

CODE OF CONDUCT 2022



WESTON
GEORGE WESTON LIMITED

FROM THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER

Since my great-grandfather founded George Weston Limited it has been built by excellent people who are committed to a shared set of goals and values. Those goals and values remain the same today; they are the foundation for the way the Company is governed, upholding the highest standards ethically, lawfully, and professionally every day. The Company's high-performance culture requires that all of us adhere to those standards both individually and collectively.

That is why the Company's Code of Conduct is so important. It represents more than words on a page; it reinforces what our businesses and stakeholders expect of us, and what we expect of each other. The Code is intended to provide a framework upon which to model our behaviours. It is designed to help us understand what it means to represent our Company.

As Chairman and Chief Executive Officer, I am committed to holding myself, our leaders, and each of you accountable to the exceptional standards and results that built, and will continue to drive, a Company that we can all be proud of.



ABOUT THIS CODE

At George Weston Limited, we are committed to honesty and integrity in all that we do. This commitment is part of what has made us a trusted company since 1882.

This Code reflects the Company's CORE values (Care, Ownership, Respect, Excellence) and our firm commitment to excellence, honesty, integrity and compliance. It also provides fundamental principles and expectations to guide your conduct as an employee.

The Code is supported by specific policies and procedures that set out Company expectations and your specific obligations in more detail. You can find them on the Company's intranet site, or obtain them from your Manager or Human Resources. Please be mindful of the Company's policies and procedures, including the [Anti-Fraud Policy](#), which speaks directly to the issues of corruption, bribery, and fraud prevention and response, the [Compliance with Laws Policy](#), the [Competition Law Policy](#), the [Securities Trading Policy](#) and the [Social Media Policy](#). If the Company has policies or procedures that apply to your job which are stricter, or more detailed than this Code, then those policies and procedures must be followed.

KNOW AND ABIDE BY THE CODE AND APPLICABLE POLICIES AND PROCEDURES

All directors, officers and employees of the Company must review, understand and comply with this Code and the policies and procedures that support it. Loblaw Companies Limited and Choice Properties Real Estate Investment Trust each has its own Code. If you hire an external company or consultant to do work on the Company's behalf, you must take reasonable steps to ensure that

they too understand and comply with the Company's Code, policies and procedures, where applicable.

ASK FOR HELP TO MAKE GOOD DECISIONS

If you have questions about this Code, please ask your Manager. Managers are expected to help clarify and apply the Code. They cannot permit or approve violations of any of its provisions.

SpeakUP!

If you suspect a violation of the Code, it is your responsibility to report it immediately to:

- your Manager;
- Human Resources;
- Compliance (Compliance@Weston.ca) or
- the Integrity Action Line (1-800-594-1495).
- www.gwlintegrity.com

The Integrity Action Line is an externally managed reporting service available for you to relay concerns or issues to the Company. By reporting through the Integrity Action Line, you may choose to remain anonymous.

The Company treats all reports seriously and with appropriate confidentiality. When appropriate, the Company will consult with and report to external authorities.

NO REPRISAL

The Company prohibits employees from retaliating against anyone who speaks up in good faith with a concern against another employee. Any employee who retaliates against another employee who has made a report is subject to discipline up to and including termination of employment.

TABLE OF CONTENTS

A WORLD CLASS CORPORATE CENTRE	5
WE RESPECT EACH OTHER	7
Respect in the workplace	
Workplace safety	
Accessibility	
INTEGRITY ABOVE ALL	11
Uphold the law	
Anti-Fraud	
No conflicts of interest	
Gifts and Entertainment	
Shareholder relations	
Fair dealings with government or regulatory officials	
Dealing with competitors / anti-trust compliance	
External board involvement	
Respecting information and assets of others	
If leaving the company	
CARING FOR OUR COMMUNITIES AND THE ENVIRONMENT	19
Environmental, Social and Governance (ESG)	
Charitable donations	
PROTECTING COMPANY INFORMATION AND ASSETS	21
Protecting confidential and personal information	
Use of Company assets	
Information Security	
Management and Integrity of Company Records	
PROTECTING THE COMPANY'S BRAND AND REPUTATION	25
Company intellectual property	
Communicating with the media and the public	
Social media	
FINANCIAL MATTERS	29
Integrity of financial reporting	
Insider trading	
Anti-bribery, corruption and money laundering	
MAKING ETHICAL DECISION	33
CONSEQUENCES FOR CODE VIOLATIONS	35
SpeakUP!	
No Reprisal	
Interpretation	

WORLD
CLASS



A WORLD CLASS CORPORATE CENTRE

“Our mission is to build generational value with an actively managed portfolio of market-leading businesses.”

At George Weston Limited our mission is to build generational value with an actively managed portfolio of market-leading businesses. As a world class corporate centre, the Company strives to achieve this mission each and every day through meaningful advisory relationships with each of the Company's operating businesses.

The Company prides itself on its ability to deliver high-quality shared services to its businesses through world-class expertise in strategy, M&A, capital allocation and talent development. The Company's employees partner with the operating businesses to help those businesses create and unlock value in a manner that is efficient and that delivers real results.





RESPECT

WE RESPECT EACH OTHER

“Employees are expected to work together and resolve issues in a constructive manner.”

Being a great place to work starts with RESPECT.

The Blue Culture at George Weston Limited cultivates an inclusive and respectful work environment. This includes treating our employees with dignity and fairness, and maintaining a workplace that is free of harassment, discrimination and violence. It also means welcoming employees with different backgrounds, perspectives and capabilities. This diversity brings us a wealth of experience that makes us a better and more effective team.

RESPECT IN THE WORKPLACE

Employees are expected to work together and resolve issues in a constructive manner. This includes respecting fellow employees' rights and protecting their

personal information. The Company does not tolerate discrimination, harassment or violence. Our policies against such behaviours extend to inappropriate use of social media, as well as to activities outside of the workplace if there is a connection to the Company or any of its businesses. A connection will be found to exist where the conduct impacts on any employee or where the conduct could reasonably be expected to impact negatively on the legitimate interests, reputation or good name of the Company or any of its operating businesses.

Report violence, discrimination or harassment as soon as you become aware of it. It's not only the right thing to do – it's your duty to others and to the Company. Refer to the [Workplace Violence, Discrimination and Harassment Policy](#) for more details.

During team meetings, Bryan sometimes tells inappropriate jokes that contain offensive language and sexual references. Jake feels uncomfortable when he hears these jokes and has tried to indicate his displeasure but Bryan has not stopped. In fact, he has recently started to tell Jake jokes in private that contain racial and religious references. Bryan does not feel his behaviour is harmful because his jokes are all in fun, are not directed at anyone and Jake is not a member of the racial or religious groups to whom he refers in his jokes. Jake has several options, including telling Bryan that the jokes are making him uncomfortable, speaking with his Manager, Human Resources, Compliance or reporting the behaviour to the Integrity Action Line.



WORKPLACE SAFETY

The Company is committed to making our environment safe for employees. In keeping with that commitment, you are expected to:

- comply with the law and the Company's health and safety policies and procedures;
- participate in health and safety training that applies to your job;
- work and act in a way that won't endanger your safety or the safety of your fellow employees; and
- immediately report any workplace accidents, injuries or other safety concerns.

Refer to the [Health and Safety at Work Policy](#) for more details.

Workplace safety is not just about policies and procedures – it's about how we do our jobs every day. We cannot provide excellent service to our businesses if our judgment and productivity are impaired. That is why the Company maintains an alcohol and drug free environment, excepting responsible consumption of alcohol at events where the Company has sanctioned alcohol consumption.

ACCESSIBILITY

The Company is committed to identifying, removing and preventing barriers to accessibility for persons with disabilities. When someone requests accommodation to access employment or programs, we work with them to eliminate barriers and support their needs.

Refer to the [Accessibility Policy](#) for more details.



INTEGRITY



INTEGRITY ABOVE ALL

“ The Company relies on employees to understand the laws that apply to their work. ”

Given the role of our businesses in the lives of so many Canadians who purchase their products, frequent their locations, work, invest and do business with them and with the Company, it is absolutely essential that the Company's employees act with integrity and take personal accountability in all interactions when representing George Weston Limited. INTEGRITY is the foundation upon which our Company was built. It continues to be the basis for our strong reputation and our loyal relationships. To protect that legacy – and because we believe it to be right – all of the Company's employees must conduct themselves in an ethical, lawful and professional manner.

UPHOLD THE LAW

The Company takes compliance very seriously and expects employees to understand, respect and abide by the law. You are responsible for reporting any suspected violations of the law, this Code or the Company's policies and procedures.

The Company relies on employees to understand the laws that apply to their work, to participate in training and to help the Company comply with its obligations by acting in a compliant manner – following the policies, procedures and training that apply to their work.

If you're unsure what's expected of you, speak with your Manager, Human Resources or Compliance.

ANTI-FRAUD

Fraud is any intentional act of deception, forgery, lying or concealment of facts. The Company has zero-tolerance for fraud, no matter how immaterial it may seem. To support the business with fraud prevention, it is your responsibility to report instances of fraud. Refer to the [Anti-Fraud Policy](#) for details.

NO CONFLICTS OF INTEREST

Business decisions must be based on the best interests of the Company, never on possible personal benefit to yourself or other individuals.

You must avoid conflict of interest situations where your personal interests (or those of your relatives or friends) could interfere with your obligations to the Company. This includes misusing your position in any way for personal gain and being involved in situations which create the appearance of a conflict of interest.

Employees must not accept compensation (in any form) for services performed for the Company from any source other than the Company.

It could be a conflict of interest for you to:

- perform services for a competitor;
- perform services for a company that does business or wants to do business with the Company or its businesses;
- have a financial interest in a competitor (although you may hold up to 5% of the publicly traded securities of the competitor);

- have a financial interest in a company that does business or wants to do business with the Company or its businesses (although you may hold up to 5% of the publicly traded securities of the company)
- conduct business on behalf of the Company or its businesses with a relative or friend; or
- engage in an intimate relationship with a subordinate.

You have a responsibility to report any actual or potential conflict of interest. If you are unsure of whether a particular situation presents a conflict of interest, speak with your Manager, Human Resources or Compliance.

GIFTS AND ENTERTAINMENT

You must never allow personal interests or relationships to influence your ability to make objective business decisions. For this reason, the Company requires that you abide by strict rules relating to gifts from persons with whom the Company does, or may do, business. Please note, your group leader has the authority to approve exceptions to these rules. Exceptions to the rules should be reported to Compliance.

- Gifts that are valued over \$250 should not be accepted
- Cash or cash equivalents such as lottery tickets, cheques, loans, credit shares or options should not be accepted
- Gifts/entertainment should not be extravagant.
- The host must be present at entertainment
- In the event that gift/entertainment is offered that does not follow the guidelines above, the employee should decline the offer and report the offer to Compliance.

By way of example, the following benefits would be considered appropriate gifts/entertainment:

- a presentation, seminar, or conference, if most of the content is educational or on a business/professional topic directly relevant to your job. A meal provided to participants directly before or afterwards is also permitted; or
- a meal with a customer, or supplier, on a regular business day, if provided while working on a business-related matter and the primary purpose is to discuss business; or
- a local cultural, sporting or entertainment event where the host is present and business is discussed.

Ingrid is in the process of selecting an event company for an upcoming conference. Three companies are competing for the business. During the evaluation period, the account manager for one of the companies invites her to a concert for her favourite band and implies that these opportunities could be made available regularly, if she chooses to do business with them. Ingrid would love to go to the concert but realizes that taking the ticket is against the Company's gift policy and could put this particular event company at an unfair advantage. Ingrid should say no to the concert tickets and should choose the event company that is the best choice for George Weston Limited.

If you receive an unsolicited inappropriate gift that cannot respectfully be returned (e.g. gift baskets received during the year-end holiday season), then you may accept it on behalf of the Company so that it can either be raffled, with the proceeds paid to a charity designated by the Company, or the contents shared with the employees of the Company (e.g. setting it in the communal kitchen).

If you have any questions about which benefits are acceptable and which must be refused, speak with your Manager, Compliance or Human Resources. They can help assess whether a benefit is permitted under this Code. They cannot approve a benefit which is prohibited by this Code.

SHAREHOLDER RELATIONS

As one of Canada's largest public companies, our Company is closely followed by both current and prospective shareholders and other market participants. The Company deals fairly with all stakeholders, including shareholders.

The Company accurately and fairly reports financial and other information to shareholders, other stakeholders and the public.

You are required to refer all shareholder and investment community related queries to Investor Relations at investor@weston.ca.

FAIR DEALINGS WITH GOVERNMENT OR REGULATORY OFFICIALS

Many aspects of our operations, including those of our businesses, are regulated and subject to routine inspections by government and other regulatory authorities.

Because the Company takes compliance obligations seriously, we and our businesses cooperate with government inspectors and other regulatory authorities, dealing with them in a fair, honest and ethical manner.

It is never appropriate to offer or receive a benefit or gift from a government or regulatory official.





If you are notified of an investigation or request for information by a regulatory authority:

- inform your Manager promptly; and
- notify the Legal Department.

All employees must co-operate fully with Company investigations of suspected wrong-doing, including alleged violations of the Code.

DEALING WITH COMPETITORS / ANTI-TRUST COMPLIANCE

We are governed by laws that ensure fair competition among companies. All employees must comply with these laws. To better understand these requirements, you must read and abide by our [Competition Law Policy, Interaction with Competitors Procedure](#) and all related policies, procedures and training. If you need further clarification, speak with your Manager or contact the Compliance or Legal Departments.

EXTERNAL BOARD INVOLVEMENT

The experience and knowledge of the Company's employees is well-recognized, leading some organizations to invite our employees to participate as directors of their boards. If you wish to accept a board position with any for-profit or not-for-profit external organization, you must obtain approval from a member of the SLT and the Legal Department beforehand.

If you are a director of an external organization, you must be mindful of conflicts of interest with the Company and its businesses. For example, you must

withdraw from any such external board discussions that may involve or impact the Company or its businesses.

RESPECTING INFORMATION AND ASSETS OF OTHERS

Our brands thrive on innovation – but we have to be careful that what we develop doesn't infringe upon the intellectual property rights of others. The Company respects others' property rights just as we expect them to respect ours. Even an allegation of infringement can be costly and can harm our reputation. Here's what you need to know:

- do not bring any competitively sensitive data from prior employers to the Company or its businesses;
- if you are involved in creating new products, campaigns or other innovations for the Company or its businesses (including software, business processes or technology), take the necessary steps to be sure that you are not violating others' rights. This includes educating yourself on what is going on in the marketplace;
- do not respond directly to letters or calls from other parties alleging that their property rights have been violated. Direct them promptly to the Legal Department.

Check with the Legal Department regarding new slogans, domain names and any other information resembling intellectual property. That way we can make sure we have the right to use them without any risk to the Company or its businesses.



IF LEAVING THE COMPANY

Return all Company property to the Company as soon as your employment ends and remember that certain obligations continue even after your employment with the Company has ended. For instance, you must:

- continue to protect confidential information of the Company and its businesses as well as the personal information of customers and colleagues; and
- honour all post-employment obligations contained in any employment or other agreements you have with the Company. These

may include promises to not entice other employees away from the Company. At a minimum, all former employees are prohibited from asking current employees of the Company or its businesses to leave their employment with the Company or any of its businesses for a period of 12 months from the conclusion of their employment.



COMMUNITIES



ENVIRONMENT

CARING FOR OUR COMMUNITIES AND THE ENVIRONMENT

“ We aim to be a force for positive change on issues that matter most. ”

At George Weston Limited, we aim to be a force for positive change on issues that matter most to our employees and our businesses. Our commitment to social responsibility, our efforts to minimize negative impacts on the environment and our charitable activities affirm our support of the COMMUNITIES in which we do business.

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)

The Company strives to be a leading corporate citizen and supports the ESG and corporate social responsibility activities of its operating businesses. These commitments include:

- respecting the environment;
- sourcing with integrity;
- making a positive difference in our community;
- advancing a culture of diversity, equity and inclusion at all levels; and
- being a great place to work.

When you make decisions in your daily work, bear these in mind. You are encouraged to behave in a manner that advances the Company's proud corporate history.

CHARITABLE DONATIONS

The Company appreciates the generosity of our employees, service providers and other stakeholders when we seek support for fundraising efforts. To be sure that our contributions have a strong impact, and to avoid imposing on the goodwill of contributors, the Company seeks donations only for Company-designated charities.

It is your choice whether to personally support a Company-sanctioned charity. The Company will not treat employees, customers or vendors negatively for choosing not to support our charitable programs.

Refer to the Company's latest [Environment, Social and Governance Report](#) for more details on our commitment to ESG.





INFORMATION

ASSETS

PROTECTING COMPANY INFORMATION AND ASSETS

“ Company assets are to be used only for the benefit of the Company and must always be protected from theft, misuse or damage. ”

PROTECTING CONFIDENTIAL AND PERSONAL INFORMATION

On a daily basis, we are entrusted with confidential and personal information that must be treated with care. Disclosure of confidential information can seriously harm the Company and others.

Generally, “confidential information” includes any information that hasn’t been disclosed to the public by the Company or its operating businesses, including projects, sales, earnings or other financial results, competitive activities, technology, products, recipes and formulations, business or manufacturing processes, marketing and advertising plans, product launches, forecasting, strategies and business plans, as well as the personal information of our colleagues or customers.

“Personal information” is any information about an identifiable person, including, anything that identifies or could be reasonably associated with an individual customer or employee.

You must only share confidential/personal information as follows:

- **Internally**, with employees who have a specific need to know, for appropriate business purposes.
- **Externally**, outside of the Company only if:
 - the other party has signed a non-disclosure agreement as approved by the Legal Department;
 - you have obtained the approval of your Manager and any other appropriate approvals required by the Company’s policies and procedures; and
 - for personal information, with the appropriate consent of the individual.

If you are unsure about whether you are dealing with confidential/personal information or whether you have the appropriate approval required before disclosing it, check with your Manager or the Legal Department. Refer to the [Colleague Privacy Policy](#), and [External Privacy Policy](#) for more details.

Lisa is a volunteer at her daughter’s school. During a recent fundraiser, she was asked to create and print posters. Since the school event was that night, she spent hours of Company time creating the posters and printing the 100 copies that were needed. This conduct is unacceptable because her personal activities impacted her job productivity and she used Company resources inappropriately. Lisa should only use her laptop for limited personal use and should not be using the Company printer to print non-business-related materials.



USE OF COMPANY ASSETS

Company assets (for example, supplies, cash and business records) are to be used only for the benefit of the Company and must always be protected from theft, misuse or damage.

Limited personal use of Company computers, phones and other communication equipment is permitted on an occasional basis, but must not negatively impact your productivity, or interfere with normal business operations.

If you use Company assets for personal purposes, you should have no expectation of privacy. As they are Company assets, the Company has a right to access any information contained on or accessed through them.

INFORMATION SECURITY

Information Security is a priority at the Company. It is important that we

safeguard Company information/assets, and information/assets we hold on behalf of our affiliates from misuse.

MANAGEMENT AND INTEGRITY OF COMPANY RECORDS

Records are valuable Company assets and it is very important that we manage them properly.

There are rules that set out how we need to manage and store our records, how long we must retain them, and how we must dispose of them.

It is your obligation to comply with the records management policies and procedures that apply to your function.

All employees must ensure that the records that they create in the course of business are accurate, clear and truthful. Employees will be held accountable for company records that they create or sign-off on.





BRAND

WESTON

GEORGE WESTON LIMITED

REPUTATION

PROTECTING THE COMPANY'S BRAND AND REPUTATION

“ “ The Company's brand is a valuable asset that has been built up over more than a century. ” ”

The Company's brand is a valuable asset that has been built up over more than a century and can be damaged through carelessness. The same goes for the Company's reputation in the public domain. What you do and say, internally and externally, really matters.

COMPANY INTELLECTUAL PROPERTY

To protect the valuable intellectual property of the Company and its businesses, you must:

- only use such intellectual property, including trademarks, for approved business use and then only in accordance with applicable Company policies;
- follow applicable Company policies and guidelines to ensure the appropriate agreements are in place with vendors and partners to protect the intellectual property of the Company and its businesses; and

- promptly report any incidents to the Legal Department if you believe that any intellectual property of the Company or its businesses is being misappropriated or misused by others.

Anything created for the Company as part of your job is intellectual property belonging to the Company.

COMMUNICATING WITH THE MEDIA AND THE PUBLIC

The Company has designated individuals to manage our important relationships with the media and the public. To help them do their jobs properly:

- do not speak publicly or to the media on behalf of the Company without the approval of Investor Relations and the Legal Department. This includes speaking about the Company at public events and trade conferences;
- send any requests for comments or information received from the media to investor@weston.ca.

Brandon is a long-standing and proud employee of the Company. During the summers, he coaches his son's soccer team in the evenings. Brandon is a proud employee and wants to call his team the "Weston Warriors". Unfortunately, Brandon cannot use Company property, including its names and trademarks, for any purpose other than the performance of his employment duties without the express permission of the Company.

And of course, if you are authorized to speak publicly on behalf of the Company, always provide factual and accurate information.

SOCIAL MEDIA

Social media is a powerful marketing and communications tool, and a venue for customer service.

The Company wants you to feel engaged and empowered to share information and ideas using social media, but you must do so in a responsible manner.

Specifically, employees using social media must:

- use sound judgment and common sense;
- adhere to the Company's values, this Code and all applicable Company policies, including the Company's [Social Media Policy](#); and
- where use of social media is permitted, participate in a manner that protects the brands, reputation, goodwill and confidential information of the Company and its operating businesses as well as the personal information of customers and colleagues.

Loblaw Digital



FINANCIAL



FINANCIAL MATTERS

“ The Company reflects business transactions accurately, fairly and in a timely manner. ”

As a publicly traded Company and a respected corporate citizen, George Weston Limited must always provide full, true and plain disclosure of its financial results. Accurate and timely disclosure is necessary to make responsible business decisions, and to maintain the trust of our stakeholders.

INTEGRITY OF FINANCIAL REPORTING

The Company reflects business transactions accurately, fairly and in a timely manner.

The Company maintains adequate and effective accounting, auditing and business control practices in accordance with industry standards, and complies with accepted accounting principles and controls at all times.

The Company is committed to providing full, true and plain disclosure in accordance with the law.

In keeping with these commitments, you are expected to:

- report expenses accurately and honestly;
- use Company funds only for legitimate Company purposes; and

- fully cooperate with the internal and external auditors of the Company.

Employees must make accurate entries into corporate books, records, reports, financial statements and public disclosures.

Any questions/concerns you may have or that are brought to your attention relating to accounting or disclosure matters, should be raised with your Manager/ Compliance or through the Integrity Action Line.

Refer to the [Accounting, Auditing and Internal Controls Complaints Procedure](#) for more details.

INSIDER TRADING

The Company encourages all employees to become shareholders of the Company. However, from time to time, some employees become aware of internal developments or plans which may affect the value of securities before those developments or plans are made public.

To comply with the law and with the Company's policies, including the [Securities Trading Policy](#), you must:

Mike is involved in a meeting where non-public information relating to the Company's future profitability is discussed. Mike is usually not privy to this type of information since he is not a senior employee. Because of the type of information he received, Mike must not buy or sell shares of the Company without first discussing it with his Manager and the Legal Department. The law prohibits Mike from profiting from inside information that is not readily available to the public.



- not use or share undisclosed Company information with others that could be used to decide whether to buy or sell securities of the Company, Loblaw Companies Limited or Choice Properties REIT; and
- trade securities of the Company, Loblaw Companies Limited or Choice Properties REIT only when you are permitted to do so.

Examples of undisclosed Company information include proposed changes in capital structure, proposed financings, proposed changes in corporate structure such as amalgamations or reorganizations, and proposed acquisitions of other companies.

As a general rule, carefully avoid any trading or disclosure that might be, or might appear to be, unfair to the public investors.

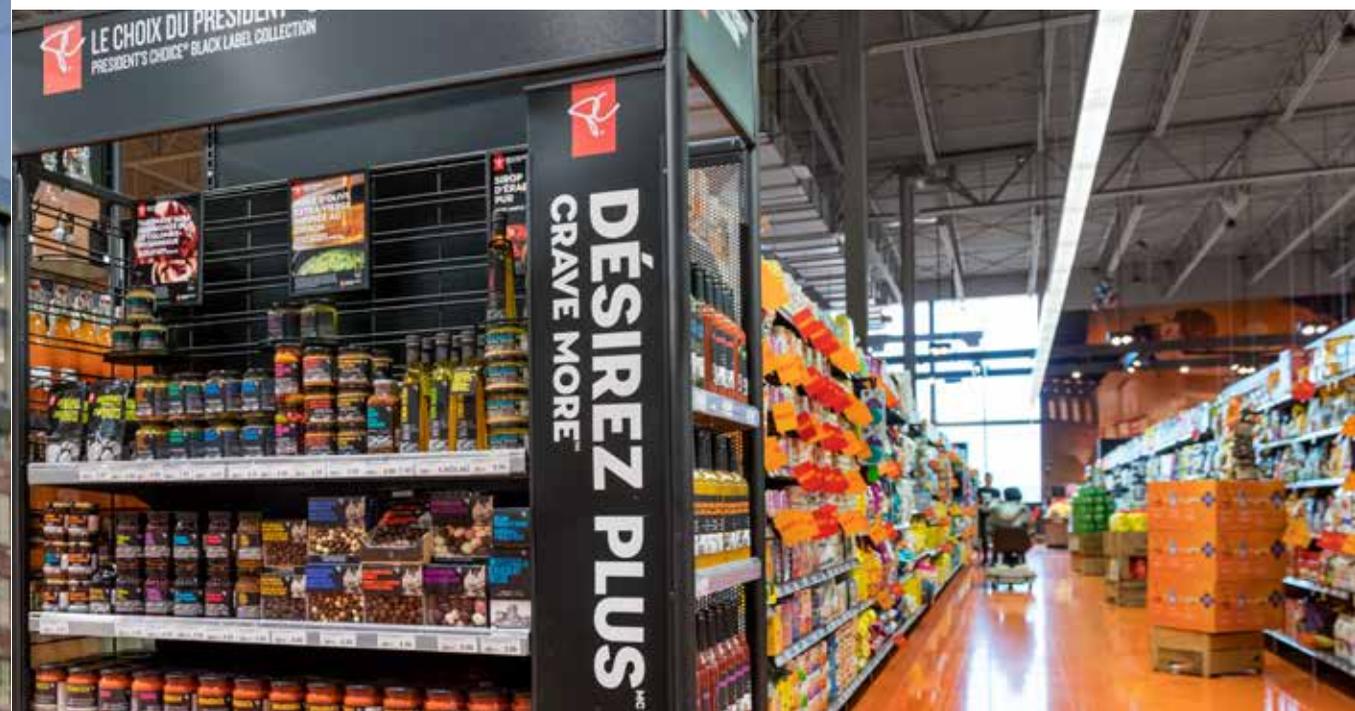
ANTI BRIBERY, CORRUPTION AND MONEY LAUNDERING

To protect our brand and reputation we have zero tolerance for any form of bribery, corruption or money laundering.

Bribes include giving or receiving gifts, travel, hospitality, offering employment to relatives of third parties and certain types of monetary payments, in order to obtain a favourable outcome for you personally or for the Company.

Corruption is the wrongful use of power by an individual for private benefit. Corruption includes unethical behaviour ranging from accepting bribes in exchange for preferential treatment, conflicts of interest and anti-competitive behavior.

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



ETHICS



MAKING ETHICAL DECISIONS

“ Would you be willing to be held accountable for your actions? ”

MAKING ETHICAL DECISIONS

At times, we face situations where the right thing to do is not obvious. The Code can help you make good decisions that are both compliant and ethical. Ask yourself the following questions to determine if the decision is both ethical and compliant.

1. Is it legal and consistent with the Company's CORE values, Code of Conduct and Policies?
2. Is it in the best interest of our colleagues, community and the Company?
3. Would you feel comfortable if it was reported in the news or to someone you respect, and would you be willing to be held accountable for your actions?

YES

If you answered yes to all the questions, then the decision is probably okay.

NO

If you answered no to any question, stop. Don't do it and seek guidance. There is potential for serious consequences.

NOT SURE

If you answered not sure to any question, seek guidance.



CONSEQUENCES



CONSEQUENCES FOR CODE VIOLATIONS

“ The Company is committed to honesty and integrity in all that we do. ”

The Company is committed to honesty and integrity in all that we do. This commitment is part of what makes us a trusted company and a great place to work.

In keeping with this commitment, all employees must review, understand and comply with this Code, as well as the Company's policies and procedures, including the [Company's Anti-Fraud Policy](#), [Compliance with Laws Policy](#), [Competition Law Policy](#), [Securities Trading Policy](#) and [Social Media Policy](#). A violation of the Company's policies or procedures is considered a violation of this Code. Behaviour that is contrary to our Code reflects poorly on the individual and, importantly, on our businesses and the rest of our employees. The Company cannot – and will not – tolerate violations of the Code.

Employees who violate the Code will be subject to disciplinary measures, which may include dismissal and/or other legal actions.

The Company has an Incident Management Program to ensure that breaches of the Code and other disciplinary matters are appropriately tracked, investigated and remediated, and to ensure that root cause analysis is performed to prevent future incidents.

SpeakUP!

If you suspect a violation of the Code, it is your responsibility to report it immediately to:

- your Manager;
- Human Resources;
- Compliance (Compliance@Weston.ca) or
- the Integrity Action Line (1-800-594-1495).
- www.gwlintegrity.com

The Integrity Action Line is an externally managed reporting service available for you to relay concerns or issues to the Company. By reporting through the Integrity Action Line, you may choose to remain anonymous.

The Company treats all reports seriously and with appropriate confidentiality. When appropriate, the Company will consult with and report to external authorities.

NO REPRISAL

The Company prohibits employees from retaliating against anyone who speaks up in good faith with a concern against another employee. Any employee who retaliates against another employee who has made a report is subject to discipline up to and including termination of employment.

INTERPRETATION

Responsibility for the interpretation of the Code and granting exceptions to its application rests jointly with the Chairman & Chief Executive Officer and the Executive Vice President & Chief Legal Officer of George Weston Limited. The Code will be reviewed annually.