



iA Financial Group Code of Business Conduct



The Code of Business Conduct was adopted by the Board of Directors of Industrial Alliance Insurance and Financial Services Inc. and went into effect on November 2, 2016.

Last modified on September 25, 2017.

iA Financial Group Code of Business Conduct

Table of contents

1 Introduction	3
1.1 Purpose of the Code	3
1.2 Scope of the Code	3
1.3 Designated persons and Integrity Hotline	3
2. Compliance with laws, regulations and guidelines	4
3. Confidentiality	4
3.1 Personal information	4
3.2 Information about Company business	4
4. Conflict of interest	4
4.1 Independence and objectivity	5
4.2 Corruption	5
4.3 Gifts and entertainment	5
4.4 Securities transactions	5
5. Employment environment	6
5.1 Equity and fairness in the workplace	6
5.2 Employment practices	6
5.3 Remuneration	6
5.4 Health and safety	6
6. Property and resources	6
6.1 Use of property, resources and assets giving access to social media	6
6.2 Safeguarding of property and resources	7
6.3 Records and reporting	7
7. Outside activities	7
8. Dealing with outside persons and organizations	7
8.1 Prompt communications	7
8.2 Sharing information with other companies	7
8.3 Dealing with public service employees	8
8.4 Communications with the media	8
8.5 Social media	8
9. Operating rules of the Code	8
9.1 Implementation and review	8
9.2 Annual declaration	8
9.3 Breach of the Code	9
9.4 Whistleblowing	9
9.5 Sanctions	9
9.6 Complaints regarding accounting activities	9
10. Declaration of probity	9
10.1 Employees concerned	9
10.2 Items affecting probity	9
11. Conclusion	9
Appendix A – Certificate upon assumption of duties (<i>Employee Copy</i>)	10
Appendix B – Annual declaration (<i>Employee Copy</i>)	11
Appendix A – Certificate upon assumption of duties (<i>Human Resources Copy</i>)	12
Appendix B – Annual declaration (<i>Human Resources Copy</i>)	13

1 Introduction

1.1 Purpose of the Code

Industrial Alliance Insurance and Financial Services Inc. (“iA”) and its direct and indirect subsidiaries, doing business as iA Financial Group (referred to in this document as the “Company”), believe it is essential to ensure that the trust that customers, investors, employees, representatives, government authorities and the general public place in them is legitimate and well-deserved. This is why a high level of integrity and professionalism must be reflected through our behaviour.

This behaviour must also respect and promote the Company’s core values: teamwork, high-performance environment, continuous improvement, respect for individuals and distributors and being service-oriented.

The key objective of the iA Financial Group Code of Business Conduct (the “Code”) is to make employees and all individuals involved in the Company’s activities aware of the high behavioural standards required from them and the importance of always acting ethically, legally, honestly and with integrity.

Employees are encouraged to have open, frank discussions at any time with their manager or other designated persons about the application of this Code and its behavioural standards.

1.2 Scope of the Code

The Code applies to:

- Directors
- Officers
- Managers
- The Company’s employees
- Any person working under the Company’s direction and control
- Members of the Retirement Committees of the Company’s pension plans and the independent contractors who provide professional services to the Retirement Committees

The terms “**employee**” and “**employees**” used throughout this Code, include all the people mentioned above.

In this Code, the term “**relative**” refers to an employee’s family member (spouse or civil partner, common law partner, parent, grandparent, child, brother, sister, uncle, aunt, nephew, niece or cousin), regardless of domicile, and to any other person(s) residing with the employee.

The term “**related entity**” refers to an entity in which the employee, or a relative of the employee, has a significant interest, either directly or indirectly.

Because this Code applies to the operations of iA and of each of its subsidiaries, the term “**senior management**” in this Code means the senior management of iA or of one of its direct or indirect subsidiaries.

Supplementary codes of conduct, policies, and procedures specific to certain groups of employees have also been developed to address conduct issues related to the Company’s activities. Employees will be advised by their manager if any such codes, policies or procedures apply to their work and activities. Employees subject to such supplementary codes, policies, and procedures remain subject to this Code.

Employees may also be members of professional or industry associations with their own codes of conduct. Employees who are subject to the rules of such associations remain subject to this Code. Any conflict in adhering to applicable codes of conduct must be reported to the employee’s manager or to one of the designated departments listed in the “Designated Persons and Integrity Hotline” section of this Code, so that they can be disclosed and documented, allowing appropriate measures to be taken, if required.

All employees are required to review the Code in order to understand the Company’s commitment to conduct business in a legal and ethical manner. Employees are required to comply with the Code as it is a condition of employment. Employees must comply with both the letter and the spirit of the Code.

A number of obligations set out in the Code continue after the termination of employment or the end of a contract.

1.3 Designated persons and Integrity Hotline

Employees must report in good faith any questionable behaviour, behaviour that may seem illegal or fraudulent or against business ethics, or any breach of this Code. A confidential and anonymous Integrity Hotline is available to employees. The website address and phone number of the Integrity Hotline are at the end of Appendices A and B. The goal of the Integrity Hotline is to strengthen the iA Financial Group’s high ethical standards by providing employees with an easy method to confidentially report behaviour that appears to be fraudulent, illegal or otherwise in violation of the Code. Employees can also consult managers, the Legal Department or the Human Resources Department as “designated persons.”

2 Compliance with laws, regulations and guidelines

The Company's operations are subject to complex and changing legislation and regulations.

Employees are responsible for understanding the laws, regulations and guidelines related to their duties. They must seek advice from their manager or from one of the departments listed under "Designated Persons and Integrity Hotline" if they require greater clarity.

The Company and all persons acting on its behalf shall comply with the laws and regulations governing its business within the legal framework in which it operates. The Company will not tolerate any violation of the law or any unethical behaviour by an employee.

Employees must apply ethical standards while taking into account the culture and business practices of the different locations in which the Company operates. The Company operates in different jurisdictions and employees must comply with the laws and regulations governing the Company's business in the jurisdictions in which it operates.

Employees are required to take any compliance training provided by the Company in order to comply with said laws and regulations.

Employees who commit or participate in illegal activities are subject to criminal prosecution in addition to the sanctions provided by the Code.

3 Confidentiality

Employees must keep the affairs of the Company and its clients, employees, investor, and subsidiaries strictly confidential both during and after the termination of employment or the end of a contract.

3.1 Personal information

The Company collects personal and confidential information about its clients and their relatives, employees, representatives and investors in carrying out its activities. Such information must be stored in a safe place at all times and used only for its intended purpose. This information can only be used in the Company's regular course of business and may only be disclosed to those persons who are entitled to access it for business purposes or as required by law. It must be used in compliance with applicable laws and the Company's privacy policies and procedures.

The Company has privacy policies and procedures and employees are required to read and comply with them, in addition to taking any required training.

In the event of a breach of privacy policies or procedures, or if confidential information is inadvertently disclosed, the employee concerned must immediately report the matter to his or her manager and/or to one of the departments listed under "Designated Persons and Integrity Hotline".

3.2 Information about Company business

The Company's confidential business information must also be protected. Any information about the Company that is not intended for the general public is confidential and must not be shared with anyone outside the Company unless expressly authorized by senior management or as required by law. This includes plans for new products or projects, operational and information technology systems, financial information, acquisitions and investments. This restriction applies to information of any kind, including programs, materials, ideas, data and lists of past, present or prospective clients which may, if provided to outsiders, have a detrimental effect on the Company's competitive position.

Employees must use discretion when discussing Company business in a public place or on a cellular phone. Employees must protect information of a personal and confidential nature, even after termination of their employment relationship or contract. They are not authorized to take with them any information, materials or data in electronic or any other form after termination of employment or the end of a contract.

4 Conflicts of interest

Employees shall avoid all situations in which their personal interests conflict or might conflict with their duties to the Company. A situation may represent a conflict of interest if an employee takes steps or has interests that prevent him or her from working objectively and efficiently for the Company. Employees have an obligation to report to the Company any situation in which their private interests may conflict with those of the Company.

To avoid conflicts of interest, new employees must fill out a Certification Upon Assumption of Duties (Appendix A). Once hired, employees must complete the Annual Declaration (Appendix B) of the Code every year. Employees are also responsible for updating their Annual Declaration if a conflict of interest, or an appearance of a conflict of interest, should arise after they have completed their Annual Declaration. An updated Annual Declaration must be sent to one of the persons or departments listed under "Designated Persons and Integrity Hotline." Employees must follow any instruction provided or agree to specific conditions to avoid the appearance of conflict of interest or to rectify the situation.

4.1 Independence and objectivity

Employees must perform their duties honestly, conscientiously, legally and in accordance with the best interests of the Company.

Employees must not use their position or the information obtained through their employment for the Company for their own personal advantage or in such a way that a conflict or an appearance of conflict of interest could arise between the Company's interests and their own.

Employees must not participate in any way whatsoever in agreements between the Company and suppliers in which they, or a member of their immediate family, have interests or from which a member of their family may benefit personally.

Fair treatment of customers is an integral part of the Company's sound commercial practices. It involves the Company's conduct at each stage of a product's life cycle from the moment product-related obligations arise until they expire. Fair treatment of consumers must be implemented in every area of the Company's operations by concerted action. Employees must, within the framework of their functions, treat customers in an honest, courteous, fair, objective and independent manner. Customers must be able to express their concerns. Complaints and disputes must be handled in a diligent and fair manner. Employees who have knowledge of a situation where a customer has been treated unfairly or where there is the appearance of such a situation must report it to one of the persons or departments listed under "Designated Persons and Integrity Hotline".

4.2 Corruption

Employees are officially forbidden from taking part, directly or indirectly, in acts of corruption (bribes, payoffs, etc.) in their business dealings. Any favour promised or granted to someone, directly or indirectly, in terms of value or offer, in order to encourage them to act inappropriately, shall be considered a bribe.

In all cases, the favour can be considered a bribe if it is offered for improper motives.

4.3 Gifts and entertainment

Employees must not, directly or indirectly, **solicit** gifts, favours or money from those doing business with, or seeking to do business with, the Company.

Employees must not, directly or indirectly, **offer** gifts, favours or money in order to influence a business transaction or decision.

Employees must not, directly or indirectly, **accept** gifts of cash, cheques, cash equivalents or items of

value from anyone doing business with, or seeking to do business with, the Company.

Employees must not, directly or indirectly, **accept** other gifts, favours or any form of entertainment from anyone doing business with, or seeking to do business with, the Company, when such gift, favour or entertainment could be reasonably construed as an attempt to influence the judgment of the person receiving it in the performance of their duties on behalf of the Company.

Participation in business-related functions, including occasional lunches or other meals, is a normal and permissible business practice. Employees can accept courtesies that:

- a) in their best judgment, are customary
- b) are not frequent or ostentatious
- c) are offered in situation in which their acceptance would not strike an objective observer as being unusual, that do not risk obligating or giving a sense of favouritism to the recipient, and that do not compromise or appear to compromise the recipient's impartiality or integrity.

If in doubt, employees should consult their manager or one of the persons or departments listed under "Designated Persons and Integrity Hotline."

4.4 Securities transactions

Company employees have the right to make personal investment decisions. However, those decisions must not contravene the law, the conflict of interest provisions of this Code or any policy or procedure established by the Company.

Employees shall not use material information gained in the course of employment (commonly referred to as "insider information") that is generally unknown to the public for personal gain or for the benefit of others such as friends, relatives or related entities.

Moreover, no employees may trade securities on their own behalf or on behalf of a relative on the basis of important information that was obtained in the course of their employment with the Company and that is generally unknown to the public. Information is important if its disclosure could affect the decision of a reasonable investor.

Providing insider information to another person or entity outside the ordinary course of business is illegal and could expose the Company and/or the employee to significant damages or imprisonment.

Employees must not allow personal investment transactions to take priority over transactions on behalf of the Company. Employees must ensure that no decision related to a personal investment could

adversely influence the decisions they make in performing their duties for the Company.

An employee who knows, or has reason to believe, that the Company is about to purchase, sell or actively trade a particular security or other investment in a business may not purchase or sell, directly or indirectly, that business's securities for his or her own account or for the account of a relative until after the Company has completed the purchase or sale.

Any employee may enrol in a share purchase or dividend reinvestment program, but remains subject to the Code with respect to the sale of the shares thus purchased.

5 Employment environment

5.1 Workplace equity and fairness

The Company is committed to treat all of its employees with equity or fairness in its employment and remuneration practices.

All employees have the right to a workplace free from discrimination and harassment in accordance with applicable human rights legislation and Company policies.

All of the Company's employment practices, including those related to the publication of vacant positions, interviews, recruitment, remuneration, benefits, and the administration of all programs affecting personnel to be conducted without discrimination on any of the prohibited grounds set forth in applicable human rights legislation.

Employees may discuss any concern they may have about unfair employment practices, discrimination or harassment with their manager or one of the departments listed under "Designated Persons and Integrity Hotline."

5.2 Employment practices

The Company aims to maintain an effective and efficient organization in which performance and competency are recognized. The Company is committed to hiring the best qualified individuals for all vacant positions.

Company employees' relatives will be considered for positions on the same basis as other candidates, subject to restrictions intended to prevent conflicts of interest.

Employees may not participate, either directly or indirectly, in any decision involving the hiring, contracting, evaluation or promotion of a relative. Employees are also prohibited from making recommendations to the person(s) responsible for making such a decision.

5.3 Remuneration

The Company pays employees in accordance with formal policies governing wage rates, benefits and incentives, where applicable.

Employees may not receive commissions or other forms of remuneration related to the sale of the Company's products or services unless the employee's terms of employment provide for it. Employees may not receive any kind of payment other than their regular remuneration or other incentives for negotiating, supplying or assisting in any transaction made by, or on behalf of, the Company, nor have any financial interest in such transaction.

5.4 Health and safety

The Company is committed to taking all reasonable precautions to ensure a healthy and safe work environment for employees.

Employees who become aware of circumstances that pose potential health or safety risks must report the matter to their supervisor or manager, the Workplace Health and Safety Committee, the Legal Department or the Human Resources Department.

6 Property and resources

6.1 Use of property, resources and assets giving access to social media

The Company has policies and procedures in place to safeguard its property and resources as well as to encourage their safe use. It also sets strict standards to prevent fraud and dishonesty. Employees who have access to the Company's resources must follow established procedures for handling and protecting this property. Employees must ensure that assets and resources such as offices, meeting rooms, personal computers, personal digital assistants ("PDAs"), computer software, copyrighted material, recorded information, telephone services, cellular phones, the Internet, and network services are used only in the Company's ongoing business operations. Usage for personal purposes should be limited.

Employees with access to the Company's computer resources (including, but not limited to, computer software, email, the Internet, PDAs, cellular phones, and file servers) are considered custodians of corporate information and as such are responsible for the safe and secure management of information and the use of computer systems and resources. All employees are required to follow Company policies related to information technology and security and must comply with all applicable laws and regulations when using Company resources.

All Company property, including systems, files, programs, documents, and any audio or video media productions developed and used to conduct the Company's business, remain the property of the Company and may not be copied, in whole or in part, or removed from Company premises for personal use without proper authorization.

Employees with access to proprietary systems must maintain the confidentiality of the information related to those systems. Copying software in whole or in part without proper licensing is strictly prohibited, as is the use of such software for anything other than Company business.

When employees are required to spend Company funds, it is their responsibility to ensure that appropriate value is received by the Company for such expenditures. Employees responsible for accounting and recordkeeping functions are expected to diligently enforce proper practices.

6.2 Safeguarding of property and resources

Employees shall exercise care in the handling and safeguarding of property owned or held by the Company. Employees must not use Company property for personal use or resale.

If employees become aware that Company property or resources have been lost, damaged, stolen or used in a fraudulent or improper manner, they must advise their manager or one of the departments listed under "Designated Persons and Integrity Hotline."

6.3 Records and reporting

All Company assets, liabilities and transactions are to be recorded in an accurate and timely manner. All funds are to be recorded and all expenses are to be properly reported.

7 Outside activities

The Company encourages employee participation in community activities. However, employees may not work, in any way whatsoever, for businesses whose activities are in competition or incompatible with those of the Company. In addition, all employees must give priority to their duties within the Company. No outside activity, whether remunerated or not, may interfere or conflict with the performance of those duties.

No outside activity should be of such a nature as to reflect poorly on the Company, embarrass the Company publicly, or affect its relationships with its clients, shareholders, employees, business partners, or with government and regulatory authorities.

Employees who participate in outside activities must ensure that their involvement is clearly personal and does not involve the Company in any way, unless prior authorization has been obtained from a member of the Company's senior management.

Employees must ensure that they are not associated with the Company when participating in a political activity, unless they are specifically authorized to do so beforehand by a member of the Company's senior management.

If employees are unsure as to whether their participation in an outside activity is acceptable, they are required to consult their manager or one of the departments listed under "Designated Persons and Integrity Hotline."

8 Dealings with outside persons and organizations

8.1 Prompt communications

It is essential that communications with applicants, policyholders, claimants, investors, members of the public, government and regulatory authorities, and other organizations be conducted in a precise, thorough and timely manner. It is the duty of each employee to provide prompt, courteous and satisfactory service. Employees must respond promptly to all requests for information and all complaints. In addition, communications in the form of a commercial electronic message must comply with the requirements of Canada's Anti-Spam Legislation.

8.2 Sharing information with other companies

Through its employees, the Company is committed to high business standards in its relationships with competitors. Misrepresentations about the Company's products or competitors' products, services, methods or financial position are prohibited.

Employees who belong to industry or professional associations may share information, but must take care not to disclose confidential information or information that could place the Company at a competitive disadvantage.

8.3 Dealings with public service employees

All dealings with public service employees are to be conducted in a manner that will not compromise their integrity or discredit their reputation or that of the Company. Since invitations and gifts of little value could potentially be viewed as a leveraging tool, they may not be offered to public service employees unless they are offered by a member of senior management or Company employees authorized by a member of senior management.

8.4 Communications with the media

Only the president and individuals duly authorized by iA or its subsidiaries may comment on the Company's position to the media. Employees are not permitted to speak on behalf of the Company unless they have been expressly instructed to do so by senior management.

Any employee contacted by a media representative shall refer them to the Company's designated spokesperson.

Senior management must authorize every article, interview or public statement provided by an employee to the media before it is published.

8.5 Social media

The popularity of social networks is undeniable. Various platforms provide a new model for interacting with customers, co-workers and the world in general. Employees who are active on social media must comply with the principles outlined in this Code and in Company guidelines on the use of social media.

When employees are on social media, they may identify themselves as an employee of the Company for professional or personal purposes. Employees shall not act under a pseudonym, and must clearly identify themselves. Employees express themselves in their own name. Employees are responsible for their own opinion and as stipulated in section 8.4 of the Code, employees are not authorized to speak on behalf of the Company unless expressly authorized to do so. The following disclaimer should appear on the employee's profile, blog or other website: "The following opinions are solely my own." This statement does not release employees from their responsibility regarding the content of their posts.

Employees who are on social media shall respect sections 3, 3.1 and 3.2 of this Code concerning confidential information about the Company, its customers, employees, suppliers and other business partners.

Opinions, photographs, publications and comments published on social media can have an impact on the Company, its employees, managers, suppliers and customers. Employees who use social media as part of their duties, as in their personal life, must ensure that they do not damage the reputation of the Company, its employees, customers, suppliers and other partners. Content posted on social media is public and can remain online indefinitely. It can be modified, redirected, printed and forwarded to third parties, even though that was not the intention of the employee.

Employees shall not publish opinions about an individual that they would not be comfortable repeating in front of that individual.

Although social media can be a useful workplace tool, it can also be a source of distraction in the workplace. During working hours the use of social media should be extremely limited unless required for work-related duties. In no way should such usage decrease an employee's performance or productivity.

9 Operating rules of the Code

9.1 Implementation and review

The Code was drafted in consultation with the Company's senior management, approved by the iA Board of Directors, and ratified by the respective boards of directors of iA's subsidiaries.

The Code shall be reviewed and revised every three (3) years, or more often if necessary. Any substantive change must be approved by the iA Board of Directors.

9.2 Annual declaration

Every new employee receives a copy of the Code. Employees must acknowledge having read it and agree to abide by it and any future amendments. They must also disclose any apparent or real conflict of interest. An example of the Certification is included as Appendix A.

At least once a year, all employees are required to confirm that, to the best of their knowledge, they have complied with the terms of this Code, as well as all applicable statutes, regulations, guidelines, and Company policies and procedures, and that they have not been involved in any undisclosed conflict of interest. An example of the Declaration is included as Appendix B.

The signature may be provided in written form or via an electronic portal if such a portal is available to the employee.

9.3 Breach of the Code

An employee who learns of a potential breach of the rules set out in the Code shall immediately inform one of the designated persons. Such information may also be communicated anonymously via the Integrity Hotline discussed in section 1.3 of this Code. The Integrity Hotline contact information can be found at the end of Appendices A and B.

Any violation of the Code is a serious matter. A strictly confidential investigation will take place regarding any questionable business transaction or dealing disclosed under the provisions of the Code and the result will be reported to senior management, to the Board of Directors, or to both, depending on the case.

9.4 Whistleblowing

All employees must feel free to report, without fear of retaliation, any allegation of misconduct they believe could reasonably constitute proof of:

- a) A failure to comply with legal or regulatory obligations the Company is subject to
- b) A criminal offence that has been committed, is being committed, or is likely to be committed
- c) A financial irregularity or a financial or non-financial fraud
- d) Improper conduct or unethical behaviour, including violations of the Code
- e) A danger to an individual's health or safety
- f) A violation of an individual's human rights
- g) Attempts to destroy or conceal information relating to any of the above
- h) A violation of Company policies, procedures, guidelines or instructions
- i) Any other improper behaviour

Suspected misconduct must be reported in good faith and without malice. Moreover, the person reporting such conduct must be reasonably sure that the information disclosed and the allegations contained therein are substantially true. The disclosure must not be made for purposes of personal gain and it must be based on reasonable grounds in all circumstances.

The Company does not consider reporting a known or suspected violation of the Code to be an act of "disloyalty" and it is against the Company's policy to retaliate against any employee who reports what he or she reasonably believes to be an actual or potential violation of this Code. Consequently, this means that an employee will not be disciplined, fired or discriminated against in any way for voicing concerns about an actual or potential violation, so long as the employee acted honestly and in good faith. Those who retaliate or take revenge against an employee who, in good faith, has reported a known or potential violation of this Code are themselves subject to disciplinary action, including termination of their contract or dismissal.

9.5 Sanctions

After a thorough investigation, including statements from the employee(s) involved, sanctions reflecting the seriousness and impact of breaches of the Code may be imposed.

Failure to comply with this Code can, depending on the circumstances, be grounds for a warning, a change in responsibilities, suspension or dismissal without notice and/or the initiation of civil or criminal proceedings.

9.6 Complaints regarding accounting activities

Complaints regarding accounting matters or accounting controls should be reported to the Internal Audit department under the *Risk Management Policy Regarding Fraud and Other Practices Associated with Financial Crime*. Complaints can also be filed anonymously via the Integrity Hotline.

10 Declaration of probity

10.1 Employees concerned

This section is for directors, members of senior management and employees in a supervisory position. For the purposes of this section, employees in a supervisory position are supervisors in the compliance, risk management and internal audit functions.

10.2 Items affecting probity

Any relevant item affecting the integrity of a person and maintaining a relationship of trust toward him/her, including a criminal record, bankruptcy, insolvency, negative judgement by a regulatory authority or professional order, a conflict of interest or any other inappropriate behaviour that could impact his/her professional responsibilities, is likely to affect probity. Any item that negatively affects a person's probity must be assessed and sanctions could be imposed, including dismissal or removal from office.

11 Conclusion

Although the various topics presented in this Code do not cover every situation an employee may encounter during his or her career with the Company, they demonstrate the Company's commitment to fairness and integrity and are an indicator of the type of behaviour expected from all employees. It is the responsibility of the members of management to ensure that all employees under their direction or control are made aware of this Code.



Certificate upon assumption of duties

Last name and first name: _____

Employee code: _____

Position: _____

Company: _____

I consent to the collection, use and disclosure of my personal information for purposes related to my employment.

I hereby acknowledge that I have received a copy of the iA Financial Group Code of Business Conduct (the "Code") and any other applicable code(s) of conduct.

As an employee (defined in section 1 of the Code) I confirm that I have read the Code and understand its contents. I agree to comply with the Code and any amendment that may be made thereto. I also agree to comply with any applicable corporate policies and procedures, including those related to privacy, money laundering and financial crimes. I agree to take, within the required timeframe, the training required by the Company that applies to me, including privacy training and anti-money laundering training. [Note: anti-money laundering policies, procedures and training are not applicable to employees of property and casualty companies in iA Financial Group.]

As a condition of my employment, every year I will review the Code and complete any required declarations.

As stipulated in the Code, I agree to provide all declarations and information periodically required by my manager, the Legal Department or the Human Resources Department for the purpose of complying with the Code. I understand that any breach of the Code on my part may result in sanctions.

If I am a director, member of senior management or an employee in a supervisory position, I consent to the Company obtaining a criminal record check and performing professional background and credit history checks. I agree that these checks are reasonable given my position of responsibility.

I am aware that the Company has in place an Integrity Hotline for the purpose of reporting behaviour that appears to be unethical or unlawful (See section 1.3 of the Code). The contact information for the Integrity Hotline is:

Telephone: **1-855-888-4670**
Website: **clearviewconnects.com**

I am disclosing below any outside employment, business, interest or activity that conflicts or potentially conflicts with the interests of the Company:

Signature: _____ Date: _____



Annual Declaration

Last name and first name: _____

Employee code: _____

Position: _____

Company: _____

I have reviewed the iA Financial Group Code of Business Conduct (the "Code") and the privacy procedures for all employees (the "Employee Privacy Procedures"). I understand my responsibility to comply with the terms of the Code that are applicable to me and with the Employee Privacy Procedures.

Except as disclosed below, to the best of my knowledge, during the past year I have complied with:

- the Code and any other applicable code(s) of conduct
- the Employee Privacy Procedures
- any anti-money laundering procedures that are applicable to me, and
- all applicable laws and corporate policies and procedures

I am disclosing below any outside employment, business, interest or activity that I now have, or plan to have, that could potentially conflict with the interests of the Company. I am also disclosing any business transaction or conduct of a questionable nature under the provisions of the Code that has not been previously disclosed to the Company.

**Items Requiring Disclosure
(If none, please write "None")**

(If more space is required, please attach a separate page.)

If I am a Board member, a director, a member of senior management, or an employee in a supervisory position, I consent to the Company obtaining a criminal record check and performing professional background and credit history checks. I agree that these checks are reasonable given my position of responsibility.

I am aware that the Company has in place an Integrity Hotline for the purpose of reporting behaviour that appears to be unethical or unlawful (See section 1.3 of the Code). The contact information for the Integrity Hotline is:

Telephone: **1-855-888-4670**
Website: **clearviewconnects.com**

Signature: _____ Date: _____



Certificate upon assumption of duties

Last name and first name: _____

Employee code: _____

Position: _____

Company: _____

I consent to the collection, use and disclosure of my personal information for purposes related to my employment.

I hereby acknowledge that I have received a copy of the iA Financial Group Code of Business Conduct (the "Code") and any other applicable code(s) of conduct.

As an employee (defined in section 1 of the Code) I confirm that I have read the Code and understand its contents. I agree to comply with the Code and any amendment that may be made thereto. I also agree to comply with any applicable corporate policies and procedures, including privacy policies and procedures and anti-money laundering policies and procedures. I agree to take, within the required timeframe, the training required by the Company that applies to me, including privacy training and anti-money laundering training. [Note: anti-money laundering policies, procedures and training are not applicable to employees of property and casualty companies in iA Financial Group.]

As a condition of my employment, every year I will review the Code and complete any required declarations.

As stipulated in the Code, I agree to provide all declarations and information periodically required by my manager, the Legal Department or the Human Resources Department for the purpose of complying with the Code. I understand that any breach of the Code on my part may result in sanctions.

If I am a director, member of senior management or an employee in a supervisory position, I consent to the Company obtaining a criminal record check and performing professional background and credit history checks. I agree that these checks are reasonable given my position of responsibility.

I am aware that the Company has in place an Integrity Hotline for the purpose of reporting behaviour that appears to be unethical or unlawful (See section 1.3 of the Code). The contact information for the Integrity Hotline is:

Telephone: **1-855-888-4670**
Website: **clearviewconnects.com**

I am disclosing below any outside employment, business, interest or activity that conflicts or potentially conflicts with the interests of the Company:

Signature: _____ Date: _____



Annual Declaration

Last name and first name: _____

Employee code: _____

Position: _____

Company: _____

I have reviewed the iA Financial Group Code of Business Conduct (the "Code") and the privacy procedures for all employees (the "Employee Privacy Procedures"). I understand my responsibility to comply with the terms of the Code that are applicable to me and with the Employee Privacy Procedures.

Except as disclosed below, to the best of my knowledge, during the past year I have complied with:

- the Code and any other applicable code(s) of conduct
- the Employee Privacy Procedures
- any anti-money laundering procedures that are applicable to me, and
- all applicable laws and corporate policies and procedures

I am disclosing below any outside employment, business, interest or activity that I now have, or plan to have, that could potentially conflict with the interests of the Company. I am also disclosing any business transaction or conduct of a questionable nature under the provisions of the Code that has not been previously disclosed to the Company.

**Items Requiring Disclosure
(If none, please write "None")**

(If more space is required, please attach a separate page.)

If I am a Board member, a director, a member of senior management, or an employee in a supervisory position, I consent to the Company obtaining a criminal record check and performing professional background and credit history checks. I agree that these checks are reasonable given my position of responsibility.

I am aware that the Company has in place an Integrity Hotline for the purpose of reporting behaviour that appears to be unethical or unlawful (See section 1.3 of the Code). The contact information for the Integrity Hotline is:

Telephone: **1-855-888-4670**
Website: **clearviewconnects.com**

Signature: _____ Date: _____



INVESTED IN YOU.

iA Financial Group is a business name and trademark of
Industrial Alliance Insurance and Financial Services Inc.

ia.ca

F75-177A-1(18-08)