

MODERN SLAVERY REPORT FINANCIAL YEAR ENDED JANUARY 31, 2025

ABOUT THIS REPORT

As an organization built on passion, trust and ingenuity, BRP is committed to actively creating a brighter future for its stakeholders, including employees, communities, customers, suppliers and shareholders. Prioritizing human rights is integral to its responsible business practices and everyone who works at or with BRP has a responsibility to protect the integrity and dignity of every individual who is part of the Corporation's operations or of its supply chain. BRP explicitly prohibits any form of child labour, human trafficking, forced or compulsory labour, physical punishment, unsafe working conditions, unreasonable or illegal work hours, and any other form of modern slavery (collectively, "modern slavery").

This statement is designed to meet BRP's reporting obligations under the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9) (the "**Act**") and the Australian *Modern Slavery Act 2018* (No. 153, 2018), by setting out the steps taken during its financial year ending January 31, 2025 ("**FY2025**") to prevent and reduce the risk that modern slavery is used at any step of BRP's production or supply chain.

This is a joint report for BRP Inc. and each of its subsidiaries which have an obligation to publish a report under the applicable act¹ (hereinafter collectively referred to as "**BRP**" or the "**Corporation**"), given that they share the same core business operations and governance framework including supply chain policies prohibiting modern slavery and supporting processes, as further described in this report.

BRP IN NUMBERS

(data as of January 31, 2025)

\$7.8 billion

annual revenue (in Canadian dollars)

≈ 16,500

employees

8

iconic brands

14

manufacturing facilities in 7 countries

2.000 +

Tier 1 direct suppliers

12,000+

Tier 1 indirect suppliers

740 +

Parts, accessories and apparel suppliers

¹ Entities required to publish a report under the Act and therefore covered by this joint report are BRP Inc., Bombardier Recreational Products Inc., Les Industries Mégatech Inc., BRP US Inc., BRP Marine US Inc., BRP-Rotax GmbH & Co KG, BRP Finland OY, BRP Mexico S.A. de C.V. and BRP Querétaro S.A. de C.V. On the other hand, BRP Australia Pty Ltd., a wholly owned subsidiary of BRP Inc., is required to publish a report under Australia's *Modern Slavery Act 2018*.

For the purpose of the relevant approval and signing requirements, this report has been approved by the governing body of BRP Inc., which controls each entity included in this joint report, and has been signed by one of its directors.

STRUCTURE, OPERATIONS & SUPPLY CHAIN

Structure

BRP Inc. is incorporated under the *Canada Business Corporations Act* (RSC, 1985, c. C-44) and is a publicly-traded Corporation listed on the Toronto Stock Exchange under the symbol "DOO," and on Nasdaq in the United States under the symbol "DOOO." Headquartered in Valcourt, Québec, Canada, BRP is a global leader in the design, development, manufacturing, distribution, and marketing of powersports and marine products. The Corporation is a diversified manufacturer of powersports products, propulsion systems and marine products, providing enthusiasts with a variety of products for all year-round use on a variety of terrains and providing access to adventures and experiences across different playgrounds.

The Corporation's diversified portfolio of brands and products includes, under the powersports segment, year-round products such as Can-Am ATVs, SSVs, 3WVs and electric 2-wheel motorcycles, seasonal products such as Ski-Doo and Lynx snowmobiles, Sea-Doo PWCs and pontoons, engines for OEMs such as Rotax engines for karts, recreational aircraft and jet boats, and Pinion gearboxes and edrive systems for bicycles, and under the marine segment, Alumacraft, Manitou and Quintrex boats and Rotax S outboard engine with stealth technology. Additionally, the Corporation supports its line of powersports and marine products with a dedicated parts, accessories and apparel business to fully optimize the riding experience.

Operations

As of January 31, 2025, BRP employed approximately 16,500 people worldwide and manufactures its products at 14 facilities: one in Australia, one in Austria, two in Canada, one in Finland, one in Germany, four in Mexico and four in the United States.

BRP's manufacturing strategy, including the products manufactured and the operational activities carried out in each manufacturing facility, is based on a variety of factors such as the proximity to key retail markets, the presence and cost of skilled labour, production capacity, international and local laws, rules and regulations (including custom duties, tariffs and free-trade arrangements) as well as social and political conditions.

Operations conducted in those facilities vary from manufacturing to assembly of components and parts to painting. Sales of BRP's products to customers are made through dealers and distributors in more than 130 countries, and maintenance services and parts are available through those dealers and distributors.

For more information about BRP's structure and operations, please refer to the Corporation's <u>Annual Information Form</u> which is available on BRP's corporate website at <u>www.brp.com</u>.

Supply chain

BRP's global supply chain consists of:

- **Direct suppliers** who provide raw materials, tooling, components, parts, assemblies and other items incorporated into BRP's vehicles on its production lines. The raw materials used in manufacturing BRP's products are aluminum, steel, plastic, resins, stainless steel, copper, rubber and certain rare earth metals. Parts, components and systems are subject to an extensive validation process to ensure their reliability and durability, and raw materials or standard parts are generally readily available from multiple sources for the products manufactured by BRP. The Corporation establishes long-term relationships with direct suppliers and, whenever possible, identifies potential substitute supply arrangements for components. The Corporation partners with over 2,000 direct suppliers worldwide.
- Indirect suppliers who provide services or goods that support BRP's operations but are either not incorporated in its vehicles such as financial and legal services, facility maintenance, information technology, marketing, sales support, transportation, customs and logistics--, or which offer consumables, such as stationery and office supplies. BRP currently works with over 12,000 indirect suppliers in more than 30 countries.
- Parts, accessories and apparel suppliers who manufacture, based on the Corporation's designs or their own, a variety of finished goods which BRP then resells to its network of dealers and distributors without making any modifications to the delivered products. BRP currently collaborates with more than 740 accessories and apparel suppliers in 35 countries.



Geographic Distribution of Tier-1 Suppliers

GOVERNANCE & POLICIES

Governance

As part of its corporate social responsibility (CSR) program, BRP fosters value creation around three main pillars — environment, social and governance (ESG) — as well as objectives that focus on the Corporation's employees, communities, operations and products. Under the governance pillar, BRP adopted a framework with effective structures, policies and processes to make sound strategic decisions, maintain high ethical standards, and conduct its operations in a sustainable manner. Reporting to the Chief Legal Officer and Corporate Services, BRP's Ethics and Compliance (E&C) team is guided by the Ethics and Compliance committee, which oversees the program implementation. This multidisciplinary committee, with representatives from legal, human resources, finance, operations, internal audit and communications, ensures a strong compliance culture at BRP. Quarterly reports on program performance and investigations of a certain risk-level are presented to the Ethics and compliance committee and the audit committee of the Board.

BRP's Board remains the ultimate steward of ESG matters. As such, a quarterly progress report on its CSR25 program, related targets and various ESG indicators is submitted to its Board for its review. Further responsibilities are delegated to two Board committees:

- Nominating, Governance and Social Responsibility Committee which oversees BRP's sustainability strategy and supervises KPIs developed as part of the CSR25 program. A session of the Committee dedicated to the topic is held twice a year.
- Audit Committee which maintains oversight on the level of sustainability disclosure, ensuring it is sufficiently rigorous and in line with the disclosure standards for BRP's financial results.

BRP publishes an annual CSR report which provides an overview of the Corporation's CSR framework and the priority issues relevant to its business and stakeholders – customers, employees, suppliers, shareholders and community partners. Additional information regarding the Corporation's CSR program and progress can be found in the CSR reports made available on the Corporation's website at www.brp.com.

Policies

BRP's efforts to address risks of modern slavery across its business and supply chains are supported by the following policies, which apply to the whole organization. These policies establish the Corporation's baseline expectations and reinforce BRP's values, goals and objectives:

Code of Ethics

BRP's <u>Code of Ethics</u> establishes integrity and ethical standards for all directors, officers, employees and representatives, at every level, in every country, and from every subsidiary controlled by BRP Inc. Through this document, BRP recognizes that each of these stakeholders has the responsibility to protect the rights and dignity of every individual that is part of BRP's global footprint. The Code has dedicated chapters on building a non-discriminatory, respectful and safe workplace, on protecting human rights as well as on reporting any suspected violations of laws or of the Code itself.

Third-Party Code of Conduct

BRP's <u>Third-Party Code of Conduct</u> was updated in 2024, to expand expectations of ethical behavior, legal compliance and responsible business practices to all third parties, whether they supply goods or services to BRP, sell or distribute its products, parts, accessories and apparel, collaborates with it, or acts on its behalf, and to reflect evolving laws, regulations, and best practices.

The Third-Party Code of Conduct specifically includes provisions prohibiting child labour and modern slavery as follows:

CHILD LABOR

BRP prohibits the employment of individuals under the age of 15 or the local legal minimum working age, whichever is higher. We require Third Parties to comply with child labor laws and ensure they only employ individuals who meet the legal age requirements.

MODERN SLAVERY

BRP enforces a zero-tolerance policy for all forms of modern slavery, including human trafficking and forced labor. We do not engage with or purchase materials or services from entities that use forced or involuntary labor. Third Parties must not require workers to surrender passports, identity papers, work permits, travel documents and other personal legal documents as a condition of employment and workers must be free to leave with reasonable notice.

The Third-Party Code of Conduct also explicitly indicates that the Corporation expects suppliers to cooperate with any requests BRP may have for additional information for the purposes of managing and monitoring compliance with this Code of Conduct, and that in the event of failure to comply,

BRP reserves the right to apply appropriate sanctions, up to the potential termination of the business relationship. Lastly, the Third-Party Code of Conduct also provides a way for anyone to report a situation that potentially violates its key principles through the Integrity Hotline (further detailed below).

• Conflict Mineral Policy

Through the <u>Conflict Mineral policy</u>, BRP supports the goal of ending violence and human rights violations in the Democratic Republic of the Congo and adjoining countries. BRP is committed to having a global supply chain that complies with the conflict mineral rules, and the Corporation requires its suppliers to take similar measures with respect to their suppliers to ensure a consistent policy alignment throughout the supply chain.

Speak Up Policy

BRP's Speak Up policy encourages employees and external stakeholders, including their respective employees, to come forward and speak up when they suspect or witness conducts that could violate BRP's Code of Ethics, Third-Party Code of Conduct or any other policy or applicable law, including any situations of possible modern slavery, such as any signs of human rights abuses in BRP's business or supply chain, or in a third party's operations.

The Speak Up policy provides multiple channels to report to, including by contacting the <u>Ethics</u> <u>and Compliance</u> team or by reporting through BRP's <u>Integrity Hotline</u>, which is a whistleblower service operated by an independent third-party provider. Retaliation against anyone who speaks up in good faith is strictly prohibited by BRP's Speak Up policy and Code of Ethics.

Service Contracts and Indirect Procurement Policy

The Service Contract and Indirect Procurement Policy seeks to frame, define and ensure sound management of procurement activities, which must be conducted in compliance with all applicable laws, regulations and internal policies.

People and Assets Security Policy

As stipulated in the Corporation's Code of Ethics, not only is safety of people a priority—it's part of BRP's mindset. To support BPR's commitment to providing a safe and secure work environment, the Corporation has recently implemented its People and Assets Security policy to ensure security is always at the forefront of everyone's actions.

To obtain a copy of the Speak Up, Service Contracts and Indirect Procurement or People and Assets Security policies, please email the Corporation at compliance@brp.com.

ASSESSING & MANAGING RISK

Risks of modern slavery

Among the Corporation's workforce

Although BRP believes that the risk of modern slavery among its employees is low, the Human Resources and Compensation Committee of the Corporation's Board of Directors oversees BRP's recruiting processes as well as the management of its human resources to ensure compliance with standards applicable in jurisdictions where BRP has employees.

Approximately 5,400 of BRP employees are covered by collective arrangements, either through an association, a joint company-employee relations committee or a certified union/works council whose roles include ensuring compliance with the working conditions negotiated by union groups and therefore contributes to excluding the risk of modern slavery. For more information on the Corporation's employees and unions, please refer to BRP's <u>Annual Information Form</u> which is available on the Corporation's corporate website at <u>www.brp.com</u>.

Within the Corporation's operations

Modern slavery risks may exist within the contingent labour population, specifically at lower levels of the supply chain, in high-risk countries and in sectors where low-skilled labour is more frequent. At BRP, agency staff, including contract service workers, subcontractors, and independent contractors must enter into the Corporation's standard consulting agreements to be able to provide services to BRP. These agreements require certain pre-qualifications and include various contractual clauses (including adherence to BRP's Third-Party Code of Conduct) to ensure compliance with applicable labour standards.

• Within the Corporation's supply chains

The Corporation is aware that BRP's global supply chain presents a risk of forced labour and child labour. To address this potential risk, BRP expects its third parties to uphold the same principles within their operations and adhere to applicable human rights and employment standards laws. BRP also expects them to ensure that any subcontractors they work with or supply from have the same respect for human rights. Recognizing that it can prove complex to identify the risk for indirect suppliers over which the Corporation has little control and visibility, BRP believes that it requires the implementation of certain additional measures, some of which are discussed later in this report.

Managing risks of modern slavery

To prevent and reduce risks of modern slavery in the Corporation's operations and supply chain, BRP has undertaken the following steps:

- **Commitment:** The Corporation's commitment to combatting modern slavery is formally addressed in its Code of Ethics and Third-Party Code of Conduct.
- Due diligence process and screening of new suppliers: BRP has formalized its Third-Party due diligence process, which involves a risk assessment procedure prior to engaging new suppliers, allowing it to prioritize its efforts and adjust its mitigation actions where risks are more prevalent. The approach starts with an assessment of the risk associated with the new supplier, taking into consideration the type of engagement as well as the geographic location, relying on a combination of country risk indicators such as the corruption perception index, the global slavery index and indicators of other risks such as economic sanctions currently in place. BRP also uses reliable third-party sources to identify various compliance risks, including labor and human rights violations, fraud and illegal activities and level of adherence to internally recognized environmental standards. Once a risk-level is established, appropriate due diligence is performed, and a more thorough Third-Party Compliance Due Diligence questionnaire may be requested to obtain further documentary evidence of compliance with the requirements of BRP's Third-Party Code of Conduct. Any specific risks suspected or identified is further reviewed and vetted by a subject matter expert such as the Corporation's E&C team before the onboarding can proceed and specific monitoring or control measures may be put in place, as needed or recommended in the circumstances.
- Contractual obligations: The Corporation requires suppliers to accept and adhere to BRP's commitment against forced modern slavery when dealing with workers, suppliers, customers and other third parties. This requirement is included in its Third-Party Code of Conduct which is incorporated by reference in BRP's contractual agreements as well as in its standard terms and conditions. In addition, for suppliers and supplier entities that are integrated through mergers and acquisitions, BRP follows its standard due diligence process carried out by the M&A team, which includes a review and risk assessment to identify any gaps with BRP's standards and related steps to be completed as part of the integration exercise.
- Supplier ongoing monitoring: The Corporation recognizes the importance of conducting a real-time continuous monitoring diligence of its existing suppliers to identify those that bring evolving risks to its business, including risks related to modern slavery. BRP leverages several tools and monitoring solutions at different stages of its relationship with suppliers, including at the time of processing a new order under an existing contract. Those tools and solutions encompass modern slavery risks and detect events that are more global in nature but could potentially impact its supply chain, such as geopolitical risks, labour disruptions and cyber-

attacks. As mentioned above, once specific risks are suspected or identified, they are channeled to the appropriate subject matter expert for revision and vetting before the order can process.

- Supplier on-site visits: The due diligence conducted at onboarding may include, where
 appropriate, a visit of the supplier's premises. Although the primary goal of these visits may
 not be to detect modern slavery practices in every case, individuals conducting these visits
 may report certain practices that would allow the Corporation to take appropriate actions, if
 needed.
- **Reporting:** The Integrity Hotline is a publicly available multilingual ethics and business conduct reporting tool which allows anonymous reporting of alleged illegal or unethical behaviour. It is operated by an independent third-party provider and is available 24 hours a day, seven days a week, worldwide, either online or via phone. The E&C team administers it in a view to objectively manage incidents to their resolution and assess any adverse impacts to operations and/or supply chain. In addition, on a quarterly basis, the Audit Committee is informed of relevant incidents, any emerging trends and themes requiring attention, as well as the proposed action plans and resolutions.

As previously mentioned, any allegation brought forward through the Integrity Hotline is reviewed and investigated when required, and BRP does not tolerate any form of retaliation against anyone for making a good-faith report of actual or potential misconduct.

- Training: All employees worldwide (except for BRP's hourly-paid plant workers) must complete the annual Code of Ethics training and certification to ensure they understand and properly apply it in daily activities. BRP tracks completion of this training and reports results to the audit committee, as well as to the nominating, governance and social responsibility committee as part of the scorecard on ESG performance metrics. Additionally, BRP provides its direct suppliers with live or recorded training on modern slavery risks, responsible minerals and human right laws offering compliance strategies to enhance awareness and accountability.
- Collaboration: Recognizing that existing tools and solutions currently in place at BRP might not cover all existing supplier relations depending on their respective scope and capacity, the Company also counts on close collaboration between internal teams to ensure efficient prevention of risks. The procurement department acts jointly with the legal department, which actively participates in the negotiation of contracts and involves the E&C team and other appropriate subject matter experts when they suspect or identify certain compliance risks that may warrant additional due diligence. The legal department also makes sure that contracts comply with the legislation in force and with ethical practice standards, while guiding contracting parties on their legal responsibilities.

REMEDIATION MEASURES

In the last financial year, the Corporation has not identified or been informed of any incident of modern slavery in its activities or supply chain. Thus, the Corporation did not need to take any measures to remediate an incident of modern slavery.

If a practice that is not compliant with either BRP's Code of Ethics or its Third-Party Code of Conduct is identified, the Corporation will assess the situation, correct it and implement measures to avoid any recurrence. BRP also requires and supports suppliers to undertake similar actions within their own supply chain.

ASSESSING EFFICIENCY

In FY2025, BRP continued to progress on its efforts to prevent and reduce the risk of modern slavery in its activities and supply chains through the following measures, acknowledging that some of them will remain continuous work in progress:

FY2025 ACHIEVEMENTS

- Held an in-person supplier conference with more than 170 key suppliers, during which the E&C team
 provided visibility on its modern slavery expectations and announced the upcoming expansion of its
 Supplier Code of Conduct into a Third-Party Code of Conduct.
- Rolled out the updated Third-Party Code of Conduct, which provides additional clarity and guidance to suppliers on the Corporation's expectations and reflects evolving laws, regulations, and best practices.
- Mapped its Tier-1 supply chain to identify high-risk areas.
- Formalized its Third-Party Due Diligence process to assess third parties for risks such as modern slavery, corruption, sanctions and human rights at the onboarding stage and on an ongoing basis. This includes screening, risk-based background checks and additional due diligence when warranted, and it leverages existing tools and solutions as well as the collaboration of other BRP teams.

BRP's objective for the next financial year is to continue to implement its action plan to address forced labour and/or child labour within its operations and supply chain, including through the following actions:

NEXT STEPS

- Roll-out the Third-Party Due Diligence process to all internal stakeholders and to its suppliers through a phased approach.
- Provide high-level training to all employees with a chapter dedicated to working with third parties in its FY2026 Code of Ethics certification.
- Develop and deliver a specific training on modern slavery risks and prevention to the procurement team and to targeted suppliers above a certain spend in higher-risk countries.
- Improve its measuring and reporting of third-party risk assessments conclusions, including through regular updates to the Ethics and compliance committee on third-party risk assessments that led to enhanced due diligence, additional control measures, periodic reassessments or negative recommendations.

| APPROVAL

This statement is issued for BRP Inc. and its subsidiaries, which have an obligation to publish a report, either under the Act or the Australian *Modern Slavery Act 2018*.

Australian Modern Slavery Act 2018

In preparing this statement, relevant employees from BRP were consulted and provided with an opportunity to review this statement, including the CSR team and the Ethics and Compliance Committee, which both have global responsibilities.

This modern slavery statement is signed by a responsible member of the board of BRP Inc. on behalf of BRP Australia PTY Ltd.

Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

This report was approved by the Board of Directors of BRP Inc., as being a joint report of BRP Inc. and its subsidiaries listed in footnote on page 1, for the financial year ended January 31, 2025, pursuant to subparagraph 11(4)(b)(i) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above statement in my capacity as a director of the board of directors of BRP Inc. for and on behalf of the board of BRP Inc.

I have the authority to bind BRP Inc.

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José Boisjoli

President and Chief Executive Officer Director of BRP Inc. March 25, 2025