



Helping people get there -  
safely, sustainably and  
successfully.

## Code of Conduct and Ethics For All Associates of Fountain Tire

---

Fountain Tire's reputation is determined by the actions, choices and decisions each of us make every day. It is expected that Associates will conduct themselves with honesty and integrity, and to treat others with fairness, dignity and respect at all times.

It is also expected that Associates will demonstrate the highest standard of conduct when dealing with other Associates, customers, suppliers, vendors and others while at or acting on behalf of the Company. Proper conduct fosters an engaged workforce, quality and efficiency, and protects Fountain Tire from loss, all of which promotes the welfare of both Associates and the Company.

It is impossible to issue guidelines for all possible conduct situations however, the following have been prepared to provide Associates with an understanding and appreciation of the values Fountain Tire expects to be used when judgment is required.

If an Associate is in doubt about what to do in a situation in either your work or personal life, ethical standards can ultimately be reduced to two simple questions:

- If your decision or action became broadly known, would it bring credit upon you and the Company?
- If your decision or actions were looked at by members of your community or family, and they had all the facts at their disposal, would they consider what you had done to be fair, honorable and trustworthy?

We must always strive to exercise our best judgment in the workplace and personal lives, and act responsibly in our communities. We need to have the courage to stand up for what is right.

### **Workplace Definition**

The workplace includes any Company or work-related premises, facility, or property. This may include but is not limited to airports, offices, hotels, off-site conferences and meetings, shop floors, rest rooms, staff lunchrooms, computers, lockers, vehicles and parking lots. The workplace also includes any work-related personal belongings, such as toolboxes, used on Company property.

## **Conflict of Interest**

Every Associate must avoid creating or being placed in situations which could compromise Fountain Tire's relationships with its Associates, customers, suppliers or contractors or damage Fountain Tire's or the Associate's reputation. It is not possible to list all instances where an Associate may put themselves into a conflict of interest. The following are some examples:

- Soliciting or accepting a gift, entertainment or favor from any competitor, customer, client, or supplier (current or intended), other than meals or gifts of value which generally should not exceed \$500 for any calendar year;
- Accepting discounts on personal purchases of a supplier's or customer's products and/or services, unless such discounts are offered to other members of the general public.
- Accepting or offering bribes, kickbacks, payoffs, or other improper incentives or payments to obtain, influence and/or maintain any transaction or relationship.
- Serving as an Associate, officer, director, or consultant with or on behalf of a competitor, customer, client, or supplier of materials or services without Company knowledge and approval.
- Discussing or agreeing with competitors regarding bids, fixing or setting prices or terms of sale, allocating or apportioning markets, or boycotting suppliers.
- Requiring customers to purchase a product or services they don't want so they can get a product or service they do want or need.
- Using the Company's time, materials, resources and information for the Associate's personal gain.
- Disclosing or using confidential information improperly (see our Confidential Information policy).
- Gossiping about or expressing a negative view of the Company, its Associates, customers or suppliers (this includes conversations in internet based social networking forums).
- Any situation where the Associates' position with Fountain Tire can be used for personal advantage or gain, or to the advantage or gain of the Associate's families, close friends and/or other Associates.

## **Declaration of Potential Conflict of Interest**

If a situation arises where an Associate should be concerned that an actual or potential conflict of interest exists or may arise out of a situation, the Associate must disclose and discuss the situation with their manager or a Fountain Tire representative listed within this policy's Contact List. If requested by their manager or a listed Fountain Tire representative, the Associate must describe the situation in writing and if instructed, cease all involvement in the situation so that it can be addressed by Fountain Tire.

### **Entertainment and Business Development Expense**

Associates shall carefully consider all relevant factors, including the frequency, appropriateness, and business purpose associated with any purchase, and in particular entertainment events prior to expensing such charges to Fountain Tire. If Associates are uncertain about the appropriateness of expensing an item or accepting an offer of entertainment from a customer or supplier, they should contact their manager before they act.

### **Safety**

Fountain Tire is committed to the program of Safety Excellence at all locations, and customer locations which we service. We highly value our Associates' and customers' well-being, and that of their property. Adherence to the Company's Safety program and requirements is mandatory.

### **Honest and Accurate Records**

Fountain Tire's assets and information must be protected at all times. All assets, liabilities and transactions must be accurately and completely documented and reflected in the Company's records. No fund or transaction is to be concealed from management or the Company or the Company's internal and/or external auditors.

Adequate management accounting and auditing practices, procedures and controls must be maintained. All transactions are to be properly approved in accordance with the Company's authorization guidelines. Associates are expected to question and report situations or transactions which are, or appear to be, at variance with established policies and procedures.

Falsifying, altering, or untimely destroying of any account, record, and/or other business-related document is strictly prohibited.

### **Environment**

One of our most important ethical obligations is the need to minimize environmental impacts from Fountain Tire's operations.

### **Communication and Public Statements**

As a responsible Canadian corporation, Fountain Tire has a responsibility to communicate – both with its associates and outside groups – in a way that contributes to understanding and trust.

The communication must however, safeguard confidential information, protect Company property, preserve the privacy of individuals, and respect the practical realities of running the business.

It is a serious violation of our Code of Conduct and Ethics for an Associate to release Company information or documents to the news media or other outside agencies, or to make public statements or provide press releases on behalf of Fountain Tire without the express written permission by the CEO of Fountain Tire Ltd.

**Acceptable Use of Technology**

Associates shall use all technology supported by Fountain Tire in a manner that is consistent with this Code of Conduct and Ethics and which furthers Fountain Tire’s business interests. Unacceptable usage, including viewing, downloading, distributing or printing any material that is illegal or likely to cause offense to others, will not be tolerated. Limited and reasonable use of Fountain Tire computer resources for personal use is acceptable provided it does not interfere in any way with normal business or conflict with any corporate policies or practices. In all usage, Associates should be aware that computer-based activities are subject to monitoring for security purposes as well as for acceptable usage, and that this monitoring extends to personal devices which are being routed through Fountain Tire networks. Associates must understand that use of Fountain Tire resources implies consent to monitoring and that there is no expectation of privacy.

**Fountain Tire Property**

During the course of employment, Associates are responsible for exercising due care and attention, making appropriate use of, and protecting all Fountain Tire property that is entrusted to them.

Unauthorized use, disclosure, possession of or removal of Company property, funds, or records will be considered Associate misconduct.

If an Associate leaves Fountain Tire they must return all Company property or property for which Fountain Tire is liable or responsible.

**Consequences:**

Violation of any part of the Code of Conduct and Ethics will lead to discipline, up to and including dismissal.

**Safe Disclosure**

The following individuals are available to discuss any questions or concerns as it relates to this document.

**Local Store Owner  
or Manager**

**Leadership**  
Jason Herle, CEO  
Jason.Herle@FountainTire.com

**Board of Directors**  
Reg Greenslade, Chair of  
Governance Committee  
reg@greenslades.org

I, \_\_\_\_\_, have read and understand the contents of the Code of Conduct and Ethics for all Associates of Fountain Tire. I agree to abide by the terms and conditions contained in this document.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date