SITEONE BUSINESS CODE OF CONDUCT AND ETHICS

At SiteOne Landscape Supply, we must do everything with the highest degree of integrity; and thereby earn the trust of our fellow associates, our customers, our suppliers, our shareholders and our community. This fundamental core value of Doing Business the Right Way is essential to creating a Great Place to Work- one with Integrity, Trust and Mutual Respect. This includes not only complying with laws and regulations, but also operating our business with the highest degree of ethical conduct with no shortcuts or exceptions. By incorporating these principles into our everyday culture, we can build a great company and set the example for our industry.

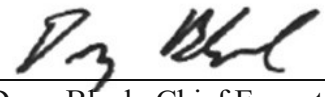
Each day we are challenged to be fair and consistent, to comply with the laws that govern our activities, and to notify others when something needs to be corrected. Our Business Code of Conduct and Ethics provides you with guidance in making the right choices when called upon to do so. Please become familiar with our Code. As you review these materials, please keep in mind that it is not simply the letter of the Code, but the spirit that we all must embrace.

If you are faced with a situation where you think our Company values or compliance with the law may be in question, you should bring this to the attention of your immediate manager or supervisor, your human resources representative, or, if you prefer, you may anonymously report your concern through our 24-hour Compliance and Ethics Hotline at 1-844-650-0008 (English) or 1-800-216-1288 (Spanish).

Working together, we will maintain our values and ensure the continued success of SiteOne.

Thank you.

Sincerely,



Doug Black, Chief Executive Officer

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INTRODUCTION

This Business Code of Conduct and Ethics (the "Code") is intended to provide you straightforward information about SiteOne's operating principles and offer tools to help you make decisions that align with our ethical expectations and legal obligations. All associates are expected to act with honesty and integrity. Adhering to the highest ethical standards is critical to SiteOne's success and is one of our fundamental core values – Doing Business the Right Way. Inside you will find examples of ethical decisions you may face as an associate. You will also find information on what to do if you have questions or concerns regarding ethical conduct.

This Code applies worldwide to all associates of SiteOne, inclusive of SiteOne controlled subsidiaries as well as all members of the Board of Directors. This Code is designed to provide a broad overview and scenarios on how to conduct Company business in a manner consistent with our core values. As it cannot cover every potential scenario you may encounter, remember that in most situations your own good judgment is the best gauge when facing a potential ethical issue.

The General Counsel can provide guidance in situations where you are unsure of the right thing to do. We understand that doing the right thing at work is not always as easy as it may sound. Just send us an email with your question at tjackson@siteone.com.

OUR VISION AND CORE VALUES

Our vision and core values reflect the beliefs, principles and standards that form the groundwork of our behavior and should be drawn on when making decisions. If we do everything with quality and integrity, then we can realize our vision:

- Be a Great Place to Work for Our Associates
- Deliver Superior Quality, Service and Value to Our Customers
- Be the Distributor of Choice for Our Suppliers
- Achieve Industry-Leading Financial Performance and Growth for our Stockholders
- Be a Good Neighbor in Our Communities

By embracing our core values and putting them to work in our daily lives, we help maintain the confidence and support of our customers, stockholders, communities and others with whom we work.

COMPLYING WITH THE CODE AND THE LAW

We have operations across the United States and Canada, and our operations are subject to various local laws and regulations. Associates are expected to comply with this Code and all applicable laws and regulations. If local law ever conflicts with this Code, seek the guidance of the General Counsel for resolution.

Board members, officers and associates are expected to report suspected or observed violations of this Code, SiteOne's other policies or applicable laws and regulations to SiteOne management. Failure to follow the provisions of this Code can lead to discipline, up to and including termination.

ZERO TOLERANCE FOR RETALIATION

If you suspect wrongdoing, including violations of this Code, SiteOne's other policies or the law, report it immediately. Retaliation against anyone who reports a good faith concern is prohibited and will not be tolerated. Good faith means that your concern is honest and accurate to your knowledge, regardless of whether it is discovered at a later date that you were mistaken. Allegations made maliciously in bad faith may be subject to disciplinary action.

WAIVERS TO THIS CODE

For associates, Executive Vice Presidents may authorize an exception to certain provisions of this Code or may designate a Senior Vice President or Vice President to review and approve such exceptions on their behalf. All exceptions must be approved in advance and must be submitted to the General Counsel at tjackson@siteone.com.

For Board members and Executive Officers, waivers of the Business Code of Conduct and Ethics may be granted only by the Audit Committee or the full Board of Directors and will be subject to applicable laws and regulations regarding disclosure to stockholders.

GETTING ANSWERS TO YOUR QUESTIONS OR REPORTING A CONCERN

If you have questions or concerns, speak up. SiteOne provides several options to report potential violations of this Code, SiteOne's other policies or applicable laws and regulations.

Depending on your concern, often it is best to speak first with your immediate manager or supervisor. Your immediate manager or supervisor is best-suited to respond to your issue quickly and may already be familiar with the concern you are reporting.

If you feel uncomfortable talking with your immediate manager or supervisor for any reason, contact one of the following resources:

- Call the Company's 24-hour Compliance and Ethics Hotline at 1-844-650-0008 (English) or 1-800-216-1288 (Spanish), where you can choose to remain anonymous
- Contact your HR representative, where you can choose to remain anonymous
- Contact the General Counsel at (770) 354-6154, or via email at tjackson@siteone.com

Example

Q. I reported a concern about fraud in our store to my supervisor, Bob. Since reporting my concern, Bob has stopped including me in certain meetings. Is this retaliation?

A. Significant changes in how you are treated after reporting a potential issue can be a form of retaliation. If you feel you are being treated differently since reporting an allegation, raise your concern by contacting your HR representative, the Company's 24-hour Compliance and Ethics Hotline, or the General Counsel.

BE A GREAT PLACE TO WORK FOR OUR ASSOCIATES

SAFETY

We are committed to providing our associates and customers a safe working and shopping environment. As an associate, you are expected to comply with all safety requirements. If you are concerned about safety or have questions, comments or feedback regarding regulatory requirements, notify your supervisor immediately.

SiteOne should never ask or expect an associate to perform any task that is considered unsafe.

Example

Q. I constantly notify my manager that our delivery vehicle has many defects which make the vehicle unsafe to operate. The manager continues to ignore my concerns and tells me that repairs are not in the budget. He tells me I can either keep making deliveries or I can go home. I don't want to lose my job, but I feel the vehicle is not safe to be on the road.

A. If your manager is not responsive to your legitimate safety concerns, you should contact Terry Jeffries, Manager – Environmental & Safety, your HR representative, or the Company's 24-hour Compliance and Ethics Hotline.

To learn more about SiteOne's commitment to the safety and health of its customers and associates, read the Safety Policies available on UE or call Terry Jeffries, Manager – Environmental and Safety.

LABOR AND EMPLOYMENT

SiteOne believes that all people should be treated with dignity, and we will not accept conduct that fails to show appropriate respect to others.

Any conduct that fails to show appropriate respect to others, including fellow associates, customers, vendors and suppliers, violates the Company's values. The following are examples of unacceptable conduct: insults; threats; intimidation; ridicule; vulgarity; discrimination; harassment; physical or verbal abuse; sexually explicit humor, conversation or behavior; gossip; slurs or stereotyping; unwelcome sexual advances; unwelcome touching or invasion of personal space; ignoring the rights of others; and insensitivity to the beliefs and customs of others.

ALCOHOL AND DRUG ABUSE

We are committed to providing a safe, healthy and drug-free workplace. Using illegal drugs at any time, using alcohol when on the job, on Company premises or coming to work under the influence of alcohol is strictly prohibited. This prohibition is a condition of

employment. Any associate found in violation of this condition of employment is subject to immediate termination. Please refer to the ***SiteOne Associate Handbook*****,** which is available on the Company's intranet, for further detail.

FAIR EMPLOYMENT PRACTICES/DISCRIMINATION

SiteOne is an equal opportunity employer committed to ensuring associates work in an environment of trust and mutual respect. We will not discriminate against any associate or applicant with regard to race, color, sex (gender), sexual orientation, gender identity or expression, age, religion, national origin, disability, protected veteran or other uniformed service status or any other characteristic or basis protected by applicable law.

Example

Q. I think I was passed up for a promotion due to my race. What should I do?

A. If you feel you have been discriminated against due to race or any other legally protected characteristic, you should raise your concern by contacting your HR representative, the Company's 24-hour Compliance and Ethics Hotline or the General Counsel.

HARASSMENT

SiteOne will not tolerate harassment in the workplace. Harassment or disrespectful behavior can be verbal, non-verbal or physical. Examples include:

- Intimidating others, including making threats
- Offensive jokes, racial slurs or inappropriate comments regarding an individual's ethnicity
- Sexual advances, requests for sexual favors or any other unwelcome visual, verbal or physical conduct of a sexual nature

Example

Q. My co-worker circulated an email that was offensive to me. What should I do?

A. First ask the co-worker to stop sending you these types of emails. If you are not comfortable speaking directly with the co-worker, or the co-worker does not stop sending these type of emails, you should contact your immediate supervisor, HR representative, the Company's 24-hour Compliance and Ethics Hotline or the General Counsel.

VIOLENCE IN THE WORKPLACE

We have a zero tolerance policy for actions that threaten our associates, customers, suppliers, visitors or property. Examples of threatening actions include physical assaults or the intentional destruction of SiteOne property or merchandise. If you observe a situation that could

become potentially violent, report it to your immediate supervisor, HR or the Company's 24-hour Compliance and Ethics Hotline.

Want to learn more about SiteOne's Labor and Employment standards? Read the ***SiteOne Associate Handbook*** available on the Company's intranet or call your HR representative.

CONFLICTS OF INTEREST

You have a responsibility to make decisions based on the interests of SiteOne without regard to how they might benefit you. A conflict can occur when your private or professional interests interfere in any way – or even appear to interfere – with the interests of the Company. Even if you did not intend for your actions to create a conflict, the perception of a conflict by others can be just as damaging to you and/or SiteOne. Be on the lookout for situations that may create the appearance of a conflict and avoid them whenever possible.

It is your responsibility to tell your immediate supervisor or the General Counsel about situations when a conflict of interest may exist or could be created. Supervisors are encouraged to report the concern to the General Counsel who can assist with handling the situation.

Example

Q. I want to start my own online pinestraw and mulch company while working my full-time job with SiteOne. Is this allowed?

A. No. Since SiteOne distributes landscape supplies to our customers, this would create a conflict of interest between your personal interest and those of SiteOne.

FINANCIAL INTERESTS

Your personal financial interests, or those of your family, should not conflict with your responsibilities to SiteOne. In particular, significant financial interests in a SiteOne competitor or a current or prospective vendor, as well as any instance in which you or a family member may receive personal gain through opportunities discovered through SiteOne, should be disclosed to the General Counsel for a conflict of interest assessment.

Financial investments with no direct control over the investment strategy (e.g., mutual funds, 401(k) investments, etc.) are not considered conflicts of interest for the purpose of this Code.

Example #1

Q. Mike, an Area Manager, owns a 25 percent stake in a SiteOne vendor. Is this a conflict of interest?

A. Possibly. Mike should disclose his ownership interest to his Regional Vice President or the General Counsel for resolution. Depending on how Mike is involved with the business and SiteOne's relationship with the vendor, he may be required to divest his ownership.

Example #2

Q. Sharon's sister, Peggy, is a representative for a SiteOne vendor. Should Sharon report this relationship?

A. Yes. Most likely this relationship will not create an issue and no changes will be necessary, but to avoid a conflict of interest or an appearance of a conflict of interest, Sharon should inform her immediate supervisor or the General Counsel of the relationship. By being transparent, Sharon's immediate supervisor can determine if any action is necessary.

RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS

SiteOne cautions against engaging in social relationships with current or prospective customers or suppliers that may interfere with your ability to perform your job objectively or create an appearance of a conflict of interest. In addition, associates should disclose when serving as a board member or paid consultant, advisor or employee of any current or prospective third party that may do business with SiteOne, including customers, suppliers, vendors or service providers.

If you believe your relationship with a customer, supplier, vendor or service provider could be viewed as a potential conflict of interest, notify your immediate supervisor, or contact the General Counsel for resolution.

SiteOne expects its customers, suppliers, vendors and service providers to act ethically and in a manner that meets or exceeds the standards set forth in this Business Code of Conduct and Ethics.

Example

Q. For several years, I have managed the relationship with a SiteOne supplier. During this time, I have become friends with the supplier's sales representative and occasionally meet for dinner outside of work to catch up with one another. We rarely discuss business unless something out of the ordinary is going on. Do I need to notify anyone of this relationship?

A. Yes. The relationship could create a conflict of interest and should be disclosed to your immediate supervisor or the General Counsel. By being transparent about the relationship, it can be reviewed to determine if any changes are necessary.

GIFTS AND ENTERTAINMENT

The acceptance of gifts and entertainment from current or potential customers, suppliers, vendors or service providers can cause a conflict of interest or give the appearance that you put your personal interests ahead of SiteOne's best interest. Taking items of value from a vendor can also increase our cost of doing business. Our policy dictates that associates may only receive gifts, meals or entertainment of a moderate or reasonable value, and on an occasional basis, from current or potential customers, suppliers, vendors or service providers, subject to compliance with all applicable laws, regulations and Company policies. Such gifts must not influence the associate's business decisions on behalf of SiteOne or place the recipient under any obligation.

This policy applies to anything received as a result of an actual or potential business relationship. Subject to the above, examples of gifts and entertainment which may be accepted within reason include:

- Continuing professional education or development opportunities
- Meals provided or paid for by customers, vendors or suppliers during traditional business hours where business discussions or negotiations are the main purpose of the meeting
- Tickets to sporting or cultural events where business discussions or negotiations are conducted before, during or after the event, as long as the value of such tickets is not excessive
- Promotional items, such as golf shirts and caps, that contain a supplier or vendor logo
- Mementos or other similar awards provided or paid for by customers or vendors as recognition for participation in a particular project or matter provided the award has no intrinsic value
- Industry events where multiple clients or potential clients are invited or are open to the public

Associates should check with their manager or supervisor before accepting such items. Also, it is important to note that these guidelines apply at all times and do not change during traditional gift-giving seasons.

There are some situations when refusing a gift would be inappropriate, awkward or cause professional embarrassment. These situations include when an associate is visiting a foreign country where the cultural norms are different from the United States and refusal of a gift would be a cultural insult to the person offering it, or where the gift is something from that country offered as part of a public occasion. In these situations, the associate should accept the gift and contact the General Counsel to disclose the gift and to arrange a donation of the gift to an approved charity or an alternative appropriate disposition approved by the General Counsel.

WHAT TO DO IF YOU RECEIVE AN UNSOLICITED GIFT?

If you receive an unsolicited gift, and you reasonably believe that the gift is excessive or not of a reasonable value, advise your manager and return the gift with a letter explaining our guidelines. If the gift is perishable, impractical to return, or returning it would embarrass SiteOne, contact the General Counsel to determine proper disposition of the gift. If you are a store associate, give the gift to your store manager, and she or he will donate the item to a SiteOne-approved charity.

If there is a business reason why you believe you should accept an unsolicited gift, please notify the General Counsel (in advance of receipt if possible).

Example #1

Q. Can I ask my co-worker, who works in marketing, to get me two tickets to the Sugar Bowl football game in New Orleans, Louisiana?

A. No. It is against our policy to receive tickets for personal use from customers, suppliers, agencies or other third parties with which the Company conducts business where the value of the tickets is not of a moderate or reasonable value.

Example #2

Q. May I accept a gift from a vendor as long as it is worth approximately $100 or less?

A. Yes. You may accept gifts or entertainment (e.g., a meal or ticket to a baseball game) as long as the value of such gift or entertainment is of a moderate or reasonable value.

DELIVERING SUPERIOR QUALITY, SERVICE AND VALUE TO OUR CUSTOMERS

ANTITRUST AND FAIR COMPETITION

SiteOne competes vigorously and lawfully to serve our customers in the competitive environment in which we operate and always acts with integrity and a spirit of fair dealing in doing so. Accordingly, all associates are required to comply with antitrust and related competition laws in jurisdictions in which we do business. These laws in the United States and other countries typically restrict and/or regulate competitive business practices in order to preserve fair, honest and vigorous competition. Violations of these laws can result in damage to our reputation, severe monetary penalties, and criminal penalties for those involved.

It is important to collect information about our competitors to compete effectively; however, such collection must be done in a lawful and ethical manner. Associates are prohibited from engaging in illegal business practices, including entering into agreements, reaching "understandings" or exchanging information with competitors about how we do business and sharing confidential and proprietary business information with or requesting such information from competitors. In addition, pricing decisions must be made independently of our customers, suppliers, vendors or service providers. If you are dealing with a potential antitrust issue, seek the advice of the General Counsel at tjackson@siteone.com.

CONFIDENTIALITY, PRIVACY AND INFORMATION PROTECTION

Much of the information with which we come into contact at work each day is confidential. Confidential information is not generally known to competitors and others outside the Company and may include: financial information, including but not limited to information about sales, earnings, expenses and investments; pricing information; vendor or supplier lists; customer lists or data; plans for future store/facility locations; business development materials; costs of goods; personnel files; Company policies, manuals, guidelines, procedures and SOPs; computer software; design documents and specifications; videos; and memos. Confidential information is critical to our competitive advantage and must not be disclosed, except as

specifically authorized or legally required. Information that has been made public by the Company, such as press releases, news articles or advertisements, is not considered confidential and does not require protection. It is the responsibility of each of us to use discretion in handling Company information so that we do not inadvertently reveal confidential information to competitors, customers, vendors, suppliers, friends and/or family members. If you are unsure about whether certain information is confidential, presume that it is.

Further, it is also our responsibility not to misuse confidential information for personal gain. This is not limited to activity concerning publicly traded securities, but also includes any financial instrument or contract, security, derivative, or evolving formulation such as prediction markets contracts. A prediction market, also referred to as an event market, information market, or betting platform, is a market (often an online or virtual platform) in which participants buy and sell contracts for which payoffs, or some other financial result, depend on the outcome of a future event.

We respect the privacy of our customers and associates and are committed to the responsible collection, use and disposal of their Personal Information. Personal Information is information that can be used to identify a specific individual. Some examples of Personal Information include a person's name in combination with their credit card number, driver's license number and/or social security number. All associates are expected to safeguard Personal Information in accordance with our ***Information Security Policy*** and applicable laws. For more details and suggestions on how Personal Information should be properly handled, refer to the Company's ***Information Security Policy***.

If you identify a potential breach of Personal Information, report it immediately to David Black, Chief Information Security Officer.

SiteOne maintains a large variety of assets including physical assets and valuable proprietary and confidential information assets. Proprietary and confidential information may be maintained in either hardcopy or electronic formats. It is vital to our reputation that all associates ensure this information is adequately protected and controlled.

Examples of ways to protect proprietary or confidential information include:

- Password protect proprietary or confidential information on a shared computer drive
- Lock your computer screen when away from your computer

Example #1

Q. An Area Manager asked me to send her a list of everyone in her department who worked on a recent SiteOne event so that she can thank them for their participation. I want to help her out, but I am very busy. Is it ok if I just send her a spreadsheet I prepared for HR that lists the names of everyone in our department and circle the SiteOne participants? Does it matter that the spreadsheet also includes other information, such as associates' social security numbers, phone numbers, addresses and emergency contact information?

A. No, the spreadsheet should not be shared. Associates should always be on alert for situations in which they might be handling Personal Information and protect it accordingly. This responsibility includes limiting access to this kind of information to only those who have a legitimate business need to see it. Here, the spreadsheet contains additional Personal Information, including Sensitive Personal Information such as social security numbers which the Area Manager does not need to do her job. Only the minimum amount of information necessary for the Area Manager to do her job should be shared.

Example #2

Q. I cannot find a thumb drive I used to store some files I was working on for my job. Thumb drives are not that expensive, so I think it will be faster and easier if I just pay to replace it myself. The files on the thumb drive may have contained some customer information. Do I still need to tell someone that I lost the thumb drive?

A. Yes. Personal Information should not be stored on flash or thumb drives as they are easily lost or stolen. Any lost or stolen Personal Information should be immediately reported to your manager and David Black, Chief Information Security Officer.

Want to learn more about how to protect personal and business information? Read the ***Information Security Policy*** available on the Company intranet.

ACHIEVING INDUSTRY-LEADING FINANCIAL PERFORMANCE AND GROWTH FOR OUR STOCKHOLDERS

PROTECTING THE COMPANY'S ASSETS AND INTELLECTUAL PROPERTY

While at work you will have access to important Company property and information. All associates should protect SiteOne's property in order to avoid theft, carelessness and waste as these have a direct impact on our profitability. All Company assets should be used for the benefit of SiteOne and never used to promote your own interests or those of another person or company.

Our intellectual property must be used properly and protected from infringement by others. The SiteOne logo, advertisements and computer software are examples of assets that make up our intellectual property. Inventions, discoveries, ideas, concepts, written material and trade secrets that are created by associates using Company time, resources or materials are also the property of SiteOne.

INSIDER TRADING

We comply with federal and state securities laws and do not tolerate insider trading. Insider trading means trading securities on the basis of material, non-public information or sharing material non-public information with another person so they can trade. "Material" information is information that a reasonable investor would likely consider important when making a decision to buy, sell or hold securities. Some examples of material, non-public information would include the following if not otherwise publicly disclosed:

- Earnings, revenues or other financial information

- Business conditions or strategies, including sales volumes, margins and conditions affecting our industry
- Potential mergers, acquisitions, tender offers, joint ventures or changes in assets
- Introduction of significant new products or services or business development initiatives
- Developments regarding customers or suppliers, including the gain or loss of customers or suppliers
- Changes in the control or management of SiteOne
- Borrowing activities or issues related to liquidity
- Events related to our securities (e.g. stock splits, dividend changes, share repurchases)

It is unethical and illegal to buy or sell stock or other securities on the basis of material non-public information. It also is illegal to communicate non-public information to any other person so that they may trade.

In addition, neither associates nor members of the Company's Board of Directors may enter into hedging or monetization transactions designed to limit the financial risk of ownership of SiteOne securities. These include prepaid variable forward contracts, equity swaps, collars, exchange funds and other similar transactions, as well as speculative transactions in derivatives of SiteOne's securities, such as puts, calls, options (other than those granted under a SiteOne compensation plan) or other derivatives.

Members of the Company's Board of Directors and Executive Officers are also prohibited from holding SiteOne securities in a margin account or otherwise pledging SiteOne securities as collateral for a loan.

Example

Q. I am good friends with Jack, a vendor representative at ABC Company. Jack told me that ABC Company just landed a big sale with SiteOne. Although an official announcement has not been made, can I purchase shares of ABC Company?

A. No. This could be considered trading on the basis of material, non-public information and a violation of Company policy, as well as federal securities laws.

To learn more about insider trading restrictions including who to call about a potential trade, read the ***Securities Laws Policy*** available on the Company's intranet or by calling the General Counsel.

FINANCIAL INTEGRITY AND REPORTING

Accurate business records are essential to the management of the Company and maintaining the Company's reputation and credibility. It is the responsibility of each associate to maintain complete and accurate financial and business records. These records include financial statements as well as time sheets, bills, invoices, expense reports, payroll and benefits records and other essential Company data. SiteOne is committed to providing full, fair, accurate, timely and understandable reports and disclosures to regulatory authorities and the public. Associates must comply with all government laws, rules and regulations and the requirements of other appropriate private and public regulatory authorities applicable to our financial and business records. This includes making sure that our financial statements conform with generally accepted accounting principles, the Company's accounting policies and its system of internal controls. Associates are expected to report any observed or suspected violations of law or regulation, Company Policy or activity that might constitute financial fraud or financial misconduct to the General Counsel, or any member of the Disclosure Committee and/or Board of Directors. Any proposed change in Company accounting policies and practices must be reported to and approved in advance by the Chief Financial Officer.

To learn more about the Company's commitment to maintaining accurate books and records, read the ***Financial Code of Ethics*** available on the SiteOne website under the "Investors" link or by calling the General Counsel.

RECORDS RETENTION

You may collect large amounts of information as part of your daily job, such as emails, spreadsheets and contracts that may need to be retained for business or legal reasons. It is important to keep this information for the period of time required and then properly dispose of it thereafter.

SiteOne maintains a ***Master Record Retention Policy*** that provides guidance on what corporate documents are business records and how long they should be maintained, as well as a branch-level filing/record retention policy which is applicable for records commonly held within our branches. Associates should consult these policies before destroying business records.

To determine the required retention time for your documents, see the ***Master Record Retention Policy*** located under the Corporate Governance tab of the Company's intranet homepage and the branch filing/record retention policy under "Section II – Branch Accounting and Asset Mgmt." within the Operational Procedures on the Company's intranet homepage or email recordsmanagement@siteone.com.

BEING A GOOD NEIGHBOR IN OUR COMMUNITIES

THE FOREIGN CORRUPT PRACTICES ACT (FCPA) AND ANTI-BRIBERY

It is against our policy to participate in any form of corruption. Neither we, nor outside parties acting on the Company's behalf will bribe another party to gain any benefit for the Company. Among other things, U.S. law and the foreign laws of countries where we do business make it illegal to offer or pay a bribe to a foreign official for a business favor or to gain an improper business advantage. The term "foreign official" includes employees of any government agency, government-owned business (such as state-owned enterprises), or political party, plus

any political candidate. Bribes go beyond giving cash payments and may also include giving gifts or other items of value. Our policy also prohibits giving, facilitating or expediting payments to foreign officials. Since SiteOne can be held liable for payments made by third parties, outside parties engaged directly or indirectly by SiteOne who may interact with foreign officials on the Company's behalf must be approved by, be thoroughly screened before being hired and must contractually agree to comply with SiteOne's Foreign Corrupt Practices Act ("FCPA") and Anti-Bribery Policy and these laws.

Given the complexity of the FCPA and anti-bribery laws, all associates should contact the General Counsel with any questions concerning obligations to comply with this policy, through the Company's intranet.

Example

Q. A foreign official refuses to grant a permit to sell a new product because our application is incomplete, but offers to issue the permit for a payment. You are told this is customary in the country. Is this allowed?

A. No. You must fix the paperwork. Providing money, gifts or entertainment to the foreign official would be a bribe and violate local law and the FCPA.

For more information about conducting business in compliance with anti-bribery laws, read the **Foreign Corrupt Practices Act (FCPA) and Anti-Bribery Policy** available on the Company's intranet, or by calling the General Counsel.