

CONFIDENTIAL INFORMATION POLICY

An underlying principle of securities legislation is that the public should have the opportunity to decide whether to buy or sell securities on the basis of information equally available to all. Directors, officers and employees of a corporation sometimes acquire knowledge of material information concerning the business and affairs of the corporation (or a related corporation) which has not yet been disclosed to the public. If that is the case, they have an unfair advantage in purchasing or selling securities because the seller or purchaser on the other side of the transaction may have made a different investment decision had they been aware of that information.

Similarly, if such a person informs another person of undisclosed material information, and such person purchases or sells securities on the basis of that information, the seller or purchaser on the other side of the transaction is, once again, at a disadvantage.

Certain securities laws in Canada have been enacted so as to prevent and deter such inequitable trading in securities. Parkland has formulated a policy to assist directors, officers and employees of Parkland in complying with these laws. The purpose of this memorandum is to advise directors, officers and employees of Parkland of such policy and some of the legal repercussions of failing to adhere to this policy. Persons who are “insiders” of Parkland and other persons who regularly come into contact with confidential information must also adhere to Parkland’s Securities Trading and Reporting Policy for Restricted Persons.

Italicized terms used in this Policy have the meaning set forth in the Definitions section of this Policy.

1. Access *to Undisclosed Material Information* shall be limited to employees who have a “need to know” such information.
2. No *Employee* or *other Restricted Person* having knowledge of *Undisclosed Material Information* relating to, or involving Parkland or another party involved in an activity or a negotiation with Parkland shall:
 1. disclose such information to a *Tippee* other than in the necessary course of business with the express written consent of the director, officer or manager of Parkland responsible for the activity or negotiation;
 2. buy or sell, or acquire an option to buy or sell, any of Parkland’s securities or securities of a third party involved in such activity or negotiation; or
 3. participate in discussions regarding decisions by others about investments in Parkland or other companies involved in the matter;
 4. before such material information has been fully disclosed to the public and a reasonable period of time for dissemination has passed (which for the purposes of this policy shall be considered to be at least two clear days following the day of the disclosure to the public) or until the

activity or negotiation giving rise to the *Undisclosed Material Information* has terminated.

3. The director, officer or employee of Parkland responsible for an activity or negotiation which, if known, might reasonably be expected to affect the market price or value of Parkland's securities or that of other parties involved in such activity or negotiation shall be responsible for initiating adequate procedures and controls to restrict the knowledge of such event in accordance with this policy and applicable laws, including:
 1. restricting participation or knowledge of such project to the minimum number of *Employees* practicable;
 2. notifying all involved *Employees* and *Restricted Persons* of their "insider status" and confidentiality obligations in writing;
 3. maintaining a list of all persons who are aware of the activity; and
 4. instituting necessary controls to provide adequate security and to monitor the observance of such controls.
4. In addition to any precautions which may be imposed on *Employees* and *Restricted Persons* by the person responsible for a matter, the following general precautions shall be adopted:
 1. ensure all correspondence concerning the matter is labeled "CONFIDENTIAL";
 2. refrain from open discussions concerning the matter where other persons not "in the know" are in the vicinity;
 3. do not leave correspondence and other documents concerning the matter in view in your working area and keep them in a secure area;
 4. if the matter has been assigned a code name, use the code name on all correspondence and refrain from using specific corporate names whenever possible; and
 5. report any information leaks or suspected information leaks to the person responsible for the matter.

Consequences of Non Compliance with Policy

1. *Employees, Restricted Persons* or *Tippees* may, under some circumstances, be subject to prosecution which may result in fines or imprisonment or both. In addition to fines, violation may result in liability to shareholders affected.
2. Parkland may be held liable for damages resulting from misleading or untrue statements or the failure to disclose information on a timely basis, and the reputation and standing of Parkland and its *Employees* in the community may be tarnished.
3. Securities' exchanges could require the untimely disclosure by Parkland of information to stop or confirm rumors.

Strict compliance with this Policy is required. An *Employee* who fails to adhere to this Policy may be subject to disciplinary action by Parkland, which could result in termination of employment.

DEFINITIONS

The following definitions are used in the Policy on confidential information:

Employee means all officers, employees and agents of Parkland, whether such employees and agents be managers, accountants, maintenance and support personnel, salesmen, secretaries, clerks, drivers or independent contractors;

Restricted Person includes all directors, officers and other insiders of Parkland as determined from time to time in accordance with Canadian Securities laws;

Tippee means an individual who obtains or receives Undisclosed Material Information from an Employee or Restricted Person and any persons who substantially receive such information, where such persons knew or ought reasonably to have known that the information originated from an Employee or Restricted Person;

Undisclosed Material Information means any information relating to the business and affairs of Parkland that when released would result in or would reasonably be expected to result in significant change in the market price or value of Parkland's shares (or the securities of other companies with whom Parkland may be conducting confidential negotiations). Examples of information which may be Undisclosed Material Information include:

1. changes in share ownership that may affect control of Parkland;
2. changes in corporate structure, such as amalgamation;
3. take-over bids in respect of Parkland's securities or securities of another company or bids by Parkland for its own securities;
4. major corporate acquisitions or dispositions;
5. change in capital structure of Parkland and distributions decisions;
6. borrowing of a significant amount;
7. public or private sale of additional securities of Parkland;
8. significant development affecting Parkland's resources, technology, products or markets;
9. entering into or loss of significant licenses or contracts;
10. firm evidence of significant increases or decreases in near term earnings prospects;
11. changes in capital investment plans or corporate objectives;
12. significant changes in management;
13. significant litigation;
14. major disputes with major contractors, suppliers or customers;
15. events of default under financing or other agreements; and
16. any other developments relating to the business and affairs of Parkland that would reasonably be expected to significantly affect the market price or value of any of Parkland's securities or that would reasonably be expected to have a significant influence on a reasonable investor's investment decision.