



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

Any observed or suspected violations of Celestica's Business Conduct Governance (BCG) policy, the law, or other Celestica policies are to be reported locally to management, HR, or anonymously to the ethics hotline or web based reporting. These reporting channels include any reporting on financial matters such as bribery. Celestica takes all reports of possible misconduct seriously and will investigate the matter confidentially, make a determination whether to BCG, the law, or other Celestica policies have been violated, and take appropriate corrective action.

Our Management Approach

- All employees train on the BCG upon hire and certify to the BCG policy on an annual basis

- Assess job functions for bribery risk and provide additional training to a targeted audience
- Refresh our BCG and anti-bribery training on a regular basis as an industry best practice
- Have Ethics Awareness Centres posted at every Celestica location to communicate the program globally
- Deliver wallet cards to every employee biennially
- 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