



CODE OF CONDUCT AND ETHICS

**The masculine gender is used in this document
without any discrimination and refers to both masculine and feminine genders.**



CODE OF CONDUCT AND ETHICS

TABLE OF CONTENTS

TABLE OF CONTENTS 2

A. WHO THIS CODE APPLIES TO 3

B. OBJECTIVE..... 3

C. BREACH OF THE CODE 3

D. POLICY STEWARDSHIP..... 4

E. COMMUNICATION AND ENFORCEMENT 4

F. CONFLICT OF INTEREST 4

G. PROTECTING ASSETS 5

H. CONFIDENTIALITY..... 5

I. WORKING ENVIRONMENT 6

J. DEALING WITH CUSTOMERS, SUPPLIERS AND COMPETITORS..... 7

K. COMPLIANCE WITH LAWS AND REGULATIONS 7

L. RAISING A CONCERN OR COMPLAINT 7

M. PROCEDURES FOR HANDLING THE REPORTING OF COMPLAINTS 9

N. RETENTION OF COMPLAINTS AND INVESTIGATIONS 10

O. CONTACT PERSONS 10

APPENDIX A – CONFLICT OF INTEREST, GIFTS, SAMPLES & INVITATIONS 11



CODE OF CONDUCT AND ETHICS

A. WHO THIS CODE APPLIES TO

The Code applies to all directors, officers, head office management, head office employees, warehouse management, distribution centre management, field management and store management (hereinafter collectively referred to as “Employee(s) of the Corporation”) of Dollarama Inc., its subsidiaries and business units (hereinafter collectively referred to as “Dollarama” or the “Corporation”). Employees of the Corporation shall acknowledge the Code (as hereinafter defined) and act accordingly by respecting not only the letter of the Code but also its intent.

B. OBJECTIVE

The objective of this Code of Conduct and Ethics (the “Code”) is to provide guidelines for maintaining the integrity, reputation, honesty, objectivity and impartiality of Dollarama.

This policy addresses various types of business conduct including, but not limited to:

- conflicts of interest, including transactions and agreements within which a director, executive officer or any Employee(s) of the Corporation may have a material interest;
- protection and proper use of Dollarama’s corporate assets and opportunities;
- fair dealing with Dollarama’s security holders, customers, employees, competitors, suppliers and other business partners;
- compliance with laws, rules and regulations; and
- reporting of any illegal or unethical behaviour.

Dollarama reserves the right to revise this Code at any time, without advance notice, in order to take into account changed circumstances or amendments to laws and regulations. Should there be a material change, the revised version of the Code and a notice will be communicated to all Employees of the Corporation.

C. BREACH OF THE CODE

Failure to comply with this Code may entail serious legal consequences for the Employee of the Corporation and Dollarama, and may, in such case, result in disciplinary action, up to and including immediate termination of employment or removal from office without any notice.



CODE OF CONDUCT AND ETHICS

D. POLICY STEWARDSHIP

Dollarama's Board of Directors, or the persons or committee appointed thereby, have the ultimate responsibility for the stewardship of the Code.

E. COMMUNICATION AND ENFORCEMENT

All Employees of the Corporation shall be informed of the existence of this Code and of its importance. The Director of Human Resources of Dollarama will ensure that a copy of this Code is provided to each Employee of the Corporation and to each new Employee of the Corporation upon their hiring.

Only Dollarama's Board of Directors or the persons or committee appointed thereby may exceptionally grant exemptions of the applicability of the Code.

F. CONFLICT OF INTEREST

Employees of the Corporation shall take all necessary measures to avoid conflicts of interest. A conflict of interest arises whenever a private interest interferes or conflicts in any way with that of Dollarama. Conflicts of interest also arise when an Employee of the Corporation, or member of his or her family, receives improper personal benefits as a result of his or her position in the company. Employees of the Corporation must always refrain from helping any other persons, companies or entities in securing any contracts with Dollarama that could result in a personal benefit to them.

Since it is impossible to provide an exhaustive list of all situations that could give rise to real or potential conflicts of interest, Employees of Dollarama shall ask themselves the following questions to determine if there is a potential conflict of interest:

- Do I stand to gain personally from this as a result of my position in the corporation?
- Does this result in a financial or other benefit for me, a relative, friend or any other person including companies or other entities with whom there is ownership interest?
- Would I be embarrassed to discuss this with my supervisor or my colleagues?
- Would I act differently if a friend, relative or any other person including companies or other entities with whom there are ownership interests were not involved?

Officers and employees

Any Employee of the Corporation that could be in a real or potential conflict of interest situation has the obligation to immediately inform their immediate supervisor or, in the case of a director, the other board members.



CODE OF CONDUCT AND ETHICS

Directors

A director who finds himself in a conflict of interest during any Board of Directors or Committee meeting must immediately declare their interest and refrain from participating in any discussion about the conflicting issue or from voting on it.

Any questions about a director's actual or potential conflict of interest with the Company should be brought promptly to the attention of the audit committee, which will review the question and determine an appropriate course of action.

G. PROTECTING ASSETS

Employees of the Corporation have the responsibility to protect Dollarama's property and assets, both physical (equipment, data, revenues, etc.) and intangible (networks, software, intellectual property, information, etc.), and to ensure their efficient use in the best interest of Dollarama.

Employees of the Corporation must take all possible safeguards to prevent theft, misuse, damage, loss, sabotage, carelessness and waste of Dollarama's property.

It is the duty of every Employee of the Corporation to report immediately to their superior any act that could be an actual or presumed breach of the guidelines concerning the protection of Dollarama's assets.

Corporation Funds

Employees of the Corporation who have access to Dollarama funds in any form including, but not limited to, money, currency, cheques, share certificates and promissory notes, must know and follow Dollarama's practices and procedures for handling funds.

Corporate Records

Corporate records serve as a base for the Corporation in managing its business, the assessment and carrying out of its obligations towards its shareholders, employees, customers, suppliers and other business partners, as well as for assuring compliance with legal, fiscal and financial requirements. Consequently, no entry, omission, falsification, or subterfuge of any kind may be made with the intent of obscuring or disguising the true nature of a transaction on Dollarama's books. Employees of the Corporation must know and follow Dollarama's practices and procedures to that effect.

H. CONFIDENTIALITY

Employees of the Corporation must respect and maintain confidential all confidential information pertaining to Dollarama's business. In most cases, the documents and data



CODE OF CONDUCT AND ETHICS

maintained, processed, created and/or accessible within Dollarama are considered confidential information which includes, but is not limited to, information in whatever form, related to Dollarama or any of its employees, customers, suppliers and other business partners which is not in the public domain. Employees of the Corporation must take all necessary actions in order to restrict access to such information and its disclosure.

Confidential information is proprietary to Dollarama and should not be disclosed, used, sold, transferred, discussed, reproduced or made available in any form for any purpose without proper authorization of the Employees of the Corporation immediate supervisor or from any other person having the authority.

I. WORKING ENVIRONMENT

Discrimination

Dollarama is committed to equity and equality in all its employment practices and policies. It seeks to recruit, develop, reward and retain its employees on the basis of merit, ability and performance. Discriminating against any employee or person with whom the Corporation does business is strictly prohibited.

Harassment

Dollarama is committed in maintaining an atmosphere free of any form of harassment or violence in the workplace. Harassment, including sexual and psychological harassment, is prohibited. Harassment includes any conduct, comment, gesture or contact that is likely to cause offence or humiliation that deprives a person of the dignity and respect to which they are entitled. In addition, harassment can also take the form of any behaviour or action which interferes with an individual's ability to perform assignments or which creates a hostile or intimidating work environment. Dollarama will not tolerate any form of harassment.

Safety

Dollarama is committed to providing a safe and secure work environment and to reducing the risks of illness and injuries. To that effect, Dollarama has put in place policies with respect to health conditions and security including working procedures in carrying out tasks. Dollarama expects every employee to assume personal responsibility for his health and safety, and that of his colleagues. All work is to be done by following instructions and working procedures in place.

Alcohol, Drugs and Other Substances

Dollarama is concerned about the health, safety and well being of its employees, its business partners, its customers and the public. Consequently, Dollarama will not tolerate



CODE OF CONDUCT AND ETHICS

any unlawful use, possession, dispensation, distribution or manufacture of a controlled substance or alcohol in the workplace. Arriving at the workplace or any supplier site under the unlawful influence of any controlled substance or alcohol is also prohibited.

Weapons

Possession or use of any and all weapons including, but not limited to, knives, handguns and martial arts weapons, regardless of whether a license has been issued or the weapon is concealed, is prohibited.

J. DEALING WITH CUSTOMERS, SUPPLIERS AND COMPETITORS

In order to enjoy a strong and lasting competitive advantage, Dollarama must take great care of its reputation for quality, service excellence and integrity. The best means of doing that and of consolidating Dollarama's position is to compete fairly while respecting our legal and ethical obligations to the letter. Competing fairly means respecting our customers, competitors, suppliers and other business partners and their respective representatives. It is imperative that the Employees of the Corporation act in a professional and courteous manner in their dealings with customers, suppliers and other business partners.

K. COMPLIANCE WITH LAWS AND REGULATIONS

Dollarama's business must be dealt with in compliance with laws and regulations applicable to Dollarama in Canada, the U.S. or foreign countries. The Employees of the Corporation shall not directly or indirectly contravene the law by either acting or omitting to act in a manner that would result in an offence to the law.

All Employees of the Corporation shall also comply with general rules, policies and internal procedures of Dollarama.

All Employees of the Corporation who are members of professional associations shall also comply with the rules of conduct and the code of ethics of their professional association.

L. RAISING A CONCERN OR COMPLAINT

Dollarama is committed to provide a work environment based on trust and respect, which enables all employees to work without fear of intimidation, discrimination or violence. As part of this commitment, Dollarama encourages an open and frank atmosphere in which complaints with respect to an illegal action or non-compliance to the Code can be raised without fear of retaliation.



CODE OF CONDUCT AND ETHICS

A complaint should be reported directly to the Employee of the Corporation’s immediate supervisor. However, if such reporting is either inappropriate, does not provide the necessary level of confidentiality or as the employee otherwise prefers, the complaint should be reported directly to the following people (hereinafter referred to as the “Designated Person”).

Contact	Issue
Regional District Manager	Protecting assets
Director of Human Resources	Conflict of interests / Confidentiality / Work Environment
Chief Financial Officer	Insider trading / Disclosure of information
Chief Operations Officer	Dealing with customers, competitors, suppliers and other business partners / Compliance with laws and regulations
Chief Operations Officer and / or Chief Financial Officer	For any issue

A concern or a complaint can be sent by any of the channels listed below.

Channel	Note
Voice Mail	Voice mail is anonymous, caller ID is not enabled, and may be reached by dialling 1-866-955-5677. The caller must identify the name or title of the person to whom the message should be sent.
E-Mail	Address the email to: complaint@dollarama.com . In the subject line indicate the name or title of the person to whom the message should be sent.
Writing	Address the letter to the name or the title of the person you wish to receive the letter.

All complaints must be accompanied by all the relevant information, including specifics such as dates, place occurred, person or witness, numbers, etc. required to conduct a reasonable inquiry. Should the complainant wish to discuss the complaint with the Designated Person, they shall indicate so when they file their complaint and indicate at what telephone number they can be reached should the Designated Person see appropriate. The Designated Person shall have the right not to proceed with any investigation should the information provided in the complaint be vague and/or insufficient.



CODE OF CONDUCT AND ETHICS

Confidentiality

Dollarama is fully committed to maintaining adequate procedures for the confidential and anonymous reporting by Dollarama employees of a complaint.

Any submission made regarding non-compliance of the Code shall be treated on a confidential basis. The complainant's identity shall be treated confidentially, unless specifically permitted to be disclosed by him, or unless required by law. Anonymous and confidential submissions shall only be disclosed to those persons who have a need to know in order to properly carry out an investigation of a complaint, in accordance with the procedures on handling the report of a complaint.

Retaliation

Any person who in good faith makes a complaint (the “**Complainant**”) will be protected from threats of retaliation, discharge, or other types of discrimination including, but not limited to, lower compensation or inferior terms and conditions of employment that are directly related to the complaint. The term “good faith” has the meaning and refers to a person who is reasonably convinced that the complaint is well founded and based on true facts, and that the complaint is not intended to provide him advantages or aimed at attacking the reputation of the person mentioned in the complaint.

- A complainant is protected from any retaliation to matters that are, or could give rise to, serious violations, provided the complaint is made: (i) in good faith, without prejudicial intentions and false allegations; (ii) in the reasonable belief of the complainant that the conduct, or matter covered by the complaint constitutes or has the potential to constitute a serious violation; and (iii) without seeking any personal gain or advantages.
- Any Employee of Dollarama who retaliates against a complainant may face disciplinary actions including termination of his employment without notice.

M. PROCEDURES FOR HANDLING THE REPORTING OF COMPLAINTS

Upon receipt of a complaint by a Designated Person, the latter shall:

- Register the complaint in a log book; and
- Review and assess the seriousness of the complaint with internal audit or any other necessary actions as deemed applicable along with the assistance of Dollarama's Board of Directors or the persons or committee appointed thereby as required, and investigate as appropriate.



CODE OF CONDUCT AND ETHICS

On a quarterly basis and upon request, the Designated Person shall prepare a report for Dollarama's Board of Directors or the persons or committee appointed thereby, sent to the attention of the Chief Financial Officer, showing all complaints received with respect to the non compliance of the Code during the previous quarter through all channels of communications; how were complaints handled; results of any investigation; and any corrective action taken.

N. RETENTION OF COMPLAINTS AND INVESTIGATIONS

All complaints and investigations with respect to the non-compliance to the Code shall be kept in a secure place in order to protect the confidentiality of the information provided by the Complainant.

O. CONTACT PERSONS

For any questions you may have with respect to the general application of the Code and its application, you may contact the Designated Person listed in section L of the Code taking into consideration the subject matter.

* * * * *



CODE OF CONDUCT AND ETHICS

APPENDIX A – CONFLICT OF INTEREST, GIFTS, SAMPLES & INVITATIONS

CONFLICTS OF INTEREST

Employees of the Corporation must avoid placing themselves in a situation of conflict of interests. A conflict of interests often occurs when we let ourselves be influenced by other persons favouring our personal interests in situations where our business responsibilities to Dollarama must come first.

GIFTS, SAMPLES AND INVITATIONS

Employees of the Corporation must avoid placing themselves in a situation of conflict of interests towards Dollarama, its customers, suppliers and other business partners. In order to do so, the following rules must be followed:

- Do not solicit suppliers for personal gain or any sort of personal services, any services or any invitations to any type of activities.
- Do not ask suppliers for gifts, samples, invitations, a service or commodities for social or company activities without first obtaining the authorization from the Chief Operations Officer or Chief Financial Officer.
- Never accept money as a gift.
- Accept only the necessary quantity of samples for your evaluation or testing of products.
- Never accept an invitation to a trip or activity sponsored by a supplier without first obtaining authorization from the Chief Operations Officer or Chief Financial Officer.
- Do not participate to more than three golf games a year during working days without first obtaining authorization from the Chief Operations Officer or Chief Financial Officer.
- Do not accept an invitation for a meal or activity for which the fees would be unreasonable under the circumstances.

Employees of the Corporation who have any doubt or uncertainty as to whether their respective situation may give rise to a conflict of interest should contact their respective immediate supervisor.

RESPECT OF POLICIES AND RULES

According to the importance of each case, confirmed violation of the above-mentioned policies and rules will lead to immediate disciplinary measures, up to and including termination of employment or removal from office without notice.