

Our Position on Human Rights

At Loblaw, our purpose is to help Canadians *Live Life Well*. We recognize our responsibility to respect and protect the human rights of all people who support and intersect with our business, and we do not tolerate abuse, discrimination or harassment in any form. Through our formal policies, codes of conduct for our colleagues and suppliers, comprehensive compliance standards and a robust governance framework, we strive to uphold the rights of our customers, colleagues and employees, as well as the many workers across our supply chain. Our commitment to protecting human rights is founded on our strong belief in doing what is right, and we pledge to create a safe and inclusive experience across our value chain for the many customers who choose our products and services.

Scope

Our commitment to Human Rights applies to our customers and the nearly 200,000 Canadians who work in our network of stores, offices and facilities nationwide. It also applies to our business partners and suppliers, including full time, part time, migrant and temporary workers employed within our wider supply chain. We expect our business partners and suppliers (as well as their contractors, agents, sub-contractors, sub-agents and labour agencies) to uphold these same principles within their operations and adhere to applicable human rights and employment standards laws.

Our policies and practices are informed by the following international and industry-leading standards:

- The United Nations' [Guiding Principles on Business and Human Rights](#) and [Universal Declaration of Human Rights](#)
- [International Labour Organization Conventions](#)
- The Consumer Goods Forum's [Forced Labour Priority Industry Principles](#)
- Local human rights laws

Governance

We have built a governance structure to ensure our programs, policies and practices are operationalized and effective. Oversight is provided at the senior executive level and includes a centralized Compliance and Ethics Department that oversees our regulatory compliance and ethics programs, as well as our Corporate Social Responsibility (CSR) and Supply Chain Compliance departments. Board-level oversight is provided by the Risk and Compliance Committee of our Board of Directors, whose mandate includes oversight of Loblaw's enterprise risk management process, regulatory compliance and ethics program, CSR activities, corporate policies and practices.

Codes of Conduct

Our Colleague Code of Conduct (the "Code") reflects our CORE values of Care, Ownership, Respect and Excellence, and reinforces our commitment to integrity, professionalism and accountability. It also highlights the importance of embracing diversity and inclusion in our workplaces and providing safe, respectful and inclusive environments for our

colleagues. The Code is managed through our Compliance and Ethics Department and is reviewed annually and updated as necessary. Additionally, we require our employees to complete an annual Code of Conduct training module, as well as a series of diversity and inclusion training modules.

Our Supplier Code of Conduct (the “Supplier Code”) applies to both domestic and foreign producers and manufacturers that supply goods and services (whether for resale in our stores or not for resale), agents, brokers and other third-parties (collectively, “Suppliers”) who conduct business with Loblaw Inc., its affiliates, subsidiaries and operating divisions, and/or customers. Suppliers must share the Supplier Code with their contractors, agents, sub-contractors and sub-agents, including any labour agencies, who are engaged to assist with providing goods or performing services for Loblaw. The Supplier Code focuses on worker rights and protections, with a particular emphasis on the importance of protecting the human rights and safe working conditions of workers in our supply chain. This includes policies prohibiting child, forced and trafficked labour, as well as any discrimination, intimidation, abuse, harassment or violence against these workers. Furthermore, our Supplier Code requires compliance with laws respecting workers’ freedom of association and right to collectively bargain their terms and conditions of employment, which include compensation and working hours. We also recognize that our suppliers are responsible for addressing human rights issues within their operations and are committed to supporting them in these efforts. Our Supplier Code is managed through our Compliance and Ethics Department and is reviewed annually and updated as necessary.

Enforcement

We assess risks across our global supply chain, and we determine priorities based on areas of highest risk. We actively monitor factories manufacturing our control brand products overseas through various means, including site audits and interviews with workers. Supplier Code violations are reported to our Supply Chain Compliance and our Enterprise Compliance and Ethics teams. We evaluate the severity of violations to determine appropriate corrective action plans to address the non-compliance. Serious or repeated violations by a supplier may result in factories and/or suppliers being delisted.

Integrity Action Line

In 2019, our Compliance and Ethics Department worked with third-party experts to enhance and relaunch our [Integrity Action Line \(IAL\)](#), proactively marketing it to colleagues and employees within our network with one simple message: “Speak Up”. This program encourages the reporting of suspicious activity and unethical practices, as well as non-compliance and suspected non-compliance with laws, regulations, our Colleague or Supplier Code of Conduct, and company policies and procedures. Starting in 2020, this program will also be extended to suppliers in a phased approach and accessible through [Loblaw.ca](#). The IAL [1-800-525-7868] is available in English, French, Mandarin, Cantonese, Punjabi, Spanish and Korean.

Collaboration with industry

We have both an opportunity and a responsibility to make a difference throughout our operations and supply chain. Improving mechanisms to support the protection of human rights more broadly, will require collaboration among businesses, civil society and governments. By working together, we can effect widespread positive change by ensuring human rights are respected and by eradicating the exploitation of vulnerable people globally.



Galen G. Weston

Executive Chairman, Loblaw Companies Limited