

CODE OF CONDUCT FOR SUPPLIERS (this “Code”)

Reitmans (Canada) Limited (and its various divisions, subsidiaries and affiliated companies, collectively, “Reitmans”) is committed to conducting its business in accordance with commercially recognized ethical standards and the local labor laws of each country in which it conducts its business. Reitmans strives to only conduct business with suppliers whose practices conform to this Code, and will not knowingly do business with any supplier which violates, or permits its manufacturing facilities to violate, this Code or the laws and regulations of the country in which it operates.

Child Labor

Suppliers shall not employ any worker who is less than 15 years of age (or 14 where the law of the country of manufacture allows), or younger than the age for completing compulsory education in the country of manufacture, where such age is greater than 15. Supplier’s factories must:

- comply with all applicable child labor laws, including those relating to hiring, wages and hours worked, overtime and working conditions; and
- maintain official documentation verifying and confirming each worker’s date of birth.

Forced Labor

Suppliers shall not make any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.

Discrimination

Workers must be employed on the basis of their ability to carry out the duties of the particular job in respect of which they were retained without regard to race, color, gender, nationality, religion, age, disability, and marital status or other personal characteristics or beliefs. No person shall be subjected to discrimination in any aspect of employment.

Freedom of Association/Collective Bargaining

Suppliers shall not restrict their workers from joining associations of their own choosing or interfere with their workers’ rights to lawfully and peacefully associate, organize or bargain collectively.

Wages & Benefits

Suppliers shall pay minimum wages, overtime premiums, and offer benefits such as paid leave and holidays in compliance with all applicable laws and regulations.

Working Hours

Suppliers shall set working hours in compliance with all applicable laws and regulations and not require working hours that could compromise humane and productive working conditions.

Environment

Suppliers and their subcontractors must comply with all applicable environmental laws and regulations. Supplier’s factories must have procedures for notifying local community authorities in case of any environmental emergency.

Working Conditions

Suppliers and their subcontractors are expected to treat all workers with respect and dignity and provide them with a safe and healthy work environment. Workers must not be subjected to corporal punishment or any other form of physical, psychological, sexual or verbal harassment or abuse.

- Supplier's factories must comply with all applicable laws and regulations relating to working conditions, including workers' health and safety. Factories must:
 - have adequate lighting in all areas;
 - be well ventilated. Windows, fans, air conditioners or heaters must be present where required in all work areas;
 - have sufficient, clearly marked, accessible exits allowing for orderly worker evacuation in case of any emergency;
 - have adequate fire alarm systems. Fire extinguishers must be appropriate to the types of possible fires in the various areas of the factory, be regularly maintained and charged, the date of last inspection must be displayed, and they must be mounted so they are visible and accessible in all areas;
 - conduct evacuation drills at least once per annum;
 - ensure that machinery is properly equipped with operational safety devices and inspected and serviced on a regular basis;
 - provide and allow workers reasonable access to drinkable water throughout the working day;
 - have a minimum of one well-stocked first aid kit and one or more employees trained in basic first aid. A procedure must be in place for handling injuries that require further medical evaluation and/or hospitalization;
 - maintain clean and sanitary toilet areas that are available to employees throughout their entire work day. There must be no unreasonable restrictions on their use;
 - store any hazardous and combustible materials which may be located on its premises in secure, ventilated areas. All safety and legal requirements must be met when disposing of such materials; and
 - in the event that dormitory facilities are provided for workers, ensure that those facilities meet all applicable laws and regulations related to wage deductions, health, safety and protection of employees, including fire, electrical, mechanical and structural safety and sanitation.

Monitoring Program

Suppliers must have a program to monitor their subcontractors for compliance with the labor laws of the country of manufacture.

Access to Facilities

Suppliers must allow authorized representatives of Reitmans unrestricted access to their facilities and to all relevant records at all times, whether or not notified in advance, to ensure compliance with this Code.

REITMANS (CANADA) LIMITED RESERVES THE RIGHT TO SUSPEND, DISCONTINUE OR TERMINATE ITS RELATIONSHIP WITH ANY SUPPLIER THAT VIOLATES THIS CODE OF CONDUCT OR ANY APPLICABLE LAW OR REGULATION IN ITS SOLE AND ABSOLUTE DISCRETION.