



ENGAGING RESPONSIBLY AND ETHICALLY



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ENGAGING RESPONSIBLY IN OUR DAY TO DAY



Neil Rossy
President and Chief
Executive Officer

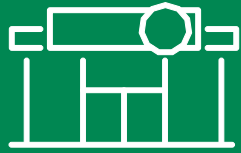
Since 1992, Dollarama has been a recognized value retailer that is committed to providing Canadians from all walks of life with the best quality and value on every dollar they spend. We represent Canadians from coast to coast and we are proud of our growing, dynamic and diverse workforce, which is critical to delivering on our mission and purpose.

One of our core values is being people-focused and our goal is to promote a diverse, equitable and inclusive workforce that operates in a safe working environment. To that end, we are excited to provide a more comprehensive Code of Conduct and Ethics to capture additional pertinent issues in more detail, such as human rights, diversity and inclusion, among many others. Our objective with this new Code is to be broader in scope, but also applicable from a practical standpoint in the day-to-day tasks of our employees regardless of their position, work environment or location. We want to ensure that everyone has the right tools at their disposal when dealing with issues of an ethical nature, whether they relate to personal conduct or business practices.

We have a significant presence across Canada and our Code applies to everyone at Dollarama, including every director, officer, corporate employee and Dollarama store and logistics employee. The Code provides guidelines for everybody with respect to maintaining the integrity, reputation, honesty, objectivity and impartiality of Dollarama. It also provides for whistleblower communication channels through which work-related concerns and suspected violations of the Code can be reported on a confidential basis.

We are committed to managing our operations and resources responsibly and ethically and encourage you to carefully read, consult and apply the Code in your everyday tasks to ensure a safe and equitable environment for all.

A handwritten signature in black ink, appearing to be 'NR', written in a cursive style.



ABOUT DOLLARAMA

Dollarama is a recognized Canadian value retailer offering a broad assortment of consumable products, general merchandise and seasonal items both in-store and online. Our locations across Canada provide customers with compelling value in convenient locations, including metropolitan areas, mid-sized cities and small towns.



OUR VISION

To be the leading value retailer in every market in which we operate, providing customers with unsurpassed value for their hard-earned money.



OUR PURPOSE

To provide Canadians from all walks of life with the best quality and value on every dollar they spend and with proximity and convenient access to affordable, everyday items that address their needs and exceed their expectations.

GET TO KNOW YOUR CODE

WHAT IS THE OBJECTIVE OF OUR CODE?

At Dollarama, we are committed to conducting business in accordance with the highest ethical and legal standards. In addition to acting as a framework in guiding our operations and practices, the Dollarama Code of Conduct and Ethics (the "Code") sets out rules and guidelines for personal conduct and ethical decisions.

WHO DOES OUR CODE APPLY TO?

The Code applies at all times to all Dollarama employees, executive officers and directors, no matter their function or location.

All employees are given a copy of the Code when they are hired and must review and sign an acknowledgement to signify their understanding of the Code. All directors, members of management and employees subject to an annual evaluation are required to confirm their compliance with the Code each year.

For the standards of business conduct expected from our vendors and commercial partners across our supply chain, please refer to our **Vendor Code of Conduct**.

WHAT ARE THE CONSEQUENCES OF BREACHING THE CODE?

Non-compliance with this Code is not acceptable. Any breach of the code may result in immediate disciplinary action, including termination and/or other legal action.

EXAMPLES OF BREACHES OF THE CODE:

- Encouraging other employees to violate the Code
- Refusing to cooperate during an investigation related to an alleged or known violation of the Code
- Retaliation against an employee who has reported a violation of the Code
- Failure to report or withholding relevant information regarding a violation of the Code



WHERE DO I RAISE A CONCERN OR COMPLAINT?

If you have a concern or complaint to report, you may do so by:

- Reporting it directly to your manager
- Calling Dollarama's confidential Ethics and Compliance Hotline available 24/7 at [833] 945-1568, operated by NAVEX, an independent and secure reporting service
- Filing a confidential complaint online via dollarama.ethicspoint.com or by scanning the following QR code:



HOW ARE COMPLAINTS HANDLED?

When a complaint is received:

- A report of the complaint will be created internally or by NAVEX
- The report will be assigned to the appropriate reviewer to evaluate the reported matter depending on the nature of the complaint and the individuals involved
- An investigation of the reported matter will be conducted, if required
- Prompt and appropriate action to address the complaint will be taken, if the report is substantiated

Confidentiality

Dollarama is fully committed to maintaining adequate procedures to ensure that any complaint reported can remain confidential and anonymous. The submission and identity of the person reporting a claim will be treated confidentially, unless specifically permitted to be disclosed by that person, or unless required by law. Anonymous and confidential submissions will only be disclosed to authorized persons competent to receive, investigate or follow-up on reports of a specific complaint.

Retention and Internal Monitoring of Complaints and Investigations

All complaints and investigations with respect to non-compliance of the Code are kept in a secure place to protect the confidentiality of the information provided by the person reporting a claim.

On a quarterly basis and upon request, a report will be prepared for Dollarama's Board of Directors (the "Board"), or the persons or committee appointed thereby, regarding complaints received, how they were handled, the results of any investigation and any corrective actions taken.

WHAT IS OUR POLICY ON RETALIATION?

We all need to contribute to creating a work environment based on trust and respect, which enables all employees to work without fear of intimidation, discrimination or violence. To achieve this, we encourage an open and frank atmosphere in which complaints about an illegal action or non-compliance of the Code can be raised without fear of retaliation. Any person who, in good faith, makes a complaint will be protected from threats of retaliation, discharge, or other types of discrimination and any employee or Board member who retaliates against a person for making a complaint may face disciplinary action, including termination of employment.

WHO IS RESPONSIBLE FOR THE STEWARDSHIP OF THE CODE?

Dollarama's Board, or the persons or committee appointed thereby, have the ultimate responsibility for the stewardship of the Code. Any modifications to the Code must be approved by the Board.

The Board must approve any waiver of the requirements of this Code for a director or an executive officer of Dollarama. An executive officer may grant a waiver for other employees with the concurrence of the Legal Department. A waiver will be granted only in extraordinary circumstances and on a case-by-case basis. Dollarama must disclose the granting of such waiver to a director or executive officer as required by applicable securities laws.



ENGAGING WITH OTHERS

HUMAN RIGHTS, DIVERSITY, EQUITY AND INCLUSION

Human Rights

We are committed to providing a work environment that respects human rights and that supports the fair and equal treatment of all individuals. As part of this commitment, Dollarama abides by all applicable wage and working hour laws, including those relating to minimum wages, overtime and maximum hours. Dollarama does not condone the use of child or forced labor, including modern slavery and human trafficking, anywhere in its facilities or supply chain.

Our expectations for our vendors and commercial partners with respect to the safeguarding of human rights and working conditions are outlined in our Vendor Code of Conduct. For more information, see our **Vendor Code of Conduct**.

Diversity, Equity and Inclusion

We embrace diversity and foster a culture of inclusion where differences are celebrated and appreciated. At Dollarama, all individuals are to respect one another and treat each other fairly and equitably, contributing to a work environment in which all employees have equal access to opportunities and resources, can contribute to Dollarama's success and achieve their full potential. If your functions at Dollarama include employee recruitment, hiring or promotion, you should promote diversity within the workplace.

DISCRIMINATION, HARASSMENT AND VIOLENCE

Discrimination

Dollarama is committed to equity and equality in all its employment practices and policies. We seek to recruit, hire, develop, promote, compensate and retain our employees on the basis of merit, performance and ability, and not based on personal characteristics or beliefs. Discriminating against any employee or person with whom Dollarama does business is strictly prohibited.

Discrimination occurs when an individual is treated differently, or negatively, on account of gender, race, colour, religious or personal beliefs, age, place of origin, language, sexual orientation, gender characteristics, gender identity, marital or family status, social condition, physical or mental disability or the use of any means to palliate a handicap, political opinion, membership in any legal organization or any other ground of discrimination prohibited by law.



CODE IN ACTION: DISCRIMINATION

I think my manager has a bias when hiring and promoting employees on my team. What should I do?

If you have any concerns of this nature and you do not feel comfortable bringing them up to your manager, you can anonymously report this through the confidential Ethics and Compliance Hotline or contact the Human Resources Department. Please provide as much detail as possible about your concerns.

**CODE IN ACTION:
HARASSMENT**

One of my colleagues often comments on my appearance at work. Even though it's a compliment, it makes me feel uncomfortable. What should I do?

You can tell that person that you would prefer that they not make any comments about your appearance, but if you are uncomfortable speaking directly to them, you should reach out to your manager or the Human Resources Department so they can address your concern and have a conversation with them.

Harassment and Violence

We are committed to 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 behavior or action which interferes with an individual's ability to perform assignments or which creates a hostile or intimidating work environment.

EXAMPLES OF HARASSMENT:

- Threats or intimidation
- Bullying
- Stalking
- Jokes, slurs or gestures about someone's race, nationality, ethnic origin, colour, religion, age, gender, sexual orientation or other ground of discrimination
- Sharing offensive material
- Coercion

HEALTH AND SAFETY

Health and Safety in the Workplace

Providing a safe, sanitary and healthy work environment, as well as reducing the risks of illness and injuries, is of primary importance to us.

To maintain a safe work environment, Dollarama expects you to:

- understand and follow all health and safety policies and procedures applicable to your respective role;
- keep up to date with all safety training requirements applicable to your role;
- conduct yourself in a way that does not endanger your safety or that of your colleagues, visitors or customers; and
- immediately report any unsafe practices or conditions observed in the workplace, as well as all accidents and injuries.

Alcohol, Drugs and Weapons

To ensure the safety and well-being of its employees, business partners, customers and the public, Dollarama does not tolerate any use, possession, distribution or manufacturing of drugs or alcohol in the workplace. In exceptional circumstances, alcohol may be served at specified company-sanctioned events. Arriving at the workplace or any supplier site impaired by any drug, alcohol, or medication is prohibited. Possession or use of any weapon in the workplace is also prohibited.

Product Safety

At Dollarama, we set high expectations for ourselves and our business partners when it comes to product safety. We only source products from vendors that observe the product quality and safety standards outlined in our **Vendor Code of Conduct**. As an employee, consideration for product safety and quality must govern your actions at Dollarama. If you become aware of any safety issue with a product, you must promptly inform your manager.

**CODE IN ACTION:
HEALTH AND SAFETY**

There is a large volume of merchandise in the back store reception area. I forgot my steel-toe capped shoes, but my manager wants the merchandise unpacked as fast as possible. If I'm extra careful, I can go ahead and do what my manager says, right?

No. When it comes to health and safety equipment, policies and procedures, there are no exceptions. Your health and safety always come first and you must follow procedure. In this case, you must use the required safety equipment to complete the task. If you do not have access to the required protective equipment for a given task, that task must be assigned to someone else.



ENGAGING WITH ASSETS

You have the responsibility to protect Dollarama's property and assets, both physical (facilities, funds, documents, equipment, etc.) and intangible (networks, software, intellectual property – such as our logo, image and name, information, etc.) and to ensure their efficient use in the best interest of Dollarama.

PHYSICAL ASSETS

You are expected to take good care of company assets and protect them from theft, misuse, damage, loss, sabotage, unauthorized use, carelessness and waste. Company assets include Dollarama buildings and facilities, office furniture, company vehicles, credit cards, computers, laptops, phones and other technological devices and equipment. Company assets must be used solely for the purpose of Dollarama's legitimate business interests.

CORPORATE FUNDS

Employees who have access to Dollarama funds in any form, including but not limited to, money, currency, cheques, credit cards, share certificates and promissory notes, must use such funds for their intended purpose. All expenses are to be properly authorized and all expense reports are to be accompanied by supporting receipts.

CONFIDENTIAL INFORMATION

You must maintain the accuracy, confidentiality, privacy and security of confidential information. You cannot share, disclose, use, sell, transfer, discuss, reproduce or make it available in any form for any purpose without proper authorization. Confidential information consists of information, in any form, related to Dollarama or any of its employees, customers, suppliers, vendors and other business partners which is not in the public domain. In most cases, the documents and data maintained, processed, created and/or accessible within Dollarama are considered confidential. Any disclosure of confidential information must be made in accordance with applicable laws and Dollarama's Disclosure Policy. These obligations continue even after the end of your employment with Dollarama. Requests by outside individuals or firms for confidential information must be directed to our Privacy Officer at privacy@dollarama.com.

EXAMPLES OF CONFIDENTIAL INFORMATION:

- Business plans
- Forecasts
- Pricing strategies
- Pricing and inventory lists
- Customer and supplier lists
- Personal employee information
- Trade secrets
- Sales and financial information
- Potential acquisitions
- Contract negotiations
- Supplier arrangements

PERSONAL INFORMATION AND PRIVACY

Dollarama is committed to respecting and protecting each employee's privacy and complying with applicable privacy laws. Your personal information will be collected, used and disclosed only by lawful means and in accordance with any applicable privacy policies, for its stated purpose and as necessary for relevant business needs.

Personal information is defined as all information about an identifiable individual that is recorded in any form. Examples of personal information include social insurance numbers, dates of birth, credit card numbers, personal email addresses, personal phone numbers, compensation information and medical records. Personal information does not include the title, business address, business email address and business telephone number of an employee.

Your responsibility for personal information:

- ensure that consent has been acquired for the collection, use or disclosure of any personal information you handle to perform your job;
- only authorized persons are permitted to access personal information and, as such, all requests for employee information or employee references must be addressed to the Human Resources Department;
- collect, use and share only the personal information necessary for our business activities and to perform your job;
- seek guidance on whether to securely delete or destroy personal information that is no longer needed;
- protect personal information from loss, theft, misuse and unauthorized access; and
- immediately report any actual, attempted or suspected events that could affect the confidentiality, integrity or availability of any information in Dollarama's possession or care, including any security breaches, privacy breaches or unauthorized access, use or destruction of information to your manager and Dollarama's Privacy Officer.

You can contact our Privacy Officer at privacy@dollarama.com if you have any questions related to personal information and privacy.



Additional Resources:

- Privacy Notice for Employees
- Electronic Monitoring Policy
- Privacy Policy
- Device Acceptable Use Policy



CODE IN ACTION: AUTHORIZED SPOKESPERSONS

I was leaving for the day and a reporter put a microphone in my face and asked me about something that was happening at Dollarama. What should I say?

You do not and should not answer any questions from media. Please tell them to contact our head office, so their questions are directed properly.

AUTHORIZED SPOKESPERSONS

We are committed to communicating accurate information to the public and have specific procedures in place to make sure we are consistent with what we say and how we say it. That is why only authorized individuals are allowed to speak on Dollarama's behalf.

AUTHORIZED DOLLARAMA SPOKESPERSONS:

- Chair of the Board
- President and Chief Executive Officer
- Chief Financial Officer
- Senior Vice-President, Legal Affairs and Corporate Secretary
- Other persons occasionally designated under the Disclosure Policy

Additional Resources:

- Disclosure Policy

INFORMATION SYSTEMS AND CYBERSECURITY

Cybersecurity is an increasingly important issue for every individual and company. You are responsible for using Dollarama's networks, computer systems, mobile devices and other information systems in a safe and ethical manner. The Internet must not be accessed for illegal, unethical or inappropriate purposes.

You must exercise particular care to follow procedures established for the secure use of such information systems and take caution to avoid any unauthorized access or cybersecurity breach.

CYBERSECURITY PROTECTION TIPS:

- Always lock your computer when you step away from your desk
- Create strong passwords that are difficult to hack
- Avoid using the same password to access multiple systems
- Do not share your password with anyone, not even IT support
- Never click on a link or attachment in an email before verifying the authenticity of the sender
- Complete all assigned online cybersecurity training
- If you have a question or are concerned about an email or website, notify the Dollarama technical support team as soon as possible at support@dollarama.com or 1-877-688-1277

Additional Resources:

- Device Acceptable Use Policy

INTELLECTUAL PROPERTY

Dollarama's intellectual property (IP) is a valuable asset that must be protected. IP includes trademarks, domain names, patents, industrial designs, copyrights and trade secrets. All IP created as an employee remains the exclusive property of Dollarama. That means, without limitation, any invention, discovery, idea, improvement, design, software, application, interface, process, concept or work product that an employee might make during their employment belongs to Dollarama even after the employee has left.

CORPORATE BOOKS AND RECORDS

Dollarama is required under securities laws, tax laws and generally accepted accounting principles to keep books, records and accounts that accurately reflect all transactions and to provide an adequate system of internal accounting and controls. This includes financial reports filed with the securities regulatory authorities and other public communications. You must therefore ensure the integrity of our records, accounting books, expense reports, invoices, payroll slips, contracts and other documentation.

As a Dollarama employee, you are required to:

- ensure that the documents and information you provide when performing your tasks are complete, accurate, truthful and transparent;
- comply with records management procedures and practices that apply to your function for standards on storing and disposing of records;
- sign only those documents you believe to be accurate and truthful; and
- ensure that all entries are recorded accurately, on time, in the proper accounts and are properly documented.



ENGAGING IN BUSINESS

CONFLICTS OF INTEREST

You must avoid placing yourself in a conflict of interest situation. Conflicts of interest occur when your personal activities and financial affairs conflict, or appear to conflict, with your duties and obligations towards Dollarama and your ability to act in Dollarama's best interest. A conflict of interest often occurs when we let ourselves be influenced by our personal interests or those of our family, friends or colleagues in situations where our business responsibilities to Dollarama must come first. Conflicts of interest also arise when you, or a member of your family, receives improper personal benefits because of your position at Dollarama.

POSSIBLE CONFLICT OF INTEREST SITUATIONS:

- Participating in any business decision that could benefit an individual with whom you have a close relationship
- Doing business on behalf of Dollarama with a company in which you or a family member has a substantial financial interest
- Hiring or managing a relative or a person with whom you have a romantic relationship
- Investing in a supplier of Dollarama or receiving compensation from a supplier, if you have a business relationship with the supplier
- Accepting a payment or benefit from another entity for work that you perform for Dollarama
- Investing in a company that competes, does or seeks to do business with Dollarama
- Taking for yourself a business opportunity that is meant for Dollarama
- Using your position at Dollarama, or Dollarama's property, resources or information, for personal gain



CODE IN ACTION: CONFLICTS OF INTEREST

My spouse has their own business that makes and sells the best craft kits. These would be perfect for Dollarama. How do I get them into Dollarama stores?

We wish your spouse all the best with their business. Your spouse needs to go through the same channels as all our other suppliers. If you are a buyer for Dollarama, you cannot be involved in that decision.

Since it is impossible to provide an exhaustive list of all situations that could give rise to a real or potential conflict of interest, ask yourself 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 at Dollarama?
- Can my actions result in a financial or other advantage for myself, a relative, friend or any other relationship?
- Would I act differently if a relative, friend or company in which I have an ownership interest was not involved?
- Would I be embarrassed to discuss this with my manager or colleagues, or have it reported in the media?

**WHEN IN DOUBT,
REACH OUT**

If you have any questions or concerns, contact the Legal Department or the Human Resources Department.

**CODE IN ACTION:
OUTSIDE
EMPLOYMENT**

I am working on a new online business and I'm just getting it started. Sometimes I need to quickly check the business email and arrange for a shipment or sale. It only takes a few minutes a day. That's okay, right?

Congratulations on your entrepreneurial spirit! However, you cannot use time you are paid to be doing work for Dollarama to look after your new business and you are not allowed to use Dollarama resources (computers, printers, supplies) for your other business.

Employees and Officers

If you are or could be in a real or potential conflict of interest situation, you have the obligation to immediately inform your manager and seek guidance.

Directors

Members of the Board who find themselves in a conflict of interest during any Board 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, potential or apparent conflict of interest with Dollarama should be brought promptly to the attention of the Audit Committee, which will review the question and determine an appropriate course of action.

OUTSIDE EMPLOYMENT

Before accepting any outside employment opportunity, employees should consult with their manager to make sure the work will not interfere with or negatively affect their performance at Dollarama. In addition, employees must never use Dollarama time, facilities, materials or resources for any outside employment or activity.

The following guidelines set out the authorizations required to engage in various outside employment activities:

- Employment held or carried out by you in other enterprises that have, or may expect to have, commercial relations with Dollarama must be approved by your manager.
- If you are a full-time employee, you may not engage in employment of any significance outside Dollarama unless you have received the required approval set out below. Moreover, full-time employees with a second job are expected to ask their secondary employer to work around Dollarama's schedule.
- If an actual, potential or apparent conflict of interest arises, or if your ability to fulfill your duties for Dollarama becomes compromised, any such authorizations may be withdrawn.

WHO DO I NEED TO SEEK APPROVAL FROM?

- If you are a full-time store operations employee, you must seek approval from your store manager
- If you are a full-time warehouse or distribution centre employee, you must seek approval from your manager
- If you are a store manager, you must seek approval from your district manager or team leader
- If you are a district manager, market leader or regional district manager, you must seek approval from the head of your function and inform the Human Resources Department
- If you are a head office employee, you must seek approval from the head of your function
- If you are a head office director or higher, you must seek approval from the head of your function and any one of the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Chief Information Officer, and the Human Resources Department



CODE IN ACTION: GIFTS AND ENTERTAINMENT

We have a great supplier that we have been using for years. It was so nice of her to give me a great price for some products I needed for my sister's wedding. That's okay, right? We weren't looking to change suppliers or anything.

If the total value of the discount you received is not significant and the supplier is not expecting any preferential treatment in the future, this should be fine. If you are at all uncertain, please contact our Legal Department.



WHEN IN DOUBT, REACH OUT

If you have any doubt or uncertainty as to whether your situation may give rise to a conflict of interest, you should contact your manager or the Legal Department.

BOARD APPOINTMENTS

Employees may not serve on the board of another for-profit company, even if it is not a competitor or business partner, without obtaining approval from their manager, and, in the case of head office employees and regional district managers, the Legal Department.

Board members may not accept an appointment as director on the board of another retail company without obtaining prior approval from the Chair of the Board.

GIFTS AND ENTERTAINMENT

Offering and receiving modest gifts or entertainment may foster long-term business relationships provided they are reasonable and appropriate for the situation. If certain strict guidelines are not followed, the practice of exchanging gifts can lead to a conflict of interest, such as a kickback or bribe, or the appearance of one.

To avoid a conflict of interest, you must not offer, solicit or accept gifts or advantages in relation to your employment at Dollarama that do not meet the following guidelines:

- Do not accept gifts unless they are infrequent, low in value and do not in any way influence business decisions
- Do not accept or offer cash or cheques as a gift
- Do not offer or accept gifts or entertainment in return for a preferential treatment or to obtain an improper advantage
- Do not accept gifts or entertainment that may embarrass Dollarama or harm its reputation
- Never accept an invitation to a trip or out-of-town activity sponsored by a supplier without first obtaining authorization from the Chief Executive Officer or the Chief Financial Officer
- Do not accept an invitation for a meal or activity for which the fees would be unreasonable under the circumstances

Report to your manager any gift you have been offered or received if you feel that gift does not meet the guidelines above. If, for cultural reasons, declining a gift may offend the offeror, you may accept it in Dollarama's name and relinquish it to the Chief Financial Officer.

Before accepting a gift or entertainment, you should ask yourself the following questions:

- Why am I being offered this, and is anything expected in return?
- Is there a clear business reason for Dollarama to attend this event?
- Are there ongoing negotiations or a tendering process with the supplier offering the gift?
- Are the costs for the hospitality reasonable and are travel and accommodation expenses covered by Dollarama?
- Can I defend my participation in public?
- Am I offered frequent gifts from the same host?
- Are representatives of other companies attending?
- Has my participation been approved by Dollarama?

FAIR COMPETITION

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 is to compete fairly while respecting our legal and ethical obligations. Dollarama is therefore committed to competing in a fair and ethically justifiable manner within the framework of the anti-trust and competition rules in the markets in which we operate. Competing fairly means respecting our customers, competitors, suppliers and other business partners and their respective representatives. It is imperative that you act in a professional and courteous manner in your dealings with customers, suppliers and other business partners and refrain from engaging in any conduct that may restrain trade.

Forbidden conduct includes: an actual or attempted arrangement with a competitor to fix prices, to allocate markets or to restrict supply, as well as disclosing competitive and non-public information to competitors, suppliers or distributors.

INSIDER TRADING

Dollarama is a publicly traded company and, therefore, you must follow these guidelines:

- You may not buy or sell Dollarama securities or securities of other companies while in possession of material non-public information
- You may not advise others to buy or sell Dollarama securities while in possession of material non-public information
- You may not disclose material non-public information to anyone outside Dollarama

The trading of any Dollarama securities while in possession of material non-public information is not only prohibited by Dollarama's policies, but is also illegal and may constitute a serious criminal offence. If ever you are uncertain whether you may trade in Dollarama securities, you should contact the Legal Department at ethics@dollarama.com. Please refer to our Insider Trading Policy for more information, which also outlines specific restrictions on trading in Dollarama securities for directors, executive officers and certain other employees.

BRIBERY, CORRUPTION AND ANTI-MONEY LAUNDERING

At Dollarama, we have a zero-tolerance policy for corruption of any kind.

A bribe is a payment or other benefit that is intended to influence the judgment or conduct of a person in a position of power, authority or trust for the purposes of securing the improper performance or non-performance of an activity. A kickback is also a form of bribery. Kickbacks are negotiated payments intended as compensation for preferential treatment or any type of improper services received. Dollarama's prohibition against bribery also extends to facilitation payments, which are relatively insignificant payments made to facilitate or expedite the performance of a routine government action. Moreover, you must never offer or accept gifts from public officials, including government officials and employees of any state-owned or state-controlled entity.



CODE IN ACTION: BRIBERY, CORRUPTION AND ANTI-MONEY LAUNDERING

A foreign customs official has detained a large shipment of goods we are importing. He says there is a problem with the paperwork, but he is willing to release the goods for payment. Can I make the payment to have the goods released? This seems like the simplest way to deal with this situation.

No. Paying an official is a bribe and violates this Code and the law. You must follow the proper legal procedure for having the product shipped. Escalate the situation to your manager.

Money laundering is an effort by individuals or organizations to hide proceeds of their crimes by making those proceeds look legitimate.

You must:

- Never offer or accept bribes, kickbacks, facilitation payments, or any other type of improper preferential benefit in doing business; local customs do not provide an exception to this requirement
- Only conduct business with third parties that provide you with accurate and proper information so you can determine if payments, transfers and other transactions are appropriate and legitimate
- Only engage with vendors who abide by Dollarama's **Vendor Code of Conduct**
- Be vigilant about suspected bribery and corruption and report any suspicious activities to the Legal Department at ethics@dollarama.com

Bribery, corruption and anti-money laundering laws are complex, and violations carry very significant penalties. You are encouraged to consult with the Legal Department if you have any questions or concerns in this area.

SANCTIONS LAWS

Transactions in certain countries or with certain persons and entities can be prohibited or severely restricted by local or foreign laws, including but not limited to the *Special Economic Measures Canada Act*, the *United Nations Act*, the *Justice for Victims of Corrupt Foreign Officials Act* (Sergei Magnitsky Law), and any regulations enacted pursuant to them. Prior to undertaking any business activities with any counterparty, you must ensure that the country in which the work would take place or the person with whom you would transact is not sanctioned or embargoed. As such, before engaging in any contractual relationship or business dealing with such party, you must do your due diligence on such counterparty. When in doubt, contact the Legal Department with any questions.

FRAUD AND THEFT

Dollarama takes all reasonable and appropriate steps to prevent, detect and deter any acts of fraud or theft. Fraud may occur in any part of our business, including online transactions, in store purchases, procurement of goods and services, transportation of goods and performance of administrative tasks. While preparing and maintaining any corporate records or documentation, you are strictly prohibited from falsifying or omitting any information. Dollarama has zero tolerance for fraud or theft no matter how small it may seem. You must promptly report any suspected fraud or theft to your manager.

POLITICAL ACTIVITIES AND LOBBYING

Dollarama employees are strictly prohibited from making political contributions on behalf of Dollarama. However, this does not prohibit employees from participating in political activities or making personal donations to political parties, so long as they do not act on behalf of Dollarama or are not perceived as acting on Dollarama's behalf. Such participation must not in any way interfere with your duties and obligations to Dollarama.

Dollarama values its relationships with governments at all levels. At times, Dollarama may communicate with government officials and legislators to advance or protect our business interests. Communications with a member of a government or legislature is considered lobbying. Lobbying involves reaching out to a public office holder to further Dollarama's objectives, whether at the federal, provincial, municipal or other level of government. Lobbying is regulated in the jurisdictions where Dollarama does business and certain jurisdictions may require formal registration prior to engaging in lobbying. It is your responsibility to be aware of and comply with applicable local laws. You should seek permission and guidance from the Legal Department prior to engaging in any lobbying activities.

COMPLIANCE WITH LAWS AND REGULATIONS

Dollarama's business must be done in compliance with laws and regulations applicable to Dollarama in Canada and other countries. You must 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.

You must also comply with general rules, policies and internal procedures of Dollarama.

All directors, executive officers or employees who are members of professional associations must also comply with the rules of conduct and the codes of ethics of their professional association.

WHERE DO I GO WITH QUESTIONS OR CONCERNS ABOUT THE CODE?

WHERE DO I RAISE A CONCERN OR COMPLAINT?

If you have a concern or complaint to report, you may do so by:

- Reporting it directly to your manager
- Calling Dollarama's confidential Ethics and Compliance Hotline available 24/7 at (833) 945-1568, operated by NAVEX, an independent and secure reporting service
- Filing a confidential complaint online via dollarama.ethicspoint.com or by scanning the following QR code:



TOPIC	CONTACT
Questions about: <ul style="list-style-type: none"> • The Code and its general application 	<ul style="list-style-type: none"> • Your manager • The Legal Department at ethics@dollarama.com • The Human Resources Department at HR-RH@dollarama.com
Questions about: <ul style="list-style-type: none"> • Human rights, diversity, equity and inclusion • Discrimination, harassment and violence • Health and safety • Workplace environment • Outside employment • Fraud and theft 	<ul style="list-style-type: none"> • Your manager • The Human Resources Department at HR-RH@dollarama.com
Questions about: <ul style="list-style-type: none"> • Laws and regulations • Ethics and compliance • Protecting assets • Confidential information • Intellectual property • Conflicts of interest • Gifts and entertainment • Fair competition • Insider trading • Bribery, corruption and anti-money laundering • Sanctions laws • Political activities and lobbying 	<ul style="list-style-type: none"> • Your manager • The Legal Department at ethics@dollarama.com
Questions about: <ul style="list-style-type: none"> • Personal information and privacy • Information systems and cybersecurity 	<ul style="list-style-type: none"> • Privacy Officer at privacy@dollarama.com
Questions about: <ul style="list-style-type: none"> • Authorized spokespersons • Disclosure 	<ul style="list-style-type: none"> • The Legal Department at ethics@dollarama.com
Questions about: <ul style="list-style-type: none"> • Media requests 	<ul style="list-style-type: none"> • media@rppelican.ca