

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, the information submitted by the web intake site, e-mail or telephone call to the hotline (collectively “Communication”) should explain the acts or omissions in as much detail as possible, including the relevant dates and parties involved.

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 concerns will be received, investigated and resolved.

B. Scope and Application

This Policy applies to all individuals working at or with IGM including employees, advisors (known as Consultants at IG Wealth Management), associates, directors, contractors, and people whom advisors employ (collectively referred to as “Workers” in this Policy).

The Policy governs the reporting and handling of concerns, issues or complaints (“Concerns”) regarding suspected or actual violation of the Code of Conduct, policies, standards, laws or regulations, 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

- Deliberate mishandling or misuse of personal information of clients, Workers, 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 non-compliance with financial reporting or disclosure requirements, internal accounting controls or auditing matters
- Any other concerns regarding legal, compliance or regulatory requirements

Concerns with respect to workplace harassment and discrimination should follow the reporting process outlined in the IGM Workplace Harassment and Discrimination Prevention Policy. Concerns can also be reported to the Whistleblower Reporting Mailbox, by web intake, or telephone.

Concerns regarding deficiencies, misrepresentation or non-compliance with financial reporting or disclosure requirements, internal accounting controls or auditing matters may follow the reporting process outlined in the Accounting Complaints Procedures of the Accounting Policies (the “Accounting Complaints Procedures”). Concerns can also be reported to the Whistleblower Reporting Mailbox, by web intake, or telephone.

C. Submission of Concerns

A report of Concerns may be submitted by e-mail, web intake or telephone. Reports of Concerns will be kept confidential, subject to IGM’s obligation to investigate the Concern and any obligation to notify others, including regulators, other authorities and third parties.

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

Concerns may also be submitted using the Complaints Form attached to this Policy for written submissions. Similar information is collected for reports of Concerns by telephone or web intake. 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 a review and/or 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 supporting information.

D. Treatment of Concerns

Upon receipt of any Communication, the IGM Chief Compliance Officer (“CCO”) and/or the IGM General Counsel (“GC”) may consult with other appropriate parties, (each an “Investigating Officer”), to perform a review to determine whether to commence an investigation.

If the Concern involves allegations of workplace harassment or discrimination, it will be assigned to the applicable Human Resources Department for assessment and/or investigation.

If the Concern involves allegations of deficiencies, misrepresentations or non-compliance with financial reporting or disclosure requirements, internal accounting controls or auditing matters, it will be assigned to the Internal Audit Department for assessment and/or investigation in accordance with the Accounting Complaints Procedures. Where the Concern involves the Internal Audit Department, the Concern will be assigned to the IGM GC.

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 whether to commence an 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 if requested, management of IGM or the applicable IGM subsidiary, will determine the validity of Concerns based on the results of the investigation and the appropriateness of any corrective actions.

The IGM CCO, and/or the IGM GC will report to the IGM CEO, IGM Audit Committee and/or to the Board, as appropriate, any substantiated Concerns of significant non-compliance reported under the Policy, and 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 review and/or 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 a Worker 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 reviews and/or investigations, shall be kept confidential, subject to IGM's obligation to review and/or investigate the Concern and any obligation to notify others, including regulators, other authorities and third parties. 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. 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, review and/or investigation and resolution. The Investigating Officer(s) will maintain records of investigations conducted under the Policy. All Communications will remain confidential to the extent possible as set forth above. All documents relating to Concerns shall be maintained for a minimum of seven years.

Approved by the Board of Directors on February 10, 2017. Last reviewed November 2021 and changes deemed to not require Board of Director approval.

Complaint Form

This form may be used to report complaints to the Whistleblower Reporting Mailbox 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:
