

# Parkland Supplier Code of Conduct

## Introduction

Everything we do at Parkland is measured against the highest possible standards of ethical business conduct. This Supplier Code of Conduct reinforces the values that guide everything we do at Parkland and is an extension of our own internal standards of conduct. Our core values are Safety, Integrity, Community, and Respect. All Parkland personnel must act in accordance with these values at all times, and we expect our suppliers, including, without limitation, suppliers of goods and services, agents, contractors, consultants, and employees of any organizations in those categories (collectively, “Suppliers”) to respect and support these values. This Supplier Code of Conduct (the “Code”) sets out principles and requirements to guide the business decisions, behaviours and actions of all Suppliers when interacting with Parkland.

Please read the Code and follow both its spirit and letter.

We recognize that many of our Suppliers’ organizations have their own values and codes of conduct. Everyone who works with Parkland should live and work by their own values, but, in the course of doing business with us, we expect you to respect Parkland’s as well. If there is ever a conflict between your own values and Parkland’s, please speak with your Parkland representative for assistance in resolving the conflict.

## Scope

Unless otherwise specified in writing, Parkland’s Supplier Code of Conduct applies to all Suppliers.

## Amendments to Code

Parkland may update or amend this Code from time to time at its sole discretion. Suppliers are expected to comply with the latest version of the Code, which is published on Parkland’s website at [https://www.parkland.ca/download\\_file/view/526](https://www.parkland.ca/download_file/view/526). Continuing to conduct business with Parkland, including the supply of goods or services, constitutes the Supplier’s agreement to comply with the most current version of the Code.

## Working with Parkland

Parkland is dedicated to providing a healthy, physically and psychologically safe, harassment- and violence-free and inclusive workplace for everyone regardless of gender identity and expression, sexual orientation, disability status, family status, physical appearance, Indigenous status, ethnicity, nationality, race, age, religion, or other protected category. Parkland does not tolerate harassment, violence, coercion, intimidation, discrimination, or other types of abusive behaviour in any form. This applies both to the Supplier and to Parkland itself.

Parkland strives to ensure that mutually respectful relationships are maintained between everyone involved with Parkland’s activities. The Supplier is entitled to be treated respectfully at all times when working with Parkland. If a Supplier representative feels that they have been subjected to harassment or violence, they should inform their Parkland representative. If they are not comfortable doing so, they may inform [supplier.help@parkland.ca](mailto:supplier.help@parkland.ca). If they prefer to remain anonymous, they should use Parkland’s whistleblower hotline (described at the end of this Code).

Similarly, the Supplier's personnel are expected to behave respectfully toward Parkland's personnel at all times. We will not tolerate harassment toward our employees, customers, or other Suppliers, and reserve the right to terminate any business with the Supplier in case of a breach of this policy.

### **Health, Safety, and Environment (HSE)**

Safety is Parkland's most important value. We also prioritize environmental stewardship and seek to minimize our environmental impact. No Supplier should engage in any activity on behalf of Parkland or while at a Parkland location without adhering to all applicable HSE policies and practices and external HSE regulatory requirements. Parkland maintains a comprehensive HSE Management System to safeguard our personnel, contractors, visitors, the general public, and our property.

Parkland requires all Suppliers to conduct a hazard assessment to ensure HSE hazards and risks are identified and mitigated prior to engaging in any work activity at a Parkland facility, if conducting activities at a third party facility in conjunction with their contract with Parkland, or when engaged in potentially hazardous activities with Parkland personnel.

All safety incidents and near misses, including hazards, associated with Parkland's business or that occur at a Parkland location must be immediately reported to the Supplier's Parkland representative or as otherwise directed by Parkland.

Parkland expects that Suppliers provide their own employees with a healthy, safe, and secure workplace that encourages safe work practices to help protect the environment, enhance environmental awareness, and mitigate environmental impact, in compliance with all laws and regulations applicable to its operations.

### **Ethical Behaviours**

All Suppliers are expected to follow ethical business practices both in their dealings with Parkland in accordance with their internal policies in addition to what is outlined in this Code. Specific requirements are below, but this general statement should be considered as applicable at all times.

### **Compliance with Laws, Regulations, Policies, and Standards**

Suppliers must comply at all times with applicable laws, regulations, and policies and standards. Applicable standards may be Parkland's or the Supplier's, may arise from professional organizations that apply to the Supplier's or Parkland's business areas, or may come from governmental or quasi-governmental organizations. Applicable Parkland policies may be included in agreements between Parkland and the Supplier. They may also be communicated to the Supplier from time to time, or may be posted on Parkland's website at <http://parkland.ca>.

### **Corruption and Fraud**

Integrity is a core value of Parkland's. Corrupt and fraudulent behaviours are never acceptable on Parkland's behalf. Some specific issues such as bribery and engaging in anti-competitive behaviours are discussed below, but other corrupt behaviours, such as dealing with third parties in bad faith, knowingly misleading third parties to gain a business advantage, and other similar behaviour are not acceptable.

### **Bribery, Improper Payments, and Gifts and Entertainment**

Bribes or other improper payments or benefits are never to be offered, given, or accepted in connection with Parkland business. This means that the Supplier must never offer or give a bribe to a Parkland

representative. If the Supplier is asked for a bribe or is told that a bribe must be paid in order to win business or to continue to do business with Parkland, the Supplier should immediately notify their Parkland representative, email [supplier.help@parkland.ca](mailto:supplier.help@parkland.ca), or, to report anonymously, use Parkland's whistleblower hotline.

No Supplier may ever pay a bribe to a third party on behalf of Parkland. Do not pay or offer to pay bribes to government officials, state-owned entities, or private organizations or individuals. Publicly communicated fees to expedite lawful behaviours of a third party, may be acceptable and in all cases, approved by Parkland in advance; however, funds or other items of value given privately to individuals or "facilitation payments" that are not available to the general public are not acceptable. If the Supplier believes that a bribe or other improper payment or benefit is expected or requested by a third party, the Supplier should immediately notify their Parkland representative.

No Supplier may ever accept a bribe or improper payment or benefit from a Parkland representative. If the Supplier is offered or given a bribe or improper payment or benefit, they should immediately notify their Parkland contact, email [supplier.help@parkland.ca](mailto:supplier.help@parkland.ca), or, to report anonymously, use Parkland's whistleblower hotline.

Although small gifts and entertainments may be offered, given, or accepted, they should never be offered, given, or accepted if the intent is to improperly influence the behaviour of the Supplier, Parkland, or a third party. If the Supplier is uncertain whether to give or accept a gift or entertainment, they should both (1) adhere to their own policies with respect to such issues and (2) discuss the matter with their primary Parkland representative.

### **Anti-Competitive Behaviour**

Suppliers should never engage or appear to engage in anti-competitive behaviours in relation to Parkland's business or on behalf of Parkland. The Canada Competition Act, US anti-trust laws, and other similar legislation apply to Parkland's business and must be adhered to by the Supplier in its dealings with Parkland and in all other respects.

Suppliers should not discuss pricing or other competitive matters for an improper purpose. Suppliers should never provide information to Parkland with respect to Parkland's competitors unless that information is publicly available or is not considered confidential by the competitor.

It is also impermissible to restrict supply of a product, to divide or allocate markets, or to engage in bid-rigging and the Supplier must never engage in such activities on behalf of or in association with Parkland, nor discuss such activities or agree to conduct them on behalf of or in association with Parkland.

If a Parkland representative requests improper information, engages in an improper discussion, or instructs the Supplier to engage in anti-competitive behaviour, the Supplier should refuse to continue the discussion or to engage in the behaviour and should immediately notify their Parkland contact, email [supplier.help@parkland.ca](mailto:supplier.help@parkland.ca), or, to report anonymously, use Parkland's whistleblower hotline.

### **Insider Trading**

Parkland is a publicly-traded corporation subject to the rules and regulations of various securities commissions and exchanges. It is impermissible to trade in Parkland securities on the basis of non-public information. Doing so is insider trading, which is subject to serious criminal and civil penalties. In

the course of their business with Parkland, Suppliers may learn information that is not available to the public, and they must never trade on the basis of such information nor facilitate or permit others to do so.

### **Conflicts of Interest**

Conflicts of interest can arise when the Supplier or key individuals associated with a Supplier have relationships, such as familial or financial relationships, with Parkland or with individuals associated with Parkland; or more generally, when there are any relationships that may compromise the Supplier's judgment or give the Supplier an unfair advantage in dealings with Parkland. Suppliers must avoid both the appearance and the reality of a conflict of interest. This means, for example, that awarding or accepting business on the basis of undisclosed personal relationships is not acceptable; and appearing to do so is also unacceptable.

If a potential conflict of interest exists or arises, this does not necessarily preclude a business relationship with Parkland, as long as it is dealt with correctly. The Supplier should notify their Parkland business and procurement representatives promptly. Parkland's acknowledgement and acceptance of such conflict must be documented in writing.

### **Human Rights and Labour Practices**

Parkland's commitment to respect human rights is guided by the rights enshrined in the United Nations (UN) Universal Declaration of Human Rights and is informed by other international standards such as the UN Guiding Principles on Business and Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Our Suppliers must make themselves familiar with and comply with these principles, with the laws of the jurisdictions in which they operate, Parkland's Human Rights Policy, and, at a minimum, the Supplier shall:

1. adhere to applicable laws regarding fair employment (i.e. safe working conditions, working hours, minimum wages, annual holidays, etc);
2. follow the ILO's definition of the minimum age for admission to employment or work, in accordance with applicable national and/or state laws and regulations;
3. not support any compulsory, forced, bonded, child labour, or other exploitative practices;
4. provide equal opportunity and treatment in employment, without regard to race, colour, religion, sex, political opinion, national extraction, social origin, or any other similar distinction which is not based on the inherent requirements of the work;
5. not tolerate any type of harassment of its employees whether direct or indirect, physical, or verbal.

### **Information and Intellectual Property**

#### **Confidential Information**

During the course of their interactions with Parkland, Suppliers may receive or have access to Parkland's confidential information. Unless otherwise stated in writing by Parkland, information that a Supplier has access to in course of their work for Parkland is only for the purpose of the services they provide to Parkland and cannot be used for any other purpose. All non-public information about Parkland must be kept confidential and must be protected by the Supplier with at least the same level of security as they use to protect their own sensitive data.

## **Communications and Social Media**

Never publicly disclose information about Parkland or speak on behalf of Parkland without Parkland's express consent. This means a Supplier should never allow the Supplier or any of its representatives to be perceived as a representative of Parkland. Never use Parkland's name in an announcement, press release, or other public communication without Parkland's written consent.

Take special care if posting on social media, because the internet's breadth and instantaneous nature mean that a post can very quickly spread beyond its intended audience and can easily be interpreted with an unintended meaning. Never disclose information about Parkland's operations, facilities, personnel, or business on social media; never post pictures of Parkland's equipment, offices, personnel, or facilities without Parkland's written permission; and, as with all public communications, never state, imply, or allow the perception that the Supplier is speaking on behalf of Parkland on social media.

## **Information Technology**

Suppliers who have access to Parkland's IT systems, including through Parkland equipment, Parkland networks, Parkland email systems, or in any other manner, must follow Parkland's information security policies as they are communicated to the Supplier from time to time. This includes, without limitation, not sharing passwords, incorporating good security practices, and notifying Parkland immediately upon becoming aware of, or suspecting, a data breach, improper access to Parkland's systems or data, attempted breaches or improper access.

## **Intellectual Property**

Suppliers may not use Parkland's name, trade-marks, logos, designs, or other intellectual property without written permission to do so.

Suppliers must avoid breaching the intellectual property rights of third parties in the course of conducting business with Parkland. This includes, without limitation, not using the intellectual property of any third-party without the rights to do so.

Unless otherwise specified in an agreement with Parkland, intellectual property rights associated with work conducted by a Supplier on behalf of Parkland or while conducting business with Parkland are owned by Parkland.

## **Sustainability and Environmental Stewardship**

At Parkland, sustainability means providing our customers with safe, reliable energy and products they need today, while making strategic decisions and innovative investments that contribute to a lower carbon future. We are committed to providing our shareholders, customers, team members and the communities in which we operate continued prosperity by operating safely and efficiently and protecting our shared environment. Our commitment to sustainability is underpinned by our values: Safety, Integrity, Community and Respect.

Parkland recognizes the importance of understanding environmental, social and governance impacts within its supply chain. As such, we expect our Suppliers to support the goals and initiatives within our enterprise-wide Sustainability Strategy, as outlined in our annual sustainability report.

Our Sustainability Strategy is grounded in five priority areas:

- Promote healthy and safe operations
- Support customers through the energy transition
- Reduce our operational climate impact
- Build a diverse team and inclusive workplace
- Invest in our communities

### **Audit Right**

Subject to any other agreement to the contrary, Parkland may, no more than once per year and upon providing at least 30 days' written notice, audit the Supplier's compliance with this policy. Any such audit shall be at Parkland's cost. Suppliers shall provide reasonable assistance as requested by Parkland to facilitate such audits.

### **Whistleblower Hotline**

Parkland has established a Whistleblower Hotline that can be used to report issues of concern. It is available to Suppliers who wish to report about topics such as:

- Requests for improper payments
- Conflicts of interest
- Unethical behaviour
- Harassment or workplace violence
- Anti-competitive practices
- Insider trading
- Other matters of concern

Parkland strictly prohibits retaliatory action in any form against any Supplier who, in good faith, reports a possible violation. Parkland commits that:

- Harassment or victimization of the complainant will not be tolerated; and
- All reasonable efforts will be made to protect the complainant's identity.

You can contact the Hotline using the contact information below. Callers to the Hotline will have the ability to remain anonymous if they choose. However, callers choosing to remain anonymous cannot receive a follow-up report.

a) Through the telephone hotline: 855-484-CARE (2273)

b) Mailing address alternative for written documents:

Grant Thornton LLP  
 19th Floor, Royal Bank Plaza South Tower  
 200 Bay Street Box 55  
 Toronto, ON M5J 2P9

c) Secure 24/7 website: [www.GrantThorntonCARE.ca](http://www.GrantThorntonCARE.ca)

d) Email [usecare@ca.gt.com](mailto:usecare@ca.gt.com)

The full Whistleblower Policy is available on Parkland's website at:

[https://www.parkland.ca/download\\_file/view/436/183](https://www.parkland.ca/download_file/view/436/183)