

**COMMITTED TO ETHICAL  
AND SOCIALLY RESPONSIBLE  
BUSINESS PRACTICES ACROSS  
OUR SUPPLY CHAIN**



## INTRODUCTION

As a leading and trusted Canadian value retailer, Dollarama L.P. (“Dollarama”) is committed to conducting its business in an ethical and socially responsible manner and in compliance with applicable laws. Dollarama seeks to only engage in business relationships with vendors who uphold compatible business standards. Likewise, Dollarama requires its vendors to observe these same standards within their own supply chain structures, and vendors must ensure that their own commercial partners act at all times in compliance with applicable laws. For the purposes of this Code, “Vendor Commercial Partners” include vendor’s contractors, authorized subcontractors, service providers, and any other entity that directly or indirectly provides goods or services to a vendor that are used in the production of products sold to Dollarama.

The Dollarama Vendor Code of Conduct (the “Vendor Code”) is a key component of Dollarama’s environmental, social and governance strategy. The Vendor Code applies to companies, foreign or domestic, that supply goods and/or services to Dollarama, and is meant to ensure that Dollarama’s business partners have a clear understanding of Dollarama’s expectations concerning their business standards and practices. To reflect Dollarama’s treatment of certain standards set out in this Vendor Code as compliance priorities, the Addendum sets out those elements of the Vendor Code that are subject to a zero tolerance policy. It is the responsibility of vendors to ensure that their employees and Vendor Commercial Partners do not violate the standards of the Vendor Code.

Dollarama will only work with vendors who comply with this Vendor Code and who have signed a copy of this Vendor Code.

## CLEAR AND DEFINED STANDARDS OF VENDOR ENGAGEMENT

Vendors are expected to meet the standards of their industry, including the OECD Guidelines for Multinational Enterprises, and comply with all laws and regulations that govern their activities in the country in which they operate. This includes an obligation on vendors’ part to evaluate and uphold the integrity of their respective supply chains, and to ensure that Vendor Commercial Partners likewise operate in accordance with the standards articulated in this Vendor Code.

The Vendor Code sets out specific expectations regarding (i) the quality and safety of the products sold to Dollarama, (ii) vendor workplace standards, as well as (iii) vendor business and environmental practices. The expectations outlined in the Vendor Code are consistent with Dollarama’s values, principles and policies regarding ethical business conduct and are used to assess new and existing vendors and their facilities.

Dollarama will not knowingly work with vendors who do not meet the standards outlined in the Vendor Code, or who partner with suppliers and other commercial participants who fail to act in compliance with all applicable laws.

## **A.** **VENDOR PRODUCT QUALITY AND SAFETY STANDARDS**

Dollarama expects its vendors to supply products and/or services that fully comply with Dollarama's specifications as well as with all applicable legal requirements and that, when used as intended, are safe.

Vendors are expected to notify Dollarama of any circumstances which could potentially affect the safety and/or quality of any given product or service, including in connection with vendors' own supply chains, to cooperate fully with Dollarama and to take all necessary steps to address any health, safety or regulatory issues associated with products and/or services provided.

## **B.** **VENDOR WORKPLACE STANDARDS**

### **1.** **SAFE AND HEALTHY ENVIRONMENT**

Vendors and Vendors' Commercial Partners are required to provide their workers with a safe, sanitary and healthy work environment, and comply in all respects with applicable laws regarding occupational health and safety and workplace safety. Vendors and Vendors' Commercial Partners are required to take all reasonable steps to prevent workplace accidents, illnesses, and injuries, and must recognize workers' rights to remove themselves from imminent danger.

A safe and healthy working environment, within the meaning of this Vendor Code, includes but is not limited to:

- > Lighting sufficient to allow workers to safely perform their duties;
- > Toilet and sanitation facilities;
- > Appropriate protective equipment for the handling of toxic or noxious substances;
- > Adequate personal protective equipment and sanitation resources to minimize workers' exposure to infectious diseases; and
- > Regular workplace safety training.

### **2.** **FIRE PREPAREDNESS**

Vendor and Vendors' Commercial Partners' are required to take all steps necessary to ensure that their facilities are adequately equipped to respond to and contain workplace fires. Vendors' and Vendors' Commercial Partners' facilities must have the following fire safety measures in place:

- > A fire evacuation plan posted in a visible location in the facility, accessible to all workers;
- > A prohibition against locking workers into the facility;
- > Fire extinguishers, retardant or other fire suppression tools on every floor of the facility; and
- > A means of rapidly engaging fire response services in the event of a fire.

Where housing facilities are provided by a vendor or Vendors' Commercial Partners to workers, these same standards and requirements apply.

### **3. EMERGENCY PREPAREDNESS**

Vendors and Vendors' Commercial Partners are required to take all steps necessary to ensure their facilities are structurally sound and are adequately equipped to withstand and respond to emergencies, including public health emergencies, natural disasters, and other catastrophic events.

### **4. NO FORCED LABOR**

Employment must be voluntary and free from financial penalties or coercion. Workers have the right to engage in work willingly, without being required to surrender identification and without the payment of fees. Workers also have the right to terminate their employment without penalty.

Dollarama condemns forced labour and will not knowingly work with vendors that engage in or support (either directly or indirectly) any form of servitude or forced labour in the manufacturing of products or the provision of services, whether prison (remunerated or not), indentured, bonded, trafficked, under government compulsion, as part of an assimilation program, or other. Furthermore, vendors are required to ensure that Vendors' Commercial Partners comply with this prohibition against the use of forced labor, as defined herein.

### **5. NO UNDERAGE LABOR**

We do not tolerate the use of underage labour and will not knowingly work with vendors that employ (whether directly or indirectly) underage workers. Underage workers are defined as individuals younger than the local minimum working age or the age of 15, whichever is older. Vendors are further required to ensure Vendor Commercial Partners comply with this prohibition against the use of underage labor, as described herein. Both vendors and Vendors' Commercial Partners are required to maintain documentation of each worker's age, which shall be made available to Dollarama, its agents or its third party representatives upon request.

### **6. PROTECTION FOR YOUNG WORKERS**

In addition to the prohibition against underage labour, vendors are prohibited from exposing young workers (understood as individuals younger than the age of 18) to working conditions that have the potential to compromise their health, safety and moral integrity and/or their physical, mental, or social development. This applies for young workers, working both directly and indirectly for the vendor or for Vendor Commercial Partners. Where such young workers are subject to compulsory education laws, they may work only outside of school hours.

### **7. FAIR DISCIPLINARY PRACTICES**

Workers must be treated with respect and dignity, and no worker may be subject to physical, verbal, sexual or psychological harassment or abuse. This standard applies to vendors' own workers, as well as the workers of Vendors' Commercial Partners.

### **8. NO DISCRIMINATION**

Cultural and individual differences must be respected and workers are expected to be employed based on merit, performance and ability, and not based on personal characteristics or beliefs. Vendors and Vendors' Commercial Partners are prohibited from engaging in, supporting or tolerating discrimination with respect to hiring, wages, benefits, advancement, discipline or termination on the basis of gender, race, color, religious or personal beliefs, place of origin, sexual orientation, gender identity, gender expression, marital or family status, physical or mental disability, political opinion, membership in any legal organization or other grounds of discrimination prohibited by law.

## **9. REASONABLE WORKING HOURS AND OVERTIME**

Vendors and Vendors' Commercial Partners must maintain reasonable and humane working hours. Vendors and Vendors' Commercial Partners shall not require workers to work more than the lesser of (a) 72 hours per week of combined regular and overtime hours, or (b) the maximum number of combined regular and overtime hours allowed per week by the law of the country in which the work is performed. Vendors and Vendors' Commercial Partners are required to provide workers with, on average, at least one day free from work in every 7-day period, and to notify workers at the time of hiring that overtime work may sometimes be necessary. In jurisdictions where vendors and Vendors' Commercial Partners are permitted by law to enter into agreements with workers to voluntarily accept hours of work in excess of those outlined herein, vendors and Vendors' Commercial Partners are required to maintain records of such voluntary agreements.

## **10. WAGES AND BENEFITS**

Vendors must, at a minimum, provide wages and benefits that comply with the laws of the country in which they operate. Likewise, vendors are required to ensure that Vendors' Commercial Partners also provide wages and benefits in compliance with applicable laws. Wages must be provided directly to workers at or near the workplace, subject only to those deductions expressly permitted by law. Workers must be notified in advance of any deductions applied to workers' wages. In addition to compensation for regular hours of work, vendors and Vendors' Commercial Partners are required to compensate workers for overtime hours at such premium rate legally required in the country in which the work is performed. In the absence of such laws, workers must be compensated for overtime work at a rate at least equal to their regular hourly compensation rate.

## **11. LABOUR AGENCY RELATIONSHIPS**

Vendors who work with third-party labour agencies or who partner with agencies to procure workers or otherwise discharge their obligations pursuant to their agreements with Dollarama (collectively, "Labour Agencies") are required to take steps to ensure any such Labour Agencies operate in accordance with this Vendor Code. In particular, vendors have an obligation to ensure that Labour Agencies comply with this Vendor Code in the following respects:

- > Payment of wages and benefits;
- > Hours of work;
- > Non-discriminatory working conditions;
- > Safe working environment; and
- > No forced, prison or underage labor, as defined herein.

Vendors are prohibited from partnering with Labour Agencies that charge fees of any type as a condition for securing employment, or who make deductions from workers' wages other than those expressly permitted by law. Labour Agencies are required to confirm the terms and conditions associated with workers' employment in writing, and to provide a copy of said terms and conditions to each worker. Copies of workers' terms and conditions of employment must be made available to Dollarama, its agents or its representatives upon request.

## C.

# VENDOR ENVIRONMENTAL AND ETHICAL BUSINESS PRACTICES

Dollarama expects its vendors to use resources, material and energy efficiently and responsibly, to ensure that the goods they supply to Dollarama comply with the prohibition against importation of goods made in whole or in part from forced labor, and to respect our ethical principles in their interactions with Dollarama employees at all times.

### 1. ENVIRONMENTAL COMPLIANCE

Dollarama seeks to work with vendors who strive to use resources, material and energy as efficiently and responsibly as possible and who work to minimize the adverse impact of their activities on the environment. At a minimum, vendors are required to operate in compliance with all applicable environmental laws and regulations in place in the jurisdiction in which they are located. This includes emissions released into the atmosphere or water bodies, the disposal of solid waste and the handling and disposal of hazardous materials. Dollarama also requires vendors to ensure that Vendor Commercial Partners operate in compliance with applicable environmental laws in place in the jurisdiction in which they are located.

Vendors must acquire and maintain all legally required environmental permits and business operating licenses necessary for the production of their products and operation of their facilities.

Practices that result in the illegal discharge of effluents, toxic substances, waste are strictly prohibited under the terms of this Vendor Code. In the event that hazardous or polluting materials are discharged improperly, appropriate authorities should be notified, and action should be taken to remediate the impact on the environment.

### 2. IMPORT COMPLIANCE

Vendors are required to ensure that the goods they supply to Dollarama comply with the prohibition against importation of goods made in whole or in part from forced labor, in accordance with tariff item No. 9897.00.00 of Canada's *Customs Tariff* and the Canada Border Services Agency's Customs Notice 20-23.

### 3. CONFLICTS OF INTEREST

Vendors are reminded that Dollarama employees owe exclusive business loyalty to Dollarama and are bound by a Code of Conduct and Ethics which requires them to avoid placing themselves in a situation of conflict of interest, actual or apparent. Consequently, employees must not be put in a position where personal or financial incentives or interests may impair their judgment and ability to make sound and unbiased business decisions in the best interest of Dollarama. We expect vendors who do business or seek to do business with Dollarama to respect these ethical principles and to not offer business courtesies (such as gifts and entertainment) that exceed nominal value.

Specifically, vendors are strictly prohibited from directly or indirectly promising, offering or giving anything of value to any Dollarama employee, agent, representative, ambassador, or to any third party or representative conducting any audits, inspections or verifications on Dollarama's behalf, in an attempt to influence audit results or any other business decision, or in an attempt to obtain or retain any business advantage ("Improper Incentives").

To this end, vendors and Vendors' Commercial Partners are required to maintain internal company controls that prohibit Improper Incentives, the use of facilitation payments, and the remuneration of agents and third parties for anything other than legitimate services.

#### **4. ANTI-CORRUPTION / ANTI-BRIBERY LAWS COMPLIANCE**

Vendors are required to comply with all applicable anti-corruption laws, including the *Corruption of Foreign Public Officials Act* (Canada). Dollarama has a zero tolerance policy for practices which are intended to reward or otherwise encourage non-compliance with such applicable laws and regulations.

#### **5. SANCTIONS COMPLIANCE**

To the extent applicable, vendors are at all times required to ensure their operations are carried out in compliance with Canadian and other international sanctions measures, 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.

#### **6. UNAUTHORIZED SUBCONTRACTING**

Vendors are prohibited from engaging in subcontractor, supplier, or other relationships with Vendor Commercial Partners who have not been provided with a copy of this Vendor Code or who have not confirmed compliance with this Vendor Code. Vendors must agree to disclose to Dollarama, upon request, the name and address of every Vendor Commercial Partner used in the production of products sold to Dollarama.

#### **7. CONFIDENTIALITY**

Vendors must hold all confidential information regarding Dollarama which may be communicated to them or to which they may have access in strict confidence and are also expected to take reasonable means to protect such information. Confidential information includes all non-public information about Dollarama, including without limitation business plans, forecasts, retail pricing arrangements and pricing strategies, personal information about Dollarama employees, trade secrets and intellectual property.

Vendors may not disclose, share or use this information other than for the benefit of Dollarama. This includes a prohibition to display or allow any supplier/vendor or factory to display items packaged for Dollarama or on the packaging of which Dollarama's name, trademark(s) or logo(s) appear in any trade fairs. Vendors are also expected to respect the intellectual property and other legal rights of third parties.

## VENDOR ENGAGEMENT

All vendors are required to carefully review the Vendor Code and agree to abide by its terms as a condition of doing business with Dollarama, either by completing the attached Addendum or by signing a contract with Dollarama which incorporates the Vendor Code and Addendum. Vendors will be asked to certify compliance with the Vendor Code every twelve (12) months.

Vendors acknowledge that Dollarama will from time to time be subject to new or amended legal requirements under Canadian law, and will revise this Vendor Code as necessary to reflect these requirements. Vendors will therefore be required, upon receiving reasonable notice from Dollarama, to agree to abide by the terms of updated versions of the Vendor Code and Addendum.

## VENDOR CODE MONITORING AND ENFORCEMENT

Vendors are expected to ensure that the standards outlined in the Vendor Code are communicated, understood and implemented at every level of their organization, to Vendors' Commercial Partners, and throughout their own supply chains.

Dollarama reserves the right to assess and monitor vendor compliance with these standards. To this end, vendors are required to maintain complete and accurate records, to respond to inquiries and requests for information, to grant Dollarama or a designated agent of Dollarama with reasonable access to facilities, records and workers for inspection or audit purposes, and to work with Dollarama or its designated agent to resolve issues. Dollarama expects cooperation and transparency in the context of the monitoring process, whether conducted by Dollarama personnel or by a third-party auditor mandated by Dollarama.

If Dollarama determines that a vendor has violated the Vendor Code, or works with a Vendor Commercial Partner that operates in violation of the Vendor Code, the vendor will be required to propose and implement a corrective action plan in order to bring its business up to Dollarama's standards within a reasonable timeframe. Dollarama acknowledges that certain instances of non-compliance may take time to resolve.

Dollarama also reserves the right to cancel purchase orders, to terminate the relationship with a vendor who is unwilling or unable to comply with the Vendor Code or to remediate a situation of non-compliance within a reasonable timeframe, or to terminate the relationship immediately in case of serious violation or gross negligence, including violations of standards that are subject to a zero tolerance policy as per the terms and conditions of the Vendor Code and related Addendum.

## VENDOR DISCLOSURE OBLIGATIONS

Vendors are obligated to disclose to Dollarama without delay any sourcing practices, procurement or supply relationships, or other commercial arrangements that involve activity in regions identified by government or other authorities as the source of forced, underage or prison labour (“Target Regions”). To this end, vendors have an ongoing obligation to bring such activities to Dollarama’s attention, and provide sufficient detail to allow Dollarama to assess whether this Vendor Code has been violated. Vendors are further required

to monitor Vendor Commercial Partners for such activities and are required to notify Dollarama without delay of any Vendor Commercial Partners’ activities that occur in any Target Regions.

**Vendors are obligated to disclose to Dollarama without delay any other practices, activities, or occurrences that constitute a violation of this Vendor Code.**

## WE WANT TO HEAR FROM YOU

### QUESTIONS

Questions regarding the Vendor Code may be submitted to Dollarama via [vendorcode@dollarama.com](mailto:vendorcode@dollarama.com).

### REPORTING VIOLATIONS

Any person who believes that a violation to the Vendor Code has or may have occurred is encouraged to report the relevant information in confidence to the Legal Department of Dollarama at [ethics@dollarama.com](mailto:ethics@dollarama.com).

With respect to the application of the Vendor Code, the head of the Legal Department will report directly to the Audit Committee, which has been delegated the primary risk oversight responsibility by the Board of Directors of Dollarama.

Dollarama will make every effort to investigate reported violations and take appropriate measures to maintain the integrity of its business. The privacy of the person reporting non-compliance or suspected non-compliance will be protected, and confidential information will only be shared on a “need to know” basis or if required by law.

## ADDENDUM – VENDOR ENGAGEMENT FORM

I confirm that I have received a copy of the Dollarama Vendor Code of Conduct, that I have read and understood its contents and that my company agrees to abide by it.

I certify that my company is and will continue to operate in compliance with the Dollarama Vendor Code of Conduct.

I certify that my company act in compliance with applicable laws.

I acknowledge that Dollarama adopts a zero tolerance policy with respect to the following standards as set out in the Vendor Code of Conduct:

- > Prohibition against forced labour;
- > Prohibition against use of labour agencies charging recruitment fees or illegally deducting fees from employee wages;
- > Import compliance;
- > Anti-corruption / anti-bribery compliance; and
- > Sanctions compliance.

I therefore understand that Dollarama reserves the right to terminate its relationship with my company in the event of my company's failure to comply with any of the above standards.

I confirm that this company has also obtained written certification from all its Vendor Commercial Partners with whom this company partners in the production of goods sold to Dollarama (as defined in the Vendor Code of Conduct) attesting to compliance with the foregoing commitments.

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NAME OF SUPPLIER:

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ADDRESS OF SUPPLIER:

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SIGNATURE: *I HAVE THE AUTHORITY TO BIND THE COMPANY (IN MY CAPACITY AS OWNER, PRINCIPAL OR AUTHORIZED OFFICER)*

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NAME OF SIGNATORY:

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TITLE OF SIGNATORY:

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DATE: