

# 2021 Environmental, Social and Governance Report

**WESTON** GEORGE  
WESTON  
LIMITED

ESTABLISHED  
1882

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# Introduction

*“We believe a thoughtful and transparent approach to ESG is fundamental to the success of our businesses and we remain committed to leading where it matters while having a positive impact on the stakeholders we serve.”*

Galen G. Weston  
Chairman and CEO, George Weston Limited

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# Letter from the CEO



**At George Weston Limited, we strive to build generational value with an actively managed portfolio of market-leading businesses.**

As a leading Canadian publicly traded company and a family-led firm with roots going back four generations to 1882, we know the important impact we have on the environment, the communities in which we operate and on our employees.

Our responsibility as a business extends beyond our shareholders to a diverse group of stakeholders. As the controlling shareholder and unitholder of Loblaw and Choice Properties, respectively, we recently adopted a new set of ESG Principles to guide the approach to ESG at GWL and our portfolio companies. Our new Principles were developed in consultation with our Board of Directors, our portfolio companies and through feedback we received from stakeholders. They reflect how we think about our business now and shape our strategy going forward. In consultation with GWL, Loblaw and Choice Properties continue to meaningfully advance their ESG programs, including adopting GWL's ESG Principles as part of their frameworks and embedding ESG into their strategic plans.

We also recognize the importance of a strong corporate culture and the value of an engaged workforce. We believe in and abide by our core values of Care, Ownership, Respect and Excellence, underscored by a strong sense of ethics, compliance and social responsibility. These are not simply words we use – they are how we operate.

We believe a thoughtful and transparent approach to ESG is fundamental to the success of our businesses and we remain committed to leading where it matters while having a positive impact on the stakeholders we serve. We encourage you to learn more about our new ESG Principles and the important ESG initiatives that GWL, Loblaw and Choice Properties are pursuing to drive growth, prosperity, and sustainability.

**Galen G. Weston**

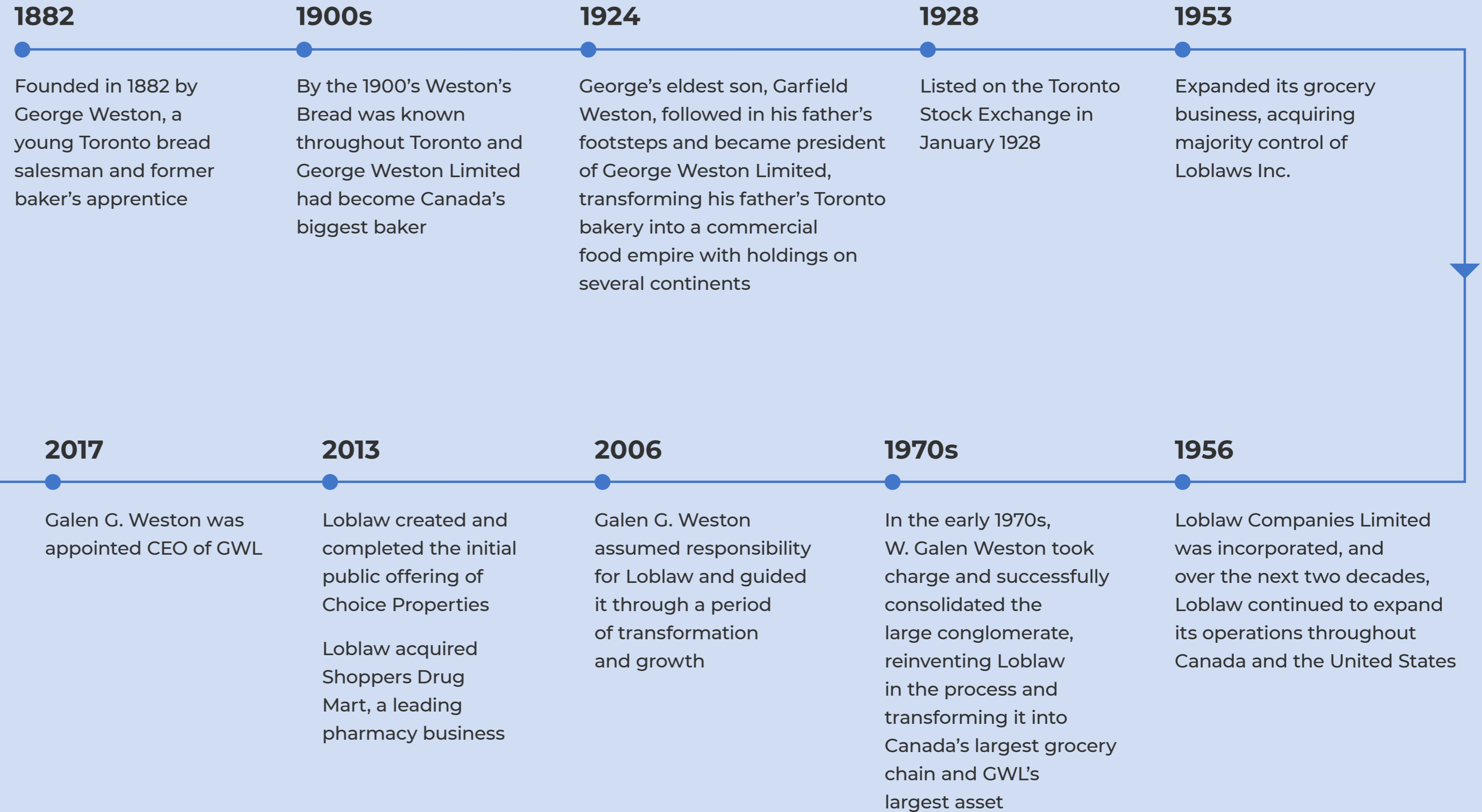
Chairman and Chief Executive Officer

May 10, 2022

# Overview and History of GWL

George Weston Limited is a Canadian public company that controls two market leading businesses, Loblaw Companies Limited and Choice Properties Real Estate Investment Trust.

The Company is the product of four generations of the Weston Family.



**2021**

GWL sold the Weston Foods consumer goods bakery business in order to focus on its market-leading retail and real estate businesses

**2018**

The Company completed a reorganization where Loblaw spun out its majority interest in Choice Properties to GWL, providing it three businesses across retail, real estate and consumer goods

**2017**

Galen G. Weston was appointed CEO of GWL

**2013**

Loblaw created and completed the initial public offering of Choice Properties  
  
Loblaw acquired Shoppers Drug Mart, a leading pharmacy business

**2006**

Galen G. Weston assumed responsibility for Loblaw and guided it through a period of transformation and growth

**1970s**

In the early 1970s, W. Galen Weston took charge and successfully consolidated the large conglomerate, reinventing Loblaw in the process and transforming it into Canada's largest grocery chain and GWL's largest asset

**1956**

Loblaw Companies Limited was incorporated, and over the next two decades, Loblaw continued to expand its operations throughout Canada and the United States

**1882**

Founded in 1882 by George Weston, a young Toronto bread salesman and former baker's apprentice

**1900s**

By the 1900's Weston's Bread was known throughout Toronto and George Weston Limited had become Canada's biggest baker

**1924**

George's eldest son, Garfield Weston, followed in his father's footsteps and became president of George Weston Limited, transforming his father's Toronto bakery into a commercial food empire with holdings on several continents

**1928**

Listed on the Toronto Stock Exchange in January 1928

**1953**

Expanded its grocery business, acquiring majority control of Loblaws Inc.

# Mission and Strategy

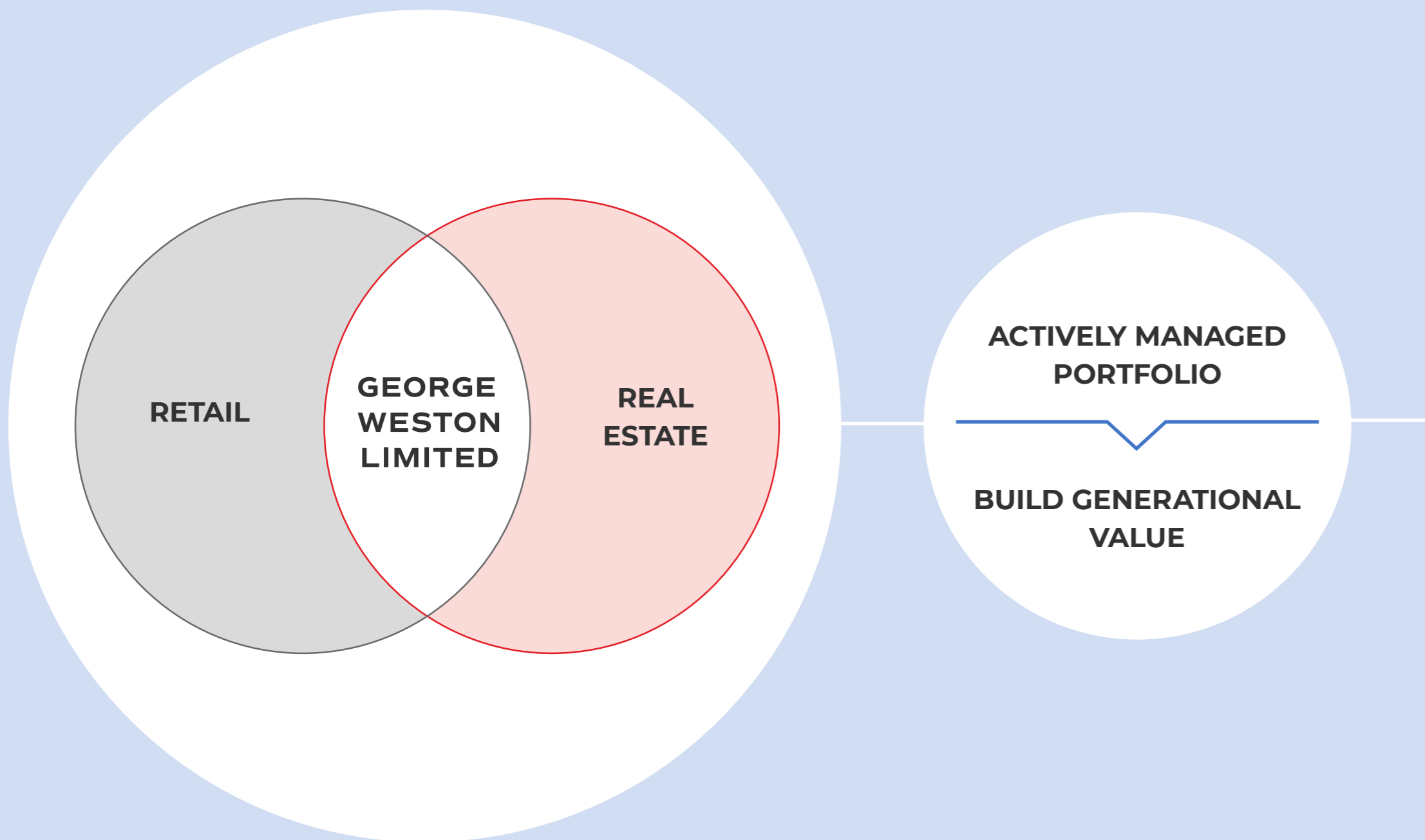
The Company is committed to creating value for its shareholders, employees, and stakeholders and to supporting the communities in which it operates.

GWL seeks to invest in businesses that generate positive cash flows through stable, high-quality operations. The Company brings a unique perspective to the operating business level, having a viewpoint that spans across the retail and real estate sectors, enabling the identification of opportunities and the sharing of best practices. The Company considers strategic initiatives where it can leverage its existing capabilities and expertise to create long-term value for shareholders.



# Our Operating and Value Creation Strategy

GWL’s mission is to build generational value with actively managed market-leading businesses in retail and real estate through expertise in strategy, mergers and acquisitions, capital allocation and talent management.



## Built on what we have in common

Together, these four concepts unite our operating companies and are core to our identity:



### CORE VALUES

Our actions are shaped by a set of CORE Values, which express a shared commitment to Care, Ownership, Respect and Excellence across the group of companies.



### ETHICS & COMPLIANCE

Throughout our interactions, our decisions are grounded in a strong sense of Ethics & Compliance.



### BLUE CULTURE

Represents how our values come to life every day in our interactions with our businesses, each other and our customers.



### SOCIAL RESPONSIBILITY

As a generational investor, long-term trends, whether social, demographic, or environmental, matter and underpin the importance we place on Social Responsibility.

## Impacting

Through active management and by leveraging our culture and values, we seek to positively impact:



### SHAREHOLDERS

We create value for our shareholders by enhancing the value of our market-leading businesses, by supporting operational excellence, investing in strategic transactions and by distributions in the form of dividends.



### TALENT

Our talent is central to achieving our long-term goals. Our focus on attracting and developing exceptional leaders is a strategic imperative and we are proud to offer challenging and rewarding careers.



### COMMUNITIES

Consistent with our heritage and values, we are focused on improving the quality of life in the communities where we live and work.

# Weston Group ESG

GWL is focused on advancing its ESG program and supporting each of Loblaw and Choice Properties as they continue to develop their own industry-specific ESG programs based on a shared approach and philosophy.

GWL believes that its investors, employees and other stakeholders care deeply about the Weston Group's commitment to being a force for positive change.

By integrating ESG practices into day-to-day business activities and the governance framework, the Weston Group strives to advance its business objectives while having an enduring and positive impact on future generations. As the holding company for the group, GWL's ESG program is centred on group-wide governance and strategic oversight, while Loblaw and Choice Properties are focused on developing their own programs to Fight Climate Change, Address Social Equity and sustain robust Corporate Governance.

GWL has established an ESG program for its corporate centre, consisting of Corporate Governance, Diversity, Equity and Inclusion, Colleagues, Culture and Community, and Data Security.

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# ESG Principles

GWL's ESG Principles, adopted by the Board in 2022, are focused on establishing a group-wide approach to ESG while ensuring that responsibility for developing and implementing “fit for purpose” ESG programs resides with the boards and management of Loblaw and Choice Properties.

Loblaw and Choice Properties have adopted the ESG Principles as part of their ESG frameworks and incorporated them into the development of their robust and industry leading programs. Each company seeks to establish ambitious ESG targets and develop impactful programs to achieve its goals. These targets and programs, and the results achieved by Loblaw and Choice Properties, are described in separate ESG reports published annually.



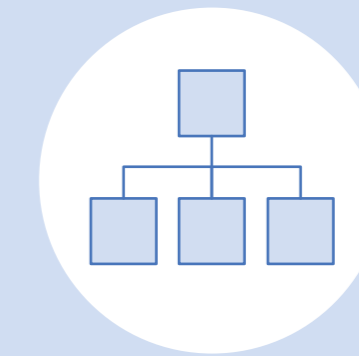
## ENVIRONMENT

- Our businesses have a responsibility to positively impact the communities in which they operate and to link sustainability with growth and prosperity
- Our businesses must commit to science-based, measurable targets to achieve net zero carbon emissions, with near, medium and long-term objectives that hold management and boards accountable



## SOCIAL EQUITY

- As a leading Canadian public company and the largest private sector employer in the country, we have a responsibility to ensure that our businesses address social equity
- Each of our businesses must commit to specific and measurable objectives to ensure that its leadership team and workforce are diverse and that its culture is one of equity and inclusion
- Our businesses must operate in a manner that is sensitive to the communities in which they operate to make them healthier and more equitable and inclusive



## GOVERNANCE

- Our businesses must adhere to the highest standards of corporate governance, focusing on appropriate and transparent decision-making processes that take into consideration all relevant stakeholders
- Our businesses must develop, manage and supervise their own ESG programs while also respecting these principles

# Environment



## ENVIRONMENT

- Our businesses have a responsibility to positively impact the communities in which they operate and to link sustainability with growth and prosperity
- Our businesses must commit to science-based, measurable targets to achieve net zero carbon emissions, with near, medium and long-term objectives that hold management and boards accountable

## Ensuring that businesses in the Weston Group are good stewards of the environment aligns with GWL's mission of creating generational value.

Failure to take meaningful action to protect the environment, including implementing initiatives to combat climate change, could result in significant long-term financial costs. Taking meaningful steps to protect the environment is not only the right thing to do for the country but is also critical to the long-term sustainable development of the Weston Group's businesses.

With just over 100 employees and limited physical footprint through its corporate office, GWL's corporate centre ESG program does not include stand-alone environmental targets but, Loblaw and Choice Properties have established meaningful environmental targets that are informed by the GWL ESG Principles.

Loblaw has plans to reduce its greenhouse gas emissions and eliminate waste from its business through actions, including reducing emissions across its operations by 50% by 2030, operating a zero-emission fleet by 2030, reducing plastic waste, including making all control brand and in-store product packaging recyclable or reusable by 2025, and sending zero food to landfill by 2030.

Choice Properties has committed to setting ambitious science-based greenhouse gas emission reduction targets based upon the Science Based Targets initiative (SBTi) Net-Zero Standard.



## Loblaw has many programs in its corporate grocery stores that have both reduced carbon intensity and environmental impacts, including:

- Electronic shelf labels in hundreds of stores, helping reduce paper/plastic-based shelf labels
- Centralized building energy management systems that provide real-time information to ensure optimized performance
- Reduced reliance on high global warming potential (GWP) refrigerants
- Phenol-free receipt paper for use at front-end checkouts
- Electric standby refrigeration units on many trailers, reducing the use of fossil fuels

# Social Equity



## SOCIAL EQUITY

- As a leading Canadian public company and the largest private sector employer in the country, we have a responsibility to ensure that our businesses address social equity
- Each of our businesses must commit to specific and measurable objectives to ensure that its leadership team and workforce are diverse and that its culture is one of equity and inclusion
- Our businesses must operate in a manner that is sensitive to the communities in which they operate to make them healthier and more equitable and inclusive

## The Weston Group must do its part to establish a more equitable, diverse and inclusive society.

The Weston Group seeks to respect and protect human rights of all people who support and intersect with its businesses, and does not tolerate abuse, discrimination or harassment in any form.

To bring the Social Equity principle to life, each company within the Weston Group has established social equity priorities that reflect its business and role within the communities in which it operates. Further detail regarding GWL's Social Equity initiatives is provided in this report under Diversity, Equity and Inclusion and Colleagues, Culture and Community.

Loblaws aspires to be one of Canada's most inclusive workplaces and to support the health of women and children as building blocks for a healthy society. Examples include setting representation goals for management, executives and its board, seeking to raise \$150 million by 2027 and feed one million children by 2025, and, through LOVE YOU by Shoppers Drug Mart, contributing \$50 million over the next five years to help women stay healthy and safe through access to care for their mind and body.

Choice Properties has established representation targets for women and visible minorities at all levels of management and its board of trustees. Choice Properties was recognized by Equileap, an equity research group focused on gender diversity, as one of only 18 public companies in the world that have achieved gender balance – defined as having between 40% and 60% women throughout its board, executive and senior management teams, and workforce. Choice Properties is committed to advancing social equity in its operations and incorporating community priorities within its developments. In 2021, it worked with six leading charities through its Choice Cares program and donated over \$400,000 and 1,200 volunteer hours in support of mental health.

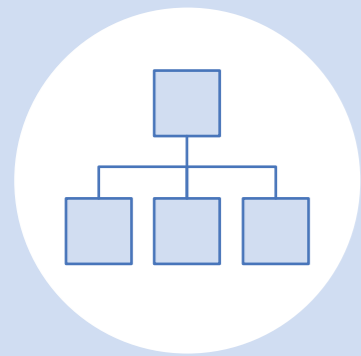


## Choice Properties - Community Building through Strong Partnerships

Choice Properties plans to revitalize and redevelop the 19-acre Golden Mile Shopping Centre in Toronto, Ontario. In 2021, Choice Properties announced its plan to introduce the Community Innovation District, which will include a flagship BMO branch to promote financial literacy amongst local entrepreneurs, and a "Communiversities" – a collaboration between the University of Toronto Scarborough and Centennial College – to enhance access to postsecondary education.

Choice Properties' Grenville and Grosvenor development in Toronto will be comprised of 30% affordable units, including a deeply affordable component, as well as a new daycare in the heart of the city.

# Governance



## GOVERNANCE

- Our businesses must adhere to the highest standards of corporate governance, focusing on appropriate and transparent decision-making processes that take into consideration all relevant stakeholders
- Our businesses must develop, manage and supervise their own ESG programs while also respecting these principles

GWL is responsible for ensuring that appropriate governance of ESG programs is in place across the Weston Group.

Through the ESG Principles, GWL influences the development of the ESG programs at Loblaw and Choice Properties. Each of Loblaw and Choice Properties has developed robust oversight of their respective industry-specific ESG programs.

**WESTON**  
GEORGE WESTON LIMITED

At GWL, the Board is responsible for overseeing and monitoring both the Company's approach to group wide ESG governance, and GWL's corporate centre ESG policies and practices. The Governance Committee of the Board receives periodic reports from management on the Company's ESG program and the Audit Committee reviews the adequacy and effectiveness of applicable controls related to the Company's ESG disclosures. The Chief Legal Officer of GWL is the executive sponsor for ESG governance for the Weston Group.

**ChoiceProperties**

At Choice Properties, the board of trustees oversees Choice's ESG program and reviews the ESG report on an annual basis. The board of trustees receives periodic reports from management on its ESG program and performance against ESG targets. The Audit Committee of the board of trustees oversees the adequacy and effectiveness of controls related to ESG disclosures. A dedicated ESG team maintains and oversees its ESG reporting system and an ESG disclosure committee, comprised of members of its senior leadership, have oversight over the programs discussed in its ESG report.

**Loblaw  
Companies  
Limited**

Loblaw's board of directors is responsible for overseeing Loblaw's approach, policies and practices related to ESG. The Risk and Compliance Committee of the board is responsible for ESG strategy and reporting and the Audit Committee reviews the adequacy and effectiveness of controls relating to Loblaw's ESG reporting. The Loblaw ESG Steering Committee, comprised of senior leaders, is responsible for setting priorities, tracking metrics and championing program initiatives across the company.

# ESG Reporting

The Company, Loblaw and Choice Properties, collectively report against various leading ESG frameworks and continue to enhance ESG reporting in line with best practices. The ESG reporting frameworks shown here are used by one or more of the companies in the Weston Group.

GWL reports against the Sustainability Accounting Standards Board framework. SASB is an independent private sector standards-setting organization dedicated to enhancing the efficiency of capital markets by fostering high-quality disclosure of material sustainability information that meets investor needs. GWL has identified SASB topics and activity metrics that apply to it as a publicly traded holding company, which are included in the [SASB Table](#). These metrics were established through internal stakeholder engagement initiatives at the Company.



TCFD



SASB



GRESB



Carbon Disclosure  
Project



GRI



Science Based  
Target Initiative



# GWL Corporate Centre ESG

*“I believe that business has both the opportunity and responsibility to have a positive effect in the community. Growth and prosperity do not need to come at the expense of sustainability.”*

Galen G. Weston  
Chairman and CEO, George Weston Limited

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# Corporate Governance

The Company's Board and management are dedicated to strong corporate governance practices designed to maintain high standards of oversight, accountability, integrity and ethics while also promoting long-term growth and compliance with the Canadian Securities Administrators' Corporate Governance Guidelines.

Strong corporate governance practices contribute to the effective management of the Company and achievement of its strategic and operational objectives. The Governance Committee regularly reviews the Company's corporate governance practices to ensure they reflect evolving best practices.

The Company's governance practices are highlighted in the [Statement of Corporate Governance Practices Appendix](#).

## Ethical Business Conduct

GWL has adopted a Code of Conduct that reflects the Company's long-standing commitment to high standards of ethical conduct and business practices.

The Code is reviewed annually to ensure it is current and reflects best practices in ethical business conduct and integrity and includes a strong "tone from the top" message.

All directors, officers and employees of the Company are required to comply with the Code and must acknowledge their commitment to abide by it on an annual basis.

The Company has established an Integrity Action Line, a toll-free number and a web portal, that any director, officer, supplier, employee or external party may use to report conduct which they feel violates the Code of Conduct or otherwise constitutes fraudulent or unethical conduct. A fraud reporting protocol has also been implemented to ensure that fraud is reported to senior management in a timely manner.



## FROM THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER

Since my great-grandfather founded George Weston Limited it has been built by excellent people who are committed to a shared set of goals and values. Those goals and values remain the same today; they are the foundation for the way the Company is governed, upholding the highest standards ethically, lawfully, and professionally every day. The Company's high-performance culture requires that all of us adhere to those standards both individually and collectively.

That is why the Company's Code of Conduct is so important. It represents more than words on a page; it reinforces what our businesses and stakeholders expect of us, and what we expect of each other. The Code is intended to provide a framework upon which to model our behaviours. It is designed to help us understand what it means to represent our Company.

As Chairman and Chief Executive Officer, I am committed to holding myself, our leaders, and each of you accountable to the exceptional standards and results that built, and will continue to drive, a Company that we can all be proud of.

*Q. Weston*



# Board of Directors

## Corporate Governance Snapshot

- Directors are elected annually
- Majority Voting Policy for the election of directors
- Annual advisory vote on approach to executive compensation
- Director Conflict of Interest Guidelines
- Director Share Ownership Guidelines
- New Director Orientation
- Continuing Director Development
- Code of Conduct

## Director Independence

A majority of the directors are independent, meaning they have no direct or indirect relationship with the Company that would interfere with their independent judgment.

## Board Leadership

Galen G. Weston is the Chairman and directs the operations of the Board. He chairs each meeting of the Board, is responsible for the management and effective functioning of the Board and provides leadership to the Board in all matters.

The Board has also appointed Gordon M. Nixon, an independent director, to serve as lead director. The lead director provides leadership to the Board and particularly to the independent directors. The lead director ensures that the Board operates independently of management.

## Board Responsibilities and Duties

The Board, directly and through its committees, provides stewardship, and supervises and oversees the management of the business and affairs of the Company. The [Board's Mandate](#) includes setting the Company's strategic direction, assigning responsibility to management for the achievement of the strategy and oversight of management's performance and effectiveness. The Board regularly receives reports on the operating results of the Company as well as reports on certain non-operational matters.

## Board Committees

### Audit Committee

The Audit Committee reviews management's administration of the Company's internal controls over financial reporting, disclosure controls and procedures and internal audit function and related party transactions. The Audit Committee also

oversees the Enterprise Risk Management program, cyber-security matters, and reviews the adequacy and effectiveness of applicable controls related to the Company's ESG disclosures.

### Governance, Human Resource, Nominating and Compensation Committee

The Governance Committee is responsible for the oversight of the Company's governance practices. The Governance Committee also oversees talent management and succession planning, compensation for the Board and senior management, and all elements of the Company's ESG program, including, this ESG report.

The Chair of the Governance Committee, who is an independent director, has been appointed by the Board to serve as lead director.

AS OF  
DECEMBER 31, 2021

9

Directors

78%

Independent Directors

33%

of directors identify  
as women

22%

of directors identify  
as visible minorities



# Diversity, Equity and Inclusion

The Company is committed to Diversity, Equity and Inclusion and supports the identification and nomination of diverse directors and candidates for hiring and promotion at all levels of the organization.

In 2020, GWL set measurable representation goals for gender diversity and visible minorities across all levels of management.



**“The Company believes differences in ideas and perspectives, born from differences in context and lived experiences, when expressed and received with respect and curiosity, help to create a vibrant, inclusive and successful organization.”**

**RASHID WASTI**  
Chief Talent Officer

# Board

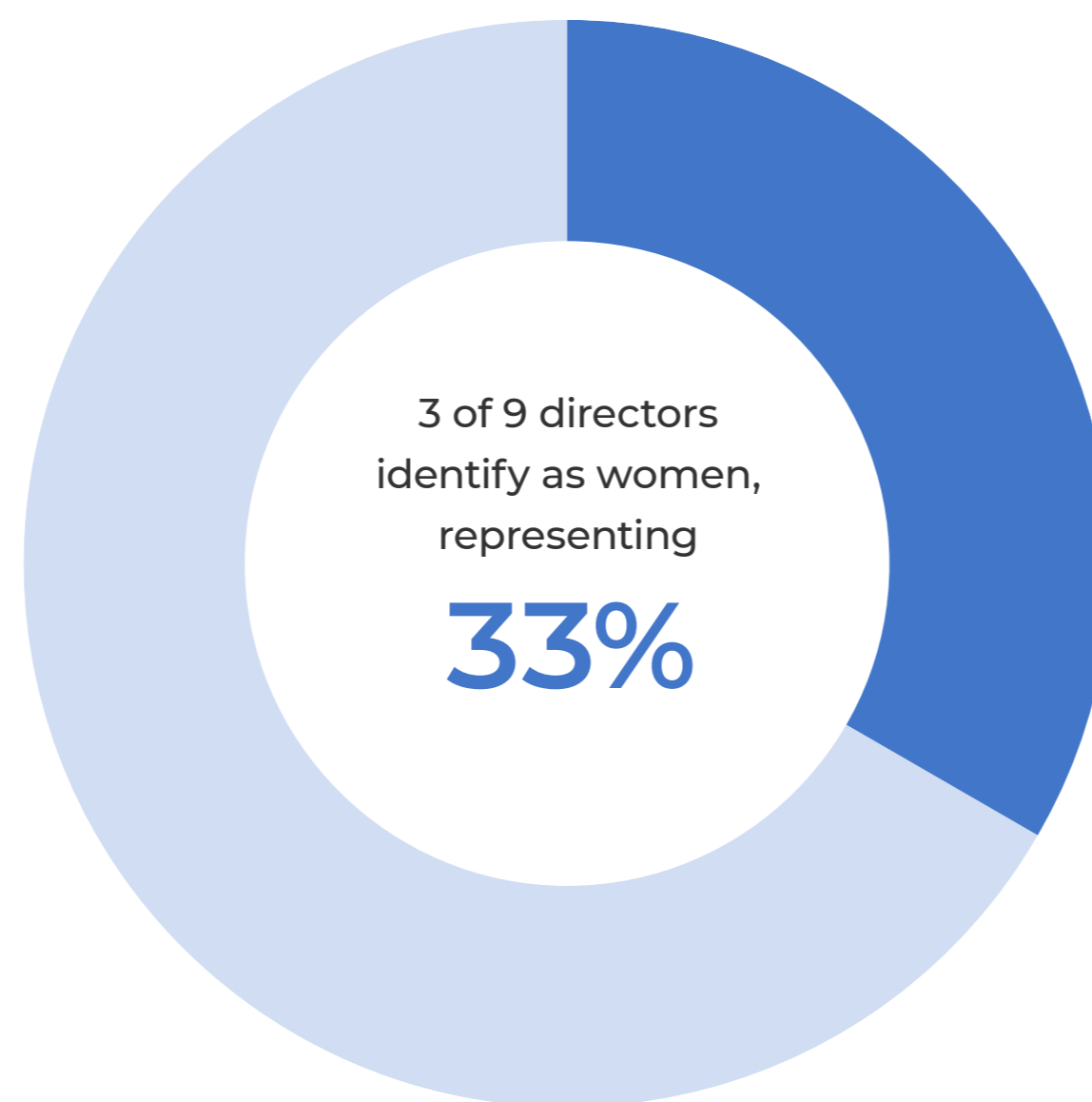
## Nomination of Directors

Diversity is an important factor that is considered in identifying and selecting Board members to ensure directors provide a wide range of thoughts, perspectives, experience and expertise to the Company. The Governance Committee meets on an annual basis, or as required, to assess the size and diversity of the Board and whether any vacancies are expected. As part of its assessment, the Governance Committee reviews an evergreen list of potential candidates, as well as the skills matrix of current Board members to determine criteria and qualifications to be considered when recruiting new director nominees.

## Board Diversity Policy

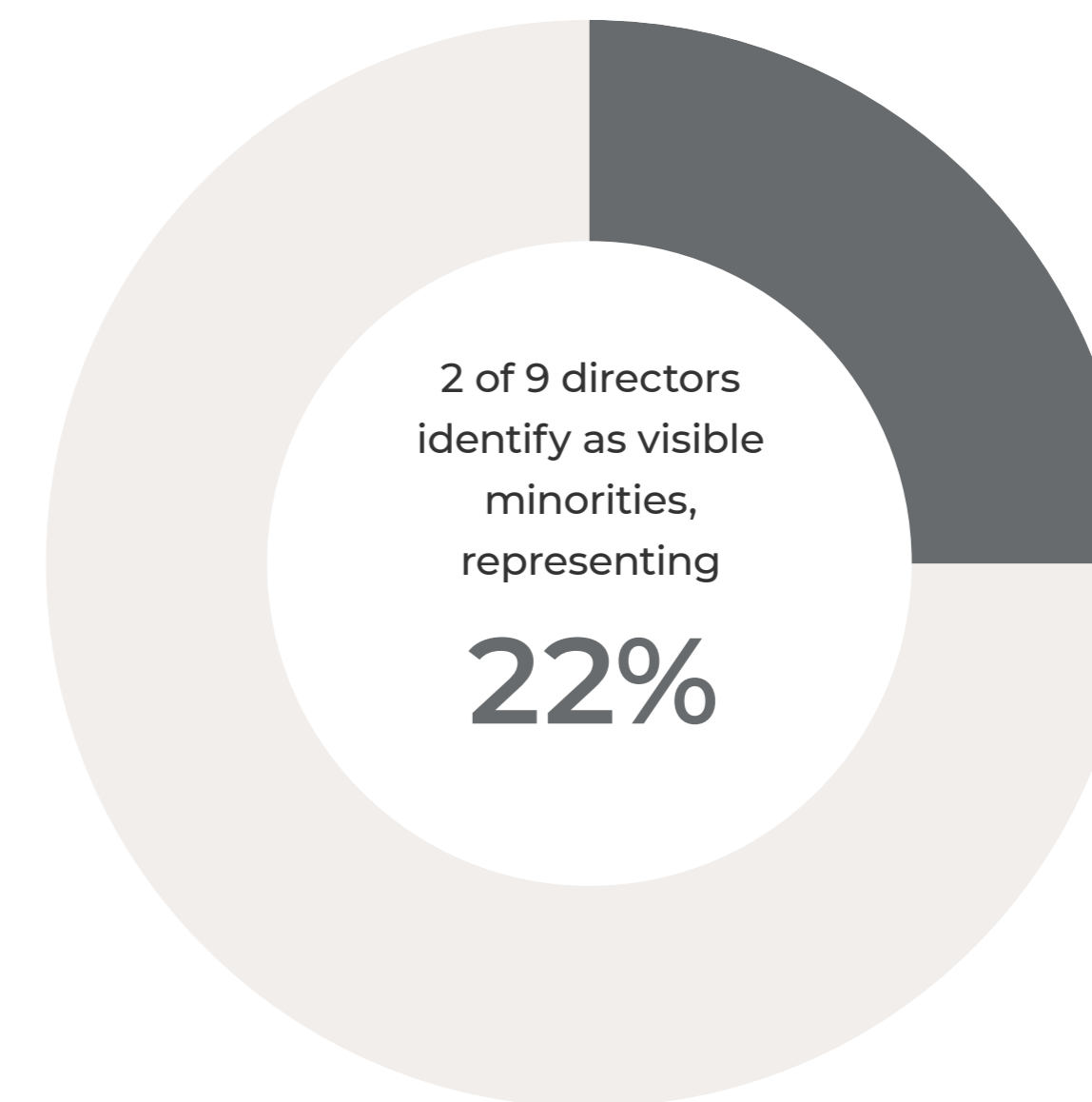
The Company adopted a written Board Diversity Policy in 2015 and has subsequently enhanced it by adopting targets for Directors who identify as women and visible minorities. The Board Diversity Policy requires that, among other qualities, a nominee's gender, age, ethnicity, disabilities and geographic background may be considered in his or her assessment.

**DIRECTORS WHO IDENTIFY AS WOMEN<sup>1</sup>**



**TARGET:**  
Women comprise at least 30% of the Board

**DIRECTORS WHO IDENTIFY AS VISIBLE MINORITIES<sup>1</sup>**



**TARGET:**  
Visible minorities comprise at least 25% of the Board by 2024

<sup>1</sup> As of December 31, 2021.

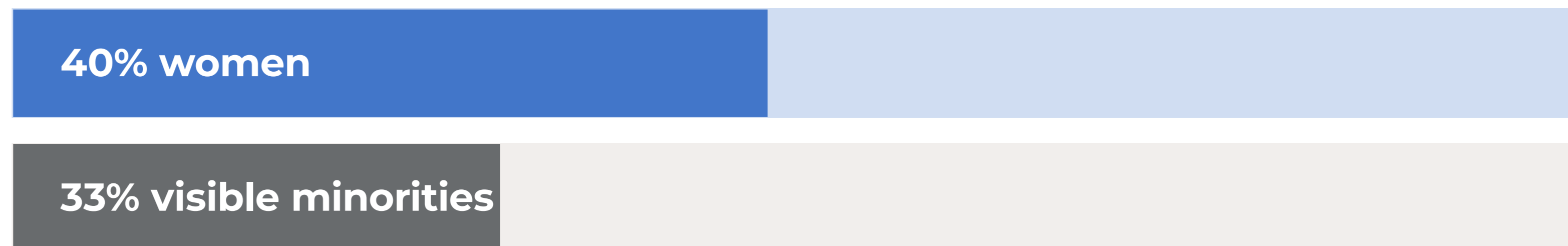
# Management

The Company has established targets for management who identify as women and visible minorities. The Company has also implemented initiatives to support diversity, equity and inclusion.

Recruiting and mentoring programs and other initiatives have been established to ensure that the Company’s rich and diverse talent is supported and provided opportunities to grow their careers to the highest levels within the organization. The Company will continue to monitor its level of diversity in management and consider whether it would be appropriate in the future to adopt formal targets for the representation of certain other diversity categories.

## PROGRESS TOWARD GOALS<sup>1</sup>

**Executive Management**  
(Vice President and above)



## 2024 REPRESENTATION GOALS

**Executive Management**  
(Vice President and above)

**50%**

of positions will be held by women

**35%**

of positions will be held by visible minorities

**Middle Management**  
(Senior Manager to Senior Director)

**50%**

of positions will be held by women

**45%**

of positions will be held by visible minorities

<sup>1</sup> As of March 2022.

# Colleagues, Culture and Community



“George Weston offers exceptional opportunities to grow as a professional by working with a broad group of stakeholders. My experiences have allowed me to progress through a number of roles within the group of companies, including a secondment at Loblaw’s, becoming General Counsel of GWL’s food manufacturing business, and now a legal leadership position at Choice Properties REIT.”

**SIMONE COLE**

Vice President, Associate General Counsel  
Choice Properties REIT



“Having started my career at the Weston Group with GWL in the Treasury function, I was afforded the opportunity to grow into challenging roles with the operating companies, always being paired with thoughtful mentors that pushed me to take the right kind of chances.”

**JODAT HUSSAIN**

Senior Vice President, Retail Finance  
Loblaw Companies Limited



“After moving from investment banking and private equity to the GWL Strategy Group, I had many opportunities to grow my career by working on significant and complex transactions for the Weston group of companies, hand in hand with our operators and the broad-based team at GWL. The collaborative and collegial atmosphere and the complexity of the work allowed me to develop relationships and grow into a leadership role.”

**KATIE MCCULLAM**

Vice President, Strategy & Corporate Development  
George Weston Limited

# Blue Culture

The Company has adopted a set of “Blue Culture” principles to support its journey to develop “best in class” capabilities. The four principles of Blue Culture are:

## Be Authentic

To be authentic is to honour who you are at your core, so your colleagues can understand you and you can give your very best to others. We believe a critical enabler of our success is the creativity, dialogue and psychological safety engendered by an environment where authenticity is valued and welcomed.

## Make Connections

The trusting relationships built with our colleagues accelerates our ability to communicate, debate, make decisions, achieve goals, and create an enjoyable work environment for all. We encourage and invest the time and effort to build those relationships through a variety of formal and informal activities over and above our day-to-day work.

## Develop Self and Others

At the heart of our ability to deliver outstanding results is a commitment to world class talent. Beyond hiring the best at all levels, we believe personal growth is an essential part of this journey.

Whether through real time feedback, formal mentoring, or structured training, our colleagues at all levels ensure they and those around them actively remain on this journey.

## Add Value

We work to offer best in-class thought leadership, technical capability, execution, and service to the businesses we enable. We anticipate, react, advise, and drive change to keep the businesses ahead of the changing landscape. We recommend appropriate risk taking, challenge the status quo and look for ways to reinvent ourselves and the business.



## Culture Champions

Culture Champions at the Company have established four committees to foster a vibrant and inclusive culture:

1. The *Social Movement* is dedicated to fostering colleague connection and engagement outside of their normal roles. This committee hosts various interactive events and competitions to strengthen colleague bonds and promote the Company's unique culture.
2. The Company has established the *Weston Academy*, whose vision of creating a culture of curiosity underpins a focus on continuous learning and development.
3. The *Inspire Women* initiative focuses on championing gender balance within our organization to promote diversity of thought and attract top talent. Our five core areas are Networking, Inspiration, Personal development, Transition support, and Awareness.
4. The *Health and Wellness Committee* provides colleagues with tools to help them live happier, healthier, more balanced lives through resources and interactive events centred on fitness, nutrition, mental health, and holistic wellbeing.



# Talent Attraction & Development

At George Weston Limited, we believe in a culture of excellence, openness and continuous development. The role of the corporate office is to provide best in class shared services to our internal clients and operating businesses.

## Responsibility for Talent

Lead by the Chief Talent Officer, responsibility for attracting, retaining and developing talent is shared across all levels of management of the Company. Recruitment at GWL is a conduit for careers across the Weston Group of companies. We see our investment in recruiting and growing exceptional leaders, as a strategic imperative and are proud to offer challenging and rewarding careers.

## Deployment of Human Capital

A strategic focus of GWL is the identification, recruitment and development of high calibre talent. Recruiting diverse colleagues with a range of skills and exposing them to our operating businesses enables them to develop into high-performing talent that can be transferred to our operating businesses, complementing the robust talent initiatives already in place at Loblaw and Choice.

Employee Development Programs	
Program Name	Overview
<b>Leadership, Engagement, and Development</b>	<ul style="list-style-type: none"> <li>Program in place for high-potential colleagues which promotes knowledge-sharing, embeds the behaviours that support our culture, and allows for the practice of new leadership behaviours within participants' current roles</li> </ul>
<b>Mentorship</b>	<ul style="list-style-type: none"> <li>Mentoring program in place to help colleagues develop both professionally and personally through shared experience</li> <li>Provides mentors with the tools necessary to develop potential as an emerging and effective leader</li> </ul>
<b>Tuition Reimbursement</b>	<ul style="list-style-type: none"> <li>Reimbursement for approved courses related to current role or career development goals</li> </ul>
<b>Academy</b>	<ul style="list-style-type: none"> <li>Launched in 2020, a web-based learning platform for all colleagues to access courses related to their role or career development goals</li> </ul>
<b>Graduate Rotation</b>	<ul style="list-style-type: none"> <li>Launched in 2019, this program is an actively managed development program for new graduates</li> </ul>
<b>Secondment</b>	<ul style="list-style-type: none"> <li>Deploying colleagues into, and receiving colleagues from, the operating businesses</li> </ul>



## Colleagues

- Annual Colleague Engagement Survey
- Culture Working Groups
- Quarterly Town Halls
- Training Sessions
- Ethics and Compliance Integrity Action Hotline
- “Let’s Talk” sessions with senior leaders
- Internal Communications and Intranet

### COLLEAGUE ENGAGEMENT SURVEY

- Voluntary survey seeks input on levels of Engagement and Happiness, Leadership effectiveness, and levels of Collaboration and Compliance
- Annually completed since 2018
- Annual participation rate of 98% or higher
- Results are benchmarked year-over-year
- Annual Diversity, Action Plans are established based on survey results

## Social Responsibility

At George Weston Limited, we believe our responsibility as a business extends beyond our shareholders to the community at large.

In 2010, George Weston successfully launched the Weston Seeding Stronger Communities employee engagement program to raise funds for charitable organizations. The Company and its employees have supported a number of significant causes, including charities encouraging the nutritional and physical well-being of children across North America. In 2021, funds raised were matched by the Company and committed to Covenant House Toronto – a critical agency that services vulnerable youth who are homeless, trafficked, or at-risk. Covenant House provides housing options, health and well-being support, training and skill development, and ongoing care once youth move into the community.





# Cyber Security

George Weston Limited recognizes cyber and technology threats will continue to increase in frequency and sophistication.

The Company is committed to protecting its corporate and stakeholder information from current and future threats by implementing a security management framework that aligns with industry best practices, including: the National Institute of Standards and Technology (NIST) and the Information Security Forum (ISF).

To maintain its security posture, George Weston Limited regularly reviews its standards, procedures, and guidelines to ensure they are relevant and address all current risks and regulatory requirements.

The Company leverages information security maturity assessments based on the ISF Security Healthcheck and NIST CSF Implementation Tiers to understand the current state of its cyber security program. Maturity scores are further used as inputs to influence cyber security strategy, investments, and roadmap.

The Company is committed to building and reinforcing a sound security foundation by providing appropriate management support and instilling a culture of security awareness across the organization. George Weston Limited invests in its people, process, and technology to mitigate cyber security risks. These practices include assessing the effectiveness of controls and adjusting the course of the Company's program in response to threat conditions.

George Weston Limited's cyber security program undergoes regular audits from independent parties, both internal and external. The results of these audits and resulting action plans are an integral part of the security program lifecycle.



# Oversight of Cyber Security

The Company has a dedicated technology and cyber security team comprised of skilled professionals who manage information security and operational controls.

The Audit Committee provides oversight and governance of the cyber security program and reviews quarterly reports from management.

At GWL, “Cyber security is everyone’s responsibility”, and this duty is shared with colleagues through our multifaceted security awareness program.

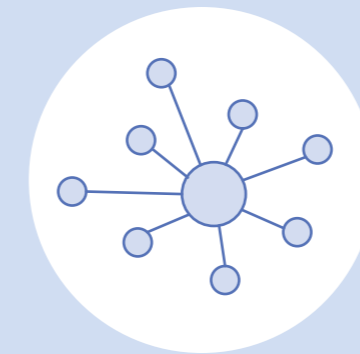
A comprehensive cyber security knowledge assessment and tailored awareness training are delivered to all new colleagues as part of their onboarding process with the Company. All colleagues are required to complete quarterly security training, which focuses on identified risks or trending threats, and are subject to monthly phishing simulations.



Refreshed GWL Information Security Governance to align with GWL’s cyber security risk appetite and information security strategy.



Enhanced GWL’s Cyber Security Risk Management program, which includes vendor risk assessment and mitigation controls.



Established GWL Data/ Information Management program, with new data labeling and retention policies.



Improved ISF maturity score through enhanced governance, security and information management programs.



Continued upgrading of the Cyber Security Education and Awareness program through regular training, mandatory quarterly assessments, and monthly phishing simulations for all colleagues and contractors.



Enhanced Cyber Security Threat and Incident Management plan through 24/7 Managed Detection Response model.

## 2021 INFORMATION SECURITY AWARENESS BY THE NUMBERS

# 18 minutes

is the average time per employee per quarter spent on cyber security related training materials.

# 1,037

training modules assigned and completed as part of the Company’s mandatory quarterly cyber security education program.

# 29

new colleagues completed the New Hire Cyber Security Awareness Training program.

# 1,913

phishing E-Mails sent to colleagues via the authorized phishing simulation program.

# ESG at Loblaw

Loblaw is Canada's food and pharmacy leader with a network of corporate and independently operated stores in communities across the country. Loblaw's purpose – Live Life Well - supports the needs and well-being of Canadians who make one billion visits each year to the company's stores. Loblaw is positioned to meet and exceed those needs in many ways.

Loblaw's purpose-led approach to ESG issues concentrates on a two-pillar approach to ESG: Fighting Climate Change and Addressing Social Equity.

**Loblaw  
Companies  
Limited**

## Fighting Climate Change

Loblaw has been an industry leader on environmental action for decades and is building on its success with a new emphasis on reducing greenhouse gas (GHG) emissions and eliminating waste from its business.

Loblaw has committed to:

- Achieve net-zero by 2040 for its enterprise Scope 1 and Scope 2 emissions, and Scope 3 by 2050.
- Adopt a science-based approach to reducing emissions across its operations by 50% by 2030.
- By 2030 it will operate a zero-emissions fleet.
- Reduce plastic waste by making all control-brand and in-store packaging recyclable or reusable by 2025.
- Send zero food to landfill by 2030, and over the next 24 months achieve measurable food waste reductions in every one of its stores.

## Advancing Social Equity

Loblaw has committed to make a positive impact that extends beyond its workforce and into the communities it serves. Loblaw aims to build inclusive and prosperous communities, starting with better leadership representation, supporting an inclusive mindset, and a continued focus on growing support for the health of children and women. Loblaw's activities will include the following:

- Achieve representation goals for its management, executives and Board of Directors by the end of 2024.
- Create a ripple effect of inclusion and empathy in communities by deploying an inclusion training program to its workforce of approximately 200,000 Canadians by the end of 2024.
- Support President's Choice Children's Charity, Canada's top non-government provider of in-school kids' nutrition programs, as it seeks to raise \$150 million by 2027 and feed one million children a year by 2025.
- Help feed more individuals and families in need through food bank and food recovery programs nationally and store-level partnerships.
- Support the LOVE YOU by Shoppers Drug Mart™ program's efforts to help women stay healthy and safe. Loblaw will support access to care for their mind and body, by contributing \$50 million over the next five years to community-based efforts and partners.

## Materiality

In 2022 Loblaw conducted a materiality assessment in line with the Global Reporting Initiative (GRI) Standards, to determine which issues have the greatest impact on its business and importance to its stakeholders. Loblaw engaged a third-party consultant to deploy a survey to over 600 internal and external stakeholders, including employees, suppliers, government, academia, NGOs and investors, measuring the importance, relevance, impact and perception of selected ESG issues. It also considered elements such as familiarity with Loblaw's existing sustainability practices and the evolution of sustainability issues over time. Recognizing the increasing impact that investors have on sustainability agendas, Loblaw also conducted targeted interviews with this stakeholder group to understand the financial sector's most material topics of concern.

# 5.5

million kilograms of food donated to local food banks and food recovery agencies across Canada in 2021

# 800,000+

Children reached by President's Choice Children's Charity in 2021

# 33.8%

Reduction of GHG emission (tonnes of CO<sub>2</sub>e) against 2011 Baseline

# Zero

Food waste to landfill by 2030

# \$8.5 million+

raised in 2021 by Shoppers Drug Mart Life Foundation and granted to support women's health initiatives

**ESG Governance**

The Loblaw board oversees the company’s enterprise risk management program, including its design and structure, as well as the assessment of its effectiveness. Risks related to governance, workplace health and safety, the environment and ethical business conduct are monitored and reported on by management to the board. The Loblaw board also oversees and monitors the company’s approach, policies and practices related to ESG matters.

In 2021, Loblaw established an ESG steering committee, comprised of senior leaders. It is responsible for setting priorities, championing progress and overseeing a control environment that ensures the accuracy and completeness of ESG reporting. Loblaw management board and various executive leaders are responsible for setting priorities and implementing ESG initiatives.



**Golden Design Rules to Reduce Plastic Waste**

The Golden Design Rules were launched globally in 2021, setting standards for packaging design to eliminate problematic elements. Late last year, Loblaw communicated with its hundreds of control-brand vendors, outlining Loblaw’s new standards and highlighting the global rules. By year end, 732 of Loblaw’s vendors registered for Packaging Association of Canada training. These efforts will continue in 2022.

**Zero Food to Landfill**

In 2018, Loblaw set an initial commitment to reduce food waste to landfill across its corporate operations by 50% by 2025 from a 2016 baseline – a goal surpassed in 2020, five years ahead of plan.

Loblaw set a new ambition in 2021. First, Loblaw is extending its commitments to the full enterprise, including franchise store operations and its supply chain. Second, each of Loblaw’s stores, corporate or independent, will achieve food waste reductions by year-end 2023; and third, Loblaw set a new goal: zero food to landfill by 2030.

# ESG at Choice

Choice Properties REIT is a large and diversified owner, manager and developer of a high-quality real estate portfolio comprising over 700 properties.

Choice Properties aspires to develop healthy, resilient communities through its dedication to social, economic and environmental sustainability.

Choice Properties' commitment to ESG practices is aligned with its purpose of creating enduring value through the ownership, operation and development of high-quality commercial and residential properties. Recognizing that its responsibility extends beyond the space it owns, Choice Properties aspires to develop healthy, resilient communities through its dedication to social, economic and environmental sustainability.

Choice Properties focuses its ESG program around two pillars where it can best create enduring value and which align with its stakeholders' interests: Fighting Climate Change and Addressing Social Equity.

The logo for Choice Properties, featuring the word "Choice" in a bold, white, sans-serif font, followed by "Properties" in a smaller, white, sans-serif font. The "C" in "Choice" is significantly larger than the other letters.

## Fighting Climate Change

Choice Properties has committed to doing its part to preserve the planet's resources for current and future generations. It uses short-term targets related to its environmental activities to keep it accountable.

Choice Properties develops and carries out programming that encompasses a wide range of environmental focus areas throughout both its operating properties and its development program. The aim of these programs is to reduce carbon emissions and preserve the planet's resources for current and future generations.

As one of Canada's largest landlords and a long-term owner of real estate, Choice Properties has an important role to play in addressing the greenhouse gas emissions that are contributing to climate change. Its purpose of creating enduring value extends beyond the short term. It is aligned with the need to promote a more sustainable future to mitigate the effects of climate change on communities and its business.

Choice Properties achieved its 2023 greenhouse gas emissions reduction target two years early. This target called for a 10% reduction in same-asset greenhouse gas emissions within Choice's operational control (primarily Scope 1 and 2). Improving energy efficiency in its office portfolio and converting over 75% of the exterior lighting in its retail and industrial portfolio to an LED standard were key drivers in meeting this target. Choice Properties achieved a 24% same-asset reduction (and a 47% absolute reduction when including properties that were owned partly or wholly by Choice at any point between 2018 and December 31, 2021).

## Addressing Social Equity

Choice Properties is committed to conducting its business in a manner that is respectful to the communities in which it operates. It develops and implements programming that encompasses a wide range of social topics that focus on its diverse stakeholder groups. Collectively, the aim of these programs is to advance opportunities for its stakeholders to thrive while delivering on Choice Properties' strategic objectives.

Choice Properties holds itself accountable for advancing diversity, equity and inclusion at all levels.

As part of its efforts to advance social equity, in 2021, Choice Properties launched its diversity, equity and inclusion framework, which includes programs focused on four areas: (i) Recruitment, Advancement & Conduct; (ii) Education & Culture; (iii) Community; and (iv) Suppliers.

## Reporting and Disclosure

Fulfilling Choice Properties' purpose of creating enduring value requires understanding both the financial impacts of ESG issues on its business as well as the impact of its activities on society and the environment. Choice Properties has used the concept of double materiality to assess and incorporate non-financial topics into its plans. This enables it to build programs and allocate resources to activities that are the most impactful, both financially and socially. Choice Properties has assessed financial materiality for its business using the real estate-specific Materiality Map published by the Sustainable Accounting Standards Board (SASB) Standards and the Financial Stability Board's Task Force for Climate-Related Financial Disclosures (TCFD) Recommendations.

Quinn & Partners conducted a verification of Choice Properties' 2021 energy, water, waste and GHG emissions statements for the reporting year from January 1, 2021 to December 31, 2021 to a reasonable level of assurance. Based on its verification activities and findings, Choice Properties' GHG emissions statement and energy, water and waste statements are fairly stated prepared to a reasonable level of assurance in accordance with ISO 14064- 3:2019.

## Choice's Net Zero Commitment

In 2021, Choice Properties committed to setting targets through the Science Based Targets initiative's (SBTi) Net-Zero Standard. In line with the SBTi requirements, Choice Properties' targets will:

- Encompass its entire portfolio and development pipeline
- Apply to its entire value chain (Scopes 1, 2 and 3)
- Align with a 1.5°C future
- Be achieved with deep emission reductions before applying offsets
- Include both a 2030 and 2050 target
- Be tracked and reported in line with global standards

Choice Properties' targets are currently with the SBTi for validation, with more details, including its net zero transition plan, to be provided in 2022 and reporting on its progress in the coming years.



### ESG Program Governance

Choice Properties executes ESG programming by integrating specific initiatives embedded in the business functions, with oversight occurring within the established governance structures. A dedicated ESG team, led by the Senior Director of Sustainability, coordinates these activities and reports directly to the President & CEO.

### Choice Cares

Choice Cares is our community involvement program through which Choice Properties' colleagues raise funds and volunteer their time to support the work of local charitable organizations. The Choice Cares mission is to form a collective of empowered individuals capable of making a lasting positive impact in the communities in which they live and work.

A bottom-up approach encourages our colleagues to take ownership of the Choice Cares program. Every year, colleagues vote on a socioeconomic issue to tackle on a national level and vote on charities with which to partner on a local level. Once the charity partners are selected, colleagues volunteer to form a national committee of Choice Cares Champions, working together to lead philanthropic activities and assume responsibility for the success of their region's campaign.

In 2021, the national fundraising campaign theme focused on supporting mental health programs in our communities and raised over \$400,000 and colleagues volunteered more than 1,200 hours (4.4 average volunteer hours per colleague).



### Choice Properties Supporting Tenants and Communities Through the Pandemic

The COVID-19 pandemic continued to impact tenants and communities throughout 2021. Choice Properties continues to adapt and respond, while putting in place programs, policies, and measures to safeguard its tenants, and bring resources to its communities. Choice Properties continues to support the pandemic effort through:

- Hosting vaccine pop-up clinics at its properties, including the Golden Mile and 25 Photography Drive plazas in Toronto, bringing communities closer to public health resources
- Providing free rapid testing to its tenants on-site at the Weston Centre and to its colleagues and contractors throughout the country
- Making operational changes such as increased ventilation and filtration at its properties that supported achievement of the WELL Health-Safety Seal for Facility Operations



# Appendices

## **In this section:**

**34** Glossary of Terms

**35** COVID-19

**36** SASB Table: GWL

**39** GWL Statement of Corporate  
Governance Practices

# Glossary of Terms

**“Carbon Disclosure Project”** is a not-for-profit charity that runs the global environmental disclosure system, focused on risks and opportunities relating to climate change, water security and deforestation.

**“Choice Properties”** means Choice Properties Real Estate Investment Trust.

**“Company”** or **“George Weston”** or **“GWL”** means George Weston Limited.

**“Data Security”** means measures to prevent the unauthorized access and leakage of sensitive, protected, or confidential information, whether through exploitation of system vulnerabilities, social engineering, phishing, viruses, malware, and other cyber threats.

**“Executive Management”** means management positions with a reporting line at most two levels from the President and includes Vice Presidents and Heads of business units.

**“GRESB”** means the Global Real Estate Sustainability Benchmark, which is a benchmark for ESG data relating to the commercial real estate businesses.

**“GRI”** means the Global Reporting Initiative, an international standards organization that established global standards for sustainability reporting.

**“Independent”** means a director who does not have any material relationship with the Company or its affiliates that could reasonably be expected to interfere with the exercise of independent judgment.

**“ISF”** means Information Security Forum.

**“Middle Management”** means colleagues who serve as project managers, implement policies determined by senior management and includes Senior Manager, Director and Senior Director positions.

**“NIST”** means National Institute of Standards and Technology.

**“SASB”** means the Sustainability Accounting Standards Board.

**“Science Based Targets Initiative or “SBTi”** is an organization that establishes science-based targets to provide companies with a clearly-defined path to reduce emissions in line with the Paris Agreement goals.

**“TCFD”** means the Task Force on Climate-Related Financial Disclosure, which developed a framework for disclosing climate related risk and opportunities.

**“UN Sustainable Development Guide”** are global goals established by the United Nations General Assembly to end poverty, protect the planet, and ensure that by 2030 all people enjoy peace and prosperity.

# COVID-19

George Weston Limited and its operating companies reacted decisively in response to the COVID-19 pandemic, with the interests of the group’s stakeholders at the forefront of every decision.

Since the onset of the pandemic in the first quarter of 2020, the Company, together with Loblaw and Choice Properties, has made significant investments to protect and support colleagues and their families, customers, tenants and the communities in which we operate.

The Company will continue to closely monitor the impact of COVID-19 on its businesses, including changes to labour markets, consumer behaviour, and advancement of disruptive technologies, and will adjust its operations as necessary to mitigate risks posed to its businesses and their customers, colleagues, tenants and other stakeholders.

On behalf of our group of companies, we want to thank our colleagues for their effort and dedication to serving Canadians and the communities we live in.



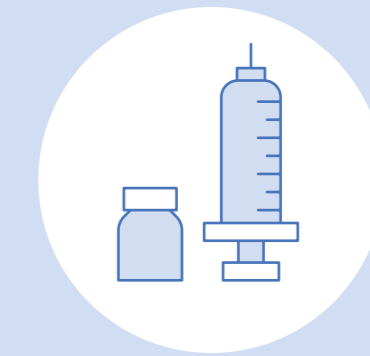
Enhancing mental health offerings for Canadians and our employees



Investments in grocery stores, pharmacies and the supply chain to ensure retail locations are open and stocked



Securing corporate workplaces, and stores, distribution centres and tenanted properties with additional health, safety, and sanitation measures



Administering COVID-19 testing and vaccinations across Canada



Enhancing customer convenience by expanding online capabilities and increasing staffing in Loblaw stores



Providing rent relief for Choice Properties’ tenants and financial hardship programs for Loblaw customers



Supporting colleagues in Loblaw stores and distribution centres with temporary pay premiums and pay protection safeguards



Technology roll-outs to support colleagues working remotely and continued high engagement

# SASB Table: GWL

George Weston Limited, as a publicly traded holding company, has identified the following topics and activity metrics as key issues against which it is able to disclose as a publicly traded company.

Sustainability Accounting Standards Board (SASB) Table				
Topic	Code	Accounting Metric	Data / Disclosure	Additional Information
<b>Employee Diversity &amp; Inclusion</b>	FN-AC-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Gender representation <sup>1</sup> : (1) Executive Management <sup>2</sup> – 40% (2) Not Reported (3) Not Reported (4) Not Reported  Minority representation: (1) Executive Management <sup>2</sup> – 33% (2) Not Reported (3) Not Reported (4) Not Reported	As per the George Weston Limited, Code of Conduct -Being a great place to work starts with RESPECT. The Blue Culture at George Weston Limited cultivates an inclusive and respectful work environment. This includes treating our employees with dignity and fairness, and maintaining a workplace that is free of harassment, discrimination and violence. It also means welcoming employees with different backgrounds, perspectives and capabilities. This diversity brings us a wealth of experience that makes us a better and more effective team.
<b>Business Ethics</b>	FN-AC-510a.1	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti- competitive behavior, market manipulation, malpractice, or other related financial industry laws or Regulations	George Weston Limited did not sustain any monetary losses in 2021 as a result of legal proceedings associated with the described conduct. George Weston Limited discloses all material legal and regulatory proceedings in its Annual Report and Quarterly Reports to Shareholders.	

Footnotes

1. Current disclosure is limited to Executive Management based on available data. George Weston Limited intends to report against additional metrics in future.
2. Executive management is defined as positions with title Vice President or above and Heads of business divisions.

Sustainability Accounting Standards Board (SASB) Table				
Topic	Code	Accounting Metric	Data / Disclosure	Additional Information
Business Ethics (continued)	FN-AC-510a.2	Description of whistleblower policies and procedures	<p>It is absolutely essential that George Weston Limited's employees act with integrity and take personal accountability in all interactions when representing the Company.</p> <p>INTEGRITY is the foundation upon which our Company was built. It continues to be the basis for our strong reputation and our loyal relationships. To protect that legacy – and because we believe it to be right – all of the Company's employees must conduct themselves in an ethical, lawful, and professional manner.</p> <p>George Weston's Code of Conduct establishes the framework by which an employee or any third party must report a concern. George Weston makes available a Business Integrity Hotline and reporting website, which is administered on behalf of George Weston by an independent external third party. George Weston Limited's Code of Conduct provides an overview of the framework for reporting illegal or unethical conduct.</p> <p>Every year, our employees complete mandatory compliance training that includes the Code of Conduct.</p> <p>The Company prohibits employees from retaliating against anyone who speaks up in good faith with a concern about another employee. Any employee who retaliates against another employee who has made a report is subject to discipline up to and including termination of employment.</p>	<a href="#">Code of Conduct</a>
	Data Security	FN-CB-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), and (3) number of account holders affected	<p>Substantiated complaints regarding breaches of privacy and data</p> <p>(1) 0 in 2021 (2) 0 in 2021 (3) Not Applicable</p>
FN-CB-230a.2		Description of approach to identifying and addressing data security risks	<p>George Weston Limited recognizes cyber and technology threats will continue to increase in frequency and sophistication. The Company is committed to protecting its corporate and stakeholder information from current and future threats by implementing a security management framework which aligns with industry best practices, including: National Institute of Standards and Technology (NIST) and the Information Security Forum (ISF).</p> <p><b>What data security means:</b></p> <p>Data security prevents the unauthorized access and leakage of sensitive, protected, or confidential information. This includes protecting George Weston's information assets against the exploitation of system vulnerabilities, social engineering, phishing, viruses, malware, and other cyber threats.</p> <p><b>Oversight for Data Security:</b></p> <p>The Company has a dedicated technology and cyber security team comprised of skilled professionals who manage information security and operational controls. The Audit Committee provides oversight and governance of the cyber security program and reviews quarterly reports from management.</p> <p><b>Responsibility for Cyber Security:</b></p> <p>At GWL, "Cyber security is everyone's responsibility", and this duty is shared with colleagues through our multifaceted security awareness program.</p> <p>A comprehensive cyber security knowledge assessment and tailored awareness training are delivered to all new colleagues as part of their onboarding process with the Company. All colleagues are required to complete quarterly security training, which focuses on identified risks or trending threats, and are subject to monthly phishing simulations.</p> <p><b>2021 Cyber Security Awareness by the Numbers:</b></p> <ul style="list-style-type: none"> <li>• 18 minutes is the average time per employee per quarter spent on cyber security related training materials.</li> <li>• 1,037 training modules assigned and completed as part of the Company's mandatory quarterly cyber security education program.</li> <li>• 29 new colleagues completed the New Hire Cyber Security Awareness Training program.</li> <li>• 1,913 phishing E-Mails sent to colleagues via the authorized phishing simulation program.</li> </ul>	

Sustainability Accounting Standards Board (SASB) Table				
Topic	Code	Accounting Metric	Data / Disclosure	Additional Information
<b>Data Security</b> (continued)			<p><b>Information and Cyber Security at George Weston Limited:</b></p> <p>The Company leverages information security maturity assessments based on the ISF Security Healthcheck and NIST CSF Implementation Tiers to understand the current state of its cyber security program. Maturity scores are further used as inputs to influence cyber security strategy, investments, and roadmap.</p> <p>To maintain its security posture, George Weston Limited regularly reviews its standards, procedures, and guidelines to ensure they are relevant and address all current risks and regulatory requirements.</p> <p>George Weston augments internal capabilities with a third-party managed detection and cyber security response service that provides 24/7 threat monitoring. Integrations from security tooling are fed into the service to continuously monitor security infrastructure. George Weston employs an in-depth approach to security which aligns with the NIST Cyber Security Framework (Identify, Prevent, Detect, Respond, Recover).</p> <p>George Weston is committed to building and reinforcing a sound security foundation by providing appropriate management support and instilling a culture of security awareness across the organization, including:</p> <ul style="list-style-type: none"> <li>• Effective risk management and compliance monitoring;</li> <li>• Appropriate segregation of duties, organizational structure, reporting lines, authorities, and security responsibilities;</li> <li>• A security risk monitoring function that applies key risk indicators providing insight into our operations and risk profile.</li> </ul> <p>George Weston invests in its people, process, and technology to mitigate cybersecurity risk. These practices include using industry benchmarks, assessing the effectiveness of controls, and adjusting the course of the Company's program in response to threat conditions.</p> <p>George Weston Limited's cyber security program undergoes regular audits from independent parties, both internal and external. The results of these audits and resulting action plans are an integral part of the security program lifecycle.</p> <p><b>Highlights of the 2021 Information Security program:</b></p> <ul style="list-style-type: none"> <li>• Refreshed GWL Information Security Governance to align with GWL's cyber security risk appetite and information security strategy.</li> <li>• Enhanced GWL's Cyber security Risk Management program, which includes Vendor Risk assessment and mitigation controls.</li> <li>• Established GWL Data/Information Management program, with new data labeling and retention policies.</li> <li>• Improved ISF maturity score through enhanced security governance, security and information management programs.</li> <li>• Continued upgrading the Cyber Security Education and Awareness program through regular training, mandatory quarterly assessments, and monthly phishing simulations for all colleagues and contractors.</li> <li>• Enhanced Cyber Security Threat and Incident Management plan through 24/7 Managed Detection Response model.</li> </ul>	

# GWL Statement of Corporate Governance Practices

Governance			
Approach	Reference	Application	2021 Highlights
<b>Majority Voting Policy</b>	See Policy on: <a href="http://www.weston.ca">www.weston.ca</a>	Annual election of Directors by Shareholders. Director who receives greater number of votes withheld than votes in favour must tender resignation. Governance Committee reviews resignation and makes recommendation to the Board	At least 97% of total votes cast at the 2021 Annual Meeting of Shareholders were cast in favour of each of the Directors
<b>Independence Statement</b>	See page 16 of the ESG Report for additional detail	Majority of the Board to be comprised of independent Directors	78% of Directors were independent. 100% of Audit Committee members were Independent. 100% of Governance Committee members are Independent
<b>Board Effectiveness</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Ensure that the Board and its Committees are functioning at optimal levels	Annual assessment of the performance and effectiveness of the Board and its Committees, and Committee Chairs. Lead Independent Director in place to drive strong independent Board oversight
<b>Share Ownership Policy</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Align the interests of Directors and executives with those of Shareholders. Applies to each Director and executive at the SVP level and higher	All Directors and executives either satisfy the required level of share ownership or are in the process of accumulating the securities as required under the Policy
<b>Continuing Education</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Ensure relevant continuing education sessions are provided to Directors	13 continuing education sessions provided to a Committee or the Board in 2021
<b>Director Tenure Guidelines</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Foster ongoing renewal of the Board's membership. Chairman and Governance Committee Chair assess Director's continued participation on the Board upon reaching the age of 75 or a change in occupation, and annually thereafter	33% of Director nominees had tenure of 0 to 5 years. 55% of Director nominees had tenure of 5 to 10 years. 22% of Director nominees had tenure of 10+ years. Average tenure of 8.3 years
<b>Director Interlock Policy</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Ensure that interlocking director relationships will not adversely affect independent judgement. Prohibited interlock occurs when more than two Directors, other than the Chairman, sit on the board of another public entity. Governance Committee reviews interlocking Directors	0 interlocks among independent Directors
<b>Related Party Transactions</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Oversight of related party transactions rests with the Audit Committee. Monitor significant related party transactions within the Weston Group	Quarterly updates on related party transactions delivered to the Audit Committee
<b>Corporate Opportunities Principles</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Framework established to facilitate decision-making process to deal with corporate opportunities which could be of interest to more than one entity in the Weston Group	Annual review of strategic focus areas for each of the main businesses in the Weston Group. Annual review of corporate opportunity principles against entity strategies
<b>Advisory Vote on Executive Compensation (Say-On-Pay)</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Provide Shareholders with an opportunity to vote on the Company's approach to executive compensation	97.67% of votes cast at the 2021 Annual Meeting of Shareholders were cast in favour of the Company's approach to executive compensation
<b>Executive Clawback Agreement</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Deterrent to executives taking excessive risk	Part of overall executive compensation program designed to align interests of the Shareholders with the Company

Business Ethics and Compliance			
Approach	Reference	Application	2021 Highlights
<b>Competition Law Compliance Program</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Reflects the Company's ongoing commitment to a rigorous competition law compliance program, including controls, training programs and reporting processes	Maintained ISO Assurance in respect of the Company's competition law compliance program
<b>Code of Conduct</b>	See Code on: <a href="http://www.weston.ca">www.weston.ca</a>	Reflects the Company's commitment to high standards of ethical conduct and business practices. Addresses conflicts of interest, compliance with laws, rules and regulations, confidentiality and fair dealing	Annual review and approval of the Code Annual acknowledgment by the Company's employees and Directors of their commitment to abide by the Code.
<b>Ethical Business Conduct</b>	See page 15 of the ESG Report or Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Integrity Action Line – Toll-free number that any employee or Director can use to report conduct thought to violate the Code. Anti-Fraud Policy – Fraud reporting protocols established to ensure fraud reporting to senior management. Accounting, Auditing and Internal Controls Procedures – outlines the procedures for receipt and treatment of complaints received in connection with accounting, internal controls, disclosure controls or auditing matters	Quarterly review of integrity action line comments with the Audit Committee. Annual review of the Anti-Fraud Policy and the Accounting, Auditing and Internal Controls Procedures by the Audit Committee
<b>Disclosure Policy</b>	See Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	The Disclosure Committee is responsible for the administration and implementation of the Disclosure Policy. Describes the processes and procedures of the Company in connection with the timely disclosure of material information. Provides direction and guidance on communications with external audiences. Establishes consistent guidance for determining what information is material and avoiding selective disclosure	Quarterly and annual review of disclosure documents, including the interim and annual management's discussion and analysis, interim financial statements and news releases. Quarterly review and reporting on the application of non-GAAP measures. Annual review of the management proxy circular and annual information form. File all continuous disclosure documents within the required timelines, including earnings releases, annual and interim reports, annual information form and management proxy circular
Environmental, Social and Governance			
Approach	Reference	Application	2021 Highlights
<b>Mandate of the Governance Committee</b>	See Mandate on: <a href="http://www.weston.ca">www.weston.ca</a>	Oversight of a Group-wide approach to ESG. Oversight of the Company's approach to ESG. Provides guidance on the Group-wide approach and to the Company on ESG	Governance Committee receives periodic reports on ESG initiatives with annual reporting to the Board
<b>ESG Reporting</b>	See: <ul style="list-style-type: none"> <li>• ESG Report</li> <li>• <a href="http://www.loblaw.ca/en/responsibility">www.loblaw.ca/en/responsibility</a></li> <li>• <a href="http://www.choicereit.ca/sustainability">www.choicereit.ca/sustainability</a></li> </ul>	Cross-functional management working team with representation from all the operating businesses of the Weston Group to advance ESG initiatives	Alignment on ESG reporting strategy across all the operating businesses of the Weston Group
<b>Board Diversity Policy</b>	See the Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Target of 30% representation on the Board by persons who identify as women. Consideration of age, ethnicity, gender, diverse backgrounds. Annual self-identification on designated group membership	33% of Director nominees identify as women. Establishment of target that 25% of Board's composition be comprised of people who identify as visible minorities by 2024. Annual assessment of Board composition
<b>Management Diversity and Inclusion Programs</b>	See page 19 of the ESG Report or Management Proxy Circular for additional detail on: <a href="http://www.weston.ca">www.weston.ca</a>	Diversity and Inclusion sessions held to generate awareness and implement activities that embed diversity principles into the culture of the organization. Consider diversity at the talent development and succession planning process at various senior levels. Annual self-identification on designated group membership	Adoption of formal targets in respect of women and visible minorities in management positions. Creation of goal that by 2024, 50% of Vice President or higher positions and 50% of Senior Manager to Senior Director positions be held by people who identify as women and 35% of Vice President or higher positions and 45% of Senior Manager to Senior Director positions be held by people who identify as visible minorities. Training sessions held on diversity and inclusion



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