DANIEL et DANIEL

5

Supplier Ethics Policy



Daniel et Daniel Catering Inc. Supplier Ethics Policy

Daniel et Daniel Catering Inc. and its affiliated entities including but not limited to Caterhelp Inc are committed to the highest standards of product quality and business integrity in their dealings with customers and suppliers. As a result, all suppliers and the Daniel et Daniel employees who work with them are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to Daniel et Daniel that suppliers and employees alike maintain high ethical standards, adhere to all applicable laws, and avoid even the perception of impropriety or conflict of interest.

We are Ethical

This policy applies to all Daniel et Daniel suppliers. "Supplier" here means any business, company, corporation, person or other entity that sells, or seeks to sell, any kind of goods or services to Daniel et Daniel, including the supplier's employees, agents and other representatives. Questions concerning this policy may be directed to the Daniel et Daniel Ethics Committee at <u>ethics@danieletdaniel.com</u>.

We Acknowledge and Abide by this Policy

As a Daniel et Daniel Supplier, we are expected to acknowledge this policy and to apply it in all dealings with, and on behalf of, Daniel et Daniel. We understand that our failure to sign and return the Ethics Certification Form (a part of Daniel et Daniel's Supplier Qualification package) may result in our disqualification from consideration for business, and/or future business, with Daniel et Daniel. We will be fully responsible for ensuring that any subcontractors, agents or other third parties that we employ in our work for Daniel et Daniel, as permitted by our agreement with Daniel et Daniel, will act consistently with this policy.

We Follow the Law

As a Daniel et Daniel Supplier, we will comply with all laws, regulations and policies applicable to us and our dealings with Daniel et Daniel, including all applicable government contractual requirements, which flow down to us through our contracts with Daniel et Daniel.

We Understand Daniel et Daniel's Gifts and Entertainment Policies

Prohibited

As a Daniel et Daniel Supplier, we will not offer, promise or provide to any Daniel et Daniel employee a kickback, favor, cash, gratuity, entertainment or anything of value to obtain favorable treatment from Daniel et Daniel. Daniel et Daniel employees are similarly prohibited from soliciting such favors from us. This restriction extends to any family members of both our and Daniel et Daniel employees, or with any other persons with whom we have or Daniel et Daniel employees have significant personal relationships in exchange for obtaining or retaining Daniel et Daniel business.

Acceptable

As long as a gift is not intended to obtain favorable treatment from us, and does not create the appearance of a bribe, kickback, payoff or irregular type of payment, or otherwise raise any potential conflicts of interest, Daniel et Daniel employees may accept a gift from a Supplier as long as all the following requirements exist:

• The total value of a tangible gift or gifts is of nominal value (\$100 or less per year) or \$200 or less, per year, for intangible gifts/entertainment (such as event tickets, etc.);

- Public disclosure would not embarrass Daniel et Daniel;
- The gift is reasonable and appropriate consistent with Daniel et Daniel's business practices, and;
- Acceptance of the gift does not violate any applicable laws.

• The Daniel et Daniel Ethics Office and Operations Manager must approve acceptance of any gift that does not fit within these criteria.

Personal Gain

As a Daniel et Daniel supplier we understand that no Daniel et Daniel employee should benefit personally from the company's relationship with us (in the form of monetary, or any other commissions). As such, if an employee of Daniel et Daniel retains services from us, we will bill the employee directly, or bill Daniel et Daniel so that Daniel et Daniel may bill the employee. Daniel et Daniel reserves the right to extend the discount offered by us to the employee at their own discretion. Under no circumstance will we provide Daniel et Daniel et Daniel for their products or services in exchange for their business. Any benefit we choose to provide Daniel et Daniel for their business relationship will be given to Senior Management and must be approved by the Ethics Committee at ethics@danieletdaniel.ca

We Avoid Conflicts of Interest

As a Daniel et Daniel Supplier, we will not enter into a financial or any other relationship with a Daniel et Daniel employee that creates any actual, potential or perceived conflict of interest for Daniel et Daniel. We understand that a conflict of interest arises when the personal interests of the Daniel et Daniel employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed and corrected. Even the appearance of a conflict of interest can be damaging to Daniel et Daniel and to us, as the Supplier, and must be disclosed and approved in advance by Daniel et Daniel's Operations Manager and the Daniel et Daniel Ethics Committee. To disclose any conflict of interest, contact the Ethics Office at ethics@danieletdaniel.ca.

We Avoid Unfair Business Practices

As a Daniel et Daniel Supplier, we will not fix prices or rig bids with our competitors. We will not allocate customers or markets with our competitors, or exchange current, recent, or future pricing information with our competitors. We will otherwise comply with all applicable antitrust and competition laws.

We are a Socially and Environmentally Responsible Supply Chain Partner

As a supply chain Supplier or Partner, we acknowledge and commit to comply with WSIB, WHMIS, ESA, AODA and all other Federal and Provincial regulations relating to employee rights. We promise to ensure worker safety and fairness, environmental responsibility and business efficiency. We also have a code of conduct outlining our organizations rules and proper business practices for every employee.

We Provide Quality

As a Daniel et Daniel Supplier, we will supply product and services that conform in all respects with the requirement of our contracts with Daniel et Daniel including, in particular, all applicable quality requirements.

We Speak Up About Ethical Concerns

As a Daniel et Daniel Supplier, we will promptly notify the Daniel Ethics Office regarding any known or suspected improper behavior by us relating to our dealings with Daniel et Daniel, or any known or suspected improper behavior by Daniel et Daniel employees or agents.

By Telephone: 416 968 9275 ext. 25

By Email: ethics@danieletdaniel.ca - Use this email address to report any concerns or potential violations, or for general inquiries to the Ethics Office, Inquiries can include questions about the Supplier Ethics Policy or the Daniel et Daniel Code of Conduct.

Anonymously: If you prefer to remain anonymous, you can mail a letter to the Operations Manager at:

Guillaume Clairet 248 Carlton Street, Toronto, Ontario M5A 2L1

Representation on Authority of Parties/Signatories.

Each person signing this policy represents and warrants that he or she is duly authorized and has capacity to execute and enforce this policy within their organization. Each party represents and warrants to the other that they will adhere to the policy.

As an authorized representative of ______(supplier company), the company agrees to abide by and uphold Daniel et Daniel's Supplier Ethics Policy and to report any suspicion of unethical behavior to Daniel et Daniel.

(Name)

(Signature)

(DD/MM/YYYY)