

SUPPLIER CODE OF CONDUCT

Part of the SiteOne Vision is to be the distributor of choice for our suppliers. As part of our partnership with suppliers, we require that suppliers adhere to our Supplier Code of Conduct. Our goal is for SiteOne and our suppliers to be identified as best-in-class companies in our industry.

Our suppliers are expected to uphold the human rights of workers, to treat them with dignity and respect and to conduct responsible business operations with integrity, and our SiteOne Supplier Agreement, our standard contractual agreement for our suppliers, requires compliance with all applicable laws.

The SiteOne Supplier Code of Conduct sets forth the expectations we have for our suppliers—to operate their businesses in accordance with SiteOne’s Vision and DNA. The SiteOne Vision and DNA reflect our expectations for the conduct of our company’s business. We encourage our suppliers to conduct their businesses in the same manner and consistent with their core values.

The purpose of the Supplier Code of Conduct is to provide general principles to follow to ensure that each of our suppliers acts responsibly and to promote compliance with applicable governmental law, rules and regulations.

DOING BUSINESS THE RIGHT WAY—COMPLIANCE WITH LAWS

Consistent with our Vision and DNA, SiteOne believes in the importance of “doing business the right way” and we expect that our suppliers share this view. Obeying the law, both in letter and in spirit, is the foundation on which our ethical standards are built. It is each supplier’s responsibility to know the laws and regulations adopted in their respective states or provinces and communities applicable to their business. All of our suppliers, their respective directors, officers, managers and employees should respect and obey the applicable laws, including laws pertaining to environmental protection.

HUMAN RIGHTS

Respect for human rights is a fundamental principle for SiteOne. Suppliers that choose to work with SiteOne are expected to embody the same principle. This Supplier Code of Conduct was created to comply with the following guiding philosophies set forth by the SiteOne Human Rights Policy:

- Our associates are our most important asset; therefore, we must endeavor to provide a safe working environment, together with ongoing training and awareness, to ensure that all of our associates return home safely at the end of each day.
- We respect each other, regardless of nationality, race, sex or anything that makes each human being unique.
- We comply with all applicable laws, including employment laws and regulations, in all jurisdictions in which we operate, and we expect our suppliers to do the same.
- We respect the environment in all communities in which we operate.

Consistent with our Human Rights Policy, compliance with this Supplier Code of Conduct requires that all persons involved with the manufacturing of products that SiteOne distributes adhere to the laws and regulations prohibiting human trafficking, slavery, bonded or indentured labor, forced labor, child labor and prison labor. Suppliers must adhere to the minimum employment age limit defined by national law or regulation.

We also expect all suppliers to respect internationally recognized human rights.

WAGES AND BENEFITS

Suppliers must have a system in place to verify and accurately record payroll, deductions and the hours worked by legally authorized employees. Suppliers must comply with all applicable wage and compensation requirements as defined under applicable labor laws for regular work, overtime, maximum hours, piece rates and other elements of compensation and employee benefits.

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HEALTH AND SAFETY; COMMUNITIES

Each of our associates has the right to a safe and healthy work environment. Suppliers shall provide safe and healthy working environments to prevent accidents and injury to health. Suppliers shall minimize associate exposure to potential safety hazards by identifying, assessing and minimizing risks by developing and implementing plans and procedures. Suppliers will respect the rights of local communities to decent living conditions, education, employment, social activities and the right to Free, Prior, and Informed Consent [FPIC] to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

ENVIRONMENTAL IMPACT AND SUSTAINABILITY

SiteOne recognizes that respect for the environment and sustainability is integral to being a world-class company. The use of resources, product storage, waste disposal and many other processes can cause adverse effects on the community, environment and natural resources. To the extent possible, these adverse effects should be minimized by our suppliers to safeguard the health and safety of its employees, the public and our communities generally. At a minimum, suppliers shall comply with the environmental laws and standards within its facilities.

ETHICS

Our suppliers should uphold the highest standards of ethics, including business integrity; zero tolerance for bribery, corruption, extortion and embezzlement, undue or improper advantage, disclosure of confidential information, falsification of records or misrepresentation of conditions or practices in the supply chain; respect of intellectual property, fair business, advertising and competition standards, privacy of personal information of everyone they do business with and no retaliation against personnel who raise or report concerns.

FOREIGN CORRUPT PRACTICES ACT

The U.S. Foreign Corrupt Practices Act prohibits the giving of anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. Illegal payments to government officials of any country are strictly prohibited. In addition, the U.S. government has a number of laws and regulations restricting business gratuities which may be accepted by U.S. government personnel. The promise, offer or delivery to an official of the U.S. government of a gift, favor or other gratuity is a violation of these rules and may not only violate company policy but may also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. SiteOne expects full compliance by each of its suppliers with these laws.

GIFT POLICY

The purpose of business entertainment and gifts in a commercial setting is to create good will and to further working relationships. Suppliers are prohibited from providing or offering gifts, including gifts of cash or cash equivalents, that are excessive or that could inappropriately influence SiteOne's business decisions or gain an unfair advantage.

VERIFICATION AND COMPLIANCE

SiteOne reserves the right to verify compliance with the standards of this Supplier Code of Conduct with each of our suppliers in any form that we choose, including completion of a questionnaire or an audit by SiteOne or a third party. SiteOne expects our suppliers to provide complete and accurate information, including access to documentation and records. In addition, SiteOne expects our suppliers to disclose any restrictions that may be imposed on the import or export of their products or services. SiteOne reserves the right to terminate any business relationship with any supplier that does not comply with this code of conduct.

Suppliers should report to SiteOne any fact or circumstance which they know has resulted or will result in a violation of this code of conduct. It is the policy of SiteOne and our expectation of suppliers not to permit retaliation for a person's good faith report of questionable behavior and/or misconduct by another. Any supplier may direct questions or comments about this Supplier Code of Conduct or report any violations to his or her SiteOne Category Management representative.