

CODE
OF ETHICS AND
CONDUCT FOR
EMPLOYEES



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**THE CODE OF ETHICS
AND CONDUCT,
A CLEAR GUIDE
FOR EVERYONE**

SCOPE OF THE CODE OF ETHICS AND CONDUCT ●

This Code applies to all employees of the SAQ, including the chief executive officer, the vice-presidents, all other management staff and all unionized and non-unionized employees. Regardless of the particular job we each perform, we are all employees of the SAQ and are therefore expected to act in accordance with the Code.

The Code neither replaces nor amends our collective agreements or any statutory, regulatory or conduct-related provisions that may apply to employees. As it sets out the minimum conduct requirements, internal policies and directives may be stricter than the Code.

The Code has no borders: as employees and thus as representatives of the SAQ, we must abide by its principles both here and abroad.

The Code of Ethics and Conduct for Employees is available on the intranet (under the “Services aux employés / Éthique” heading), at the office of the Secretary General and on the saq.com website.

We belong to a government corporation with a commercial mandate. Besides striving to adopt the best business practices in order to serve our customers, we must also assume our social responsibility of parapublic administration and maintain the trust that has been placed in us. Accordingly, we must maintain high standards of conduct in our relations with our colleagues, customers and business partners. Demonstrating exemplary probity must be part of our daily work, irrespective of our position and in all our actions and decisions. The purpose of this Code is, first and foremost, to foster proper behaviour in the performance of our work and to indicate the path to take in order to remain upstanding and true to our values.

Of course, it is impossible to codify every situation. The Code should therefore be seen as a tool for reflection that will guide our actions and help us make the best possible decision in every circumstance. When we find ourselves in difficult situations, it is important to consider the consequences, to ask the right questions and to seek the necessary advice before taking action. In short, ethics must be everybody's business, regardless of his or her role in the company.

By complying with the Code of Ethics and Conduct, we will maintain the trust that the public places in us and further the mission we have been given. In so doing, we will preserve our integrity and that of the company. Ultimately, it is our brand image that we are preserving. It is therefore the responsibility of each of us to familiarize ourselves with these rules and to take them into account in all our actions.

The Management Team



The SAQ is...

a government corporation with a mandate to sell beverage alcohol. The SAQ carries out this mandate with the cooperation of its some 7,500 employees and through a network of more than 800 stores and agency stores. The SAQ sells more than 11,000 products from 65 countries.

OUR VALUES ● The SAQ has defined a set of values to guide us in managing the company’s affairs. Whatever the situation, these values describe the state of mind we aim to achieve when making each of our decisions. The values inspire our corporate culture and guide our behaviour at work.

PASSION

Passion is what drives us to excel in order to constantly offer more to our customers. It is the enthusiasm our employees share about the world of wine and spirits, the services they provide to customers and the efficient work we do every day, regardless of what it involves. Passion is also apparent in the dynamism and entrepreneurial spirit that permeate all our business practices. It is what makes us proud to be part of the SAQ team.

COURAGE

Courage is the foundation of our success. Courage is the source of our commitment to reinventing ourselves, to showing initiative, to thinking outside the box so we can deliver the best possible experience to our customers. Courage is also the strength to take risks and go beyond what is obvious, what is known. It means giving ourselves the tools and manoeuvring room necessary to improve how we do things. Courage should inspire all employees so that each feels justified in acting as an initiator or an ambassador of change.

RESPONSIBILITY

Responsibility means fully assuming our professional role, mainly by ensuring the sound management of public funds, supporting the sustainable development objectives and applying the sales ethic. Responsibility commits all employees to fully assuming the consequences of their actions and decisions and to contributing to the excellence of the customer experience. Responsibility requires that information be shared and a climate of trust be present in the company.



WORKING AT THE SAQ ● The SAQ expects us to act professionally, respectfully, loyally and honestly. In return, it aims to provide us with a healthy and safe working environment that allows us to do our best. These legitimate and reciprocal expectations are the foundation on which the mutual trust essential to fulfilling our mission is built.

ACT ● PROFESSIONALLY

To act professionally means performing our duties carefully, efficiently and to the best of our ability. We must treat our customers, colleagues and the people with whom the SAQ has a business relationship with respect and courtesy. This implies, among other things:

- dedicating ourselves to in-store customer service and not discussing internal affairs among ourselves or texting while on the sales floor;
- not sharing confidential information about a customer;
- dressing appropriately for work – wearing one's uniform, for example – and maintaining a well-groomed appearance.

ACT ● CIVILLY

When it comes to maintaining good relationships and ensuring collective well-being, civility is key. Politeness, courtesy and good manners as well as collaboration are the foundation on which a healthy, positive and respectful work climate is built.

ACTING CIVILLY MEANS, AMONG OTHER THINGS:

- being polite in our interactions with each other and with customers;
- addressing customers and partners respectfully (for example, using *vous* when appropriate when speaking to them in French, especially when first getting to know them);
- debating ideas and not disparaging the persons who hold them;
- not using your smartphone when you are attending a meeting.

EXAMPLES OF UNCIVIL BEHAVIOUR:

- Deliberately ignoring a colleague;
- Making unkind remarks;
- Spreading rumours about a business partner;
- Being indiscreet about our customers;
- Being negative about the company in front of customers;
- Inventing nicknames.

These types of behaviour are not acceptable.

ACT ● LOYALLY

We must perform our work in a manner consistent with the company's expectations regarding its mission and refrain from any action that could jeopardize its legitimate interests.

ACTING LOYALLY MEANS, AMONG OTHER THINGS:

- in a situation where a customer criticizes our store or company:
 - staying calm;
 - encouraging the customer to address his criticisms to our manager and, if appropriate, to Customer Service;
 - keeping our personal opinions to ourselves;
 - and focusing our efforts on serving the customer.

By acting in this way, we demonstrate loyalty. Regardless of our opinion of the comments being made, our professional attitude ensures customers receive courteous service in keeping with the SAQ's brand image. The same is true for social media; we should not comment on debates or share them with others.

IT ALSO MEANS:

- not taking advantage of our position to promote a partisan position;
- rather than voicing our dissatisfaction to the media or on the Web (on blogs, for example), making constructive comments inside the company so we can improve our practices.

In this way, we will all help maintain the reputation of the SAQ and its personnel.

Moreover, our obligation of loyalty lasts for a reasonable period of time after we stop working for the company and forever when the reputations and private lives of others are concerned. What is considered a reasonable period will vary depending on an employee's position and level of responsibility at the SAQ.



Tips, etc.

There is no reason to feel uncomfortable about refusing a gift, tip or other benefit. Even if the customer insists, you must decline. Why? Because providing excellent customer service is an integral part of our work.



WORKING AT THE SAQ ● (cont.)

ACT ● HONESTLY

Honesty is a quality that is revealed in each of our everyday actions.

ACTING HONESTLY MEANS, AMONG OTHER THINGS:

- strictly devoting our time to performing our duties;
- always submitting genuine claims (sick leave, travel, work accidents);
- using SAQ property for work purposes only and in accordance with the written directives;
- not selling beverage alcohol for our own profit;
- not reselling tickets to SAQ-sponsored events that were received as a recognition;
- returning to the SAQ any document, such as a customer list, that we have in our possession when we stop working for the company, since such documents belong to the SAQ.

CAN WE USE THE COMPANY'S TELEPHONE, EMAIL, INTERNET AND OTHER SYSTEMS TO CONDUCT PERSONAL BUSINESS (MAKE APPOINTMENTS, DO BANKING, ETC.)?

- **YES**, provided we do so on a reasonable and occasional basis and provided it never interferes with our work in any way. Remember that even reasonable use can result in additional costs to the company and that these tools are intended, above all, to be used for work purposes. Whether the equipment belongs to the SAQ or is our own, the basic principle remains the same: our work time must be devoted exclusively to carrying out our duties.
- **NO**, never in the store, even on the rare occasions when there are no customers. We have breaks for doing that.
- **NO**, when doing so could endanger our safety or that of others (for example, speaking on your cellphone or texting while driving a truck or walking in a warehouse).
- **NO**, if we are using them to operate a private business, such as managing an income property.

ACT TO PROMOTE HEALTH AND SAFETY

Required to provide a healthy and safe working environment, the SAQ calls on its employees to actively assist it in doing so. And that means we should always remember that health and work go hand in hand.

The company takes our health and safety into account by:

- implementing and updating prevention and training programs and any other measures needed to reduce the risks of illness and accidents;
- offering an employee assistance program to help employees with personal or professional needs.

Some practices and behaviours, however, are prohibited outright as they could endanger our health and jeopardize our safety and that of our colleagues and customers.

We must also never perform our work under the influence of alcohol, illegal drugs, excessive doses of prescription drugs or other psychotropic substances. Similarly, we must never consume these substances at the workplace.

VIOLENCE AND HARASSMENT

A healthy workplace must be free from all forms of violence and harassment. Harassment takes many forms: it can be subtle or flagrant, it can be a single, serious act or repeated actions. Regardless of the form it takes, it is always unacceptable since it undermines the dignity and integrity of the person who is targeted.

Here are some examples of what can be considered harassment:

- making threats or seeking to intimidate;
- demanding sexual favours in exchange for preferential treatment;
- making offensive or inappropriate remarks about someone's appearance or clothing;
- using denigrating terms in reference to a person's ethnic origins.

Working in retail sales involves regularly interacting with customers and may entail occasional risks. Various prevention techniques exist to help ensure the safety of employees and customers. In cases of verbal or physical assault:

- do not argue uselessly with an arrogant customer;
- withdraw from the situation and enlist the help of a colleague;
- notify the manager and responsible authorities.

REFERENCES

Please consult the following documents on the intranet under the "Services aux employés / Éthique" heading:

- Act C-21;
- Health and safety policy;
- Employee assistance program;
- Article 2088 of the *Civil Code of Québec*, which deals with the obligation of loyalty;
- SAQ communications and media reference guide (directive regarding the use of social media);
- *Act respecting labour standards* (R.S.Q., c. N-1.1);
- Workplace Harassment and Violence Prevention Policy;
- Directive D-13 regarding working alone in stores;
- Quebec *Charter of Human Rights and Freedoms* (R.S.Q., c. C-12, see s. 10.1).

2

TASTING AND CONSUMING ALCOHOL ● For many of us, tasting alcoholic beverages is part of our work because it helps us to advise customers, expand our knowledge, select the best products and so on.

Tasting involves rules recognized in the business and, as professionals, we should comply with them by remaining sober and spitting out the product being tasted.

Moreover, swallowing alcohol when tasting adds nothing to the sensory experience and, in fact, quickly diminishes the objectivity we should always maintain.


During tasting activities, whether in a store, at an authorized tasting event or during a training session organized by the SAQ or a third party, regardless of where the session is held, employees who taste a product must imperatively spit all of it out.

When taking part in SAQ-authorized activities (a recognition dinner or wine show, for example), we may, unless otherwise directed, consume the alcoholic beverages we are offered, provided we remain sober at all times.

REFERENCES

Please consult the following documents on the intranet under the “Services aux employés / Éthique” heading:

- Memo regarding in-store tasting activities;
- Taster’s protocol in effect in our laboratory;
- Directive D6 regarding the consumption of alcohol or drugs in the workplace at the SAQ.

A person in a dark jacket is holding a wine glass with the SAQ logo. The background is a blurred bar with shelves of bottles. A large orange circle is overlaid on the image, containing text.

Remember that...
we should always behave
in a professional manner
representative of the SAQ.

3

THE SALES ETHIC ● The beverage alcohol trade is unlike any other. To ensure we sell alcohol in a responsible manner, we have adopted a sales ethic. Putting it into practice it is an integral part of our work. As SAQ representatives, we are duty bound to comply with and enforce it.

Specifically, we do not sell alcohol to:

- minors or anyone attempting to purchase alcohol for minors;
- anyone in an obvious state of inebriety or attempting to purchase alcohol on behalf of such a person.

REFUSING TO SELL TO MINORS

To reduce the risk of inadvertently selling alcohol to minors, we ask for proof of age from customers whom we suspect of not being of the legal age to purchase it, i.e. 18 years old. By checking the age of customers who appear to be 25 years old or younger, we can broaden our aim.

If we have reasonable grounds to believe that a customer of adult age is purchasing alcohol for a minor, whether or not the minor is his or her child, we refuse to make the sale because it is against the law. This precaution is all the more necessary as the practice is unfortunately far too common.

REFUSING TO SELL TO OBVIOUSLY INEBRIATED PERSONS

To protect such persons and the community as a whole, we refuse to sell alcohol to anyone who is obviously under the influence. Similarly, we refuse to sell alcohol to a third party who wishes to buy it for anyone who is obviously under the influence.

Our sales ethic applies in all situations, including tastings. Although selling beverage alcohol responsibly is part of our duties, doing so must never compromise our safety.

REFERENCES

Please consult the following documents on the intranet under the “Services aux employés / Éthique” heading:

- Store directive 17 regarding the Sales Ethic;
- *Act respecting offences relating to alcoholic beverages* (R.S.Q., c. I-8.1).

4

CONFLICTS OF INTEREST ● Working with integrity and to the best of our ability implies carrying out our functions objectively and impartially. A conflict of interests exists when we find ourselves in a situation where we risk giving priority to our personal interests or those of a third party over those of the SAQ.

THE APPEARANCE OF A CONFLICT OF INTEREST

The appearance of a conflict of interest occurs when a situation leads one to believe such a conflict exists. It is not necessary to have actually given priority to our personal interests or those of a third party or to intend to do so for the appearance of a conflict of interest to exist. We may even find ourselves in a conflict-of-interest situation by accident. That said, if another person can reasonably and objectively conclude that there is a risk of our personal interest taking priority over the SAQ's, even if no real conflict is actually present, then there is an appearance of a conflict of interest, and measures must be promptly taken to rectify the situation.

HERE ARE TWO SITUATIONS THAT ARE NOT PERMITTED:

- Working for the SAQ and, at the same time, being a promotional agent;
- Working for the SAQ and, at the same time, working for one of our suppliers or one of their agents.

Due to the nature of our business, it is unacceptable for us to hold a second job in the same field. That would be a true conflict of interest. Our customers and suppliers must rightly believe that we provide advice on every product objectively and to the best of our knowledge.

TAKING PART IN WINE SHOWS AND OTHER EVENTS

Exceptions

The SAQ acknowledges that, for members of its personnel who wish to increase their knowledge and liaise with their field, it may be acceptable for some to take part, on a volunteer basis or not, in an event (a wine show, for example) organized by an outside group (a foundation, non-profit organization, trade association). For this to be acceptable, we must maintain our impartiality and act with integrity by ensuring that:

- we do not associate systematically with the same agent or supplier (repetitively and regularly);
- the participation remains occasional;
- the activity is held for professional development purposes so that all of the employees concerned can increase their knowledge;
- all of the employees concerned notify their supervisor of their planned participation, who will determine whether it is acceptable.

CONFLICTS OF INTEREST ● (cont.)

In such situations, we must ensure that we are above all suspicion of conflict of interest, favouritism or bias and ask ourselves the following questions:

- Does my associating with this partner (supplier or agent) give the impression that I would recommend its products over another's?
- Am I able to reassure other partners and confirm to them that I remain impartial at all times?
- Will customers who see me at these shows be inclined to believe that I am associated with a particular brand?
- Might my actions lead other partners to question the SAQ's impartiality?

The SAQ offers a broad range of products marketed according to strict rules. It ensures that all its partners are treated fairly by, among other things, using a call-for-tenders process and negotiating agreements in accordance with its Procurement and Merchandising Policy. Agents and suppliers are therefore entitled to expect fair treatment with respect to the selection, merchandising and sale of their products.

AT ALL TIMES...

Employees whose main duties involve the selection or procurement of beverage alcohol products, merchandising or marketing may not take part in wine shows and other such activities as an expert.

OTHER EXAMPLES OF SITUATIONS THAT ARE NOT PERMITTED

- Taking part in business meals with a current or potential supplier:
 - if the meals are recurring;
 - if they occur during a call-for-tenders process in which the supplier is involved;
 - during a period when a contract is being negotiated with the supplier.
- Evaluating a bid submitted by a company that, for example, is our spouse's employer or in which we have an interest other than holding shares traded on the stock market;
- Sitting on a committee responsible for evaluating applications for a job for which our spouse or a close relative has applied.

HOLDING A SECOND JOB OR RUNNING ONE'S OWN BUSINESS

Such occupations are acceptable provided they do not interfere with our jobs and tasks at the SAQ and do not place us in a conflict of interest.

The SAQ considers that a second job that involves “beverage alcohol expertise” – for example, giving courses on products (other than courses through our official distributor), leading tastings, acting as a wine cellar management consultant – is acceptable under certain conditions:

- any organizing, preparation or performance related to the job must be done outside our SAQ work schedule;
- SAQ customers must not be solicited during work or at any SAQ workplace;
- the SAQ brand may not be associated with our occupation. We may not promote ourselves as an “SAQ employee,” although it is permissible to mention but not emphasize it when, say, listing our work experience;
- no SAQ customer lists, teaching tools or materials or uniform (including the SAQ logo and signatures) may be used in performing this job;
- no SAQ materials (customer lists, Internet access, computers, photocopiers, etc.) may be used for this purpose.

Note that the above guidelines are not exhaustive. Moreover, if the solicitation activity is related to our duties or our expertise, we must inform our manager about our second job.

For example, if a wine advisor organizes tastings for profit, he must tell his manager. We must ensure we are above all suspicion of a conflict of interest, favouritism or bias.

- Could the fact that I have a second job give the impression to my colleagues or customers that, in my work at the SAQ, I would recommend certain products over others?
- Am I able to reassure and confirm to all other partners that I will maintain my impartiality at all times?
- Could my actions lead other partners or customers to question the SAQ’s impartiality?

In cases of doubt, we should speak with our manager.

If the second job is in a field other than the beverage alcohol field – for example, a truck driver for a transportation company or an accountant for another business or for a non-profit organization (charity), even if on a volunteer basis – the same considerations apply.

AT ALL TIMES...

We may never solicit promotional agents or suppliers of beverage alcohol or good and services to the SAQ in order to obtain gifts or other benefits.

CONFLICTS OF INTEREST ● (cont.)

SUPERVISING A MEMBER OF ONE'S IMMEDIATE FAMILY

The act of supervising a member of one's immediate family* or a person with whom we are in a relationship can place us in a conflict of interest or lead colleagues, customers and business partners to believe that we are in one. Despite all the objectivity and good will that we hope to demonstrate in such a hierarchical relationship, it will always be seen as privileged and prone to generating perceptions of favouritism, which is never desirable. In such situations, we must notify our manager and the Human Resources Department in writing, who will take the necessary action.

WHAT TO DO IN CASES OF REAL, POTENTIAL OR APPARENT CONFLICT OF INTEREST

Whenever we find ourselves in a real, potential or apparent conflict-of-interest situation, we must immediately inform our manager so that a solution can be found to end or, if that is not possible, to minimize the effects of any such conflict. Subject to any other measure that may be taken, an employee in a real, potential or apparent conflict-of-interest situation must withdraw from any discussion, evaluation or decision-making process related to the source of the conflict of interest.

REFERENCES :

Please consult the following documents on the intranet under the "Services aux employés / Éthique" heading:

- the authorized tasting activity;
- Procurement and Merchandising Policy.

* Definition of "immediate family member": one's spouse, one's child or the child of one's spouse, one's father, mother, brother or sister, or the spouse of one's father, mother or child.



It is important...
to avoid creating confusion
between our SAQ job and
our second job. A clear line
must be drawn between our
two occupations.

5

SOLICITING AND ACCEPTING GIFTS OR OTHER BENEFITS ●

In carrying out our duties, it is imperative for us to avoid being indebted to any person or entity other than the company. Accepting a benefit may colour our judgement or give the appearance of our doing so, even if we believe that the benefit will not affect our objectivity or impartiality.

Our status as a government corporation means that, to maintain our independence, we must be particularly careful not to become indebted to any third party. That is why it is prohibited to solicit or accept benefits except in certain very special circumstances.

Soliciting and accepting a benefit may, among other things, put us in a conflict-of-interest situation. By remaining independent in our thinking and actions, it will be that much easier for us to perform our job to the best of our ability and retain the trust of all our partners, the public and our customers.

For this reason, we may not solicit or accept, either directly or indirectly, for our own benefit or that of a third party, any benefit, including gifts, cash donations, lodging, services, favours, meals, tickets to sports, cultural or social events and so on. The person who is solicited or seeks to offer a benefit is just as likely to be a customer (consumer, restaurant owner, etc.) or a supplier as any other person who has business relations with the SAQ or wishes to do business with the SAQ or obtain something else, whatever that may be.

UNDER NO CIRCUMSTANCES MAY WE:

- accept a tip or the equivalent (for advice, car service, etc.);
- accept lodging or transportation services offered directly by a supplier;
- take part, at a third party's expense, in an event (meal, tasting or party) to celebrate the holiday period or the beginning or end of a project, nor may we accept a gift on such occasions;
- accept anything whatsoever from a supplier who the SAQ is negotiating a contract with or who is currently involved in an SAQ call-for-tenders process;
- receive any remuneration other than from the SAQ when we act as a guest speaker, spokesperson or columnist on its behalf;
- solicit, in the SAQ's name, donations, prizes or other contributions from customers, suppliers or any other person having business relations with the SAQ, even if this solicitation occurs in the context of a fundraising campaign for an organization with which we are associated (for example, as the honorary chair of a foundation);
- solicit privileged or free "access" to winery or estate visits through SAQ business relations;
- accept a prize won at an SAQ-sponsored activity to which we have been invited, such as a benefit dinner. Refusing the prize avoids any appearance of the draw being "fixed."

If we receive a benefit that is not allowed, we must immediately inform our manager. The manager must return the benefit to the donor as soon as reasonably possible or dispose of it in such a way that no employee can derive benefit from it (form letters to be used when returning benefits can be found on the intranet).

EXCEPTION

The SAQ acknowledges that prospecting trips to wineries are an integral part of the duties of some of its employees. These employees may receive invitations from trade organizations to visit wineries or take part in training activities. However, before accepting them, employees must obtain authorization from management and ensure that the proposed activity both fits with the company's business strategies and complies with the Management Committee guidelines.

REFUSING A TIP OR GRATUITY

There is no reason to feel uncomfortable when you politely refuse a tip, gift or any other benefit. Why? Because providing excellent customer service is an integral part of our work and does not need to be acknowledged in this way. Accepting it and saying that we will donate it to a non-profit organization is not an alternative, because others will still see it as our accepting a tip. Refusing a tip is a gesture that shows integrity and helps to preserve the trust that customers and the public place in the SAQ.

TAKING PART IN EXTERNAL ACTIVITIES

For business development purposes, the SAQ may allow us to accept some invitations. These must be modest in value, not received on a recurring basis and in compliance with good business practices and recognized rules of etiquette. However, before accepting a meal or an invitation to attend a convention, conference or tasting or training activity, whether organized by a public body, business organization or joint-trade organization, we must always make sure that, due to the knowledge that can be acquired there, it is in the SAQ's interest for us to take part in the event. The primary purpose of these events should not be entertainment, and if a meal is involved, the cost should be reasonable.

In every instance, we must obtain our manager's authorization before taking part. Remember that all tasting activities must be approved by the Training Department before any employee can attend them.

SOLICITING AND ACCEPTING GIFTS OR OTHER BENEFITS ● (cont.)

BEFORE ACCEPTING ANY INVITATION OR BENEFIT

It is important to clearly understand the donor's intention as well as the impact that the benefit may have on our future actions and on other people's perceptions:

- Am I in a position, because of my job, to influence any SAQ decision regarding the company or organization involved?
- Why is this benefit being offered?
- Will my integrity and objectivity be compromised, or be perceived as being compromised, by my accepting a gift or attending the event concerned?
- What is my current relationship with the company or organization involved?
- How would people outside the SAQ or my colleagues react if they knew that I had accepted these benefits?
- Would this be creating a precedent that I would not like to see repeated?

SOLICITING CUSTOMERS OR COLLEAGUES FOR FUNDRAISING ACTIVITIES


It is never authorized to solicit customers except during SAQ-recognized official activities, such as the Generous Wines campaign. In our workplace, solicitation is acceptable if it is to raise funds for a non-profit philanthropic organization (charity, raising funds for school activities, etc.) and has been authorized by our manager.

Such solicitation may be aimed only at our immediate colleagues and only for a limited period of time. We should always bear in mind that such solicitation can interfere with our colleagues' work and, by causing them to feel pressured to contribute, make them uncomfortable.

REFERENCES

Please consult the following documents on the intranet under the "Services aux employés / Éthique" heading:

- Store directive C7 regarding activities of a promotional character;
- Store directive C5 regarding suppliers and sales representatives;
- Form letters to be used when returning gifts and other benefits received.

A man with a beard and mustache, wearing a red and black plaid shirt, is smiling broadly as he opens a cardboard box. He is using a black utility knife to cut the tape. The background is slightly blurred, showing what appears to be a warehouse or office setting. A large yellow circle is overlaid on the right side of the image, containing text.

Remember that in business...
there is no such thing as a
free gift and gifts don't always
come in pretty packages.
Also, let's be realistic: it is
only because of the work we
do that we are the targets of
such "generosity."

6

PROVIDING QUALITY CUSTOMER SERVICE ● Customer service is key at the SAQ. To maintain professional relationships with our customers and suppliers without giving them preferential treatment, it is imperative to comply with our existing, normal business management process.

AVOIDING PREFERENTIAL TREATMENT

Preferential treatment occurs when we give an advantage to someone without regard for the existing official procedures. Here are some examples of preferential treatment that are not permitted:

- putting products aside for a good customer despite the rules governing the practice (for example, during sales operations for new arrivals);
- postponing payment to a supplier in exchange for a favour;
- in the context of a public call for tenders, sending a particular bidder relevant information that is not sent to other bidders (for example, the evaluation criteria and their weighting);
- filling out entry forms for SAQ and other contests on behalf of a good customer.

REFERENCES

Please consult the following documents on the intranet under the “Services aux employés / Éthique” heading:

- Store directive H5 regarding customer orders;
- *Rules respecting publicity contests* (R.S.Q., c. L-6, r. 3.1).

7

PROTECTING INFORMATION ● Running a successful company requires a considerable amount of operational, strategic and other information. This information is subject to specific rules regarding its dissemination and protection.

A concern for properly managing the dissemination of information helps reduce the risk of adversely affecting the operation of the SAQ and its partners and of invading the privacy of individuals. We must all do our part to protect the information held by the SAQ, which is why complying with the company's security rules is imperative. We must also pay close attention to any situations or incidents that could result in the loss, theft or misuse of information held by the SAQ or entrusted to us by customers and partners. When any doubt exists, we should notify our manager.

PROTECTING PERSONAL INFORMATION

If we have access to personal information on customers, partners or staff members, we must exercise strict control at all times to ensure its confidentiality. At no time may this personal information be consulted or shared without authorization.

Information on customers and partners is an important subset of the information held by the company. We must never seek to obtain, share, use or give access to this information under any circumstances other than those authorized by the company. When any doubt exists, we must contact the person responsible for access to information.

DISSEMINATING INFORMATION

We must obtain specific authorization before sharing information held by the company as part of our duties, unless, of course, the information is already public. Aside from such cases, we may not disclose any information and must forward all information requests to the following persons, as applicable:

- a Customer Service representative;
- a Public Affairs representative (the only spokesperson authorized to deal with the media);
- the person in charge of access to information, who will decide whether or not giving access to the requested information is justified.

REFERENCES

Please consult the following documents on the intranet under the "Services aux employés / Éthique" heading:

- *Act respecting access to documents held by public bodies and the Protection of personal information* (R.S.Q., c. A-2.1);
- Payment Card Industry Data Security Standard.

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MEDIA RELATIONS ● To ensure the quality of the information disseminated about its activities, the SAQ has mandated its Public Affairs Department to handle all media requests. All such requests are therefore to be forwarded directly to that department.

Here are some examples of media requests or situations that should be forwarded to Public Affairs:

- filming or taking pictures in stores;
- interviewing employees or customers;
- obtaining information, including from unofficial sources;
- when a story about the SAQ takes off in the media;
- when we hear rumours about the SAQ or its employees, customers or partners.

At all times, we should be careful not to make any comments that could harm the company or tarnish its image.

PUBLIC INFORMATION VS. INTERNAL INFORMATION

All information contained in our official publications, such as our annual report, circulars and magazines or on our SAQ.com or B2B websites is considered public. None of the information found on our intranet or in emails, our management systems (OneWorld, data repositories, etc.) or other information tools intended for internal use constitutes public information. All requests for access to this internal information must be forwarded to one of the persons authorized to receive and handle requests of this nature.

PROTECTING OUR INFORMATION SYSTEMS

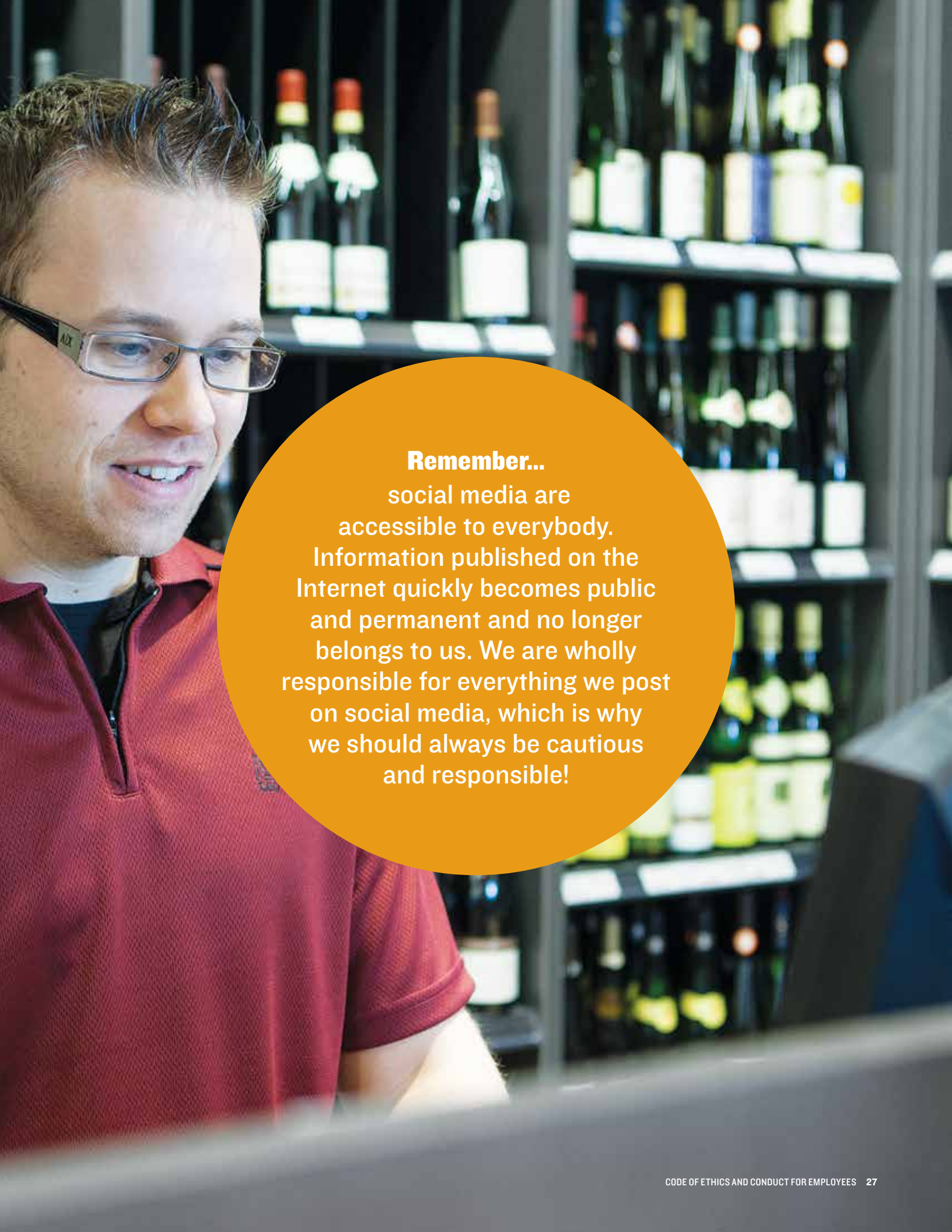
Computers, computer networks, Internet access, software, electronic cash registers and wireless scanners are powerful tools vital to our business operations. We must do make every effort to ensure these tools and the data they process are protected against any falsification, loss, damage or corruption.

From the moment we are authorized to access the SAQ's information systems, we are responsible for using this access judiciously. Moreover, to ensure this is the case, the SAQ reserves the right to verify our use of the system, including our occasional use for personal reasons.

REFERENCES

Please consult the following documents on the intranet under the "Services aux employés / Éthique" heading:

- Communication policy;
- Media relations directive;
- General information security policy;
- Directive regarding the use of information technology;
- Directive regarding mobile communication devices;
- Communications and media reference guide;
- Directive regarding the use of social media.



Remember...
social media are accessible to everybody. Information published on the Internet quickly becomes public and permanent and no longer belongs to us. We are wholly responsible for everything we post on social media, which is why we should always be cautious and responsible!

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DILEMMA ● The Code of Ethics and Conduct for SAQ Employees is a clear guide. That said, the Code may not provide the specific answer we are looking for because it cannot cover every action to be avoided or favoured. We can, however, draw on the spirit of these rules and their underlying values.

Here is the process that we recommend for resolving a dilemma, making the best decision and acting ethically.

FIRST, ASK YOURSELVES THESE QUESTIONS BEFORE TAKING ANY ACTION:

- Is the action legal and in compliance with the company's policies and directives?
- Does my decision take the SAQ's values into account?
- What consequences will my decision have for others?
- Is my decision the best one I can make under the circumstances?
- Would I be able to justify my decision to my peers, my manager or the public?
- Is there an appearance of bias, of conflict of interest or of favouring my personal interests?
 - Am I creating a precedent that I would not like to repeat?
 - What if everyone were to do the same?
 - Would I myself like to be treated this way?

HOW TO IDENTIFY A CONFLICT OF INTEREST

- If seen by someone else, could the situation give the impression that I acted in my personal interest or that of another?
- Would it embarrass me to discuss the issue with my manager or colleagues?
- Do or could my actions give me or a third party a financial or other type of advantage?
- Would I act differently if I or a third party were not involved?

WHAT TO DO IF DOUBTS REMAIN

If you remain uncertain about what decision to make or how to behave, we encourage you to discuss the issue with your manager or, if the situation so requires, with his hierarchical superior, the Secretary General, or to use the whistleblower hotline to expose fraudulent or illegal acts. After exhausting all the other avenues available to you, you may also contact the SAQ's ombudsman.

Any question regarding the application of the Code may be submitted to the secretary general, whose opinion on the matter shall prevail.

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Questions regarding application of the Code of Ethics for SAQ Employees to the secretary general's conduct fall to the chief executive officer. The SAQ's Governance and Ethics Committee is responsible for dealing with questions regarding the application of the Code to the chief executive officer.

REFERENCES

Please consult the following document on the intranet under the "Services aux employés / Éthique" heading:

- Policy regarding the disclosure of wrongdoing in the workplace.

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The masculine gender is used solely to facilitate reading and with no discriminatory intent.

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