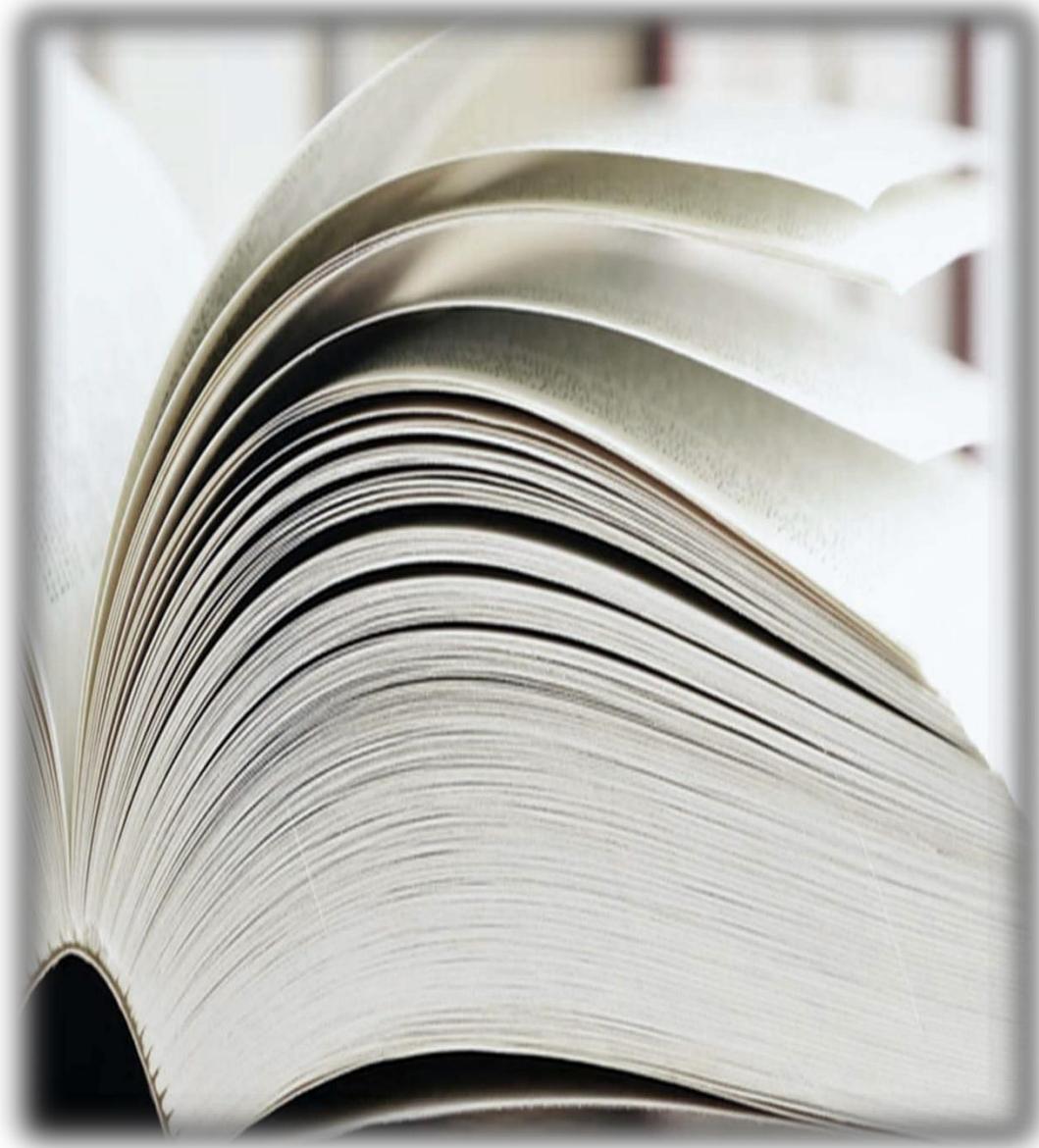




CODE OF BUSINESS CONDUCT AND ETHICS



Effective Date: January 1, 2026

Table of Contents

Overview	3
Purolator's Values	5
Legal Compliance and Ethics.....	6
Environment, Health and Safety	7
Harassment and Violence Prevention	8
Diversity, Equity, Inclusion and Belonging.....	9
Conflicts of Interest.....	10
Political Activities	12
Anti-Corruption.....	13
Competitive Practices.....	14
Company Assets and Reporting Obligations.....	15
Confidential Information	16
Intellectual Property.....	17
Protection of Personal Information.....	18
Information Security, Records Retention and Disposal.....	19
Other Policies and Procedures	21
Suggesting Changes	22

Overview

Why do we have a Code?

This Code of Business Conduct and Ethics (referred to as the “Code”) applies to all employees of Purolator. The term “Purolator” refers to Purolator Inc. and Purolator International, Inc., collectively or individually as the context requires. The term “employees” refers to the employees (including part-time employees, contract employees and students), officers and directors of Purolator. The term “leadership team member” refers to employees of Purolator holding a “Director” level position or higher. A separate Supplier Code of Conduct applies to all suppliers and vendors of Purolator.



When does the Code apply?

Compliance with the Code is a condition of employment. All employees are expected to understand the Code and exercise ethical judgment when making decisions. Violations of the Code (including the policies and procedures referred to in it) may result in disciplinary action up to and including dismissal. Purolator employees are expected to uphold Purolator’s standard of professionalism and integrity as representatives of Purolator. As a result, the Code applies at all times to employees’ conduct inside and outside of the workplace.

In the event of a conflict between the Code and any other policy or procedure of Purolator (in other words, where it is impossible to comply with both), you are required to comply with the Code.

Who do I ask if I have questions about the Code?

The purpose of the Code is to provide guidance and promote ethical behavior in support of Purolator’s values and policies. However, the Code does not provide an answer for every possible situation you might encounter. For this reason, each section of the Code indicates whom you can contact for more information. In addition, Purolator’s policies and procedures provide additional guidance on specific issues.

If after contacting the appropriate person or department for more information and reviewing Purolator’s policies and procedures you still have questions about the interpretation or application of the Code, please contact Purolator’s Corporate Compliance Officer as follows:

Mail:
Purolator Inc.
Legal Department
2727 Meadowpine Blvd
Mississauga, ON L5N 0E1
Attention: Corporate Compliance Officer

E-mail:
corporatecomplianceofficer@purolator.com

Telephone:
1-800-326-4963
ext. 8776433

How do I report a violation?

All employees are required to report violations of the Code. You may report a violation of the Code to your immediate supervisor, Human Resources, Purolator’s Corporate Compliance Officer (CCO), or through Purolator’s Confidential Submissions process.

Reported violations will be reviewed to identify the steps to address and resolve the issue. For certain types of violations, the recipient of the report may need to consult with or forward the report to another department. The process engaged to handle the report will be subject to the applicable policy. Due to privacy concerns, you may not receive certain details regarding the outcome. When a Code violation is reported to the CCO, they may refer it to their delegate or to another department for handling.

If you do not feel comfortable reporting a potential violation directly to your supervisor or Human Resources, you may make a report anonymously through ClearView Connects using one of the following channels:

Mail:
ClearView Connects
P.O. Box 11017 Toronto, ON
M1E 1N0

Internet:
www.clearviewconnects.com

Telephone:
1-866-981-5597

All reports of violations will be handled promptly and confidentially. You will not be discriminated against or penalized for reporting in good faith any violations of the Code. For more information, please see Purolator's *Confidential Submissions Policy*, which is available on PuroNet under "Policies".

Is the Code available in other formats?

Purolator is committed to fostering an inclusive and accessible environment for all people. It is important that all employees have access to the Code in a format that they can understand. The Code is available in accessible formats upon request.

The Code is available in both English and French to uphold employees' language rights and ensure full understanding of their responsibilities in their preferred language.

Note on Amendments

The Code is reviewed annually. Purolator reserves the right to amend the Code and any of its policies and procedures at any time. Significant changes to the Code or any of Purolator's policies or procedures will be communicated broadly to employees and posted on PuroNet.

Purolator's Values

The Code reinforces our values by articulating the standards of conduct expected of all Purolator employees in areas of critical importance to Purolator. Those specific standards of conduct are set out in the pages that follow.



Purolator is building a risk culture and encourages our employees to talk openly about risk and work together to find solutions. Purolator supports risk-informed decision-making, to optimize risk/reward outcomes and ensure that decisions are made within Purolator's risk appetite and managed within associated tolerances.

Legal Compliance and Ethics

Purolator's reputation can be seriously damaged if we act illegally or unethically. Every employee has a duty to comply with the law and act ethically at all times. These are the most basic duties that underpin all other duties set out in the Code.

Purolator consistently monitors shifts in the legal landscape, and potential impact on the public and the organization. This includes compliance with laws intended to prevent and or reduce the risk of forced or child labour in its supply chain and other systemic human rights violations.

Your responsibilities as a Purolator employee:

- comply with the legal requirements applicable to your job. Seek clarification if you do not understand your legal obligations. Remember that ignorance of the law does not excuse you from your obligation to comply;
- do not ask or allow an outside party to do anything that you are not permitted to do as a Purolator employee;
- do not accept or offer bribes, kick-backs or any other payments or benefits that might be perceived as improper or illegal;
- do not exercise authority or influence over a matter in which you have a conflict of interest;
- be honest in all your interactions with Purolator, your fellow employees our customers, suppliers and security holders. Take care not to deceive or mislead them, even if only unintentionally;
- do not take or divert property, information or other assets belonging to Purolator or other parties (including our customers) through fraud, deception, extortion or other illegal means. Ensure that you protect all assets entrusted to you for the benefit of the parties to whom they belong;
- do not falsify any record or present information in a manner that is misleading;
- ensure you have proper authorization prior to creating and/or modifying a record;
- create and maintain accurate records;
- ensure that you always place compliance with our health and safety, and environmental commitments ahead of operating objectives (including profit);
- do not make commitments on behalf of Purolator that you do not have the authority to make or that you know Purolator cannot live up to;
- cooperate with all internal and external investigations into potential misconduct including potential violations of the Code and maintain confidentiality where possible; and
- do not retaliate against any employee who reports in good faith any violation of the Code or a Purolator policy or procedure.

For more information, please contact the Legal department.

Legal requirements arise primarily from:

- laws
- orders from courts and regulatory agencies
- court decisions

Many of Purolator's policies and procedures incorporate legal requirements to help ensure Purolator's compliance with the law.

Environment, Health and Safety

Purolator is committed to protecting the environment and the health and safety of its employees as a top priority. This commitment must always take precedence over operating objectives. Every employee shares the responsibility to work safely and to act in a way that protects the environment from harm, fosters a safe and healthy workplace. This includes addressing and preventing incidents of harassment and violence and supporting affected employees to create a safer, more inclusive workplace.

It is important for employees to lead by example. Employees can demonstrate their commitment to the protection of the environment and to the health and safety of their fellow employees in the way they perform their job. Employees should also prioritize their health and safety, including their mental health, and seek assistance when needed.

Everyone who has the authority to direct or actually directs how another person does work or performs a task has a **legal duty** to take reasonable steps to prevent bodily and environmental harm.

Your responsibilities as a Purolator employee:

- ensure you understand and comply with Purolator's environment, health and safety policies and procedures, and the related regulatory requirements applicable to your workplace;
- attend and actively participate in Purolator's environment, health and safety training programs. Do not hesitate to request the training you are required to have in order to perform your job safely;
- prioritize mental health and seek support if needed;
- promptly report to your supervisor any violations of environmental, health or safety laws, policies or procedures, unsafe conditions or practices that may endanger you or others;
- promptly report to your immediate supervisor any accidents or incidents that result or have the potential to result in personal injury or harm to the environment;
- cooperate with your site's health and safety committee and with all environment, health and safety investigations, inspections and audits. Also ensure you actively participate in and contribute to the implementation of action plans to correct deficiencies and continuously improve Purolator's environmental, health and safety performance.
- ensure that you always place compliance with our health and safety and environmental commitments ahead of operating objectives (including profit);
- always wear the protective clothing and equipment required for your function and dispose of waste in compliance with Purolator's waste disposal procedures. Do not hesitate to alert your co-workers and management to any unsafe practices you observe them engaging in;



For more information, please contact the Health & Safety department or the Sustainability department with any ideas and suggestions on ways to improve Purolator's environmental impact.

Harassment and Violence Prevention

Purolator is committed to a workplace that is free from harassment and violence – one where employees are respectful and considerate toward one another, with customers, business partners and the public. It is important to speak up if you experience or witness violence or harassment in the workplace.

Every employee has the right to a safe and respectful workplace. All forms of harassment and violence are prohibited at Purolator. This includes harassment and violence based on a protected identity, which means a person's race, national or ethnic origin, colour, religion, age, sex (including pregnancy and childbirth), sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability (including previous or present drug or alcohol dependence), pardoned conviction or record suspension.

Purolator's Workplace Harassment & Violence Prevention Policy outlines the resolution process Purolator used to resolve incidents of harassment and violence in the workplace and provides examples of workplace harassment and violence.

Your responsibilities as a Purolator employee:

- treat others the way you would like to be treated, with respect, courtesy, fairness and sensitivity;
- do not engage in, support or ignore any form of violence or harassment;
- exercise authority and management duties with care, and avoid taking management actions that may constitute harassment or abuse of authority
- report concerns and incidents of harassment and or violence immediately to ensure these matters are recorded and address; and
- participate in all resolution processes in a confidential manner that respects the privacy of those involved.

For more information, please contact your local Human Resources Business Partner.

Harassment includes:

- threats or bullying
- excluding other employees from work or social events with intent of isolating them in the workplace
- offensive remarks, such as unwelcome, graphic or suggestive comments about an individual's body, appearance, dress or protected identity (for example, race, disability, sexual orientation)
- obscene jokes, comments or other inappropriate, sexually explicit or offensive language



Diversity, Equity, Inclusion and Belonging

Purolator is committed to providing an inclusive, respectful and safe environment that is free from discrimination and harassment for all. We make every effort to make progress by recognizing and addressing historical and current barriers experienced by various groups.

Discrimination is any conduct that has a negative impact on an individual or group based on one or more of the protected grounds under the *Canadian Human Rights Act (CHRA)*.

Purolator makes employment decisions (for example, hiring, discipline, termination, access to benefits and training) based on a person's qualifications and not on a prohibited ground under the *CHRA*. Purolator has developed policies and practices to eliminate employment barriers for designated groups and to ensure fairness for all.

Employees should not be afraid to speak up and be assertive if they feel they are being discriminated against. Retaliation against anyone raising legitimate complaints is forbidden.

Your responsibilities as a Purolator employee:

- treat everyone with respect, courtesy, fairness and sensitivity regardless of their identity or background;
- do not engage in, support or ignore any form of discrimination;
- provide timely accommodations to employees in order to eliminate barriers in the workplace, while respecting their confidentiality;
- respect everyone's right to self-identify on their own terms. Never require, pressure or coerce anyone to disclose details about their identity or background;
- do not share information about anyone's identity, background or accommodation needs without their permission; and
- If you witness someone engaging in discrimination, report the incident immediately to your supervisor, Human Resources or the Diversity, Equity, Inclusion and Belonging department.

For more information, please contact your local Human Resources Business Partner or the Diversity, Equity, Inclusion and Belonging department.

The protected grounds of discrimination are

- race, colour, national or ethnic origin
- religion
- age
- sex, sexual orientation, gender identity or expression
- marital status
- family status
- genetic characteristics
- disability (including previous or present alcohol dependence)
- a conviction for which a pardon has been granted or a record suspension



Conflicts of Interest

Identifying a Conflict of Interest

A conflict of interest exists when your professional or personal interests interfere with, or might be seen by others to interfere with, the interests of the company. Purolator employees must act honestly and with a view to the best interests of Purolator.

Your responsibilities as a Purolator employee:

- do not make presentations, publish articles or otherwise make public statements on issues or matters that concern Purolator's competitive position or could have a significant impact on Purolator's reputation without notifying Corporate Communications in advance, or where advance notification is not possible, as soon as possible after making the presentation or statement;
- do not use Purolator's facilities, equipment, time or materials for your personal benefit or the benefit of others. Purolator's resources (including your time while at work) are to be used solely to advance Purolator's legitimate interests;
- do not accept significant gifts from employees who report to you or from anyone whom you have the ability to exercise direction or control, customers, suppliers or competitors;
- do not exercise decision-making authority or exercise any influence in relation to any existing or proposed business relationship with any person or organization in which you have a significant personal interest, unless you have disclosed your interest in writing and the conflict has been waived in writing by the President and C.E.O. or, in the case of a conflict involving an officer or director, the conflict has been addressed in accordance with applicable law and any protocols established by Purolator's board of directors from time to time;
- do not engage in work outside of Purolator if you are a leadership team member or you are prohibited through your employment contract from doing so unless you have obtained your manager's prior written consent. In seeking such consent, employees must also disclose the nature of the potential work engagement to Human Resources and Purolator's Corporate Compliance Officer for consideration.
- for all other employees, you are permitted to engage in work outside of Purolator (for yourself or another person or organization) as long as that work is not for a person or organization (other than an affiliate – Canada Post Corporation, Livingston International Inc. and Williams PharmaLogistics Inc.) that could be considered to be a competitor, supplier or customer of Purolator and that work does not interfere or conflict with your ability to carry out your duties to Purolator. For greater clarity, work outside of Purolator includes, but is not limited to, employment with outside organizations, operating your own business or serving as a director on a charitable board.
- do not use confidential, privileged or proprietary information to advance your own or others'

You are considered to have a **significant personal interest** in another person or organization if you or any person with whom you have a close personal relationship (for example, friends or family members) have an interest that could influence, or could reasonably be perceived by others to influence your judgment or impartiality in your dealings with that other person or organization.

interests (see the section of the Code titled “Confidential Information”)

Examples of a Conflict of Interest

- Recommending that a family member is hired for a position over which you exercise influence either directly or indirectly.
- Being involved, directly or indirectly, in any hiring decisions of a candidate that has a significant personal relationship with a supplier, over whom you exercise any influence.
- Exercising any decision making authority over a supplier with whom you have a significant personal interest.
- Serving as a director, officer, partner, consultant, manager or in a technical capacity for a competitor, supplier or customer or acting as a broker or intermediary for transactions involving Purolator.
- Accepting a significant gift or benefit from a vendor. For clarity, a significant gift or benefit for the purpose of this policy, is one that could influence, or could reasonably be perceived by others to influence, your judgment or impartiality in your dealings with the other party. For this reason, business entertainment in particular must be moderately scaled, attended by one or more representatives of the party providing the entertainment and intended only to facilitate business goals.
- Bribes or kick-backs of any kind
- Making and or influencing decisions regarding any existing or proposed services agreement for which you have a personal direct or indirect interest.

Disclosing a Conflict of Interest

- Employees must avoid an actual, potential or perceived conflict of interest.
- Where you are unsure of whether the work outside of Purolator could be a conflict or be perceived by others as a conflict, you are required to disclose the conflict in writing to your manager and to Purolator’s Corporate Compliance Officer for consideration.

For more information, please contact the Corporate Compliance Officer.



Political Activities

Access to government in a free and open manner, is a matter of public interest. Purolator actively and openly communicates with all levels of government to share its views on proposed laws, policies and programs that may affect Purolator's business or the transportation industry as a whole. Purolator believes it is important to contribute to the formulation of sound public policy in a manner that is compliant with the law and adheres to high ethical standards. For this reason, Purolator does not engage in lobbying of public office holders unless appropriately authorized and registered as required and ensuring reporting of lobbying activities, as applicable.

Depending on the jurisdiction, communications with government officials may require registration even if those communications are initiated by a government official. Also bear in mind that goods and services (not just money) provided to political organizations or their representatives may also be considered to be contributions.

Your responsibilities as a Purolator employee:

- do not communicate with government employees or elected officials on issues of public policy or to secure funding for Purolator initiatives without notifying the Legal Department in advance of such communication or, where advance notification is not possible, as soon as possible following such communication;
- prior to lobbying, you must ensure timely completion of required registrations in lobbying registries and reporting of communications, as applicable (contact the Legal Department for direction);
- do not make any contributions to political organizations or their representatives (including candidates for political office) using Purolator funds or resources (whether directly or indirectly), even when the laws of your jurisdiction permit it, without the prior approval of the Legal Department;
- you may get involved in political issues on your own behalf by, among other things, getting involved in campaigns, speaking at public rallies and making contributions to political organizations and candidates. However, ensure that you do not use company time or resources in support of your personal activities and that you take the utmost care to avoid giving the impression that you are speaking on behalf of Purolator;
- do not provide any gifts or entertainment to, or pay the expenses of, any government officials without the prior approval of the Legal Department; and
- ensure that you keep track of the details (i.e., name, date, location and subject matter discussed) of all meetings and communications with government officials which relate to public policy issues and provide those details to the Legal Department.

Lobbying is the act of communicating with a public office holder in an attempt to influence a public policy or program, law or resolution regulation, decision of Executive Council or the awarding of contract, grant, contribution or other financial benefit from a government body.

For more information, please contact the Corporate Compliance Officer.

Anti-Corruption

As Purolator's networks expand, we must be more vigilant in ensuring our compliance with laws that govern both national and international commercial transactions. Bribery and corruption are pervasive issues in international cross border transactions and that is why, Purolator must do its part to combat corruption in the national and foreign market while competing to serve our customers and be profitable.

It is a criminal offence in Canada to offer or provide payment, reward, advantage or benefit of any kind to a federal or provincial government official in exchange for a business advantage. A conviction of bribery under the *Criminal Code* may result in imprisonment and or fines.

Your responsibilities as a Purolator employee:

- do not accept "kickbacks" or payments of any kind for the purpose of facilitating a business transaction on behalf of Purolator;
- do not offer or provide payment, reward, advantage or benefit in any form to a foreign public official in order to keep or obtain an advantage in business;
- do not offer or provide payment, reward, advantage or benefit in any form to a third party for the benefit of a foreign public official in order to keep or obtain an advantage in business;
- do not offer or provide payment, reward, advantage or benefit in any form to a family member or friend of a foreign public official in order to keep or obtain an advantage in business;
- do not agree to provide a benefit to any government official, a member of the government official's family, or to a third party for the benefit of the government official in order to obtain an advantage in business;
- do not engage in deceptive bookkeeping practices to conceal bribery;
- do not submit documentation for non-existent expenses;
- do not accept "kickbacks" or payments of any kind for the purpose of facilitating a business transaction on behalf of Purolator;
- do not conceal or destroy, records or other documents for the purpose of concealing evidence of bribery committed by another individual; and
- do not conspire to commit bribery or engage in other deceptive practices; and
- do not agree to provide a benefit to any government official (domestic or foreign), a member of the government official's family, or to a third party for the benefit of the government official in order to obtain an advantage in business.

Bribery is a corrupt practice that undermines good governance and fair competition in the global market.



Pursuant to the *Corruption of Foreign Public Officials Act* there are limited exceptions where a benefit provided to a foreign public official is permitted. Determining whether an exception applies involves an interpretation of the law. Therefore, you must consult with the Legal Department to determine whether the above exceptions apply prior to offering a benefit that you think is permissible.

For more information, please contact the Corporate Compliance Officer.

Competitive Practices

Purolator competes vigorously in the marketplace to provide products and services of value to our customers, earn a profit and enhance shareholder value. In doing so, Purolator must comply with all applicable competition and consumer protection laws.

Your responsibilities as a Purolator employee:

- do not discuss or share any confidential or competitively sensitive information with competitors of Purolator;
- do not make any agreements or arrangements with any competitor of Purolator in relation to:
 - pricing (for example, list rates, surcharges, discounts and rebates); or
 - the allocation of customers or markets (for example, who will serve which customers or geographic areas); or
 - the supply of products and services to the market (for example, how much of a product or service will be made available to the market).
- do not make any agreements or arrangements with anyone (whether or not a competitor of Purolator) that could have the effect of unduly reducing, restraining or injuring competition in a market;
- do not make any agreements or arrangements with anyone (whether or not a competitor of Purolator) in relation to the terms of a proposal or the decision to submit or withdraw a proposal that is prepared in response to a call or request for bids or tenders;
- ensure that all communications about Purolator's products and services are accurate and disclose all relevant information, particularly if withholding information could create an impression of the products and services that is false or misleading;
- consult the Legal Department prior to entering into any arrangements with customers or suppliers that create a relationship of exclusivity, impose restrictions on the price at which the products or services may be resold, tie the sale of one product or service to the sale of another product or service or otherwise impose restrictions on the sale or resale of the products or services;
- consult the Legal Department prior to joining or participating in a trade or industry association; and
- Report immediately any potential violations of competition or consumer protection laws to the Legal Department.

A **competitor**, for purposes of the Code, means anyone who competes or could potentially compete with Purolator in relation to one or more products or services.



Note that discussions or exchanges of certain competitively sensitive information and/or certain agreements or arrangements with competitors may be permissible in limited circumstances. Do not, however, initiate or participate in any such discussions, exchanges, agreements or arrangements without obtaining the prior approval of the Legal Department.

For more information, please contact the Legal department.

Company Assets and Reporting Obligations

Purolator must use its resources in the most efficient and effective manner possible. This means getting the best possible value for the goods and services it purchases and using those goods and services for the benefit of Purolator's business. It also means exploring and, where possible, pursuing opportunities for increasing the profitability of Purolator's business. In maximizing asset value, Purolator will treat its suppliers and business partners fairly by making its expectations known and honouring its commitments.

Your responsibilities as a Purolator employee:

- always use Purolator's assets for the benefit of Purolator's business, not your personal benefit or the benefit of others. In particular, do not pursue a business opportunity for yourself that you become aware of as a result of your role with Purolator or refer that opportunity to another person or organization for them to pursue;
- do not exercise decision-making authority or influence in relation to the procurement of goods or services for Purolator if you have a significant personal interest in the supplier of the goods or services (see the section of the Code titled "Conflict of Interest");
- do not solicit or accept a significant gift or benefit from a supplier (see the section of the Code titled "Conflict of Interest");
- do not make any commitments to suppliers that you are not authorized to make under Purolator's Delegation of Authority;
- respect the confidentiality of all confidential information provided to Purolator by a supplier (see the section of the Code titled "Confidential Information");
- engage suppliers who conduct themselves professionally in accordance with Purolator's Supplier Code of Conduct and share Purolator's commitment to high ethical standards;
- ensure that all significant commitments to suppliers are set out in a contract or purchase order and that all payments to suppliers are made by Purolator cheque, bank draft or electronic funds transfer pursuant to an invoice or other billing document that allows Purolator to track its expenditures;
- understand and comply with all internal controls over financial reporting applicable to your role;
- maintain accurate books and records to support all financial transactions and accounting entries you are responsible for; and
promptly alert your immediate supervisor or Corporate Accounting if you notice any potential financial or accounting wrongdoing, including any suspicious or unusual transactions or accounting entries.

Purolator's assets consist of anything of value to which Purolator is entitled, including:

- facilities
- equipment (for example, computers, revenue vehicles)
- employee time
- corporate memberships
- tickets to sporting events
- supplier credit notes
- business opportunities

For more information, please contact the Procurement department or Corporate Accounting.

Confidential Information

Confidential information is one of the most valuable assets of any company. Whether the confidential information relates to financial, technical or other business matters, Purolator requires all of its employees to respect and protect confidential information belonging to Purolator and third parties.

Your responsibilities as a Purolator employee:

- do not at any time during or after your employment with Purolator:
 - disclose any confidential information to any person other than a current employee of Purolator who has a need to know the information in order to perform their duties for Purolator;
 - use confidential information other than to fulfill the purpose for which it was disclosed to you;
- upon the termination of your employment with Purolator, return all confidential information and copies thereof to Purolator;
- do not claim any rights in or to any confidential information. No employee is granted any right, by license or otherwise, in respect of confidential information;
- provide reasonable assistance to Purolator in securing any injunction or other legal remedy to protect confidential information from disclosure;
- before you give outside parties any confidential information about Purolator's business, ensure that you have received any required approvals to do so and that the outside party has signed an agreement that prohibits them from disclosing the information to anyone else (a "non-disclosure agreement");
- ensure you understand and comply with the terms of any confidentiality or non-disclosure agreements between Purolator and third parties;
- do not disclose to Purolator any confidential information belonging to your former employer, and do not place any other Purolator employee in a position where they might feel obligated to disclose to Purolator confidential information belonging to their former employer;
- do not knowingly accept any third party confidential information that Purolator is not legally entitled to possess; and
- treat all legal advice provided by the Legal Department as confidential information and do not ever disclose all or any part of it to others (even other Purolator employees) without first obtaining the approval of the Legal Department.

Confidential information is distinct from personal information (information about an identifiable individual) it refers to business information of a confidential or proprietary nature, whether in written, oral, visual or machine readable form, concerning the business or affairs of a person or organization, including, but not limited to, that person or organization's former, current or potential customers, suppliers, marketing or strategic plans, investment plans, results of operations, technical information, processes, trade secrets and know-how, except to the extent that it is generally available to the public through no fault of your own.

For more information, please contact the Legal department.

Intellectual Property

Purolator employees and contractors create significant and valuable written works, technology, data compilations and artwork. They also identify problems and develop solutions by making improvements to equipment, tools and processes. These creations and solutions constitute intellectual property.

To maintain our technological and competitive standing, Purolator often registers its intellectual property. This measure ensures that we clearly own our intellectual property and have all rights to its use. It is important for Purolator employees to understand the different types of intellectual property they might create or be exposed to in their job.

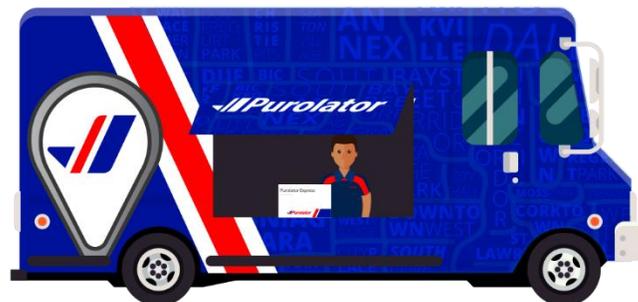
Your responsibilities as a Purolator employee:

- treat intellectual property as confidential information (see the section of the Code titled “Confidential Information”);
understand the different types of intellectual property you might create or be exposed to in your job;
- ensure that you respect and do not infringe upon the intellectual property rights of others;
- ensure that intellectual property issues are addressed in contracts with third parties, particularly those who are developing intellectual property for Purolator or using Purolator’s intellectual property; and
- speak to your immediate supervisor if you think something you have created in the course of your work duties should have intellectual property protection.

For more information, please contact the Legal department.

Intellectual property includes:

- trademarks
- trade names
- literary, dramatic, musical and artistic works
- inventions
- industrial designs
- integrated circuit topographies
- trade secrets



Protection of Personal Information

Purolator acknowledges its obligations under applicable privacy laws and takes its responsibility to safeguard all personal information entrusted to it seriously.

Your responsibilities as a Purolator employee:

- assess the potential impact of new initiatives on Purolator's privacy obligations, a Privacy Impact Assessment (PIA) may be required if new technology, use of Personal Information, outside of Quebec/Canada, biometric data (individual's physiological or behavioural characteristics) or artificial intelligence (AI) is part of the new initiative (contact the Privacy Officer for guidance);
- collect personal information only with the consent of the person to whom it belongs and only to the extent reasonably necessary to fulfill the purpose for which it is being collected. Ensure you clearly communicate to the person disclosing their personal information to Purolator why it is being collected and how it will be used and disclosed by Purolator;
- use and disclose personal information only in a manner that is consistent with the consent that was originally provided by the person to whom the personal information belongs;
- retain personal information only for as long as reasonably necessary to fulfill the purpose for which it was collected. All personal information must be deleted or disposed of in a secure manner in accordance with Purolator's Record Retention and Disposal Procedure;
- keep track of the location of all personal information entrusted to Purolator and implement controls to protect the personal information from loss and unauthorized access;
- take steps to ensure that all personal information in Purolator's possession is complete and up-to-date and at an individual's request can be provided, corrected or deleted. In particular, ensure that you update Purolator on any changes to your personal information that is held by Purolator;
- immediately report any actual or potential breach of Purolator's security safeguards to Purolator's Privacy Officer;
- participate in any investigation into a potential breach of Purolator's security safeguards; and
- promptly alert your Department Privacy Representative if you have any concerns about how your or anyone else's personal information is being handled.
- contact Purolator's Privacy Officer immediately if you believe that someone has gained unauthorized access to Personal Information.

Personal information means information, in any form, about an identifiable individual (including Purolator's own employees), but does not include business contact information such as the name, title, business address, email address or telephone number of an employee of an organization. Examples of personal information include: age, identification numbers, e-mail address, income, ethnic origin, opinions of or about the individual, comments, credit records, account history and intentions (for example, to acquire goods or services).

For more information, please contact your Department Privacy Representative or the Privacy Officer at privacy@purolator.com.

Information Security, Records Retention and Disposal

Purolator considers information and records to be valuable corporate resources that contribute to achieving our objectives and require diligent management. Records created in the course of your employment belong to Purolator. All records must be destroyed in accordance with Purolator's Record Retention and Disposal Procedure. This includes regular disposal of records that are no longer required, subject to these record retention requirements. This extends to records created, managed and stored in hard copy and electronic format using Purolator's networks, including laptops and mobile devices.

Purolator networks are also used to communicate with internal and external stakeholders and must be used in a manner that does not compromise the personal and confidential information in the network. That is why understanding information security is critical.

Your responsibilities as a Purolator employee:

- familiarize yourself with and comply with all applicable Privacy, Information Technology and Records Retention policies and procedures;
- securely delete or destroy records (including all copies) once they are no longer required to be maintained under Purolator's Records Retention Procedure;
- do not place any confidential or personal information in Purolator care and control, on the Internet or on any publicly accessible computer or device except for Purolator business;
- protect your confidential login credentials;
- do not exchange confidential or personal information in Purolator care and control using instant messaging, social networking sites (for example, Facebook, LinkedIn), or through non-Purolator email accounts;
- encrypt removable media and password protect confidential and personal information that is transmitted over email;
- create authentic, reliable and useful records required for the operation of Purolator's business and maintain those records for as long as required under Purolator's Records Retention Procedure;
- do not create incomplete, inaccurate or misleading records; and
- limit your personal use of corporate computer systems.

Virtually everything employees document in the course of daily business, using computers, personal digital assistants, pens, cameras or audio or video recorders is a **record**.

Documents and information created, distributed or received by computers such as e-mail correspondence, daily agenda entries, documents, graphics and spreadsheets are also records.

For more information, please contact the Legal or IT Security department.

Financial Reporting

Purolator's security holders extend capital to Purolator based in part on their understanding of Purolator's financial position. Maintaining the trust of our security holders requires Purolator to prepare financial statements that present Purolator's financial position, the results of its operations and its cash flows fairly in all material respects.

As a Purolator employee:

- understand and comply with all internal controls over financial reporting applicable to your role;
- maintain accurate books and records to support all financial transactions and accounting entries you are responsible for; and
- promptly alert your immediate supervisor or Corporate Accounting if you notice any potential financial or accounting wrongdoing, including any suspicious or unusual transactions or accounting entries.

Financial or accounting wrongdoing includes questionable and/or improper accounting, internal control or auditing practices or conduct (including fraud, deliberate error or misrepresentation).

For more information, please contact Corporate Accounting.

Other Policies and Procedures

Purolator continually develops and maintains numerous policies and procedures to explain Purolator's expectations in relation to specific issues. While the Code speaks to some of the areas of greatest concern, you are also expected to understand and comply with Purolator's other policies and procedures that apply to you. Set out below are the principal subject areas for which specific policies and/or procedures currently exist:

Company Vehicle Use
Delegation of Authority
Employee Discounts
Employee Equity
Employee Exit
Employee Leaves of Absence
Employee Performance and Talent Management
Employee Recognition
Employee Recruitment and Selection
Employee Referral
Employee Relocations and Transfers

Employee Training and Continuing Education
Environment
External Work
Health and Safety
Information Security
Information Technology
Protection of Personal Information
Record Retention and Disposal
Workplace Accommodation
Workplace Violence and Harassment Prevention

Please note, this is not an exhaustive list of Purolator's policies and procedures. All of Purolator's policies and procedures are available on PuroNet or can be obtained from your manager or local Human Resources Business Partner.



Suggesting Changes

The Code is a living document. This means that it should continually evolve to address new challenges so that it remains relevant to us all. It also that all of Purolator's employees are expected to understand and comply with it.

If you have any suggestions for improving the Code of Business Conduct and Ethics, you are encouraged to submit your suggestions to Purolator's Corporate Compliance Officer. Please state the section of the Code you suggest changing, how you would like to see it changed, and provide a brief explanation of why you think the change would improve the Code.

Please submit your suggestions to the Corporate Compliance Officer in writing as follows:

Purolator Inc.
Legal Department
2727 Meadowpine Blvd
Mississauga, ON L5N 0E1
Attention: Corporate Compliance Officer

- or -

E-mail: corporatecomplianceofficer@purolator.com

