



Supplier Code of Conduct

THIS DOCUMENT IS AVAILABLE IN ALTERNATE FORMATS UPON REQUEST

Introduction

Manitoba Liquor and Lotteries (MBLL) takes a leading stance with respect to the incorporation of ethical, social and environmental practices in all of our business decisions. MBLL is committed to driving and supporting meaningful change in our business, for our partners, and ultimately for our consumers and the communities in which they live.

Integrity, honesty and transparency are central to the way in which MBLL operates, and we expect the same of the people, companies and other entities who provide our goods and services.

This Supplier Code of Conduct (the Code) sets out MBLL's expectations of its suppliers. This includes those who supply goods for sale as well as those who supply of goods and services that we use to run our operations. We expect our suppliers to act in an ethical manner, to comply with this Code in its spirit and intent, and to align with MBLL's core values.

This Code is incorporated into every transaction conducted between MBLL and its suppliers and forms part of every contract, agreement, purchase order, or call-up.

This Code applies to all suppliers including their directors, owners, employees, agents, partners and subcontractors ("Supplier Agents") who provide goods and/or services to MBLL. For greater certainty, the actions of Supplier Agents will constitute actions of the Supplier in the context of this Code. MBLL expects its suppliers to share and enforce this Code with their Supplier Agents.

Suppliers are required to alert MBLL as soon as they become aware that they or one of their Supplier Agents are in non-compliance with this Code. MBLL reserves the right to take one or more of the following actions with a supplier if they or their Supplier Agents are unable or unwilling to comply with this Code:

- Working with a non-compliant supplier to bring it into compliance;
- Deeming quotations, bids, proposals, or tender responses ineligible for acceptance;
- Terminating any existing contracts, agreements, outstanding purchase orders or call-ups.

Code of Conduct Principles

Compliance with Laws

Suppliers and their Agents must comply with all applicable Canadian federal, provincial, and local laws and regulations. Additionally, for suppliers or their Agents with supply chain presence in other jurisdictions, they must comply with the laws and regulations of those relevant jurisdictions.

Compliance with MBLL Policies

Suppliers and their Agents must comply with all applicable MBLL policies, procedures, and guidelines.

Consumer Safety

Suppliers and their Agents must comply with all Health Canada regulations including the Canadian Consumer Product Safety Act.

Environment

Suppliers and their Agents must comply with all applicable statutes, regulations, guidelines, codes of practice, orders from and agreements entered with government authorities relating to the protection and conservation of the environment.

Ethical Business Conduct

Suppliers and their Agents must conduct business to a high ethical standard, including but not limited to:

- Honesty and fairness in all dealings with MBLL.
- Accurate representation of their capacity to satisfy the requirements of any bid, proposal, or offer and enter into contracts with MBLL only if they are able to fulfill all obligations.
- Monitoring its business relationship with MBLL for any potential or actual conflict of interest, and disclose this to MBLL as soon as the potential or actual conflict of interest occurs.
- Not offering or providing gifts to MBLL employees, other than of a nominal value as permitted by MBLL's Conflict of Interest policy.
- Not disclosing confidential information obtained during their business relationship with MBLL.
- Not attempting to gain improper advantage or improperly impacting MBLL's ability to make sound, impartial and objective decisions.
- Compliance with all applicable laws on corruption, bribery and prohibited business practices and will not make, offer, receive or approve of any bribe, kickback or other type of improper payment.
- Keeping accurate and reliable financial and business records to ensure legal and regulatory compliance.

Fair Labour Practices

Suppliers and their Agents will:

- Recognize the freedom of association and grant their workers the right to join or form trade unions of their own choosing and to collectively bargain with their employer.
- Provide workers with a written employment contract outlining the terms of their employment in a language understood by the employee.
- Pay the legal minimum and overtime wages for hours worked. It is expected that the wages will be paid directly to the worker or to a worker-controlled account. Workers will not be charged any recruitment fees or related costs.
- If overtime is necessary, suppliers and Supplier Agents will inform workers of such employment precondition prior to the time of hire and in advance of the overtime shift. Workers must be allowed to refuse to work overtime without punishment, penalty or disciplinary action.
- Provide an anonymous and confidential method for all workers to raise concerns to senior management without fear of retaliation.

Indigenous Peoples

Suppliers are expected to uphold the rights and freedoms of Indigenous Peoples.

Respect, Discrimination, and Human Rights

Suppliers will treat their employees and persons with whom they do business with respect and dignity. Suppliers will promote an inclusive, respectful and safe workplace and will not tolerate harassment, discrimination, workplace violence, retaliation and other disrespectful and inappropriate behavior. Suppliers and their Agents will not engage in any employment practices that are discriminatory based on grounds that are prohibited by applicable laws. These include race, colour, ethnic origin, age, gender, gender identity, sexual orientation, family status, pregnancy, religion, social origin, disability or medical status.

Human Trafficking, Forced Labour, and Child Labour

Suppliers and their Agents must not engage in or benefit from any form of human trafficking. This includes recruiting, transporting, or harbouring individuals through the use of force, coercion, fraud, or by exploiting a position of power or vulnerability. Furthermore, it is strictly forbidden to provide or accept payment to secure consent for the control or exploitation of another person.

Suppliers and their Agents must not employ individuals below the legal minimum age defined by local law. Operations must comply with both local laws and core International Labour Organization (ILO) standards regarding child labour, specifically Conventions 138 and 182.

Suppliers and their Agents must not use forced or compulsory labour. This includes any work performed involuntarily under threat, force, penalty, or the abuse of legal processes, such as indentured or bonded labour, slavery, and servitude. Suppliers must not require workers to surrender government-issued identification, passports, or work permits as a condition of employment. Additionally, workers must retain the right to leave work and freely terminate their employment, subject to applicable legal notice requirements.

Suppliers and their Agents will comply with Canada's prohibition of forced labour and importation of goods produced, in whole or in part, by forced or compulsory labour. This includes forced or compulsory child labour and applies to all goods, regardless of their country of origin.