



SUPPLIER CODE OF CONDUCT

PURPOSE

Transat A.T. Inc. and its subsidiaries (hereinafter “Transat”) is committed to operating in a sustainable manner and to integrating environmental, social, and good governance (hereinafter “ESG”) principles and practices into its procurement processes. Transat relies on the cooperation of its partners, suppliers, travel service providers (hereinafter "Suppliers") to maximize its positive impact in the broader communities in which both Transat and its Suppliers operate. The purpose of this Supplier Code of Conduct (hereinafter the "Code") is to set forth the requirements for all Suppliers conducting business with Transat and to ensure that all the business activities of Transat are conducted with integrity and the highest standards of ethics.

The Code is based on the ten principles of the United Nations Global Compact, which refers inter alia to the Universal Declaration of Human Rights, the Principles on the Rights of the Child, the OECD Guidelines for Multinational Enterprises and anti-bribery laws.

Please note that this code does not claim to cover all the legal and ethical standards that may apply to supplier’s dealings with Transat. All the requirements in a Suppliers contract(s) with Transat continue to apply, and nothing in this document may be read as excusing performance from any contractual requirement.

SCOPE

The provisions of this Code applies to all Suppliers. Transat therefore expects its Suppliers to comply with the requirements set forth in this Code and to demand the same of their own partners, suppliers, employees, and subcontractors.

If this Code needs to be modified to remain consistent with current ESG regulations, best practices or standards, the Supplier will receive an updated version of the Code, which will automatically replace this document upon its receipt by the Supplier.

FUNDAMENTAL PRINCIPLES

1. LEGAL COMPLIANCE

Transat expects its Suppliers to comply rigorously with applicable laws and regulations in all areas, particularly regarding the health and safety of employees and customers, human rights (including children's rights), the fight against corruption, and environmental protection. This includes all obligations under international conventions signed by Canada and the countries in which Suppliers are based.

2. BUSINESS ETHICS AND CORRUPTION

Transat does not tolerate any form of corruption, extortion, or embezzlement. Any direct or indirect involvement with bribes, illicit kickbacks, illegal incentives, misappropriated funds or other similar types of payment is strictly prohibited. Suppliers must comply with all applicable international, national, and local laws and regulations on trade sanctions, competition, anti-trust, anti-corruption anti-bribery, and anti-money laundering, and to strive to uphold high standards of integrity, transparency, and good governance.



SUPPLIER CODE OF CONDUCT

3. DATA PROTECTION AND INTELLECTUAL PROPERTY

Transat's confidential information, know-how and intellectual property must be respected and protected. All personal information concerning individuals, such as consumers or employees, must be treated with full respect for the protection of their privacy and all applicable laws and regulations. All information provided by Transat that is not in the public domain is considered confidential and is used only for the intended and designated purposes.

4. RESPECT OF FUNDAMENTAL HUMAN RIGHTS

Transat is committed to providing an environment where individuals are treated with dignity and respect, free from any form of discrimination or harassment.

Transat is committed to fostering a work environment that is diverse and inclusive, and Transat encourages its Suppliers to do the same. Working conditions for Suppliers' employees must be safe, humane, and fair. Transat expects its Suppliers to treat their employees with dignity and respect and apply ethical and socially responsible policies in managing their human resources, in accordance with the International Labour Organization ("ILO")'s Declaration on Fundamental Principles and Rights at Work.

Discrimination

Discrimination of any kind, notably towards employees or customers, such as discrimination based on gender, age, physical or mental disability, ethnicity, sexual orientation, religion, personal beliefs, marital status, or criminal conviction for which a pardon has been granted is not acceptable. Suppliers must promote equal opportunity in hiring and labour practices, including remuneration.

Forced labour and child labour

All forms of forced or illegal labour are prohibited. Under no circumstances may the Supplier use forced labour, whether in the form of compulsory labour, bonded labour, indentured labour, or other forms of forced labour. Mental and physical coercion, slavery, and human trafficking are prohibited.

The use of child labour by the Supplier is strictly forbidden. No child under the age of 15 is allowed to work, subject to exceptions authorized by the ILO. Suppliers are expected to evaluate the risk of child labour in their respective supply chains and if child labour is identified, they must take appropriate measures to responsibly manage the elimination of child labour from its business.

If the Supplier employs persons between the ages of 15 and 18, the working conditions of employees under the age of 18 must comply with applicable laws and regulations as well as the provisions of the United Nations Convention on the Rights of the Child and any other relevant international conventions. An employee under the age of 18 may not be employed in work which is unsuitable for children and which, by its nature or the circumstances in which it is carried out, is likely to jeopardize their health, safety, or morals. The Supplier will not employ undocumented migrant workers and undertakes to make all legally required declarations to the applicable administrative, social and tax authorities required in the countries concerned.

Combating the sexual exploitation of children

Sexual exploitation of minors is unethical and criminal, and should be eradicated. Transat expects its Suppliers to do their part, by educating their employees, partners, suppliers, and customers, and by cooperating with local organizations and law enforcement agencies in this regard when appropriate.



SUPPLIER CODE OF CONDUCT

Freedom of association and collective bargaining

Suppliers must uphold its employees' freedom of association and right to participate in collective bargaining, in accordance with the applicable laws and regulations.

Fair Treatment

Suppliers must comply with all legal and regulatory requirements applicable to working hours and remuneration, such as overtime compensation. In any event, wages must at least correspond to the minimum income necessary for a worker to meet his or her basic needs.

Health, hygiene, and safety

Suppliers must provide its employees with a safe and healthy workplace to prevent accidents, injuries, and illness. To this end, Suppliers must adopt a proactive approach to health and safety and apply strict hygiene standards. Suppliers are expected to implement a health and safety policy, guidelines, and procedures to reduce and prevent physical harm, and to train their staff accordingly in this regard. This includes, but is not limited to, providing adequate protective equipment, and ensuring that work environments are adequately lit and ventilated. In addition, Suppliers should implement a policy for prohibiting individuals from working under the influence of drugs or alcohol.

Additionally, Suppliers must have an emergency plan in place and provide all necessary support to Transat, its employees, partners, and customers to ensure above all the safety of all individuals involved in case of emergency.

5. LOCAL COMMUNITIES

Transat expects its Suppliers to maintain harmonious relations with local communities, and to foster positive social and economic relationships with them. Suppliers should be mindful of the well-being of communities, the protection of natural resources, and the respect and preservation of local culture and heritage.

6. ENVIRONMENTAL PROTECTION

Transat expects its Suppliers to comply with all applicable local, national, and international environmental laws and regulations, and to commit to reducing the environmental impact of their activities, with an emphasis on reducing the consumption of natural resources, minimizing waste, and reducing greenhouse gas emissions.

Protection of animals

Where applicable, Transat expects its Suppliers to treat animals in captivity or in the wild according to best practices. Specifically, Transat encourages its Suppliers to comply with standards relating to animal welfare, in accordance with the Five Domains of Animal Welfare. We also expect our Suppliers to undertake not to sell, offer or promote activities involving marine mammals in captivity souvenirs containing endangered species of flora and fauna.

7. MONITORING AND ENFORCEMENT

Transat may ask its Suppliers to provide additional information to manage and monitor the compliance with this Code. Anyone may contact Transat to report a breach of this Code:

- Email: ethique-ethic@transat.com



SUPPLIER CODE OF CONDUCT

Suppliers shall ensure that employees have a confidential reporting mechanism that allows them to report any issues concerning health, safety, security, and other labour issues. Such a mechanism must be internal to the Supplier. Transat is committed to guiding Suppliers to remedy any compliance issues under this Code.

In case of failure by Suppliers to comply with this Code, Transat may request corrective actions from the non-compliant Suppliers, and/or not enter a commercial relationship with the non-compliant Suppliers or suspend or terminate the commercial relationship with the non-compliant Suppliers.

AGREEMENT AND SIGNATURE

I, the undersigned, on behalf of my company, a Supplier, have read and understood this Code. I agree to comply with the standards set out in this Code and to commit my company to fully comply with this Code at all times.

Name

Title

Signature