



# TELUS Supplier Code of Conduct

Last updated 2018



## 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 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. We expect our suppliers to comply with this Code and all applicable laws and regulations wherever they operate. In the event that this Code imposes stricter requirements than local laws or regulations, or in the event that local laws or regulations impose stricter requirements than this Code, we expect our suppliers to 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.

We expect our suppliers to meet or exceed the requirements set forth in this Code and to cause their affiliates, suppliers, employees and contractors to perform obligations for TELUS 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 to TELUS under any agreements with TELUS.

## A: Ethics

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To meet social responsibilities and achieve success in the marketplace, our suppliers are expected to uphold high standards of ethics.

- 1) **Business Integrity:** Our suppliers are expected to 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 are expected to comply with all applicable laws in the jurisdiction in which they operate regarding bribery and corruption and refrain from engaging in any form of corruption, including kickbacks, extortion and 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 are expected to 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 are expected to 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 and Information Security:** TELUS is committed to respecting the privacy of our customers and team members' personal information and to appropriately safeguarding all TELUS information. We expect our suppliers to demonstrate the same respect for privacy and security throughout their operations, and in particular to be demonstrably accountable with regard to personal information entrusted to them by TELUS. Unless disclosure is authorized or legally mandated (for example by court order), our suppliers are expected to protect the confidentiality of their employee, contractor and customer information, including TELUS proprietary, confidential and restricted information, in compliance with all applicable laws in the jurisdiction in which they operate, including privacy laws, contract obligations, and TELUS' Data Management standard, irrespective of whether the information or data was provided by the employee, contractor or customer, or was created by the supplier.
- 4) **Intellectual Property:** Our suppliers are expected to respect the intellectual property rights of TELUS and others, and to comply with their contractual and other obligations pertaining to intellectual property rights.
- 5) **Fair Business, Anti-Spam, Advertising and Competition:** Our suppliers are expected to 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.
- 6) **Responsible Sourcing of Materials:** Our suppliers are expected to evaluate the origin or source of their materials throughout their supply chains to reasonably assure that they have not been obtained in any illegal or unethical manner. In particular, our suppliers are expected to 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 armed groups that are perpetrators of human rights abuses. Suppliers are expected to exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to TELUS upon request.
- 7) **Supplier Diversity:** TELUS' Supplier Diversity Program takes proactive steps to provide equal access to a supply base that reflects the diversity of where we live, work and serve. The program encourages economic development and provides more opportunities for ethnic minority, Indigenous People, LGBTQ and/or women-run organizations to bid for our business in competitive processes. Our suppliers are encouraged to identify, adopt, and integrate diverse vendors into their processes so their own supply base reflects the true make-up of society.
- 8) **Non-Retaliation:** Our suppliers are expected to 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 are expected to maintain whistleblower confidentiality.



- 9) **Conflicts of Interest:** Our suppliers are naturally involved in business relationships with people and organizations in addition to TELUS. It is expected that these relationships will not, and will 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.
- 10) **TELUS Property:** Our suppliers are expected to 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.
- 11) **Community Investment:** Our suppliers are encouraged to engage and invest in the communities in which they live, work and serve to foster social and economic development.
- 12) **Accessibility:** Our suppliers are encouraged 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 inclusion and accessibility within our workplace and the communities we serve. To the greatest extent possible, suppliers are expected to incorporate universal design principles by removing or by avoiding the introduction of barriers that may impede a person from independently using products, services, solutions, or environments.

## B - Labour

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Our suppliers are expected to uphold the human rights of workers, and treat them with dignity and respect in compliance with internationally accepted standards and laws governing working conditions. 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, and any other type of worker. Our suppliers are expected to take appropriate actions against any of their workers that violate the labour standards expressed in this Code.

- 1) **Freely Chosen Employment:** It is expected that all work for 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, it is expected that they will not be required to surrender government-issued identification, passports or work permits as a condition of employment.
- 2) **Child Labour Avoidance:** It is expected that our suppliers do 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. We encourage the use of workplace apprenticeship programs, provided they comply with all applicable laws and regulations in the jurisdiction in which they operate.

- 3) **Working Hours:** Our suppliers are expected to 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 six consecutive days without a rest day away from work, except in emergency or unusual situations.
- 4) **Wages and Benefits:** It is expected that compensation paid to workers complies 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 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 are expected to be committed to a workforce free of harassment and unlawful discrimination and they are expected not to engage in discrimination based on race, national or ethnic origin, religion, age, sex, gender identity, sexual orientation, marital status, family status, medical test results, 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 are expected to 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 are expected to 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 are expected to ensure that any foreign workers within Canada 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 are expected to 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 are expected to implement and train their workers on policies, programs and procedures to address the following health and safety matters.



- 1) **Occupational Health and Safety:** It is expected that exposure to potential health and safety hazards will be controlled by our suppliers 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, 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. There will be no disciplinary action taken against workers that bring forward health and safety concerns.
- 2) **Property Risk Reduction and Emergency Preparedness:** Our suppliers are expected to 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 supplier's provision of service, the lives and well-being of their workers 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:** It is expected that our suppliers 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 return of workers to work.
- 4) **Fit for Work:** It is expected that our suppliers 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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Our suppliers recognize that environmental responsibility is integral to producing world-class products and services. In manufacturing, industrial and service operations, our suppliers are expected to minimize adverse effects on the community, environment and natural resources and safeguard the health and safety of the public.

Our suppliers are expected to comply with all applicable environmental laws and are expected to have a strategy, including policies and programs, in place to manage, monitor and continuously reduce the environmental impact of the following, non-exhaustive, list:

- Consumption of resources (e.g., fuel, electricity, water, paper)
- Usage, handling and disposal of hazardous (e.g., gasoline, paint) and non-hazardous (e.g., packing materials) wastes



- Management of waste from administrative, operations, and manufacturing facilities (e.g., garbage, organics, recyclables, hydrovac waste)
- Release of contaminants into the air (e.g., greenhouse gases, ozone depleting substances, volatile organic compounds)
- Release of contaminants into water and soil (e.g. runoff)
- Product life cycle, including product content as well as the recovery and appropriate disposition of materials

Our suppliers are expected to be aware of [TELUS' Environmental Policy](#), relevant aspects of the environmental management system, which is certified to the ISO 14001:2015 standard, and TELUS' objectives, targets and environmental performance. Our suppliers are expected to adhere to our [TELUS Sustainable Paper & Packaging Policy](#). TELUS continuously monitors and annually reports on such objectives, targets and performance through our [Sustainability Report](#) and website, including but not limited to goals surrounding climate change and greenhouse gas emissions.

## 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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TELUS is committed to continuous improvement and encourages suppliers to proactively share suggestions in regards to process, business performance and relationship improvement for TELUS to consider. 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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- **TELUS website:** [www.telus.com](http://www.telus.com)
- **TELUS' Sustainability Report:** <https://telus.com/sustainability>
- **TELUS Code of Ethics and Conduct:**  
<https://www.telus.com/en/about/policies-anddisclosures/code-of-ethics-and-conduct?linktype=nav>
- **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 standard contact:** [SecurityGRA@telus.com](mailto:SecurityGRA@telus.com)
- **To report a concern or misconduct:** 1-888-265-4112 or [www.telus.ethicspoint.com](http://www.telus.ethicspoint.com)