

IGM Financial Inc.

WORKPLACE ANTI-HARASSMENT AND DISCRIMINATION POLICY

IG Wealth Management, Mackenzie Investments and Investment Planning Counsel and their subsidiaries (collectively “IGM”) are committed to maintaining a professional and inclusive workplace where all individuals who do business with or for us are treated with dignity and respect, and individual qualities, characteristics and differences are valued. Every individual has a right to work in an environment that is free from discrimination or harassment as described below.

The goal of this Policy is to educate, prevent, identify and correct conduct which may result in workplace-related discrimination, harassment or violence.

SCOPE AND APPLICATION

This Policy applies to all individuals working at or with IGM. This includes employees (permanent and fixed term), consultants, associates, directors, advisors, contractors, and people whom consultants and advisors employ to provide services to IGM (collectively referred to as “Workers” in this policy).

The obligations in this Policy apply to behaviour anywhere IGM business is being conducted or sponsored by IGM, whether on or off IGM premises (the “Workplace”). This includes, but is not limited to, offsite locations such as training programs, conferences, social events, and client locations.

IGM will take all reasonable and practical measures to prevent, investigate and address all forms of Prohibited Conduct as defined below that may come to our attention, to ensure a safe and inclusive workplace for all individuals.

Where possible, the identity of the parties involved in an investigation and the information gathered for the investigation will be kept confidential. Confidential information, including the names of the individuals involved, will only be disclosed for the purposes of an investigation, as required to take corrective action or as required by law. Anyone who participates in an investigation will be held to the strictest confidence and provided only with such information as deemed necessary for reaching a conclusion.

Any breach of this Policy will result in appropriate action, up to and including termination of employment, contract or business relationship. This includes a refusal to cooperate in an investigation if asked to do so or any attempt at reprisal against a Worker who escalates a concern in good faith under this Policy or takes part in an investigation. Anyone who engages in any form of attempted or actual reprisal will be subject to termination of employment, contract or business relationship.

PROHIBITED CONDUCT

Discrimination: differential treatment in employment or contracting based on any of the protected grounds outlined in human rights legislation across Canada as the legislation may be amended from time to time. Discrimination does not have to be intentional or directed at a specific person or group. It can result from practices and policies that may seem neutral but have the effect of treating a member or members who fall under a protected ground differently. Protected grounds include age, marital or

family status, pregnancy, disability, sex, sexual orientation, gender identity or expression, race, colour, ancestry, ethnic or national origin, citizenship, religion or creed, or any other ground identified by provincial human rights legislation as it is amended from time to time.

Harassment: a course of vexatious comment or conduct that is known or ought to reasonably to be unwelcome. It is behaviour that creates an intimidating, threatening, hostile or offensive work environment, or unreasonably interferes with a Worker's performance, employment, or contractual opportunities. It is a form of discrimination and can take many forms, including written, verbal, physical, visual, or electronic. It includes threats or promises regarding job security, opportunities or treatment based on accepting or rejecting harassing behaviour. A single such event can also be considered harassment where it appears to create a poisoned work environment.

Some common types of harassment prohibited by legislation are:

1) Sexual Harassment: a course of vexatious comment or conduct against a Worker, in a workplace, based on sex, gender identity or expression, or sexual orientation, where the course or comment can reasonably be known to be unwelcome. It also includes making a sexual solicitation or advance that the person knows or ought reasonably out to know the solicitation or advance is unwelcome. It can occur between individuals of the same or different sex, sexual orientation or gender expression. Some examples are:

- Sexist, homophobic or sexually-oriented jokes or comments
- Derogatory, insulting or degrading remarks
- Sexually suggestive gestures or innuendoes
- Sexually explicit or demeaning images or communication
- Unwelcome physical contact such as touching, pinching, rubbing or patting
- Questions or comments about someone's physical appearance, sex life or personal relationships
- Unwelcome flirtation, advances or propositions
- Invitation for dates or sexual favours by someone in a position to grant or deny a benefit or advancement to a Worker
- Threats or promises regarding job security or job or contracting opportunities, or any other treatment based on accepting or rejecting behaviours listed above

2) Workplace Harassment: a repeated course of unwarranted behaviour targeted at a Worker that could reasonably be known to be unwelcome and perceived as bullying, and that adversely affects the Worker's psychological or physical well-being. The comments or conducts can be unrelated to a prohibited ground, and can include a single comment or conduct, if serious enough. Some examples are:

- Insults, or derogatory names or nicknames
- Shouting at someone or slamming items down on desks
- Vandalizing personal belongings
- Sabotaging work
- Spreading malicious rumours about a Worker
- Aggressive or threatening gestures or comments directed at a Worker
- Constant and unwarranted nitpicking or criticism over trivial matters or mistakes

- Cyber-bullying by way of harassing emails or texts, or posting humiliating or intimidating information on social media or websites

3) *Psychological Harassment* –verbal comments, actions and gesture that are hostile or unwanted, directed towards a specific person or group of persons, which serve no legitimate work-related purpose and have the effect of interfering with a person’s work performance or creating an intimidating, humiliating, hostile or offensive environment. Some examples are:

- Repeated verbal abuse and/or patronizing comments
- Repeated incidents of yelling or name-calling; or
- Threats to terminate employment or contracts unrelated to performance.

4) *Poisoned work environment*: created by comments or conduct directed at a particular group. While the comment or conduct is not directed at someone specifically, a worker who is a member of the targeted group may still experience a poisoned work environment. It can also develop when association or alliances in the workplace exclude an individual or group of individuals in such a way that they feel disadvantaged or undervalued.

Harassment or bullying **does not include**:

- Decisions to change job accountabilities, work assignments or reporting structures
- Enforcement of regulatory or contractual obligations
- A change in working conditions, such as hours or location
- Job assessments and performance evaluations
- Performance reviews and discussions
- Minor disagreements or differences in opinion between co-workers
- Disciplinary action or legitimate termination of employment or contractual relationship

RESPONSIBILITIES

Leaders, including Consultants who employ others in any business conducted on behalf of IGM:

- Set the appropriate tone in the Workplace by understanding, actively supporting and complying with this Policy
- Communicate and model IGM’s commitment to maintaining a respectful Workplace
- Read and understand this Policy as it may be amended from time to time
- Take all reasonable measures to prevent and protect Workers, clients and visitors from any form of Prohibited Conduct
- Take all concerns of harassment or discrimination seriously; immediately contact the HR Business Partner who supports that leader’s business channel, who will then escalate the situation to IGM’s Employment Practices group for handling.

Workers:

- Read, understand and abide by this Policy as it may be amended from time to time
- Immediately report any incident of Prohibited Conduct, whether experienced or witnessed, through one of the reporting channels outlined in this Policy
- Fully cooperate in the investigation and resolution of any reported incident.

Employment Practices

- Communicate the policy to Workers
- Provide appropriate training for workers on the obligations under this policy
- Ensure appropriate steps, including a proper investigation, are taken as soon as possible
- Keep the immediate parties informed of the status of the investigation and ultimate findings
- Provide Workers with the appropriate resources when facing a harassment situation
- Track the nature of and outcome of investigations to assess any trends requiring additional education or communication
- Review this Policy at least annually or as required by law.

COMPLAINT PROCEDURE

Any Prohibited Conduct must be reported as soon as possible.

A Worker who is subjected to or witnesses any Prohibited Conduct should keep a written record outlining the nature of the Prohibited Conduct, the date, the names of any other witnesses, and copies of any relevant documents such as texts or emails. If comfortable doing so, the Worker should advise the other party (the Respondent) that he or she objects to the behaviour and that it is contrary to this Policy.

In addition, use any one of the following reporting channels to escalate the concern:

- advise a member of IGM's leadership team, a Human Resources Business Partner, or a member of the Legal Department of the incident, and they will escalate the concern to IGM's Employment Practices group for appropriate review, investigation and resolution
- contact the IGM ethics line at: www.igmfinancial.ethicspoint.com
- email the Whistleblower Reporting Mailbox
- telephone the Whistleblower Reporting hotline at
 - For Canada and US: 1-844-231-3603
 - For Ireland: 1-800-550-000
 - For Hong Kong: 800-961763

This Policy is not intended to discourage or prevent a Worker from exercising any other legal right to file a complaint or request information or assistance under any applicable laws, including provincial human rights, health and safety, or whistleblower legislation, the Criminal Code of Canada, or any complaint process provided by a professional regulatory body applicable to the alleged offender. IGM reserves the right to report the issue to law enforcement or an applicable regulatory body if such action is warranted, based on the findings of any investigation and/or the nature of the Prohibited Conduct.

Complaints made in bad faith: if the person complaining knows that the complaint is false and deliberately and maliciously filed knowing it has absolutely no basis. In this case, the complainant will be subject to the same penalties as a harasser.

INVESTIGATION AND RESOLUTION PROCESS

Any complaint under this Policy will be referred to IGM's Employment Practices group, which is responsible for managing and overseeing any investigation under this Policy. IGM is committed to investigating incidents of Prohibited Conduct in a timely, impartial and objective manner.

- The Vice President, Employment Practices will review the complaint to determine if it meets the definition of Prohibited Conduct, or whether it is an issue better handled by other parties, for example Compliance, Legal or senior management.
- If the matter is determined to be Prohibited Conduct, an investigator will be assigned. It may be an internal or an external investigator, depending on the nature of the Prohibited Conduct, the anticipated extent of the investigation and other factors deemed relevant.
- The investigator will review any necessary documentation and interview all relevant and necessary parties as quickly and confidentially as possible in the circumstances.
- Generally speaking, the individual who is alleged to have been subjected to the Prohibited Conduct (the complainant) and the individual accused of the Prohibited Conduct (the respondent) are interviewed first. It may also be necessary to interview other witnesses.
- All parties to the investigation must maintain confidentiality concerning the complaint, and not engage in any reprisal against anyone involved in the investigation.
- The purpose of the investigation is to establish a full understanding of what happened and to determine an appropriate response to ensure the Prohibited Conduct stops and is not repeated.
- The investigation may require disclosure to and engagement by other IGM departments such as Compliance or Legal, or the parties' management team in order to assess all facts, or determine appropriate corrective action.
- Corrective action will be determined based on the severity of the Prohibited Conduct, the respondent's explanation, past actions taken in comparable circumstances, and whether this is a first or subsequent occurrence.
- Once completed, the complainant and the respondent will be advised in writing of the outcome of the investigation and any corrective action that is taken. The parties will not be provided with a copy of any full report.
- If applicable, the applicable Health and Safety Committee will be asked to develop any additional workplace procedures that may be required.

Interference with the course of an investigation or retaliation against a complainant or witness is prohibited under this policy and may itself constitute discrimination or harassment or otherwise result in disciplinary action.

QUESTIONS