

## Supplier Code of Conduct

A global leader in software and services, BlackBerry Limited (“**BlackBerry**”) enables the Enterprise of Things by providing the technology that allows endpoints to trust one another, communicate securely, maintain privacy, and provide secure crisis communications capabilities. Founded in 1984 and based in Waterloo, Ontario, BlackBerry operates in North America, Europe, Asia, Australasia, the Middle East, Latin America, and Africa. BlackBerry trades under the ticker symbol “BB” on the Toronto Stock Exchange and the New York Stock Exchange. For more information, visit [www.BlackBerry.com](http://www.BlackBerry.com).

As described in the [BlackBerry Code of Business Standards and Principles](#) and the [BlackBerry Human Rights Policy](#), BlackBerry is committed to conducting its business in accordance with the applicable laws and regulations of the countries in which BlackBerry operates and in accordance with internationally recognized industry standards of business ethics and social and environmental responsibility.

This commitment to corporate responsibility extends to our supply chain and any other supplier of a good or service. We expect our suppliers of goods and services (“**Suppliers**”) to comply with the applicable laws and regulations of the countries in which they operate and to conduct their operations in an ethical, socially and environmentally responsible manner, and in accordance with this BlackBerry Supplier Code of Conduct (the “**Code**”) and the standards that it references.

The Code also encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.

In selecting and retaining Suppliers, BlackBerry will take into consideration whether a Supplier can in an open and objective manner demonstrate its active pursuit of compliance with the Code.

Suppliers and other third parties are encouraged to report any potential infractions of this Code by BlackBerry Suppliers using BlackBerry’s confidential reporting system, [BlackBerry EthicsLink](#).

Should a Supplier fail to demonstrate commitment to the Code or fail to implement appropriate corrective actions to improve performance, BlackBerry may choose to suspend making purchases from the Supplier or terminate its relationship with that Supplier on the basis of contractual breach.

The Code is a statement of certain fundamental principles and standards that BlackBerry intends its Suppliers to follow in their conduct of business with BlackBerry. It is not intended to, nor does it, create or transfer any rights (including, without limitation, any intellectual property rights) to any employee, customer, supplier, competitor, shareholder or any other person or entity.

This Code is based upon the industry-standard Responsible Business Alliance (“**RBA**”) Code of Conduct, which is available online at [www.responsiblebusiness.org](http://www.responsiblebusiness.org). In alignment with the UN Guiding Principles on Business and Human Rights, the provisions in this Code are also derived from key international human rights standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.

This Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics; and Section E outlines the elements of an acceptable system to manage conformity to this Code.

## A. LABOR

Suppliers should commit to supporting the human rights of workers, and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Applicable labor standards are:

**1) Freely Chosen Employment** – Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitive prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction, misleading practices or fraud for labor or services. There shall be neither unreasonable restrictions on workers' freedom of movement in the facility nor any unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in the language of the worker or in a language the worker can understand that contains a description of terms of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to satisfy local law and provide equal or better terms for the worker. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents shall comply with all local labor laws including those in countries in which the recruiting takes place and may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. Workers shall not be required to pay employers' or agents' recruitment fees. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

Employers or agents must provide or pay for return transportation for foreign workers back to their country of origin.

**2) Young Workers** – Child labor is prohibited. The term "child" refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 ("Young Workers") shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

**3) Working Hours** – Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum

set by applicable local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest and all overtime must be voluntary.

- 4) **Wages and Benefits** – Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Overtime compensation shall be at rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.
- 5) **Humane Treatment** – There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Similarly, there is to be no threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.
- 6) **Non-Discrimination** – Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices and disabilities. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.
- 7) **Freedom of Association** – In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

## B. HEALTH and SAFETY

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information. The health and safety standards are:

- 1) **Occupational Safety** – Potential for workers to be exposed to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) should be identified, assessed and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training.

Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from hazardous working conditions, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as establish reasonable accommodations for nursing mothers.

- 2) **Emergency Preparedness** – Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.
- 3) **Occupational Injury and Illness** – Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.
- 4) **Industrial Hygiene** – Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and shall use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.
- 5) **Physically Demanding Work** – Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.
- 6) **Machine Safeguarding** – Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.
- 7) **Sanitation, Food, and Housing** – Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or labor agent must meet local housing and safety standards and are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.
- 8) **Health and Safety Communication** – Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by

workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

## C. ENVIRONMENTAL

Suppliers recognize that environmental responsibility is integral to designing and producing world class products. Adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information. Environmental standards to be followed are:

- 1) **Environmental Permits and Reporting** – All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.
- 2) **Pollution Prevention and Resource Reduction** – Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance and facility processes, or by other means. The use of natural resources including water, fossil fuels, minerals and virgin forest products, is to be monitored and periodically assessed, and responsible activity such as re-use, conservation and recycling should be employed.
- 3) **Hazardous Substances** – Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe and appropriate handling, movement, storage, use, recycling and reuse or disposal.
- 4) **Solid Waste** – Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle non-hazardous solid waste.
- 5) **Air Emissions** – Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from production activities are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Suppliers shall conduct routine monitoring of the performance of their air emission control systems.
- 6) **Materials Restrictions** – Suppliers are to adhere to all applicable laws, regulations and the [BlackBerry Policy for Control of Substances in Products](#) which relate to the prohibition or restriction of specific substances in hardware products and manufacturing, including labeling for recycling and disposal. Suppliers shall also implement controls to prevent the introduction of counterfeit parts into their products.
- 7) **Water Management** – Suppliers shall implement a water management program for their production activities that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

- 8) **Energy Consumption and Greenhouse Gas Emissions** – Suppliers should look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions. It is preferable that energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions resulting from production and distribution activities are to be tracked and documented, at the facility and/or corporate level.

## D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics, including:

- 1) **Business Integrity** – The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit all forms of bribery, corruption, fraud, extortion and embezzlement. This includes the criminal evasion of taxes wherever a supplier operates, and to the knowing facilitation of another's tax evasion. At a minimum, we expect our suppliers to have reasonable procedures in place to prevent the criminal facilitation of tax evasion by their employees or by those they transact with in connection with BlackBerry's business, and to also immediately report any concerns regarding tax evasion involving transactions with BlackBerry to their BlackBerry contact or through BlackBerry's confidential reporting system, [BlackBerry EthicsLink](#).
- 2) **No Improper Advantage** – Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with applicable anti-corruption laws, including the Canadian Corruption of Foreign Public Officials Act, the U.S. Foreign Corrupt Practices Act, and the UK Bribery Act.
- 3) **Disclosure of Information** – All business dealings should be transparently performed and accurately reflected on Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable laws, regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 4) **Intellectual Property** – Intellectual property rights are to be respected, and transfer of technology and know-how is to be achieved in a manner that protects intellectual property rights. Supplier will safeguard customer information.
- 5) **Fair Business, Advertising and Competition** – Standards of fair business, advertising and competition are to be upheld.
- 6) **Protection of Identity** – Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers<sup>1</sup> are to be maintained, except to the extent prohibited by law.

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<sup>1</sup> Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

Suppliers should have a communicated process for their personnel to be able to raise any ethical concerns without fear of retaliation.

- 7) **Responsible Sourcing of Minerals** – Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the hardware products they manufacture do not directly or indirectly finance or benefit illegitimately-armed groups or contribute to serious human rights abuses in Conflict-Affected and High-Risk Areas. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request. Supplier should comply with BlackBerry's [Responsible Minerals Policy](#).
- 8) **Privacy** – We expect our suppliers to comply with the requirements of applicable data privacy laws and regulations to ensure: (i) appropriate technical and organizational security measures to safeguard BlackBerry's confidential and personal information, as well as that of everyone that supplier does business with, including suppliers, customers, consumers and employees; and (ii) that there is no disclosure of BlackBerry's confidential and/or personal information to third parties without BlackBerry's prior authorization. BlackBerry also expects Suppliers to inform BlackBerry immediately in the event of a suspected or actual data breach of BlackBerry information, or if BlackBerry's information is released to any third party without authorization.
- 9) **Trade Compliance/Export Control** – Suppliers shall not conduct business, either directly or indirectly, with any business or involving any government (or any sub-division thereof), or any person, entity or project, targeted by, or located in any country that is the subject of any U.S embargo or comprehensive sanctions administered by the U.S. Department of Treasury Office of Foreign Asset Control (OFAC), the U.S. Department of State, the U.S. Department of Commerce or any equivalent sanctions or measures imposed by Canada, the United Nations, the European Union or any other U.S. government entity.

## E. MANAGEMENT SYSTEM

Suppliers shall adopt or establish an appropriate management system the scope of which is related to the content of this Code. The management system shall be based on a supplier's particular facts and circumstances and designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations and products or services; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. The management system should contain the following elements:

- 1) **Company Commitment** – A corporate social and environmental responsibility policy statement affirming Supplier's commitment to compliance with laws and regulations, endorsed by executive management and made accessible to all workers in the local language.
- 2) **Management Accountability and Responsibility** – A clear identification of senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management should review the status of the management system on a regular basis.
- 3) **Legal and Customer Requirements** – A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

- 4) **Risk Assessment and Risk Management** – A process to identify the legal compliance, environmental, health and safety<sup>2</sup> and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
- 5) **Improvement Objectives** – Written performance objectives, targets and implementation plans to improve the Supplier's social and environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.
- 6) **Training** – Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- 7) **Communication** – A process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, suppliers and customers.
- 8) **Worker Feedback and Grievance Process** – An effective grievance mechanism and a way for employees to obtain feedback regarding violations of policies or allegations of improper conduct.
- 9) **Audits and Assessments** – Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.
- 10) **Corrective Action Process** – A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
- 11) **Documentation and Records** – Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- 12) **Supplier Responsibility** – A process to communicate the significant requirements outlined in this Code to their own suppliers and to monitor the compliance of their own suppliers with those requirements.

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<sup>2</sup> Areas to be included in a risk assessment for environmental, health and safety include production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.