

SUPPLIER CODE OF CONDUCT

Loblaw Companies Limited and its subsidiaries (“**Loblaw**”) are committed to doing business in a legal, ethical and socially responsible manner. Reflecting this commitment, all directors, officers and colleagues are expected to comply with the Loblaw *Code of Business Conduct* in conducting their business relationships. To maintain these standards, Loblaw desires to do business with those suppliers, vendors and contractors (collectively, “**Suppliers**”) whose practices are consistent with Loblaw’s ethics and principles of business conduct. This Supplier Code of Conduct (as amended or modified from time to time, the “**Code**”) sets forth the types of standards and practices that Loblaw expects of its Suppliers.

Compliance with Laws

Suppliers are expected to abide by all applicable laws and regulations including all federal, provincial and local laws regarding environmental matters, occupational health and safety, labour and employment practices, human rights, immigration, product safety, shipping and product labeling. Loblaw also expects that their Suppliers will comply with applicable guidelines and best practices for their industry.

Gifts

Loblaw has a Gift Policy that restricts Loblaw colleagues from accepting gifts from suppliers or prospective suppliers. Gifts include cash, cash equivalents, goods, services, entertainment or hospitality. A gift is exempt from the Gift Policy only if it qualifies as being professional in nature and provides no personal benefit to the recipient. We ask our Suppliers not to place our colleagues in the difficult position of having to refuse gifts that would place them in conflict with the Loblaw Gift Policy.

Environmental Commitment

Loblaw expects its Suppliers to conduct their businesses in a manner that preserves and protects the environment. To minimize or eliminate negative impacts of their operations on the environment, Suppliers should endeavour to minimize waste, avoid excess packaging, use nontoxic, recycled and recyclable materials where possible and promote energy efficiency.

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

No Child Labour or Forced Labour

Suppliers shall not use workers under the applicable legal age of employment or forced or involuntary labour or engage any supplier, vendor, contractor or partner that uses such workers. Suppliers should only use workers who are legally entitled to work in the jurisdiction in question.

Employment Practices of Suppliers

The procedures and policies of Suppliers should reflect the commitment of Loblaw to fair and reasonable labour and employment practices. Suppliers are expected to comply with all local and applicable labour laws and employment standards, such as compensating workers in compliance with all applicable wage, benefit and employment standards laws and maintaining reasonable colleague work hours and a safe and healthy workplace. Loblaw expects that Suppliers shall not inflict, threaten to inflict or permit corporal punishment or any other forms of physical, sexual, psychological or verbal abuse or harassment on any colleagues.

Food and Product Safety

Loblaw employs best practices for storage and distribution of food products. The procedures of Loblaw food Suppliers for food safety, food handling, preparation, packaging and distribution should meet or exceed industry standards. All Suppliers, for both food and general merchandise products, should also meet or exceed standards for product safety applicable in their industry, including those established by applicable regulators and consumer standards associations.

The safety of products provided by Suppliers should also be protected by adequate security measures at all stages of production, packaging, storage and distribution in order to prevent tampering or contamination.

Product Recall Process

All products, both food and general merchandise, provided by Suppliers must be safe for consumption or for their intended purpose, as applicable, by Loblaw customers. Each Supplier is expected to have in place proper procedures to identify potentially harmful products and complete an appropriate product recall, whether voluntary or mandated, in accordance with applicable laws and industry practices. Such procedures should ensure clear and prompt communication regarding such products to consumers and Loblaw and the immediate removal of Potentially harmful products from Loblaw inventory.