



Business Ethics

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Celestica strictly prohibits bribes or other means of obtaining undue or improper advantage from being 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, record keeping, and enforcement procedures are implemented to ensure compliance with anti-corruption laws.

Celestica respects 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.

Celestica examines actual and potential impacts that can occur as a result of our operations. Stakeholders are involved in the process of identifying impacts, as well receiving updates on how the material topic affects our operations. Celestica recognizes that our operations can have an actual or potential impact on employees and Celestica itself such as:

- Legal
- Reputational
- Business Relationships
- Company Values

Celestica measures the success of eliminating corruptive behavior, by the amount of reported incidents to our internal ethics hotline. All Celestica employees complete Business Conduct Governance (BCG) training upon hire and certify to the BCG policy on an annual basis, which includes how to identify instances of corruptive behavior and how to report any incidents. Celestica also has a Whistleblower policy that protects employees who choose to report any instances of unethical behavior. Our goal is to ensure there are no instances of corruptive behavior within the organization. Any form of unethical business behavior is reported using the ethics hotline or web based reporting, and the incidents are investigated. Once the matter has been investigated, appropriate actions are taken as required and the report is closed. Celestica uses these metrics to inform our management approach.

Our Management Approach

- Provide general training to all employees
- Assess job functions for bribery risk and provide additional training to a targeted audience
- Refresh out anti-bribery training on a regular basis to keep contact current and relevant
- Ensure executive oversight of the overall business ethics program
- Create and enforce policy in our [Business Conduct Governance Policy \(BCG\)](#)

Customer Privacy and Data Security

GRI 418-1

Celestica is committed to ensuring customer privacy and data security is protected across our global operations. We are committed to implementing the technical and organizational safety measures to protect the personal data of our customers, suppliers, business partners and employees.

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Celestica measures the success of our customer privacy and data security practices by ensuring there are no breaches in our security systems. Our goal is to ensure there are no information leaks in our systems, and Celestica has been able to maintain that goal for many years. Celestica uses these metrics to inform our management approach.

Our Management Approach

- Maintain Celestica's [Privacy Policy](#)
- Maintain policies from senior management intended to protect the confidentiality, integrity and availability of information and systems at all Celestica locations
- Conduct routine internal and external compliance assessments to ensure that those policies are followed