our suppliers must ensure that exposure to potential health and safety hazards will be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures. It is expected that where hazards cannot be adequately controlled by these means, persons present at or near the worksite are provided with appropriate and well-maintained personal protective equipment. Potential health hazards may include exposure to chemical, biological and physical agents where overexposure to such agents may damage health, and safety hazards where lack of physical guards and barriers around machinery may injure people. Suppliers must not take any disciplinary action taken against workers that bring forward legitimate health and safety concerns.
- 2) **Property Risk Reduction and Emergency Preparedness:** Our suppliers must use reasonable efforts to identify and mitigate property and life safety-related risks including, but not limited to, the structural integrity of the supplier's facilities, fire risk, flooding risk, power supply continuity risk, and other risks which could reasonably be expected, if they occur, to impact the lives and



well-being of their workers, the supplier's provision of services to TELUS, and/or otherwise negatively impact TELUS. It is expected that potential emergency situations and events will be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, notification and evacuation procedures, training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

- 3) **Occupational Injury and Illness:** Our suppliers must have procedures and systems in place to manage, track and report occupational injury and illness, including provisions to:
  - a) encourage reporting
  - b) classify and record injury and illness cases
  - c) provide necessary medical treatment
  - d) investigate cases and implement corrective actions to eliminate their causes; and
  - e) facilitate the return of workers to work.
- 4) **Fit for Work:** Our suppliers must require their workers to report fit for work, such that their ability to work safely is not impaired for any reason. Their workers should be free of the negative effects of alcohol, drugs, medications or any other substance that could cause impairment.

## D - Environmental

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TELUS is committed to protecting our planet. We have a goal to achieve net carbon neutral operations by 2030 and have set science-based targets to reduce our Scope 1, 2 and 3 greenhouse gas (GHG) emissions. Our suppliers are expected to share our commitment and support us in achieving these outcomes.

In alignment with the TELUS' Environmental Management System (EMS), our suppliers must comply with the [TELUS Environmental Policy](#), [TELUS Sustainable Paper & Packaging Policy](#), and all applicable environmental laws, regulations and standards. Suppliers are also expected to have a strategy, including policies and programs (e.g., an EMS certified to ISO 14001), in place to identify, manage, monitor, and continuously reduce the environmental impact of the aspects associated with their work, including but not limited to:

- 1) **Resource use and pollution:** Our suppliers are expected to work to minimize the consumption of resources (e.g., fossil fuels, water, forest products, other raw materials) and adverse impacts on the environment, including biodiversity, ecosystems and habitats.
- 2) **Hazardous substances:** Dangerous goods, chemicals and other substances or materials posing a hazard to humans or the environment must be identified, labeled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal in accordance with local, provincial and/or federal regulations.



- 3) **Waste management:** Our suppliers are expected to implement a systematic approach to identify, manage, reduce, and responsibly dispose of waste of all types. It is expected that our suppliers make efforts to implement circular economy strategies by considering the lifecycle impacts of products and services, from sourcing, production and use, through recycling and refurbishment.
- 4) **GHG emissions and energy consumption:** Our suppliers are expected to actively monitor, report, and set their own science aligned targets to reduce GHG emissions and energy consumption from their operations and value chain. Suppliers are expected to provide data on GHG emissions and progress toward reduction targets to TELUS upon request.

## **E - Management System**

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Our suppliers are expected to have in place the appropriate management system to ensure (a) compliance with applicable laws and regulatory requirements in the jurisdiction in which they operate, and customer requirements related to the supplier's operations and products; (b) conformance with the principles of this Code; and (c) identification and mitigation of operational risks related to this Code. The management system should facilitate continuous improvement. TELUS understands that the design of such a management system will have to be scaled to the particulars of the supplier's business.

We expect that suppliers' management systems will include the following elements:

- 1) **Management Accountability and Responsibility:** Clearly identified supplier representative responsible for ensuring implementation of the management systems and associated programs.
- 2) **Legal and Customer Requirements:** A process to identify, monitor and understand all applicable laws and regulatory requirements in the jurisdiction in which they operate, and customer contractual and other requirements that may include business continuity planning and capability in the event that the supplier's operations are interrupted.
- 3) **Risk Assessment and Risk Management:** A process to identify the environmental, health and safety and labour practice risks associated with the supplier's operations. A process to identify the privacy and fraud risks affecting its customers' and their customers' information and proprietary rights. A determination of the relative significance for each risk and implementation of appropriate technical, procedural and physical controls to control the identified risks and ensure regulatory compliance.
- 4) **Communication and Training:** A process to communicate clear and accurate information about the supplier's policies, procedures and improvement objectives to its workers and programs to train these workers to meet applicable legal and regulatory requirements as well as customers' contractual requirements.



- 5) **Compliance Assessments and Corrective Actions:** Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code and customer contractual and other requirements and a process for timely correction of identified deficiencies.
- 6) **Accurate Accounts and Record Keeping:** Creation and maintenance of accurate and reliable financial and business records to ensure legal and regulatory compliance, conformity to company requirements, confidentiality to protect privacy, and the conveyance of accurate information to customers and their customers. All business dealings are accurately reflected in the business records. All business records (such as quality, safety or personnel, as well as financial records) relating to contractual supply arrangements are protected and retained in compliance with supplier's legal obligations and compliance requirements.

## F - Implementation

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Suppliers must ensure their employees and contractors working on TELUS' projects understand and comply with the contents of this Code.

TELUS is committed to continuous improvement and encourages suppliers to proactively share suggestions in regards to this Code, business processes and performance, and relationship improvement. Suppliers are expected to proactively seek opportunities for continuous improvement throughout their own operations.

TELUS reserves the right to assess and monitor on an ongoing basis the supplier's practices regarding this Code. Such measures may include a request that the supplier complete a self-assessment questionnaire, provide proof of compliance with all applicable laws in the jurisdiction in which they operate, or allow onsite inspections of working conditions.

## Further Links & Information

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- **To report a concern or misconduct:** 1-888-265-4112 or [www.telus.ethicspoint.com](http://www.telus.ethicspoint.com)
- **TELUS website:** [www.telus.com](http://www.telus.com)
- **TELUS Procurement contact:** [ProcurementServiceDesk@telus.com](mailto:ProcurementServiceDesk@telus.com)
- **TELUS Data and Trust Office:** [Datatrustoffice@telus.com](mailto:Datatrustoffice@telus.com)
- **TELUS Data management standards contact:** [SecurityGRA@telus.com](mailto:SecurityGRA@telus.com)
- **TELUS Sustainability Report:** <https://telus.com/sustainability>
- **TELUS Code of Ethics and Conduct:**  
<https://www.telus.com/en/about/policies-and-disclosures/code-of-ethics-and-conduct?linktype=n av>