



CANADIAN TIRE CORPORATION

**CODE OF CONDUCT**

# A Message from the CEO



**GREG HICKS**  
PRESIDENT AND CEO,  
CANADIAN TIRE CORPORATION, LTD.

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Throughout our history, Canadian Tire Corporation, symbolized by our Triangle, has generated a sense of pride amongst our customers and all of those with which we do business.

The Billes family created our Enterprise almost 100 years ago and has been evolving it ever since. They instilled the basic values of honesty, integrity and respect to which generations of employees have embraced.

Our Brand is our most valuable asset. We are woven into the communities that make up this great country and we are now extending our reach beyond our borders.

Our world is ever more complex and it is our responsibility to continue to protect our Brand.

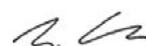
The way we conduct our business is as important to our Brand as the products and services we offer. This means that as Canadian Tire Corporation Employees and representatives, we all have a great responsibility to protect the reputation of this iconic Brand by upholding the highest standards of ethical conduct.

Our Code of Conduct outlines the behaviors expected of all of us and provides us with the information and resources to guide our actions.

As Canadian Tire Corporation Employees, we are all ambassadors for our Company. This is a responsibility we must take very seriously.

Acting with honesty, integrity and respect allows us to uphold Canadian Tire Corporation's unique place in the lives and hearts of those who do business with us.

Thank you for the important role you play in making sure that these values are upheld every day across our great Company.

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

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# Introduction

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## SCOPE

The Canadian Tire Corporation, Limited (“CTC”) Code of Conduct (the “Code”) describes the standards of conduct required of Employees (full-time, part-time and temporary), Directors and Independent Contractors of CTC and its subsidiaries. The Code is your first point of reference if you are facing an ethical situation and need guidance on what steps to take. If there is something in this Code that you do not understand, or if you require additional guidance, you can ask your Manager, Business Unit Executive or the Triangle Ethics Office (TEO) for advice. The Glossary at the end of this document contains definitions of key terms, along with a list of Related Policies.

### TO WHOM DOES IT APPLY

The Code is applicable to all Employees and Directors and Independent Contractors while conducting business on behalf of, or for CTC.

The Code does not apply to Dealers and franchise owners or their respective Employees, where requirements on ethical conduct are detailed in contractual agreements.

All suppliers conducting business with, or on behalf of CTC, must adhere to the Supplier Code of Conduct.

### ACKNOWLEDGEMENT OF THE CODE

An **annual acknowledgement and confirmation** that the Code has been

read must be provided by all Employees, Directors and Independent Contractors.

### COMPLIANCE WITH THE CODE

Employees will be required to complete periodic training on the Code of Conduct. Disciplinary action will be taken for non-compliance with the Code. Breaches of the Code should be reported as described in “Reporting”.

### CONSEQUENCES FOR FAILING TO COMPLY

All Code violations will be treated seriously and appropriate disciplinary action will be taken where necessary. This action may include, but is not limited to, training, coaching, written warnings and termination of employment.

# Introduction

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## ROLES & ACCOUNTABILITIES

### EMPLOYEES

New CTC Employees will be provided with a copy of the Code and must acknowledge that they have received and read it. Employees are required to confirm compliance with the Code on an annual basis, ask questions when unclear about their responsibilities or the appropriateness of a particular action, and report any actual or potential breach of this Code immediately.

### MANAGERS

Managers have additional responsibilities to be aware of and communicate applicable laws, regulatory requirements and internal policies, procedures and processes, and to manage and supervise Employees so that the law, regulatory requirements, this Code and other internal policies, procedures and processes are followed.

Managers must also respond to questions from Employees, seek guidance if they are uncertain of the answer, and report any actual or potential breach of the Code.

### EXECUTIVE MANAGEMENT AND THE BOARD OF DIRECTORS

The **Chief Executive Officer**, the **Chief Corporate Officer** and the Board of Directors have additional responsibilities.

The **Chief Executive Officer** has overall responsibility for enacting and publicizing the Code so that it is followed throughout the organization. The CEO also has the duty to report on compliance with this Code annually to the **Board of Directors**.

The **Board of Directors** is responsible for reviewing and approving the content of this Code, including the authorization of any changes.

These roles and responsibilities are summarized in a table on the following page.

# Introduction

## ROLES & ACCOUNTABILITIES

Roles / Accountabilities	Independent Contractors	Employees	Managers	BU & Support Function Executives	Chief Corporate Officer	Chief Executive Officer	Board of Directors
Understand, Follow & Acknowledge	▼	▼	▼	▼	▼	▼	▼
Seek Advice	▼	▼	▼	▼	▼	▼	
Report Violations	▼	▼	▼	▼	▼	▼	▼
Answer Questions			▼	▼	▼	▼	▼
Report on Compliance				▼	▼	▼	
Approve Changes & Communicate						▼	▼

# Introduction

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## THE CANADIAN TIRE COMMITMENTS

Our Commitments reflect our values and form the foundation for how we go about business and how we interact with internal and external stakeholders. Living up to our Commitments is an important part of meeting our Company goals, safeguarding our reputation and maintaining customer trust.

### Commitment 1

WE TREAT OTHERS AS WE WOULD LIKE TO BE TREATED



### Commitment 2

WE SAFEGUARD OUR COMPANY ASSETS, INFORMATION AND REPUTATION



### Commitment 3

WE CONDUCT OUR BUSINESS HONESTLY AND WITH INTEGRITY



### Commitment 4

WE CONTRIBUTE TO THE COMMUNITIES IN WHICH WE OPERATE



# Commitment 1

WE TREAT OTHERS AS WE WOULD LIKE TO BE TREATED



An inclusive work environment is one that respects and promotes equal opportunity and is free from discrimination.

As an equal opportunity employer, discrimination of any kind, abuse, harassment, bullying or any form of disrespectful or inappropriate behavior towards our Employees, suppliers, customers or others will not be tolerated. All Employees are expected to treat others with respect and professionalism.

Harassment, including sexual harassment, is a form of discrimination. Harassment means any conduct, comment or gesture that is inappropriate and likely to:

**Reasonably cause offence or humiliation to any employee or customer**

**Reasonably be perceived as placing a condition of a discriminatory nature on employment or employment opportunities such as training or promotion**

## EXAMPLES OF DISCRIMINATION AND HARASSMENT

**Sending an email with sexually suggestive comments**

**Spreading false or malicious rumours about a team member**

**Causing or threatening physical injury to another**

**Not selecting a candidate because of their age**

## WORKPLACE HEALTH AND SAFETY

CTC will provide a healthy, safe workplace for its Employees in accordance with the applicable local laws and regulations.

Workplace safety is a collective responsibility and all Employees should follow health and safety procedures detailed as part of Business Unit procedures and under **CTC's Occupational Health & Safety Policy**. Any safety violations are to be reported pursuant to the requirements of this Policy.

# Commitment 1

WE TREAT OTHERS AS WE WOULD LIKE TO BE TREATED



## RESPECT IN THE WORKPLACE

### DRUG, ALCOHOL AND CANNABIS CONSUMPTION

The possession, solicitation or use of illegal drugs, or being under the influence of any impairing drugs while at work is prohibited and will not be tolerated. Being under the influence of alcohol, cannabis or similar substances that would impair your ability to carry out duties at work or drinking alcohol or using such substances on CTC property is forbidden.

Employees of legal drinking age may consume alcoholic beverages at CTC-sponsored events if the consumption of alcohol is approved in advance by a Business Unit Executive or the senior individual sponsoring the event.

### TREATING OUR CUSTOMERS RIGHT

CTC values the trust our customers and Dealers have placed in CTC. Employees must undertake their activities in a customer-centric manner and strive to provide exceptional service. Customer complaints will be investigated promptly.

### PRODUCT SAFETY

All products sold at CTC must meet safety and quality standards under applicable laws and regulations. Our large network of suppliers means we have to make sure they adhere to product health and safety requirements. Employees with responsibilities for health and safety standards for products must take steps to ensure that they comply with these requirements.

### FAIR HOURS AND WAGES

CTC will comply with applicable laws and regulations on appropriate wages and working hours covering the following key areas:

#### **Rest breaks**

#### **Days of rest**

#### **Overtime pay**

#### **Minimum wage requirements**

#### **Hours for minors and child labour laws**

CTC will manage pay and working hours requirements under Human Resources policies.

## Commitment 2

WE SAFEGUARD OUR COMPANY ASSETS, INFORMATION AND REPUTATION



### BRAND AND REPUTATION

#### COMMUNICATING WITH THE PUBLIC

All Employees who are invited to participate in a speaking engagement or panel discussion at an external conference, seminar or workshop must receive approval from the Business Unit Executive and Head of Corporate Communications prior to accepting the invitation.

All Employees who provide inputs for, prepare and/or disseminate public disclosures (for example the Annual Report) have a legal and ethical duty to ensure that the disclosure is full, fair, accurate, timely, and understandable.

Employees should not communicate with the public through public channels such as **Social Media** as part of their CTC employment. Only designated spokespeople are permitted to disclose non-public information or material about CTC to media, suppliers, competitors, investors, and/or customers.

External requests for information, for example from the media, must be directed to our **Media Hotline** ([mediainquiries@cantire.com](mailto:mediainquiries@cantire.com) or 416-480-8453).

Please refer to CTC's **Employee Social Media Guidelines** for more information.

## Commitment 2



WE SAFEGUARD OUR COMPANY ASSETS, INFORMATION AND REPUTATION

### AUTHORIZED PERSONS

Only the following spokespersons, or persons they designate, are authorized to speak on behalf of CTC, unless otherwise permitted:

**The Chairman of the Board**

**The Chief Executive Officer**

**The Chief Financial Officer**

**Head of Corporate Communications**

**Head of Investor Relations**

### USING COMPANY E-MAIL

When using Company e-mail, we should consider the following guiding principles:

**E-mail must be written in a businesslike manner and be free of obscene, harassing, threatening or otherwise offensive language.**

**E-mail communications should be professional and reflect the business standards of CTC.**

**Protect the privacy and security of all personal information.**

**All efforts should be made to protect restricted and confidential information.**

**Please refer to CTC's Email Management Standard for more information.**

## Commitment 2

WE SAFEGUARD OUR COMPANY ASSETS, INFORMATION AND REPUTATION



### CONFIDENTIAL INFORMATION

#### INFORMATION SECURITY AND INTELLECTUAL PROPERTY

It is the responsibility of every employee to protect personal and Company information. We must protect information, physical (such as paper) and electronic (such as email, customer data) in accordance with applicable laws and regulations including standards in our **Information Security Policy**. Employees should consider the following guiding principles when dealing with personal and Company information.

**Dispose of physical information in confidential shredding bins**

**Lock and secure confidential information**

**Do not attach unauthorized personal devices to CTC's network and do not download CTC data onto removable storage devices such as USB and Flash drives – unless you are approved to do so by your Manager**

**Do not forward CTC data to personal email accounts**

**Return CTC property on termination of employment, including cell phones, laptops and security badges**

**Do not open email attachments or pop-ups from unknown or suspicious sources**

**Do not share 'trade secrets' outside of CTC**

## Commitment 2



WE SAFEGUARD OUR COMPANY ASSETS, INFORMATION AND REPUTATION

### PRIVACY AND INFORMATION MANAGEMENT

Personal information about customers, Employees, and suppliers must be collected and processed in accordance with applicable privacy laws and regulations.

**Access information for business purposes only**

**Only store personal and business data for as long as needed**

**Be aware of information classifications within CTC including highly sensitive data such as medical information**

**Familiarize yourself with CTC's privacy policy and procedures**

Refer to CTC's **Information Security Policy**, **Privacy Policy** and **Employee Privacy Policy** for further guidance.

### EXAMPLE OF PRIVACY BREACH

Without consent, a Manager told his entire team about a team member's long term medical condition during a period of extended sick leave.

# Commitment 3

WE CONDUCT OUR BUSINESS HONESTLY AND WITH INTEGRITY



## FINANCIAL REPORTING

### REPORTING INTEGRITY AND RELIABILITY OF BUSINESS TRANSACTIONS

CTC is required under laws and regulations and generally accepted accounting principles to keep books, records and accounts that accurately reflect all transactions and to have in place an adequate system of internal accounting and controls.

Activities not in line with CTC's standards on financial reporting:

**Improperly accelerating or deferring expenses or revenues to achieve financial results**

**Maintaining any undisclosed or unrecorded funds, accounts or "off the books" amounts**

**Establishing improper, misleading, incomplete or fraudulent accounting documentation or financial reporting**

**Making any payment for purposes other than those described in the documents supporting the payment**

**Submitting or approving any expense report where the employee knows or suspects that any portion of the underlying expenses were not incurred, are not accurate or are not in compliance with CTC's expense policies**

**Signing any documents believed to be inaccurate or untruthful**

### EXAMPLES OF FINANCIAL REPORTING BREACH

Due to a challenging quarter for retail sales, a Manager asks his direct report to adjust performance figures to improve the financial outlook.

A large invoice is received for services from a CTC supplier. In a bid to make CTC's financial position look better, the Manager withholds the invoice for a period of time.

# Commitment 3

WE CONDUCT OUR BUSINESS HONESTLY AND WITH INTEGRITY



## ILLEGAL ACTIVITIES

### INSIDER TRADING

Trading in (buying or selling) CTC or related company stocks or other securities on the basis of material, non-public information or inside information is illegal and strictly prohibited.

Inside information is any material, non-public information that could reasonably be expected to affect the value of an investment and is likely to be considered important when making an investment decision.

### TIPPING

Tipping which involves sharing inside information so others can trade in stocks or other securities is also illegal and prohibited.

If you are aware of inside information about CTC or any other company, including our suppliers, you are prohibited from trading directly or indirectly, or tipping others to trade in stock or other securities of that company.

These same restrictions apply to any person living in your household or who is financially dependent upon you.

Please refer to CTC's **Securities Trading and Reporting Corporate Directive** for further guidance.

### ANTI-MONEY LAUNDERING (AML)

CTC is required to comply with applicable AML laws and regulations. Money laundering is the concealment of the origins of illegally obtained money. CTC requires all Employees to be alert to activities potentially indicative of money laundering, including:

**Volume purchases of prepaid products such as gift cards or large cash transactions**

**A customer or other third party who is reluctant to provide complete information, provides false or suspicious information, or is anxious to avoid reporting or recordkeeping requirements**

**Unusual domestic or foreign fund transfers that indicate scam activities or fraudulent schemes**

**Structuring a transaction to avoid reporting requirements, such as conducting multiple transactions below reportable threshold amounts**

# Commitment 3

WE CONDUCT OUR BUSINESS HONESTLY AND WITH INTEGRITY



## COMPETITION

### FAIR COMPETITION AND ACQUIRING COMPETITIVE INTELLIGENCE

We are committed to complying with all applicable competition, fair dealing and antitrust laws applicable to CTC. These laws help protect competition and the fair operation of markets while promoting honest sales, advertising and marketing practices.

In doing so, we will thrive as a Company and continue to help our customers enjoy their jobs and joys of life. Further information on applicable laws can be obtained from CTC's Legal team.

We must not manipulate or misrepresent facts and always be protective of confidential information of other parties. Competitive intelligence must only be gained through ethical and legal means.

### GENERAL COMPLIANCE WITH LAWS AND REGULATIONS

Every Employee has an obligation to be aware of and to comply with all applicable laws, rules, regulations and Company policies that apply to our business operations, and in particular, those which impact our roles within such business areas.

We operate in many jurisdictions, both domestic

and foreign. All Employees and Independent Contractors working on behalf of the Company must know and comply with all laws, regulations and policies applicable in those jurisdictions.

### RESPONSIBLE ADVERTISING

The way we present and market our products is key to CTC's success. However, we must do this in a way that is fair and representative of the products and services we offer. We must make sure that advertising and media communications are honest, responsible and fair.

We must not misrepresent product prices, features, and availability and we must clearly state the conditions of offers.

### EXAMPLE OF A COMPETITION BREACH

**A staff member has a friend who works at one of CTC's competitors. The staff member read recently that the competitor is a potential buyer for a new sportswear company. The staff member promises to buy her friend lunch if she tells her details about the acquisition.**

# Commitment 3

WE CONDUCT OUR BUSINESS HONESTLY AND WITH INTEGRITY



## CONFLICTS OF INTEREST

### GENERAL

Personal interests or relationships should not influence one's ability to make honest and ethical business decisions in the best interests of CTC. A conflict of interest can happen when a judgment could be influenced, or might appear to be influenced, by the possibility of personal benefit.

### OTHER EMPLOYMENT

Employees must not perform any paid services for a competitor. Employees must not be part of outside business activities which create a conflict of interest with their work at CTC. In practice, this means the outside business activity cannot be similar in nature to your role at CTC, benefit from the use of CTC assets or intellectual property or negatively impact CTC's reputation and brand.

### INTERNAL REPORTING

All personal or family relationships, and business interests, that may impact an Employee's ability to make honest and impartial decisions should be disclosed. Efforts to prevent a direct reporting relationship between relatives must be made and discussed with Human Resources in advance.

### RELATIONSHIPS WITH SUPPLIERS

Employees should not have social or other relationships with suppliers if the relationship would give the perception that a business influence is being exerted. Relationships with suppliers should be based on fair and lawful business practices.

The selection of suppliers must be made on the basis of objective criteria, including, integrity, quality, price, delivery, product suitability, maintenance of adequate sources of supply, and CTC's purchasing practices and procedures.

# Commitment 3

WE CONDUCT OUR BUSINESS HONESTLY AND WITH INTEGRITY



## CONFLICTS OF INTEREST

### GIFTS AND ENTERTAINMENT

Accepting gifts or other entertainment gratuities (for example, tickets to a sporting event) might be perceived by our customers, suppliers and other Employees as a potential conflict of interest.

Gifts and entertainment gratuities above CAD\$200 (or its equivalent in the jurisdiction of the operations) must be politely declined and returned.

There may be circumstances that justify an exception; these must be approved by a Senior Executive.

Attendance at vendor sponsored events (e.g. sporting and cultural events) should be occasional and authorized by a Senior Executive and reported to the TEO.

Gifts of cash or cash equivalents (i.e., vouchers) can never be accepted.

### GIFTS TO GOVERNMENT OFFICIALS

There are regulations governing the acceptance of gifts by elected officials and public office holders. Therefore, any gifts to such individuals must be cleared through the Public Affairs team.

# Commitment 4

WE CONTRIBUTE TO THE COMMUNITIES IN WHICH WE OPERATE



## CHARITIES

### GENERAL

CTC takes pride in being a core part of communities in which we operate and is committed to giving back to these communities. Key principles that guide our efforts include:

**Supporting Canadian Tire Jumpstart Charities**

**Supporting the communities in which we operate globally**

### CHARITABLE DONATIONS

While it is acceptable to solicit support for CTC's charities of choice from our Employees, suppliers and other key stakeholders, Employees are not allowed to solicit support for any other personal charitable activities unless approved by a Business Unit Executive.

**Suppliers and business partner decisions regarding charitable support must not influence normal business dealings**

**Employees must not commit CTC to a charitable donation of any kind without appropriate prior approval**

CTC's **Donations Policy** provides further guidance.

# Commitment 4

WE CONTRIBUTE TO THE COMMUNITIES IN WHICH WE OPERATE



## POLITICAL ACTIVITY

The Public Affairs team manages all politically-associated activities within CTC and should be contacted in case of any queries regarding planned political activities. Some guiding principles for political activities are detailed below.

**Only permitted Employees can represent CTC's interests with elected officials and non-elected public office holders**

**Business issues requiring contact and/or communication with any level of government, should be discussed and approved by the Public Affairs team**

**Employees cannot use job titles or Company affiliation in connection with personal political activities**

**Corporate funds shall not be provided to political organizations**

## ENVIRONMENT AND SUSTAINABILITY

CTC will conduct business in a socially responsible and ethical manner.

CTC engages in a number of environmental initiatives to avoid the emission of greenhouse gases and help our customers avoid emissions, develop sustainable products and minimize waste. We promote the well-being of workers in our supply chain and the well-being of our customers by, among other things, eliminating and replacing harmful chemicals with better alternatives where possible, and we create an inclusive culture for those who face physical, mental, and social economic barriers.

Employees are expected to be aware of and support CTC sustainability initiatives that apply to their roles and areas of responsibility.

# Reporting

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## OBLIGATION TO REPORT

Employees are expected to bring forward all Code-related concerns. The Code requires all Employees, Directors of CTC and Independent Contractors to report, in good faith, any activity that appears to be in breach of the Code.

Any complaint or concern around the Code of Conduct can be reported to your Manager, your Manager's Manager, or Human Resources representative, Triangle Ethics Office, Senior Vice President Internal Audit, General Counsel, CEO, Chair of the Audit Committee or the Chairman of the Board.

All breaches must be reported to the **Triangle Ethics Office (TEO)** or the **TEO Hotline**. Such reporting can be done anonymously.

## WHO TO CONTACT

### TEO HOTLINE

**Website:** [www.canadiantire.ethicspoint.com](http://www.canadiantire.ethicspoint.com)

**Phone:**

**Toll-free (Canada and U.S.):** 1-800-620-6943

**Toll-free (Southern China):** 10-800-120-1239

**Toll-free (Northern China):** 10-800-712-1239

### THE TEO

**Email:** [TEO@cantire.com](mailto:TEO@cantire.com)

**Phone:** 416-480-8202

### MAIL:

**CTC Triangle Ethics Office**

2180 Yonge Street

Box 770, Station K

Toronto, Ontario M4P 2V8

Envelope should be marked as

**“Personal & Confidential:**

**To Be Opened Only by Addressee**

# Reporting

## IMMEDIATELY REPORTABLE CRITERIA

Employees may raise concerns regarding ethical conduct that may violate the Code of Conduct through the TEO as detailed on the previous page. However, there are certain types of allegations that must immediately be reported to the TEO.

**Providing, offering, promising, requesting, or receiving any improper or unearned benefit (bribery)**

**Interfering with audits or internal controls**

**Falsifying, misrepresenting, or destroying financial records, or improperly concealing or altering financial records**

**Information system hacking**

**Conduct involving an employee maliciously gaining unauthorized access to company or customer information**

**Price fixing, market or customer division or allocation, or other anti-competitive practices**

**Insider trading**

**Money laundering**

## INVESTIGATION AND PENALTIES

Investigations of potential violations of the Code are handled confidentially, respectfully, and lawfully.

All Employees are expected to fully cooperate when responding to an investigation or audit, or to inquiries that are conducted by CTC.

## WHISTLEBLOWER PROTECTION

Information regarding Employees reporting code violations will, to the extent possible, remain confidential. CTC will not tolerate any retaliation for reports made in good faith.

Employees will not be penalized for inquiring about and/or reporting, in good faith, suspected unethical behavior or for seeking guidance on how to handle Code violations or suspected illegal acts. CTC will not tolerate any retaliation for any such inquiries.

# Where to go for Guidance

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## CONTACT INFORMATION

Code violations should be reported to the TEO, but if you would prefer to make contact with another team you can contact any of the following.

### COMPLIANCE WITH LAWS AND REGULATIONS OR LEGAL

Canadian Tire Corporation Legal Department  
**General Counsel**

### COMMUNITY RELATED OR POLITICAL ACTIVITY

Canadian Tire Corporation  
Communications Department  
**Head of Corporate Communications**

### HUMAN RESOURCES RELATED MATTERS

Canadian Tire Corporation  
Human Resources Department  
**Head of Human Resources**

### FRAUD OR CRIMINAL MATTERS

Internal Audit  
**Chief Internal Audit**

Corporate Security  
**Head of Corporate Security**  
**General Counsel**

# Glossary

“**Triangle Ethics Office**” is the office established by the Chief Corporate Officer to oversee the implementation and maintenance of, and compliance with, the Ethical Business Conduct Policy, the Codes and the Triangle Ethics Office Directive.

“**Business Partner**” for the purpose of this Code, refers to any person or entity that has or potentially has an alliance, contractual or otherwise, with the Company, and includes Independent Contractors and Suppliers.

“**Business Unit**” refers to any of Canadian Tire Retail, Canadian Tire Petroleum, PartSource, Canadian Tire Financial Services, Mark’s, FGL Sports Ltd, Helly Hansen and Musto.

“**Company**” refers to Canadian Tire Corporation, Limited, its divisions and subsidiaries that it controls.

“**Corporate Function**” refers to:

- a. Canadian Tire Real Estate
- b. Communications
- c. Corporate Strategy
- d. Dealer Relations
- e. Finance
- f. Human Resources
- g. Information Technology
- h. Legal
- i. Risk and Regulatory
- j. Supply Chain
- k. Treasury

“**Director**” refers to Members of the Board of Directors of Canadian Tire Corporation, Limited and Canadian Tire Bank

“**Employee**” for the purpose of this Code, refers to a person hired by the Company on a full-time, part-time or contract basis through the Company’s Human Resources department. It does not include individuals who are employed through a staffing services agency or Independent Contractors.

“**Independent Contractor**” for the purposes of this Code, refers to a person hired through a consulting arrangement wherein a Business Unit or Corporate Function is invoiced directly by the person.

# Related Policies

	Policy	Contact Details
1	<u>Competition Law Policy</u>	General Counsel
2	<u>Disclosure Corporate Operating Directive</u>	General Counsel
3	<u>Donations Policy</u>	Head of Communications
4	<u>Email Management Standard</u>	Information Governance
5	<u>Employee Privacy Policy</u>	Head of Regulatory Affairs
6	<u>Employee Social Media Guidelines</u>	Head of Communications
7	<u>Information Security Policy</u>	Chief Information Security Officer
8	<u>Occupational Health and Safety</u>	Head of Human Resources
9	<u>Prevention of Discrimination, Harassment and Sexual Harassment</u>	Head of Human Resources
10	<u>Prevention of Violence in the Workplace</u>	Head of Human Resources
11	<u>Privacy Policy</u>	Head of Regulatory Affairs
12	<u>Securities Trading and Reporting Corporate Operating Directive</u>	General Counsel
13	<u>Supplier Code of Conduct</u>	Head of Regulatory Affairs
14	<u>Travel and Expense Management Policy</u>	T&E Administration Team
15	<u>Technology Acceptable Use Policy</u>	Chief Information Security Officer
16	<u>Workplace Impairment Guidelines</u>	Head of Human Resources



