

CODE OF BUSINESS CONDUCT



Table of contents

Introduction.....	3
Compliance with laws	5
Client experience.....	6
Confidential information.....	7
Conflicts of interest.....	8
Employment environment.....	11
Property and resources.....	12
Outside activities.....	13
External communications.....	14
Operating rules of the Code.....	16
Declaration of probity.....	17
Appendix A – Certificate upon assumption of duties.....	18
Appendix B – Annual declaration.....	20

1

Introduction



Purpose of the Code

iA Financial Corporation Inc. (iA) and its direct and indirect subsidiaries, operating under the name iA Financial Group (collectively referred to as the “Company”) believe it is essential to ensure that the trust that clients, investors, employees, representatives, contractors, 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.

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.

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.

Employees are encouraged to openly discuss the application of the Code with their manager or other resource personnel.

Scope of the Code

iA Financial Group’s Code of Business Conduct applies to:

- Directors
- Senior executives
- Executives
- Employees
- Any person whose work is the responsibility of the Company’s management and over whom the Company has direct control
- Members of the Retirement Committees of the Company’s pension plans

The terms “employee” and “employees” used in the present Code include all the people mentioned above.

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

The term “affiliate company” refers to a company in which the employee, or a relative of the employee, has a significant interest, either directly or indirectly.

As the Code applies to the Company’s activities and the activities of each of its direct and indirect subsidiaries, the use of the term “senior management” in the Code refers to the senior management of iA and the senior management of its 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 without

delay to the employee’s manager or to the Legal Department or the Human Resources Department so that it can be disclosed and documented, and appropriate measures 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.

Obtaining assistance and reporting a violation

Employees must report in good faith any questionable behaviour, behaviour that may seem illegal or fraudulent or against business ethics or any breach of trust of this Code.

Employees can also consult managers, the Legal Department or the Human Resources Department for any questions or concerns regarding behaviour or a breach.

Employees may also report confidentially and anonymously through the Integrity Hotline, by phone at 1-855-888-4670 or online at clearviewconnects.com. The goal of the Integrity Hotline is to strengthen the Company’s high ethical standards by making it easier for employees to report violations in a confidential manner.

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 will be subject to disciplinary action, which may include termination of their contract or dismissal.

2

Compliance with laws



The Company's operations are subject to complex and changing laws 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 the Legal Department if they require assistance. In addition, employees are required to take any compliance training provided by the Company.

All 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 will not tolerate any violation of the law or any unethical behaviour by an employee. Employees who commit or participate in illegal activities are subject to criminal prosecution in addition to the sanctions provided by the Code.

3

Client experience

Clients have a right to fair treatment at each stage of a product's life cycle from the moment it is designed right up to after-sales service. Fair treatment of clients must be implemented in every area of the Company's operations. Employees must offer a client experience focused on the current and future needs of clients and ensure that their decisions are in the clients' best interest.

Employees must, within the framework of their functions, treat clients in an honest, courteous, fair, objective and impartial manner. Clients 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 client has been treated unfairly or where there is the appearance of such a situation must report it to their manager, the Legal Department or via the "Integrity Hotline."



“ I always put the client first ”

4

Confidential information

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

“ I am responsible for protecting the personal information of the Company’s clients and employees. ”

“ I use discretion at all times and I do not discuss Company business with people outside the Company, unless authorized to do so ”

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 Company privacy policies and procedures.

The Company has drafted 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 the Chief Privacy Officer.

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 mobile 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, material, or data in electronic or any other form after termination of employment or the end of a contract.



5

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.

Employees must not participate, directly or indirectly, in agreements between the Company and suppliers in which they, or a relative, have an interest or from which they, or a relative, may benefit personally.

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.

Employees must promptly report to their manager or to the Human Resources Department, any situation which could reasonably lead to a conflict of interest, or an appearance of a conflict of interest, and must update their Annual Declaration accordingly. Employees must comply with any instructions, or conditions imposed, to rectify the situation.

New employees must declare conflicts of interest, if applicable, when they fill out the Certificate Upon Assumption of Duties (Appendix A).

Corruption

Employees are strictly prohibited from participating directly or indirectly in acts of corruption (bribes, kickbacks, etc.). Any benefit, offered, promised or given to a person, directly or indirectly, in order to induce him or her to behave inappropriately, should be considered a bribe.

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



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.
- **Offer** gifts, favours or money in order to influence a business transaction or decision.
- **Accept** gifts of cash, cheques or negotiable securities or any valuable property from those doing business with, or seeking to do business with, the Company.
- **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 a situation in which their acceptance would not strike an objective observer as being unusual and that do not compromise, or appear to compromise, the recipient's impartiality or integrity



Question

How do you recognize a conflict of interest?

Answer

Does the situation affect my judgment or objectivity?

Will the situation put my interests, or those of my relative, in conflict with those of the Company?

Could this have a negative impact on the Company's reputation?

Would I be comfortable if this situation were known to my manager or colleagues?

If in doubt, employees should consult their manager or the Human Resources Department or the Legal Department.

Securities transactions



Do not trade in securities using material information that is not known to the public and never provide material information of this kind to relatives.

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.

In the course of their duties, employees who have access to privileged information or material information that has not yet been made public must not, on their own behalf or on behalf of friends, relatives or related companies, trade in securities using such information or otherwise use such information before that information has been fully disclosed to the public and sufficient time has elapsed to allow for the dissemination thereof. This restriction applies to the Company's securities as well as those of any other company, including a company that does business with the Company or in which the Company intends to invest.

Information is deemed to be privileged if it has not yet been generally disclosed to the public and if it is likely to affect the decision of a reasonable investor to purchase or sell securities. Material information is information that would reasonably be expected to result in a significant change in the value or market price of a security.

Providing privileged information or material information that has not yet been made public to another person or company outside the Company's ordinary course of

business (commonly referred to as "tipping") is illegal and could expose the Company or the employee to significant fines, damages or imprisonment.

Employees must ensure that decisions relating to personal investments do not adversely affect decisions they make on behalf of 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 such transaction.

In addition, certain persons, because of their functions and the information to which they have access, may be subject to blackout periods on the Company's securities.

Any employee may enrol in a share purchase or dividend reinvestment program set up by the Company. However, the employee remains subject to the Code with respect to the sale of the shares acquired in such a manner.

For more information, employees are invited to refer to the *Securities Trading Policy – iA Financial Group* and the policies or guidelines specific to their department or sector.



6

Employment environment

Equitable, respectful and safe employment environment

The Company is committed to treating all of its employees with equity and fairness in its employment and remuneration practices. The Company is also committed to taking all reasonable precautions to ensure a healthy and safe work environment for its employees.

All employees have the right to a workplace free from discrimination, harassment and violence, 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 are to be conducted without discrimination.

“ I contribute to a respectful and inclusive employment environment ”

Employees must comply with their obligations under the Respectful Workplace Policy, the Violence Prevention in the Workplace Policy and the Alcohol and Drugs in the Workplace Policy.

Employees should discuss any concern they have about unfair employment practices, discrimination or harassment with their manager or the Human Resources Department. They may also report any situation anonymously via the “Integrity Hotline.”

Employees who are aware of circumstances that could pose a potential health or safety risk must inform their manager or the Human Resources Department or the Workplace Health and Safety Committee.

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.

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.

7

Property and resources

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, mobile phones, the internet, and network services are used only in the Company's ongoing business operations. Use for personal purposes is strictly limited.

Employees must report any loss, damage, theft or fraudulent or inappropriate use of the Company's property and resources.

Employees with access to the Company's computer resources 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 must comply with the Information Security Policy and the documents arising therefrom, and comply with all applicable laws and regulations when using Company resources.



If you know of or suspect an incident or infraction affecting information security, report it immediately to your manager or to the IT Help Desk:

1-844-352-5200

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. 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.

8

Outside activities

The Company encourages employee participation in community activities. However, employees are not permitted to work, in any capacity, for businesses whose activities are in competition or incompatible with those of the Company. In addition, employees must give priority to their duties with 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 the Human Resources Department.



Question

Can an employee hold a position outside the Company?

Answer

Only if it does not result in a real or apparent conflict of interest with the employee's position with the Company and if the employee's performance is not affected.

9

External communications



Prompt communications

It is essential that communications with applicants, clients, 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 responsible for such communications 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*.

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.

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. Any gifts or invitations can only be offered if authorized by a member of senior management and only if their value is minimal.

Any lobbying activity must first be authorized by the Legal Department. Employees who engage in such activity must do so in accordance with the various applicable laws.

Communications with the media

Only the president and individuals duly authorized by the Company 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.

Social media

The popularity of social networks is undeniable. Various platforms provide a new model for interacting with clients, co-workers and the world in general. Employees who are active on social media must comply with the principles and rules outlined in this Code and in the Company's Directive 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 use a pseudonym and must clearly identify themselves. Employees are not authorized to speak on behalf of the Company. It is desirable that the following disclaimer appear on an employee's profile, blog or other website: «The following opinions are solely my own.» However, this statement would not release an employee from their responsibility for the content of their posts.

Opinions, photographs, videos, publications and comments published on social media can have an impact on the Company, its employees, managers, suppliers and clients. 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, clients, 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 intended purpose.

Employees shall not publish opinions about an individual that are contrary to the Code and 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.



Question

Can I use social media to post my opinions about topics in the news?

Answer

Yes, but you must never state or imply that you are speaking on behalf of iA Financial Group. It must be clear that you are speaking on your own behalf, and such statements must only be posted from your personal account. In addition, your posts must not damage the reputation of the Company.

10

Operating rules of the Code

Implementation and review

The Code was drafted in consultation with the Company's senior management and approved by the iA Board of Directors.

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.

Annual declaration

Every new employee receives a copy of the Code. New employees must complete the Certificate Upon Assumption of Duties (Appendix A) to confirm they have read the Code and agree to comply with it and any future amendments. They must also disclose any apparent or real conflict of interest.

At least once a year, all employees are required to complete the Annual Declaration (Appendix B) 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.

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

“ It is my duty to report all Code violations that I become aware of, because I care about the integrity of our Company ”

Breach of the Code and sanctions

An employee who learns of a potential breach of the rules set out in the Code shall immediately inform their manager, the Human Resources Department or the Legal Department. Such information may also be communicated anonymously via the Integrity Hotline, for which the contact information can be found on the signature page of this Code.

Allegations, suspicions and incidents associated with financial crime and fraud must be submitted to the Internal Audit Department or confidentially via the Integrity Hotline, as per the Risk Management Policy Regarding Fraud and Other Practices Associated with Financial Crime.

The Company deems any violation of the Code a serious matter. Any transaction or conduct that is a suspected violation of the Code will be investigated in strict confidence. The result of an investigation may be reported to senior management or the Board of Directors, or both where appropriate.

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.

“ I am responsible for signing the Annual Declaration every year ”

11

Declaration of integrity

Employees concerned

This section of the Code applies to directors, members of senior management and employees in charge of oversight functions. For the purposes of this section, oversight functions are the compliance, risk management, internal auditing and actuarial divisions.

Items affecting integrity

Matters that impact integrity include a criminal record, bankruptcy or insolvency, an unfavorable decision by a regulatory authority or a professional disciplinary committee, or inappropriate conduct that affects a person's professional responsibilities. Any matter impacting integrity must be reported without delay. Depending on the circumstances, sanctions up to and including dismissal or removal from office could be imposed.



Appendix A

EMPLOYEE COPY

Certificate upon assumption of duties

First name

Last name

Employee code

Position

Company

Personal information

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

Compliance with the Code

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 that applies to me required by the Company, including training on privacy, money laundering and information security. [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.

Directors, members of senior management, employees in charge of oversight functions or persons occupying a position deemed to be at risk

If I am a director, member of senior management, an employee in charge of oversight functions (see section 11 of the Code) or a person occupying a position deemed to be at risk, 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.

Integrity Hotline

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.

Conflicts of interest

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

Signature

Date

The contact information for the Integrity Hotline is:

Telephone:
1-855-888-4670

Website:
clearviewconnects.com



INVESTED IN YOU.

Appendix A

SEND TO HUMAN RESOURCES

Certificate upon assumption of duties

First name

Last name

Employee code

Position

Company

Personal information

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

Compliance with the Code

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 that applies to me required by the Company, including training on privacy, money laundering and information security. [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.

Directors, members of senior management, employees in charge of oversight functions or persons occupying a position deemed to be at risk

If I am a director, member of senior management, an employee in charge of oversight functions (see section 11 of the Code) or a person occupying a position deemed to be at risk, 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.

Integrity Hotline

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.

Conflicts of interest

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

Signature

Date

The contact information for the Integrity Hotline is:

Telephone:
1-855-888-4670

Website:
clearviewconnects.com



INVESTED IN YOU.

Appendix B

EMPLOYEE COPY

Annual declaration

First name

Last name

Employee code

Position

Company

Compliance with the Code

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.

I have taken, within the required timeframe, the training that applies to me required by the Company, including training on privacy, money laundering and information security.

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

Conflicts of interest

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.

Employment, business, interest or activity for which disclosure is required (if you do not have any employment, business, interest or activity to disclose, please write "None.") (If you do not have enough space, please attach a sheet to this form.)

Directors, members of senior management, employees in charge of oversight functions or persons occupying a position deemed to be at risk

If I am a director, member of senior management, an employee in charge of oversight functions (see section 11 of the Code) or a person occupying a position deemed to be at risk, 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.

Integrity Hotline

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.

The contact information for the Integrity Hotline is:

Telephone:
1-855-888-4670

Website:
clearviewconnects.com

Signature

Date



INVESTED IN YOU.

Appendix B

Annual declaration

SEND TO HUMAN RESOURCES

First name

Last name

Employee code

Position

Company

Compliance with the Code

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.

I have taken, within the required timeframe, the training that applies to me required by the Company, including training on privacy, money laundering and information security.

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

Conflicts of interest

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.

Employment, business, interest or activity for which disclosure is required (if you do not have any employment, business, interest or activity to disclose, please write "None.") (If you do not have enough space, please attach a sheet to this form.)

Directors, members of senior management, employees in charge of oversight functions or persons occupying a position deemed to be at risk

If I am a director, member of senior management, an employee in charge of oversight functions (see section 11 of the Code) or a person occupying a position deemed to be at risk, 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.

Integrity Hotline

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.

The contact information for the Integrity Hotline is:

Telephone:
1-855-888-4670

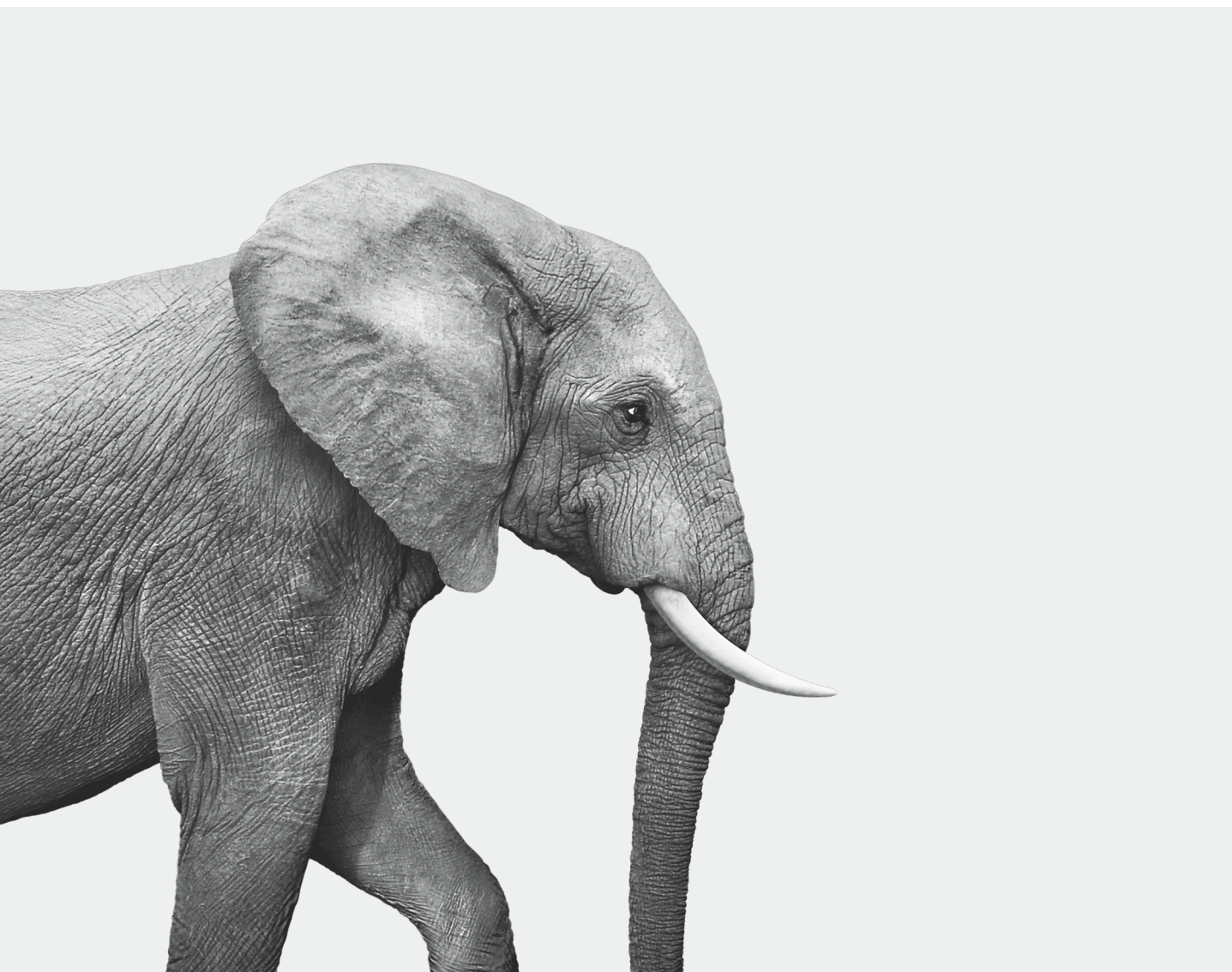
Website:
clearviewconnects.com

Signature

Date



INVESTED IN YOU.



F75-177A(21-09)

INVESTED IN YOU.

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

ia.ca