

Whistleblower Policy

Reporting Parties may submit Concerns under this Policy through any of the following channels:

By web intake site at:

www.igmfinancial.ethicspoint.com

By e-mail addressed to the IGM CCO or IGM GC at:

Whistleblower Reporting Mailbox

By telephone to the Whistleblower Reporting hotline at:

For Canada and US: 1-844-231-3603

For Ireland: 1-800-550-000

For Hong Kong: 800-961763

To allow for proper assessment, web-based information, e-mail or call (collectively “Communication”) should explain the acts or omissions in as much detail as possible, including the relevant dates.

A. Purpose

IGM Financial Inc. and its subsidiaries (collectively “IGM”) are committed to maintaining high business and ethical standards. The purpose of this Policy is to **encourage** employees and others to **raise concerns related to inappropriate or unethical conduct in violation of laws, regulations, ethical standards and IGM policies**. Specifically, the Policy:

- Defines what types of concerns may be submitted and by whom, and
- Describes how that concern will be received, investigated and resolved.

B. Scope and Application

This Policy applies to all individuals working at or with IGM and includes employees, 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 Policy governs concerns, issues or complaints regarding suspected or actual violation of policies, standards, or the Code of Conduct, and includes, but is not limited to, the following:

- Fraudulent or dishonest activities, such as theft, embezzlement, forgery and alteration of documents

- Conflicts of interest
- Breaches of the privacy of personal information received from clients, employees and other individuals
- Bribery, extortion or attempts to inappropriately influence others to obtain a business advantage or favoured treatment
- Misappropriation, unauthorized removal, or fraudulent or inappropriate use of Company resources
- Concerns regarding deficiencies, misrepresentation or compliance with financial reporting or disclosures, internal accounting controls or auditing matters
- Any other concern regarding legal, compliance or regulatory requirements (collectively “Concerns”).

Concerns with respect to workplace harassment and discrimination should follow the reporting process outlined in the IGM Workplace Harassment and Discrimination Prevention Policy. This reporting can include submission of a concern to the Whistleblower Reporting Mailbox or by web intake as outlined below.

C. Submission of Concerns

A report of Concerns may be submitted by e-mail, web-intake or telephone. As set out below, all reports of Concerns will be kept confidential to the extent permitted by law.

Workers may report Concerns on an anonymous basis. Where possible, the identity of the parties involved in an investigation will be kept confidential. Names will not be disclosed unless necessary to conduct a full and fair investigation or assess and take corrective action.

Submissions may use the Form attached to this Policy for written submissions and may provide similar information for submissions by telephone or web intake site. The Communication should be candid and include all of the information that the Worker knows regarding the Concerns. To the extent possible, the Communication should also include as much information as possible to support the commencement of an investigation. IGM may, in its reasonable discretion, determine not to commence an investigation if the Communication contains only unspecified or broad allegations without appropriate support.

D. Treatment of Concerns

Upon receipt of any Communication, the IGM CCO and/or the IGM GC, may consult with other appropriate parties, (each an “Investigating Officer”), to perform a preliminary investigation to determine whether a reasonable basis exists for commencing a comprehensive investigation. If the matter concerns workplace harassment or discrimination, it will be forwarded to the Vice-President, Employee Practices in Human Resources for assessment.

The determination by the Investigating Officer(s) will be provided to the IGM CCO and IGM GC. The IGM CCO and/or the IGM GC, will then determine, exercising reasonable judgment, whether to commence a comprehensive investigation.

The IGM CCO, in consultation with the IGM GC, shall have the authority to retain outside legal, accounting or other relevant expertise in any investigation, as deemed necessary to conduct the investigation in accordance with this policy or may rely on the Investigating Officer(s).

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 Concern.

E. Corrective Action, Oversight and Controls

The IGM CCO and/or the IGM GC, the Investigating Officer and management of IGM or the applicable IGM subsidiary, if requested, will determine the validity of Concerns and the appropriateness of any corrective actions. It is the responsibility of the IGM CCO and the IGM GC to report to the IGM CEO, IGM Audit Committee and to the Board, as appropriate, any non-compliance with legal, compliance or regulatory requirements, and to ensure that IGM takes appropriate corrective action.

F. No Retaliation

IGM values clear and open communications and respects the contributions of all Workers. This Policy is intended to enable individuals to raise Concerns for investigation and appropriate action. A reporting party will not be retaliated against for reporting information. IGM will not terminate employment or engagement, demote, transfer to an undesirable assignment, discriminate against, or subject the reporting party to any adverse consequence for reporting Concerns under this Policy.

It is a violation of IGM's policies to intimidate or to impose any other form of retaliation on an employee or adviser who reports any actual or suspected illegal or unethical conduct. IGM takes claims of retaliation seriously. IGM will investigate allegations of retaliation, and anyone found responsible for retaliating against a reporting party is subject to disciplinary action, up to and including termination of employment and possible legal action.

Nothing in this Policy shall limit the authority of IGM to discipline, penalize, suspend or terminate any Worker for good and sufficient reasons. The right to protection from retaliation under the Policy does not extend to immunity for any complicity in the matters that are the subject of the Concerns or any ensuing investigation.

G. Confidentiality

Reports of Concerns, and subsequent investigations, shall be kept confidential to the extent permitted by law, consistent with the need to conduct an adequate investigation. The IGM CCO and/or IGM GC shall take reasonable steps necessary to protect the identity of any reporting party making a report of a

Concern if requested. Information will not be released to persons without a specific need to know about the Communication.

H. Record Keeping

The IGM CCO will maintain a log of all Communications, tracking the receipt, investigation and resolution. All Communications will remain confidential to the extent possible as set forth above. All documents relating to the Communications and the investigations shall be maintained for a minimum of seven years.

Approved by the Board of Directors on February 10, 2017. Last reviewed November 2018 and changes deemed to not require Board of Director approval.

Complaint Form

This form may be used to report complaints under IGM's Whistleblower Policy.

Part I (optional)

Parties may, but are not required to, complete Part 1 of this form.

Name: _____

Address: _____

Telephone: _____

Email: _____

Part II (required)

Department(s) and/or individual(s) involved in this matter

Describe all relevant facts of the complaint or concern (where, when, who, what):

Describe how you became aware of this matter and whether there are any other witnesses:

Describe any steps taken to remedy the matter of which you are aware, including any escalation of the matter:
