



Office of the Grocery Sector Code of Conduct

June 2, 2026

CANADA
GROCERY
CODE

CODE
D'ÉPICERIE
DU CANADA

CanadaCode.org

OFFICE OF THE GROCERY SECTOR CODE OF CONDUCT (OGSCC)



The OGSCC is Responsible For:

- Promoting awareness and education on the Code
- Supporting fair application and implementation
- Administering dispute resolution and adjudication
- Monitoring industry participation
- Guiding the spirit of the Code into daily practice

What we don't do:

- The Adjudicator and the OGSCC cannot advise members about specific cases related to the Code.
- This is because the Adjudicator may later be asked to adjudicate between a supplier and a retailer on the issue.

RECRUITMENT



OGSCC Membership Update

- Total Members*: 200
- Member Type Breakdown:
 - 63% Manufacturer/Suppliers
 - 21% Retailers
 - 9% Non-Affiliated Wholesalers/Distributors
 - 7% Primary Producers

The full list of active members is available on the [Member Directory](#) on our website.

** This total reflects both active members and those in the onboarding pipeline; it is not a count of active members in good standing only.*

GOVERNANCE UPDATE

AGM – March 31

- Appointment of Auditors – Frouin Group
- Election of Permanent Board of Directors

Meeting of the Board of Directors – March 31

- Agreement to hire Independent Chair – search ongoing
- Appointment of Interim/Independent Chair – Michael Graydon

Meeting of the Board of Directors – June 1st

- Appointment of Code Advisory Group Members
- Independent Chair Interviews

OGSCC's Permanent Board of Directors

- Iain McRuvie, Burnbrae Farms
- Steve Roosdahl, BCfresh Vegetables
- Pierre Morin, Boulangerie Humanité
- John Danyluk, Earth's Own Food Company
- Martin Payant, Unilever Canada
- Rhonda Mitchell, The Clorox Company of Canada Ltd.
- Stacey Kravitz, UNFI Canada
- Giancarlo Trimarchi, Vince's Market
- John Pritchett, Powell's Supermarket
- Rob Allsop, Empire Company Limited
- Jodat Hussain, Loblaw Companies Limited
- Marc-André Bally, Costco Wholesale Canada

Reporting Issues



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HOW THE OGSCC EXECUTES ITS MANDATE (CODE COMPLIANCE)

— Industry -informed model

- Our work is fundamentally driven by what we hear from the sector
- We rely on members to surface issues, concerns, and emerging practices

— Complaint - and dispute -based system

- We do not proactively audit or investigate
- We act when issues are brought forward through established channels

— Designed to lower barriers to raising issues

- Confidentiality protections are central
- Flexible entry points depending on the nature of the issue

— Reactive and proactive approach

- **Reactive:** responding to specific complaints and disputes
- **Proactive:** identifying trends and systemic issues based on aggregated inputs

— Intelligence -led oversight

- Insights from complaints and engagement inform guidance, education, and priorities
- Focus on patterns and root causes, not just individual cases

How the OGSCC Gets Information

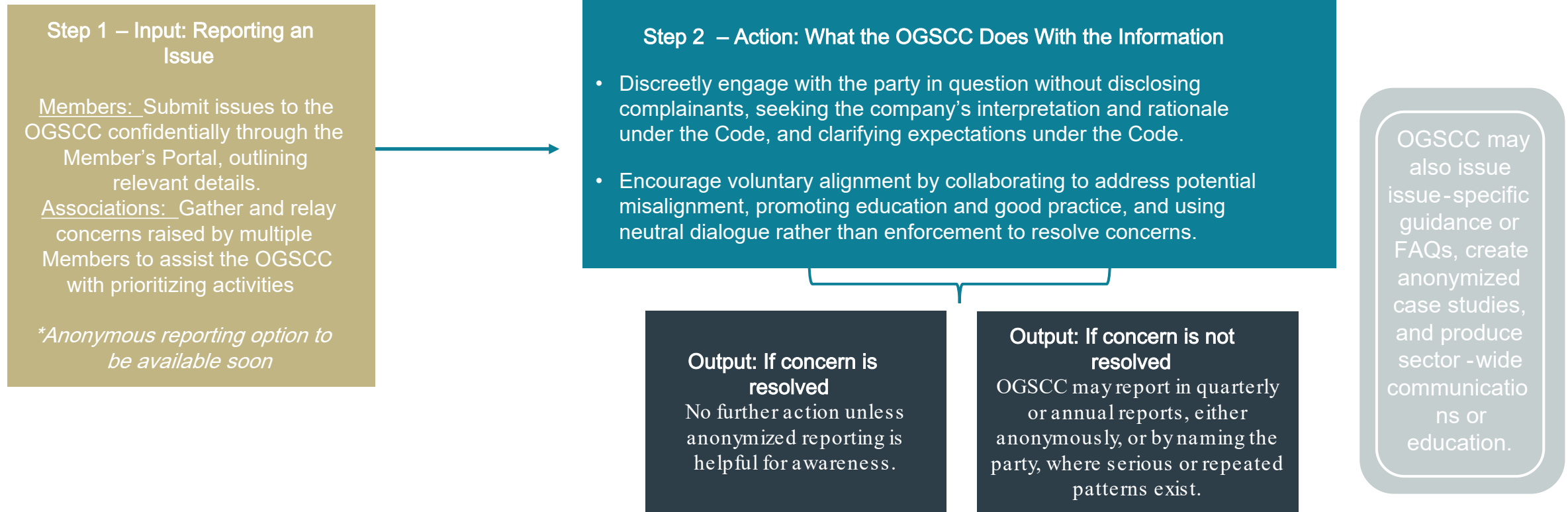
Enabling full implementation of the Code

- Effectiveness depends on ongoing participation from industry
- Our role is to support alignment with the Code through engagement, education and guidance
- DRMP as needed (last resort)

Multiple pathways to receive information

- Confidential Code complaints (including anonymous reporting)
- Formal disputes between parties (DRMP)
- Direct engagement with members and Associations
- Targeted information-gathering exercises (proactive)

CONFIDENTIAL COMPLAINTS PROCESS

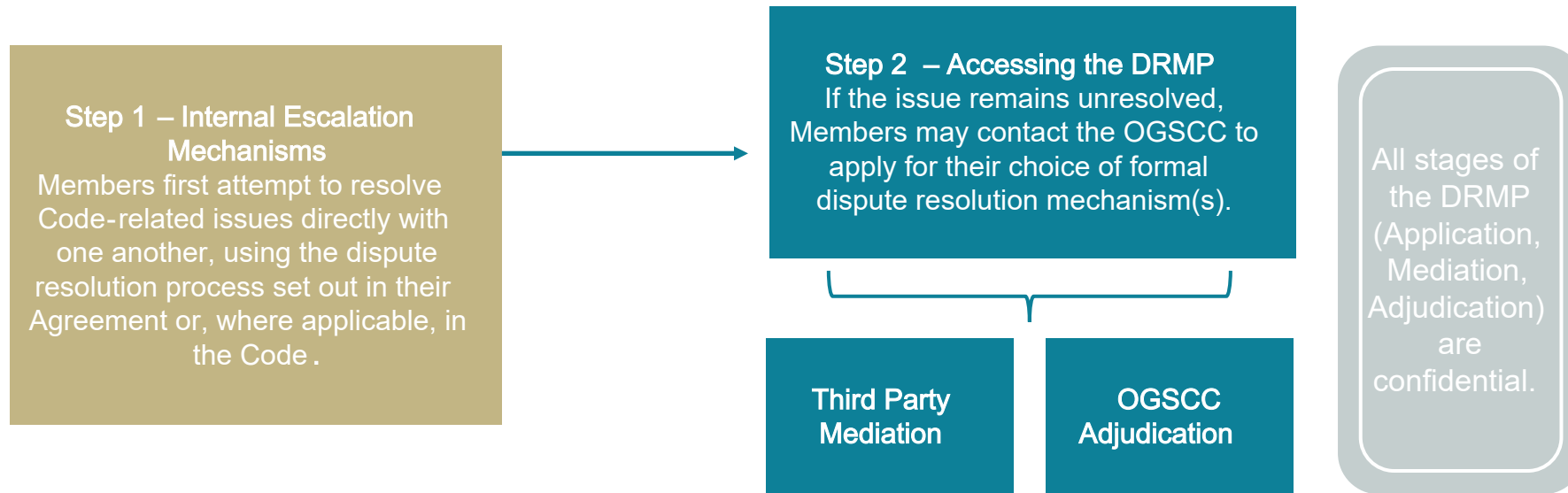


Note: The Adjudicator has full discretion to determine whether a concern warrants follow-up, conduct confidential engagements, and encourage corrective behaviour without the use of enforcement tools.

Managing Incoming Complaints

- When Members submit issues through the online portal, the Office does not treat these as individual, one-to-one complaints that trigger direct intervention with the other party.
- Instead, submissions are used as part of a broader intelligence-gathering function to identify patterns, trends, and potential systemic issues across the sector.
- This approach is intentional. Acting on a single submission could risk revealing the identity of the reporting party particularly in concentrated supply chains—thereby undermining confidentiality and potentially discouraging Members from raising concerns.
- The Office must also manage its resources responsibly and cannot act on every individual complaint received.
- By aggregating inputs and assessing them collectively, the Office is better positioned to engage in a measured, evidence-based way on issues that appear systemic, while preserving the trust and anonymity of those who come forward.
- Where a matter is better suited to a formal, bilateral process, Members retain the option to pursue it through the Dispute Resolution Management Process.

DISPUTE RESOLUTION MANAGEMENT PROCESS



Note: Resolving a dispute through another process does not prevent the DRMP from being used to address ongoing conduct that may be non-compliant with the Code, once the other process has concluded.

EARLY STATS

Confidential Complaints Portal: 14 complaints

DRMP Pre-Meeting Requests : 3

- 2 out of bounds
- 1 relevant but too early

Member Notices: 1

- Supplier Cost Changes

Guidance Issued: 2

- “Click-to-Accept”
- Unilateral Changes

Information Gathering Exercise(s)



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INFORMATION GATHERING EXERCISE

- **Launch:** March 2, 2026 to better understand certain practices related to agreements raised with the Office.
- **Who Received It :** Distributed to Code Representatives following advance notice in the February 26 newsletter.
- **Timeline:** March 31, 2026 to provide input.

Current Status: On May 4th, 2026, the OGSCC issued guidance in both cases.



Canada Grocery Code Member Notice

March 2, 2026

Canada Grocery Code Request for Information

Hello!

The [Office of the Grocery Sector Code of Conduct](#) (OGSCC) is seeking anonymous input from Code Members on current practices related to the presentation, acceptance, and amendment of commercial agreements specifically as they relate to Sections 1.1–1.4 of the [Code](#).

Sections 1.1 and 1.2 of the Code establish that parties are required to negotiate in good faith and, where they seek to enter into an Agreement, to do so by mutual consent. Section 1.3 further provides that Parties may not alter contracts unilaterally, except where the Agreement expressly allows for such changes or where the change is mutually agreed.

This outreach is a targeted information-gathering exercise intended to help the OGSCC better understand two specific agreement-related issues across the sector. The first relates to the use of “click-to-accept” or similar processes to enter into, or agree to changes to, agreements. The second concerns the use of clauses that allow one party to make unilateral changes to agreements. The information gathered will inform the OGSCC’s assessment of whether guidance on these issues would be helpful.

This exercise is not a determination that any specific practice breaches the Code; nor a substitute for the Dispute Resolution Management Process (DRMP).

NEXT “INFORMATION GATHERING”

Fair Dealing Across the Value Chain

Nothing in the Code shall require a Party to purchase a Product from or supply a Product to another Party. In addition, nothing in the Code shall require a Supplier to accept an order from a Retailer or a Retailer to place an order with a Supplier. Where:

- a) A Supplier does not accept an order from a Retailer in whole or in part, or
- b) A Retailer does not place an order with a Supplier in respect of products that have been previously forecasted or provides an order with a material variance from a previous forecast,

The relevant Party shall provide an explanation of its decision with reasonable substantiation to allow the other Party to understand the basis for such decision.

Where the supplier does not accept a retailer order setting out the quantity of products it wishes to order from the supplier, the retailer shall not impose fines or penalties on a supplier solely as a result of the supplier failing to deliver the quantities in the non- accepted order. Where the retailer does not issue an order, the supplier will not impose fines or penalties on a retailer solely as the result of the retailer failing to make an order.

Fill Rates:

- Likely to launch in June
- Longer process than previous – more complex
 - Information Gathering
 - One-one meetings (retail & suppliers)
- Outcome not pre -determined
 - Guidance
 - Best practices
 - White paper
 - Etc...

Reporting



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OGSCC REPORTING FRAMEWORK (ANNUAL CYCLE)

Spring Report (May/June)

Coverage: Jan–May / Early-Year Signal

- Early DRMP intake & emerging trends
- Issues Centre themes
- Preliminary compliance observations
- Outreach & education activities
- Early systemic risks to monitor

Fall Report (September)

Coverage: June–September / Mid-Year Pulse Check

- DRMP activity trends & metrics
- Mid-year systemic issues
- Member responsiveness patterns
- Updated thematic insights
- Inputs to Survey & Code Review

Annual Report (Jan/Feb)

Full-Year Synthesis / Accountability Document

- Full-year DRMP analysis
- Issues Centre trends & systemic themes
- Compliance patterns & relationship health
- Annual Survey results
- Code Review findings & recommendations
- OGSCC performance metrics
- Forward priorities
- Financials (AGM-aligned)

Objective: *Transparent, structured reporting to identify issues early, monitor trends, and support continuous Code implementation.*

ACKNOWLEDGEMENTS

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Thank you.



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