1.0 Introduction

At Loblaw, Sourcing with Integrity is a key component the way we do business. We expect our suppliers to uphold the same values and principles of business conduct we do. This means adherence by suppliers to strong social and safety standards in all aspects of their operations. The Supplier Code of Conduct (the “Code”) sets out minimum standards which suppliers must meet. We expect suppliers at all times to diligently work towards compliance with the Code or local law, whichever provides the greater level of protection for its workers.

Monitoring labour and safety practices and conditions is of critical importance to us. We will employ third party audits on a regular basis to ensure our standards are being met. Suppliers are required to submit to such audits and be transparent about their operations. A key component of audits is effective interviews with workers and we expect suppliers to facilitate this communication. Loblaw personnel will visit supplier facilities on a regular basis to monitor progress of improvement programs, when they are in place.

Loblaw acknowledges that many issues that are identified may take time to resolve. If appropriate in the circumstances, we will work with suppliers on reasonable time frames to make improvements in their operations. We will seek to establish and maintain relationships with suppliers that demonstrate their commitment to the Code by responding promptly to our concerns. However, serious violations of the Code may warrant and immediate response and termination of our relationship.

2.0 Code of Conduct

The provisions of the Code are minimum and not maximum standards to be met and nothing in the Code shall prevent suppliers from exceeding these standards. The Code applies to all suppliers of goods and services to Loblaw. In addition to the provisions of the Code, suppliers must at all times comply with local laws and regulations.

2.1 No Child Labour

2.1.1 Workers younger than 16 shall not be employed.

2.1.2 Complete records relating to the age of all workers must be kept on site and be accessible at all times.

2.1.3 Workers under 18 must have the benefit of working hours and conditions and other benefits that are appropriate to their age.

2.2 Employment must be Freely Chosen

2.2.1 There shall be no forced, bonded or involuntary prison labour.

2.2.2 Workers must not be required to deposit funds or personal documents as a condition of their employment.
2.2.3 Overtime must be voluntary and refusal of overtime must not be penalized.

2.2.4 Workers must be permitted to terminate their employment without financial penalty.

2.3 **Discrimination will not be tolerated**

2.3.1 In their hiring and treatment of workers, suppliers must not discriminate on the basis of race, colour, age, gender, caste, social background, sexual orientation, ethnicity, national origin, disability, pregnancy, religion, political affiliation, union membership, marital status, medical condition or any other personal characteristic.

2.4 **No Abuse or Harassment**

2.4.1 Workers must not be subjected to any form of verbal, physical or sexual abuse or harassment or any form of intimidation.

2.4.2 Monetary penalties are not to be used as a form of discipline.

2.5 **Freedom of Association must be respected**

2.5.1 Workers or their representatives must be permitted to associate and bargain collectively.

2.5.2 Workers’ activities with respect to their rights and interests, including association and collective bargaining, must be permitted to take place in the workplace.

2.6 **Employment Laws must be respected**

2.6.1 Employment terms must in accordance with the employment contract if one is present and the worker must have access to the terms of any such contract.

2.6.2 Only workers with a legal right to work in the country are to be employed.

2.6.3 The use of Labour Agencies will not affect any of a suppliers’ obligations under this Code. The use of such agencies is discouraged.

2.7 **Working Hours are not to be excessive**

2.7.1 The average total working hours for workers (including overtime) must not exceed 72 hours, or the maximum allowed by local law, whichever is lower.

2.7.2 Overtime must always be voluntary.

2.7.3 Workers must be provided, on average, at least one day off for every 7 day period.
2.8  *Reasonable Living Wages must be Paid*

2.8.1 Workers must be paid at least the minimum wage in the applicable jurisdiction or an agreed-to wage that is enough to meet basic needs and provide some discretionary income.

2.8.2 Overtime must be paid at a premium where it is required by local law.

2.8.3 Wages must be paid regularly and on time.

2.9  *Working Conditions must be Safe*

2.9.1 Workers must be provided a safe and hygienic working environment.

2.9.2 Sufficient potable drinking water must be available at all times.

2.9.3 Functional fire alarms, fire extinguishers and relevant firefighting and prevention equipment must be present at all facilities.

2.9.4 Safety and emergency prevention programs must be in place and training of workers must take place at appropriate regular intervals.

2.9.5 Routes of egress for workers must remain clear and emergency evacuation possible at all times.

2.9.6 Suppliers’ facilities must have the appropriate structural integrity and be suitable and approved for its purpose.

2.10  *Protection of the Environment and Treatment of Animals*

2.10.1 We expect our suppliers to conduct their businesses in accordance with all laws, standards, regulations, administrative practices and policies that relate to the protection of the environment.

2.10.2 Suppliers that provide animal products must ensure that animals are treated in accordance with government and industry-accepted guidelines for humane treatment.

2.11  *Ethical Conduct*

2.11.1 Suppliers must not be involved in any actions involving bribes when acting in connection with Loblaw’s business. This includes offering, paying, receiving or suggesting bribes, advantages or kick-backs to both private and public individuals. Notwithstanding any local practice or custom, facilitation payments to local officials are not permitted when acting for or on behalf of Loblaw.

2.11.2 Suppliers must not offer or provide gifts, entertainment, hospitality or favours, other than of nominal value, to Loblaw employees with the goal of obtaining favourable
treatment from such Loblaw employees. Gifts, entertainment or hospitality may be offered or provided which are customary and proper in the circumstances, provided that no obligation could be, or be perceived to be, expected in connection with the gift, entertainment or hospitality.

2.11.3 If suppliers have access to business information, trade secrets, formulations, recipes, specifications or other sensitive information which belongs to Loblaw, they must keep all such information strictly confidential and shall only disclose it to those individuals within their own organizations with a need to have the information.