

Code of Ethics



“Prospering *with* **RONA**”

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MESSAGE FROM THE PRESIDENT AND CHIEF EXECUTIVE OFFICER

Since its creation in 1939, RONA has derived strength from a shared vision and deeply rooted values to which we all bound. Service, unity, respect, search for the common good and sense of responsibility are more than words: these values represent a collective and individual commitment.

RONA's values and Code of Ethics count among the reasons why our customers, employees, investors, and all business partners (suppliers) place their trust in us. They know that RONA's business is conducted according to the highest standards of professionalism, honesty and integrity.

Notwithstanding these shared values, the fast pace of change in today's world and the accelerated growth of our business make it necessary and desirable to draw up a set of written rules to which we can refer.

This updated version of our Code of Ethics contains adjustments which, while still in line with our core values, reflect the new realities of our organization as well as the changing social context in which RONA operates.

This document is thus a compilation of the principles and standards which each of us personally undertakes. Naturally, it does not cover every situation that we may encounter while exercising our daily tasks. If a situation with ethical implications should arise, the employee should discuss with their supervisor how the situation should be handled. When the question requires deeper analysis, it will then be submitted to the Corporate Executive Committee.

This Code of Ethics is intended for the use of all RONA employees as well as its administrators and employees of its franchised stores and affiliated dealer-owners. All must comply with this Code, as the reputation of our organization depends on it. RONA firmly believes in the soundness of the business ethics principles that underpin this Code. We are also taking measures needed to promote and improve our business relationships with our business partners and consultants based on ethical standards similar to the ones in this Code, and have adapted them to these contractual business relationships.



Robert Dutton
President and Chief Executive Officer
RONA Inc.

A. PURPOSE OF THE CODE

As RONA employees, everyone is responsible for being familiar with the Code of Ethics and understanding how it applies to their job.

At RONA, ethics go far beyond mere compliance with standards or rules. The concept of ethical conduct calls for everyone to be personally responsible when exercising their duties so that the spirit of RONA's values and of the general principles of ethics is reflected on a daily basis.

This Code has been prepared to help everyone understand the general principles of ethical conduct and to promote best business operating practices.

It is to be noted that the Code may be amended from time to time to take account for new circumstances or amendments to laws and regulations. The Code offers advice on the most common situations that may be encountered. However, it does not deal with every conceivable situation. Employees are invited to read the Code and other Company documents and policies dealing with certain issues in greater depth, available on ZONE.RONA.ca.

B. APPLICATION AND IMPLEMENTATION

The RONA Code of Ethics applies to employees and directors of RONA, as well as to those of its subsidiaries, franchised stores and affiliated dealer-owners, and any person reporting to them or to their representatives.

Every employee must ensure that the standards and guidelines set forth in this Code are respected and take the necessary steps to correct any breach to the Code.

RONA's Executive Committee is responsible for applying the rules and evaluating cases that are brought to its attention.

Managers have the responsibility to promote behaviour that is in accordance with and supporting the Code of Ethics. They are also responsible for ensuring compliance to the Code.

The People and Culture Department is responsible for distributing the Code to all employees of RONA inc. and its subsidiaries. It is also responsible for applying the Code, coaching managers about its application, and keeping the Code up to date.

C. RONA'S MISSION AND VALUES

At RONA, we achieve our aim by standing out: providing a unique, remarkable, consistent customer experience with the right home products and construction materials at the right price.

We accomplish our mission through a retail and distribution network that seeks to position our corporate units, affiliated dealer-owners and franchised stores as leaders in their respective markets.

RONA fulfills its aim and its mission as a company that takes responsibility for its social, economic and environmental impact on the communities where it does business.

RONA's values guide its day-to-day business methods and decisions. They determine the means by which the Company intends to retain leadership of its business sector. By building a consensus among its dealers and employees around five core principles, RONA wishes to foster optimal conditions for its growth and development in a highly competitive industry. The values advocated by RONA are not mere words but rather require every employee at RONA to adopt certain behaviours on a routine basis.

Service

RONA and its employees are committed to customer service. This unconditional commitment is both the rationale for and the instrument of RONA's prosperity and growth. The commitment to service also applies to internal relationships between departments, functions and colleagues. The effectiveness of RONA's operations depends on the quality of service that each employee delivers to the others.

Unity

Unity is a founding principle at RONA. The Company considers that all its dealers, subsidiaries, corporate departments and all of its employees are part of one team sharing one objective, which is to provide the most efficient and enjoyable store experience possible to each and every one of our customers. Our commitment to maintain this unity is the driving force behind all development projects undertaken by the Company.

Respect

Respect manifests itself in the resources we invest in our people's development and in the attentive way we listen to everyone—from employees to shareholders, customers and business partners. Respect is also reflected in the working conditions and in the work environment we provide to our employees.

Search for the Common Good

In the search for the common good, RONA partners with people and businesses who believe in the benefits of being part of a group, and who accept its operating guidelines. RONA's actions are always guided by the collective interest of our employees, investors and customers. The search for the common good also extends outside the Company to include our economic and social partners.

Sense of Responsibility

At RONA, each person has the latitude to implement whatever actions they feel are necessary to support the Company's success. By developing a strong sense of responsibility among our employees, by encouraging them to work in a way that is respectful of others and in accordance with their own commitments, by encouraging initiatives and supporting projects within the organization, RONA gives our people the opportunity to grow apace with the Company.

D. CONFLICTS OF INTEREST

RONA respects everyone's right to manage their own affairs. However, each employee must make sure to avoid any situation in which their personal interests could be in conflict or even appear to be in conflict with RONA's interests.

When employees carry out their duties and functions on behalf of RONA, they must act at all times in the best interests of the Company and perform their duties and obligations fully and objectively without allowing their personal interests to conflict with those of RONA's.

Employees should avoid situations in which they could find themselves as being in an apparent or actual conflict of interest or appear to be using their position at RONA to gain a personal advantage for themselves or anyone else.

All employees should also avoid situations in which their personal interests could compromise or appear to be compromising their ability to make objective decisions that serve RONA's best interests.

It is impossible to describe in detail all the circumstances where conflicts of interest may occur. Even if an employee feels he or she is not behaving in a reprehensible manner, there may sometimes be an appearance of conflict. That may be just as harmful as an actual conflict of interest. When in doubt, employees should ask themselves:

- Will I gain personally from this?
- Could this result in a financial or other benefit for me, a relative or a friend?
- Would I be embarrassed to discuss this with my supervisor or my colleagues?
- Would I act differently if a friend or relative were not involved?
- Could someone else view this as a conflict of interest?

If the answer to any of these questions is yes, there is a real potential for conflict of interest and employees should not proceed or should discuss the matter with their immediate supervisor. A real or perceived conflict of interest is a serious matter. Do not hesitate to discuss it and ask for guidance.

**Did you know that hiring
a relative could be a conflict
of interest?**



Annual Declaration of Interests

RONA directors and senior executives, as well as merchandisers and assistant merchandisers must complete an annual statement of interest in which describes family, business or financial relationships of employees with RONA's business partners or direct competitors.

Gifts, Gratuities, Favours and Personal Benefits

Gifts

Employees may not accept gifts, gratuities, favours or personal benefits from business partners, except in certain limited circumstances with limited impact, and when the gift's value is unsubstantial.

Gifts, gratuities or favours may be perceived as a means of unduly influencing business relations and place an employee in a situation of a conflict of interest. Every employee has the responsibility of avoiding any type of situation involving a perceived or actual conflict of interest.

That is why no one should accept any gifts or favours from business partners unless they are infrequent, unsolicited gifts or favours of unsubstantial value. A gift that is worth less than \$50 is generally considered to be of unsubstantial value.

Tickets to a local sporting or cultural activity or a recognition event for a business partner's customers are also considered as acceptable gifts or favours as long as the business partner is also a participant in these events, and they are infrequent. These activities must however be of short duration and of reasonable value. For example, one hockey game during the season would be acceptable, but an entire weekend at the F1 Grand Prix would not be acceptable.

Any gift received during an activity with a business partner is subject to the rules of the present Code of Ethics.

Cash or equivalent gifts (gift certificates, credit or payment cards) are never acceptable, regardless of their value.

In all cases, a gift or favour, regardless of its value, must be reported to the employee's supervisor who will take action if the gift or favour may call into question RONA's or the employee's impartiality. For example, during negotiations or calls for tenders with a business partner, any gifts or favours must be considered inappropriate regardless of their value.

Any gift deemed inappropriate will be returned to the business partner, or will be handed out to the department's staff or used as a prize or reward during social activities involving store, service and distribution centres employees.

It is to be noted that all samples provided by a current or prospective business partner are the propriety of RONA.

Meals

Generally, business meals with business partners or their representatives should be of a reasonable duration and RONA should normally pay for the employee's share.

Travel

Trips of any type offered by business partners should be declined unless they are deemed necessary and approved in advance by a RONA vice president. In such cases, the allocation of expenses between RONA and the business partner will be determined so as to avoid a conflict of interest or the appearance of a conflict of interest.

It is forbidden to accept any personal or leisure trips or extensions of business trips for personal or entertainment purposes offered by a business partner.

Solicitation and "Employee Pricing"

Soliciting donations, gifts, sponsorships or financial contributions from business partners on behalf of RONA is permitted, but is only allowed when a specific authorization is given by a director or vice president, and is carried out in a formal manner, usually in writing.

It is strictly forbidden for a RONA employee to ask for a business partner discount, favour or personal gift for their own or someone else's benefit. In addition, no employee may make purchases for themselves or others directly from a business partner. To benefit from a rebate on products offered by business partners, all employee purchases must be made at participating stores or in designated distribution centres. Employee discount programs are applied in accordance with the current policy.

Business partners under contract with RONA are also subject to a code of ethics forbidding them from granting favours, gifts or benefits to RONA employees. Any employee suspecting that a business partner is acting in a reprehensible manner should inform their immediate supervisor.

Family and Personal Ties

In order to prevent a perceived or actual conflict of interest, any family or personal relationship with another employee, with a competitor's senior manager or major shareholder or with a business partner should be reported to the employee's immediate superior. Together, the employee and the supervisor will consider ways to avoid any perceived or actual conflict of interest, and prevent a personal relationship or other from hindering an employee's ability to act in the Company's best interest.

In general, RONA will take all the necessary measures to avoid situations involving a supervisory relationship between members of the same family.

In all cases where employees have a personal or professional relationship with an employee from competing businesses or business partners, they are responsible for maintaining the confidentiality level normally expected from RONA employees. In case of doubt, employees should discuss the matter with their immediate superior.

These guidelines are not intended to discourage employees from referring friends, acquaintances or family members who have the required skills required for positions at RONA.

Outside Employment, Business Opportunities and Other Activities

Employees are free to do what they like outside of working hours. However, these other activities must not be in actual or apparent conflict with RONA's activities or restrain employees from performing their duties.

Consequently, employees may not:

- work for a competitor of RONA;
- set up a business that offers products or services that compete with RONA;
- sell or promote a third party's product line or services if such products and services are in competition with RONA;
- use the Company's equipment or facilities to do paid or unpaid work for another organization unless they have received specific approval from management (for example to support a charitable or philanthropic organization);
- accept any other employment or undertake any activity that could prevent them from performing all their duties for the Company fully and in a competent manner;
- take advantage of an opportunity arising from using either RONA's assets or information that is not publicly available;
- conduct their business during working hours and/or in RONA's facilities;
- unless they have been expressly authorized to do so by RONA's management, support a political activity or group in the Company's name. However, RONA employees may support political groups or activities in their own name.

Some employees, as part of their responsibilities, have to represent the Company in social events involving customers, business partners or employees. These events may take place during or outside regular working hours. It is expected that employees, in these occasions, will behave in a responsible manner and that they will not act in any way that could cause prejudice to the organization. It is also expected that employees will take actions to prevent any situation which could pose a threat to the physical integrity of participants in these events.

Undue Influence Over the Conduct of Audit Activities

Employees are prohibited from manipulating, misleading, or fraudulently influencing RONA's external or internal auditors. They are also prohibited from placing them under duress.

E. PROTECTING AND PROCESSING INFORMATION

Confidentiality

In carrying out their duties, employees may have access to confidential information or become aware of facts or events that could have an important impact on the price or value of RONA's shares.

Unauthorized disclosure of confidential information may harm RONA directly by causing the Company to lose a competitive advantage, damaging its relations with its customers, harming its employees or putting RONA in default towards third parties with whom non-disclosure agreements were concluded.

"Confidential information" means any information or knowledge discovered, acquired or possessed by the Company that it does not wish to disclose to the general public, including any confidential information that may be given to RONA by a third party pursuant to a nondisclosure agreement.

Financial information, business plans, information about employees, sales and marketing data, information about customers and business partners, as well as the Company's legal affairs are all considered as being confidential information.

Employees of RONA who prepare, protect, use or by chance become aware of confidential information must protect its confidentiality and must not disclose such information to third parties, unless its disclosure is expressly authorized or required by law.

Every employee has an obligation to protect confidential information so that RONA can remain competitive. All employees should use such information efficiently to achieve the Company's business objectives and never use the information for their or other's personal gain or for motives that are not business related.

**Did you know that buying
and selling shares with "insider"
information is illegal?**



Disclosure of Information

RONA appoints a limited number of spokespersons to communicate with the financial community, regulatory authorities and the media. The authorized spokespersons may occasionally appoint other persons within the Company to accomplish these tasks.

Unless they have been specifically appointed by management or by the Communications and Public Affairs Department, no other employees shall be authorized to respond to requests (even if made anonymously) originating from the financial community, the media, securities regulatory authorities (including stock exchanges) or coming from other sources. Any requests for information of this kind should be forwarded immediately to the Communications and Public Affairs Department.

Insider Offenses

RONA is generally bound by law to promptly disclose to the public any material information that concerns it, including information that, if publicly disclosed, would probably influence investors' decisions or the market price of RONA's shares.

Employees may sometimes become aware of material information that has not yet been disclosed to the public. Until the information has been fully disclosed to the public, and until a reasonable period of time has elapsed allowing the information to become widely known, employees must treat it in strict confidence.

Material information is usually disclosed to the public by means of press releases or by a filing with government or regulatory authorities. All employees are responsible for reading and complying with RONA's *Disclosure Policy*.

Undisclosed material information means information that, if made public, could have an effect on the price of the Company's securities or would probably be considered material by investors in deciding to purchase, sell or trade in such securities. For example, investors may rely on such information to buy, exchange or sell RONA shares or securities of third parties that do business with RONA.

Here are some examples of material information:

- annual or quarterly financial statements;
- new products and services;
- business plans;
- corporate reorganization plans;
- important or strategic acquisition projects;
- sales figures;
- important changes in the management; and
- confidential information provided by third parties.

It is illegal for employees or members of their immediate families to buy, sell or otherwise trade in securities based on such information. Moreover, it is illegal to communicate such information to other persons who might buy, sell or otherwise trade in securities.

Protection of Personal Information of Customers and Business Partners

The very nature of our organization means that RONA must gather personal information for business and customer relations purposes.

To prevent any abuse and to ensure compliance with laws and regulations, the Company has put into place a policy regarding privacy and the protection of personal information that complies with the applicable laws. RONA's *Privacy Policy* is available on RONA.ZONE.ca. This policy governs the collection, possession, use and communication of personal information.

The collection of personal information may be used, in particular, to:

- identify customers and business partners in order to establish and maintain business relations with them (including for purposes of processing credit applications);
- provide customers with continuous service, including purchasing, billing and delivery procedures as well as to provide them with personalized service when they visit, call or email us;
- improve the products and services that we offer;
- provide customers with information on other RONA products and services that may be of interest to them; and
- protect customers of RONA from mistakes and fraud.

RONA may also use personal information to gather statistics for its business. These statistics do not contain any information that could allow direct identification of individuals, whether they are customers, business partners or employees.

All the personal information that the Company has on its business partners and customers is confidential and may not be disclosed or used directly or indirectly except for the purposes authorized by the Company.

Any employee who, in the course of their duties must handle personal information regarding customers and business partners, must exercise the utmost vigilance to protect the confidentiality of this information and not to disclose same to any third party, all in accordance with RONA's *Privacy Policy*.

Protection of Employees' Personal Information

The Company protects the personal information of its employees and only gathers information that is required for its business.

"Personal information" means any information which relates to a physical person and allows that person to be identified within the meaning of applicable Canadian and provincial privacy laws. For employees, personal information can include information in their personal record and any other information gathered and used to provide services or support, such as information relating to compensation or benefits.

Personal information must be protected by security standards in accordance with the sensitivity of the information and may be used only for reasonable purposes. All employees — management and non-management — who hold personal information on other employees must treat that information in accordance with the principles of protection of privacy.

In addition to taking normal precautions (e.g., locking desk drawers and offices), employees must avoid discussing personal information with other employees in public places.

RONA may not guarantee the protection of communications using the Company's equipment (e.g., email, Internet or intranet activities, voicemail, computer files or disks) and in the workplace (e.g., offices and filing cabinets).

RONA reserves the right to monitor or search any such property at any time if it has a reasonable motive to do so, such as:

- to evaluate and measure quality of service;
- to ensure the security and protection of other employees and the Company; and
- if it has reason to suspect an employee of fraud, theft, an undisclosed conflict of interest or another offense likely to harm another employee, the Company or likely to tarnish its reputation.

Security of Computer Systems and Networks

To protect the integrity, confidentiality and availability of the information contained in its various computer systems and other technological equipment, RONA has put into place an *Information Security Policy*. This policy is available on ZONE.RONA.ca and all employees are required to read and comply with the policy.

In addition to contributing to information security, all employees must comply with the following standards:

- access to computer systems is granted only to authorised users;
- users are responsible for their access to the computer systems and their use of such systems. In addition, all access codes and passwords must remain confidential;
- the use of computers (whether portable or desktop) must be such as to protect the confidentiality of the information stored thereon;
- the use of the Company's computer systems or networks for personal or non-work related purposes is strictly prohibited unless the employee obtains the permission of his or her immediate supervisor, all subject to the guidelines on the personal use of Internet access described hereafter; and
- each employee is bound to report any breach of computer security guidelines, methods or standards.

Books and Records

The Company's books and records contain vital data on all its activities. These are documents that RONA's executives and senior managers, as well as external financial analysts, shareholders, investors, regulatory bodies and others, rely on when making important decisions.

Employees should ensure that all documents, reports and files for which they are responsible are accurate and complete. They should also ensure that all transactions are duly authorized.

In preparing and keeping the books and records of the Company, employees should:

- comply to recognized accounting standards and practices and to applicable rules, regulations and controls;
- ensure that all entries are recorded promptly and accurately in the appropriate accounts and are properly documented;
- record all funds, assets and transactions. No undisclosed or unaccounted for funds or assets should be established;
- keep books and records that reflect accurately, fairly and in sufficient detail transactions, acquisitions, dispositions of assets and other similar activities of the Company;
- only sign documents whose accuracy is not in doubt; and
- limit access to sensitive or confidential information (e.g., financial information and information on business partners) in order to ensure that the information is not deliberately or accidentally disclosed, altered, misused or destroyed.

Contract Negotiations

Contracts and similar arrangements constitute one of the Company's business risks. They may also allow RONA to reduce its risk. If an employee's duties include contract negotiation or execution thereof, they should take steps to protect RONA's interests adequately by having such contracts and arrangements reviewed by the Legal Department in compliance with the terms of RONA's *Expenses Authorization and Commitment Policy*.

In all cases where an employee is in a position to bind RONA contractually, they must refer to and comply with the *Expenses Authorization and Commitment Policy and the Purchase of Goods and Services* other than those for Resale Policy. These policies are available on ZONE.RONA.ca.

Personal Use of Internet Access Provided by the Company

Access to Internet is provided primarily for the conduct of the Company's business.

Employees must refrain from visiting sites or conducting exchanges that are inappropriate, racist, pornographic, violent or otherwise promoting antisocial or illegal behaviour.

Internet access must not be used for personal gain or for an employee's business dealings on their own account. Furthermore, Internet should not be used for entertainment, criminal or litigious activities, polemical or defamatory communications. Every employee is responsible for all of their Internet or email use.

Accessing the Internet for personal use is permitted but must remain occasional and must never hinder the completion of employees' tasks.

Furthermore, information systems and their use remain the property and the responsibility of RONA, and the Company may verify how its systems are being used.

Social Networking

Whenever employees are engaged in social networking (e.g., via Facebook, MSN, LinkedIn, etc.) or chatting, they must refrain from taking a position on behalf of RONA. They must also exercise restraint and discretion when making comments to avoid harming RONA's reputation. Among other things, employees must meet their obligations in terms of protecting the confidentiality of the information available to them through their positions at RONA.

Moreover, RONA email addresses (ending by "@rona.ca") should never be used for identification purposes and access to "personal" social networks.

F. DEALING WITH CUSTOMERS AND COMPETITORS

In order to enjoy a strong and lasting competitive advantage, it is every employee's duty to help develop and protect RONA's reputation for quality, service excellence and integrity.

The best means of doing that, and of consolidating this position, is to compete hard but fairly while respecting legal and ethical obligations to the letter. Competing fairly means respecting business partners, customers, competitors and representatives.

Sales of Products and Services

RONA's business partners and customers have the right to expect that RONA will offer them quality products and services, and that RONA will promote in an honest way the advantages it offers over the competition.

To keep this trust:

- Employees should only sell products and services that meet the needs and demands of RONA's customers and business partners;
- Employees should not make any misrepresentations or false promises when promoting the products and services offered by RONA; and
- Employees should only refer contractors that are part of RONA's *Install Program*.

Respect for the Competition

RONA encourages free and open competition. The Company treats its competitors with the respect they deserve. Thus, RONA remains faithful to the concept of healthy competition, which motivates the Company to give of its best.

Every RONA employee has the duty to portray the competitors of the Company with accuracy, fairness and impartiality. To do otherwise would expose RONA to accusations of anti-competitive behaviour and even to legal proceedings.

Respecting the competition means:

- not describing a competitor to the public or to a customer inaccurately, in a misleading, offensive or unfair manner; and
- not showing any disrespect to a customer who chooses a competitor's products or services.

Competition Laws

Compliance with Laws

RONA's policy is to respect all applicable competition laws. Any contravention to these laws may give rise to serious criminal offenses and civil sanctions, including severe fines and prison sentences for the individuals.

In order to comply with applicable laws, it is forbidden, in particular, to enter into any agreement:

- relating to price fixing or price maintenance;
- relating to the allocation of sales, territories, customers and markets;
- to restrict the production or the supply of a product; or
- relating to bid-rigging.

Obtaining Information on Competitors

It is legitimate for RONA to gather commercial information about the markets in which it operates. That includes information about its competitors, their products, services, prices, and marketing campaigns.

However, this information may only be obtained by legal and ethical means. It is forbidden for employees to obtain information directly from a competitor or to exchange information with a competitor through an intermediary. Acting otherwise would run counter to our commitment to integrity and respect, and could also be illegal.

For any question relating with the application of competition laws and more particularly to make sure of the legality of your actions, we invite you to consult the Legal Affairs Department of RONA.

G. PROTECTING THE COMPANY'S ASSETS

All employees are bound to protect the Company's assets. This responsibility is essential to maintain the confidence of shareholders and other stakeholders.

Misuse of the Company's assets or accounting for them incorrectly could seriously harm the Company's reputation for integrity, defeat its business strategies and decisions, and weaken investor confidence. It could also be considered illegal and subject to criminal prosecution.

Every employee of RONA has an obligation to protect the Company's assets both physical (e.g., persons, inventory, materials, buildings, facilities, information, revenues) and technological (e.g., communications and information systems) that are entrusted to their care. Access to such assets and their use must be authorized, properly monitored and related to work.

The use of the Company's assets for personal means or gain is strictly prohibited. In addition, each employee must take appropriate steps to prevent losses resulting from intentional acts by third parties, both inside and outside the Company, or that could cause to bodily injury or property damage or the theft, loss or misuse of or unauthorized access to the Company's physical or technological assets and intellectual property (including data).

It is the duty of every employee to report immediately to their supervisor any act that could be an actual or presumed breach of the guidelines contained in this Code regarding the protection of the Company's assets.

H. A HEALTHY, RESPECTFUL WORK ENVIRONMENT

The Company commits itself to foster a workplace that:

- recognizes the dignity and personal value of every employee;
- allows every employee to work without fear of intimidation, discrimination, harassment or violence;
- promotes open and honest relationships;
- allows every employee to work in a safe environment;
- favours a work-life balance; and
- promotes healthy lifestyles as well as group and individual well-being.

Workplace Diversity

The Company defines diversity as respect for everyone. Culture, nationality of origin, sex, age, religion, a disability, sexual orientation, education and experience are just some of the ways in which diversity is measured.

By valuing differences, everyone can create a welcoming workplace based on merit and respect in which all employees can achieve their full potential. The Company also undertakes to better reflect the communities in which it operates and the customers and business partners with whom it does business.

Employment Equity

Employment equity is an important aspect of the Company's diversity strategy. Diversity comprises a number of different factors which make each person unique. Employment equity does not mean hiring unqualified people, but offering equal opportunities of employment to all.

Discrimination and Harassment

RONA does not tolerate any form of illegal discrimination or harassment of any person or group including its employees, business partners, customers and investors. This expressly includes discrimination on grounds of race, national or ethnic origin, colour, religion, age, sex, pregnancy, language, sexual orientation, marital status, social condition, a disability or the use of any means to palliate a disability.

Harassment means any offensive, embarrassing, demeaning and often repeated behaviour that deprives a person of the dignity and respect to which they are entitled. It may take several forms such as:

- threats, intimidation or verbal abuse;
- inappropriate remarks or jokes, for example about race, religion, disability, sex, sexual orientation or age;
- unwelcome physical contact, such as touching, patting, pinching or hitting;
- photos, posters, emails or screensavers that are sexist, racist or otherwise offensive; and
- any other act that could reasonably be perceived as offensive or demeaning.

Sexual harassment means any offensive or demeaning behaviour relating to a person's sex as well as any sexual behaviour that creates a work climate that is intimidating, embarrassing, hostile or offensive, or that could reasonably be interpreted as making the employment of a person or his or her chances of employment or promotion conditional to sexual favours.

Here are a few examples:

- questions and conversations about a person's sexual life;
- remarks about a person's sexual attractiveness or unattractiveness;
- displaying posters, calendars or screensavers that are of sexual nature; and
- writing notes, letters or emails with a sexual connotation.

An employee who believes that he or she is the victim of harassment or discrimination should immediately contact their supervisor or the People and Culture Department.



Occupational Health and Safety

RONA is committed to providing a safe and secure work environment in an effort to eliminate the risks of illness and injury.

Occupational health and safety is therefore a responsibility shared by every employee, at every level.

Every employee is responsible for their own health and safety.

To this end, each employee should:

- follow the work methods dictated by the Company when carrying out their duties;
- comply with all the Company's health and safety guidelines, including established emergency measures;
- observe all occupational health and safety laws and regulations;
- wear required protective equipment; and
- hold all required licences required for any vehicle used to complete the tasks assigned to the employee.

For its part, the Company undertakes to:

- provide a workplace that is healthy and safe in order to eliminate the risk of illness and injury;
- comply with or exceed legal requirements regarding health and safety; and
- provide appropriate supervision, training and equipment in this area.

Alcohol, Drugs and Other Substances

The Company is concerned about the health, safety and wellbeing of its employees, business partners, customers and the public. For this reason, the Company takes all reasonable steps to minimize the risks associated with its activities and to ensure a healthy, safe and productive work environment.

These principles apply to all employees at all locations where the Company carries its operations, to all operations during working hours. Each employee should behave responsibly at business, social and recreational gatherings involving RONA.

Employees must be prepared to perform their duties at all times. RONA applies a zero tolerance policy regarding alcohol, drugs or illegal drugs for all employees whose duties require the use of motorized equipment and/or whose duties involve a security risk to themselves, customers, the public or coworkers.

For clarity purposes, it is therefore unacceptable for these groups of employees to perform their duties while under the influence of alcohol, drugs or illegal drugs. All other group of employees must not be impaired by any of these substances.

The consumption, sale, illegal possession, manufacturing or distribution of alcohol or illegal drugs in the workplace or during working hours is strictly forbidden. However, the consumption or sale of alcohol is permitted at social events authorized by the Company at conditions set by the management for the holding of such events.

Furthermore, each employee is responsible for determining, with the assistance of their physician or pharmacist, any potential side effect caused by the use of prescription or over-the-counter drugs.

Should there be any side effects that may affect an employee's performance at work (e.g., prescription drug that causes drowsiness) it is the employee's responsibility to notify their immediate supervisor. The Company reserves the right to ask for a doctor's note to validate the employee's ability or inability to perform their tasks when taking medication.

Judicial Affairs

Employees involved in a legal matter or police investigation should inform their supervisor immediately if the situation is likely to affect their ability to attend work or to perform all their duties fully and properly.

Workplace Violence

Every employee is entitled to work in a workplace that is free from violence and threats. Therefore, the Company prohibits all physical, verbal or written aggression or violence by an employee towards another employee, or towards any other person with whom the employee has dealings in the course of their work.

Every employee is responsible for reporting to their supervisor any violence or threatened violence they witness.

I. COMPLIANCE WITH LAWS, REGULATIONS AND INTERNAL POLICIES

RONA must ensure compliance with the spirit and the letter of laws, rules and regulations and with generally accepted ethical standards.

Employees are responsible for taking reasonable measures to ensure such compliance. Similarly, every employee is bound to comply with the policies, standards and procedures implemented by RONA.

J. BREACHES TO THE CODE

Any breach to the Code is considered a serious matter, whether or not such breach has been committed for personal convenience and whether or not it results in a loss or a gain for RONA or for others.

Any breach to the present Code will give rise to an investigation and, if appropriate, may lead to disciplinary action up to and including dismissal. No provision of the Code prohibits RONA from taking disciplinary action against an employee, nor limits RONA's powers in this regard whether or not the matter is dealt with in this Code explicitly.

In addition, an offense under the Code may give rise to civil or criminal proceedings against the employee who committed the offense.

**Discuss any breaches to the Code
with your superior.**



K. REPORTING OF OFFENSES

This Code deals with fundamental principles adopted by RONA in matters of ethics as well as inherent responsibilities for the monitoring and reporting of breaches.

All employees of RONA are personally obliged to report in good faith any activity appearing to be in breach to this Code or laws and regulations in force.

If an employee believes that a person associated with RONA (employees, business partners, consultants, intermediaries, etc.) has breached a provision of the Code, the employee should report the fact in good faith to their supervisor either by mail, phone, email, in person or anonymously by contacting ClearView Connects by (RONA's Ethics Hotline) phone at 1.866.353.7662 or via their website: www.clearviewconnects.com. RONA will then take the necessary steps to investigate the matter.

ClearView Connects™ is a service of ClearView Strategic Partners Inc., an independent communications consulting company providing confidential and anonymous feedback services to organizations. Their secure reporting systems are designed to protect the identity of employees using their services.

Employees will not be discriminated against nor penalized, dismissed, relieved of their duties or suspended because they have reported in good faith an activity that could constitute a breach to the rules contained in this Code.

Please read RONA's *Policy on Complaints Regarding Accounting, Internal Accounting Controls or Auditing Matters* on RONA.ZONE.CA

L. ADDITIONAL INFORMATION

To obtain more information about the Code, please contact your immediate superior or the People and Culture Department.

If you have questions about a particular situation, you should contact your immediate supervisor or the People and Culture Department.



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