

IA FINANCIAL GROUP SUPPLIER CODE OF CONDUCT

1 INTRODUCTION

The *iA Financial Group Supplier Code of Conduct* (the “Code”) sets forth the principles and expectations of iA Financial Group and its affiliates (designated collectively as the “Company”) as to how suppliers of goods and services, their representatives and employees (designated as “employees of the Supplier” are to conduct business and deal with the Company.

Suppliers that wish to establish a business relationship with the Company must agree to respect the principles and standards applicable to the Code and must ensure that they act ethically, honestly and with integrity with respect to this relationship.

2. LEGISLATIVE, REGULATORY AND GUIDELINE COMPLIANCE

In their activities, suppliers must ensure they conduct business in compliance with the applicable laws, rules and regulations of the jurisdictions in which the Company operates. It is incumbent upon suppliers to understand the standards, laws and regulations.

3. ETHICS AND GOVERNANCE

The Company considers it essential that its business relationships be founded on transparency and integrity. The Company asks its suppliers to act ethically in the conduct of their business. Suppliers must therefore act honestly and with integrity at all times and must not knowingly facilitate dishonest, illegal or inappropriate activities.

All suppliers must apply ethics standards while taking into account the business culture and practices in the Company’s places of business.

3.1 CONFIDENTIAL INFORMATION

In its business relationship with the Company, suppliers must keep any information pertaining to the activities of the Company, its clients, its employees, its investors and its affiliates strictly confidential during the course of a contract and thereafter. Suppliers may use the information obtained in the context of their business relationship with the Company only for the purposes for which it was provided.

Suppliers must store information as agreed with the Company and have appropriate information security policies and procedures in place to secure access to Company information. Suppliers must notify the Company promptly of actual or suspected privacy breaches, security breaches, or losses of Company information.

3.2 CONFLICTS OF INTEREST

A conflict of interest means any situation in which the interests of the supplier may conflict, or be perceived to conflict, with those of the Company.

Any conflict of interest or situation likely to create a conflict of interest that has an impact on the impartiality of the Company’s employees must be declared to the Company.

3.3 COLLUSION AND CORRUPTION

Any arrangement that may prevent a normal business relationship between the Company and its suppliers, including all forms of corruption, extortion, bid rigging, influence peddling, use of confidential information, mismanagement and falsification, must be avoided.

3.4 GIFTS AND HOSPITALITY

Suppliers must not offer to the Company or its employees, either directly or indirectly, gifts, favour, or cash for the purpose of influencing a transaction or business decision.

3.5 OUTSOURCING AND SUBCONTRACTING

Suppliers must obtain the prior written consent of the Company to subcontract services or outsource activities that directly impact the delivery of goods and services to the Company.

In addition, suppliers must monitor outsourcing and subcontracting arrangements to ensure they comply with the suppliers’ contractual obligations and with this Code, and provide evidence of such monitoring upon request. Suppliers are responsible for any subcontracted service or outsourced activity irrespective of Company approval thereof.

4. OCCUPATIONAL HEALTH AND SAFETY

Suppliers must comply with the workers’ and human rights legislation and regulations in force in jurisdictions in which the Company operates.

Suppliers must take all reasonable precautions to provide a healthy and safe workplace.

5. ENVIRONMENT

Suppliers must comply with all applicable environmental laws, regulations and standards, and with the Company’s policies.

The Company considers it essential that its suppliers be aware of environmental protection and sustainable development in the course of its business operations. It is the responsibility of each supplier to reduce its environmental footprint to a minimum by implementing best environmental practices and improving upon them.

6. COMMITMENT

6.1 CONTRACTUAL VALUE

This Code is an integral part of all contractual documents and shall guide business relationships.

6.2 AUDIT

The Company expects its suppliers to comply with the Code and to periodically review their programs to ensure the compliance of their activities in all areas under this Code.

The Company may require a supplier to periodically confirm in writing that it meets the requirements of this Code. The Company must also be able to monitor and audit a supplier's control environment.

In the event of non-compliance, the Company expects its suppliers to initiate corrective action within a reasonable period by using a continuous improvement approach, but without limiting other remedies provided in the contract between the parties.

6.3 SANCTION

Any failure to comply with this Code may result in the termination of the business relationship as well as any other remedies provided in the contract between the parties.

6.4 REPORTING

In the context of their business relationship with the Company and its employees, suppliers are invited to report suspicious, illegal, fraudulent or unethical behaviour, misconduct, or any violation of this Code via a confidential and anonymous integrity hotline, by phone or online, at:

Telephone: **1-855-888 4670**

Website: **clearviewconnects.com**

7. CONCLUSION

This Code does not cover all situations suppliers may face in their business relationship with the Company and does not exempt them from respecting the spirit of the Code and the Company's values, which are set out at:

Website: **<http://ia.ca/about-us>**

DECLARATION

Full name: _____

Position: _____

Company name: _____

As a supplier to iA Financial Group, you acknowledge that you have read the *iA Financial Group Supplier Code of Conduct* and agree to abide by its terms.

Signature: _____ Date: _____