

Introduction

The Code of Conduct (the “Code of Conduct” or “Policy”) applies to each officer and employee of the Vancity Group and its subsidiaries - Vancity Investment Management (“VCIM”), and Vancity Life Insurance Services Ltd. (“VLIS”), including permanent and temporary employees and independent contractors (collectively, the “employees”). Throughout employment within the Vancity Group, it is the responsibility of each employee to act in accordance with these standards in addition to any other professional code of ethics and standards of practice to which you are bound.

The Vancity Group’s Code of Conduct is designed to give employees information to recognize actions that may have an adverse impact on the Vancity Group and/ or you.

Roles and accountabilities

This table describes the roles and accountabilities related to the Code of Conduct.

Role	Accountability
Employees	Read, understand and work in accordance with this Policy
Management	Support employees in understanding and applying the Code of Conduct and ensure annual declarations are completed.

Policy

This Policy establishes a baseline standard of conduct for all employees of the Vancity Group.

By reading, understanding and acting in accordance with this Policy, you will help to maintain and enhance the valued reputation, which the Vancity Group has developed and wishes to maintain.

The Vancity Group expects all employees to:

- Adhere to a high standard of business ethics,
- Be responsible to our members and other employees,
- Work to promote trust and confidence in our dealings,
- Seek to do what is right for the protection of members and the Vancity Group,
- Respect the values of the Vancity Group,
- Behave in a manner that reflects high ethical standards, and;
- Report any violations of the Policy.

Annually all employees of the Vancity Group of Companies must

- Complete the eLearning module,

- Discuss with their manager, and
- Confirm they consent to following the Code of Conduct.

New employees must review and consent to the Code of Conduct at the time of employment.

Guidance and assistance

The Code of Conduct tells when and how to obtain guidance if you are concerned about possible ramifications of your actions.

All officers and employees must consider

- Whether actions are in compliance with the Code of Conduct,
- How actions may appear to a third party, and
- How best to conduct the Vancity Group's business according to high ethical standards and be seen to do so.

Remember: Difficulties and problems are most easily avoided or minimized if you request assistance as soon as a possible problem or potential or real conflict of interest is identified.

Employment related to bondability

In accordance with the BC Financial Services Authority (BCFSA) regulatory requirements for all BC financial institutions, the Vancity Group is required to maintain its insurance under the Master Bond program. In order for the Vancity Group to maintain its insurance, employees are required to be bondable. In order for employees to be **unconditionally** bonded, they must have a minimum credit score of 600.

However, the Vancity Group acknowledges that systemic barriers and historical exclusion may disproportionately impact some individuals' credit score. The Vancity Group will work collaboratively with employees who encounter such barriers and whose credit score falls below the specified threshold, to seek exception with conditional bonding.

Conditional bonding is a term our insurer uses to describe the conditions when someone does not meet unconditional bonding requirements. Employees who do not meet the unconditional credit score requirements are issued conditional bonding for a 6-month period and reassessed every 6 months thereafter until a minimum credit score of 600 is reached.

Should any changes occur, that may affect your bondability status, please contact our confidential email at hr_consulting@vancity.com. We want to work with you, like any of our members, to help you improve your overall financial health and resilience.

The Vancity Group may review your bondability status at any time during your employment. If it is determined that you are not bondable due to factors unrelated to your credit score, please be aware that regulatory requirements would prohibit your employment with the Vancity Group or any financial institution in British Columbia.

**Observing
and
respecting
laws**

Employees are:

- Required to be aware of the laws and regulations relating to the business that the Vancity Group conducts and specifically for the areas in which they work, and
- Never expected to commit or condone an illegal act or instruct others to do so on behalf of the Vancity Group. This would include engaging in or aiding someone else in conducting the following types of illegal activities which include, but are not limited to:
 - Fraud
 - Kiting
 - Bribery
 - Theft
 - Commission sharing
 - Falsifying records
 - Negative Option Billing
 - Copyright infringements
 - Money laundering
 - Terrorist financing
 - Tied selling
 - Insider trading
 - Criminal Discrimination
 - Criminal Harassment

Participation in illegal activities including those mentioned above may result in:

- dismissal, and
- revocation of bonding.

**Personal
integrity**

As a financial services organization, our success depends on the honesty and integrity of our employees. Your conduct has a direct effect on how members and other external stakeholders think about the Vancity Group.

To promote trust and confidence with each other, our members and other external stakeholders, honesty, integrity and adhering to high ethical standards must underlie all of our actions and decision making. Employees must ensure that their conduct in and outside of the workplace does not tarnish or negatively impact Vancity's reputation in the community.

Participation in dishonest or unethical activities may cause revocation of bonding, resulting in dismissal.

**Irregular
business
conduct -
personal
integrity**

The Vancity Group prohibits any irregular business conduct which includes, but is not limited to:

- Using your position at Vancity to engage in lending or borrowing of personal monies to and from members or fellow employees where such transactions will place you or Vancity in a compromising position that could negatively affect our business with the member or workplace.
- Personally, profiting from resale of staff benefits

Example: Buying foreign currency at a preferred exchange rate for resale to a third party at a premium.

- Engaging in kiting fraudulent or unauthorized account, loan and other improper activity.
- Failing to follow policies and practices related to ensuring Vancity's accounting books and records are accurate, and business transactions are properly and accurately documented and authorized.

Example: Failing to follow procedures outlined in Vancity Group's *Management Signing Authority Policy*.

Employees are expected to conduct personal financial transactions in accordance with standard operating procedures and all transactions must be held to the same level of scrutiny as member transactions.

Irregular business conduct may result in disciplinary action up to and including your termination from employment with Vancity Group.

**Gifts and
entertainment
- personal
integrity**

Employees must not seek, directly or through a third party, gifts, entertainment or favours from members or suppliers, potential members or suppliers or any other person with whom the Vancity Group has dealings.

Additionally, where acceptance, directly or through a third party, of gifts, entertainment or favours from members or suppliers, potential members or suppliers or any other person with whom the Vancity Group has dealings can place you in a compromising position, you and your immediate family must not accept such gifts. This includes avoiding any form of bribery, corruption, or unethical conduct in all dealings, whether direct or indirect.

Employees are to use discretion in deciding whether acceptance is the business 'norm'. If uncertain as to whether acceptance of a gift is appropriate, the employee must consult with their manager.

Unethical business solicitation and/or acceptance activity is forbidden. Employees cannot accept cash payments of any sort at any time. The same principle applies to giving gifts or benefits on behalf of the Vancity Group. Any breach of this may result in disciplinary measures up to and including dismissal.

The following table provides information on the types of gifts and entertainment.

If the employee is ...	Then ...
offered promotional items of nominal value (e.g. mugs, hats, shirts, pens)	gifts are considered acceptable.
asked to speak publicly to an organization or professional association	<p>the employee may accept a small honorarium or gift if it is reasonable under all of the circumstances.</p> <p>Note: Employee should consult their manager before accepting any offers.</p> <p>Important: Attending a networking or educational event where the travel or overnight accommodation expenses are paid for by a supplier is not permitted unless approval is given by a manager or designate.</p>
asked to speak or make presentations to share information with colleagues	<p>it may also be permissible for the employee to accept the offer of travel and/or accommodations.</p> <p>Note: Employee should consult their manager before accepting any offers.</p> <p>Important: Attending a networking or educational event where the travel or overnight accommodation expenses are paid for by a supplier is not permitted unless approval is given by a manager or designate.</p>
taken to lunch or dinner by a supplier, or takes a customer to lunch or dinner	it would not normally be prohibited even though the supplier is likely trying to maintain or extend the services, provided that the lunch or dinner is consistent with accepted business practices.

	Note: This applies equally when taking a customer to lunch or dinner.
taking (or being taken by) a customer or a supplier to a local sporting or other event	it would generally be acceptable, subject to being reasonable and consistent with accepted business practices.
giving (or accepting) a gift certificate or gift card	item is acceptable provided the certificate or card is modest in value.

Respect in the workplace - personal integrity

The Vancity Group is fully committed to creating and maintaining a psychologically safe workplace that is:

- characterized by respect, inclusivity, and a deep appreciation for every individual,
- free of discrimination and harassment,
- where the individual differences of all employees are valued, and
- where all employees are treated with dignity and respect.

In this regard, we emphasize that a respectful workplace necessitates the cooperation and support of each and every employee. This policy is in place to ensure a professional atmosphere where everyone is treated with respect and dignity.

Employees are expected to act in accordance with the *Respect in the Workplace Policy* (the “Policy”). All employees must serve as positive role models, refraining from any behaviour that may reasonably offend, intimidate, embarrass, or humiliate others, whether intentionally or inadvertently. Every employee shares the responsibility of promoting positive communication, embracing diversity, equity, inclusion, and reconciliation, advocating for fair and respectful treatment, and creating an environment where everyone thrives. This entails considering others' needs, recognizing and appreciating courteous conduct, nurturing collaboration and active listening, and facilitating open and thoughtful sharing of ideas. Furthermore, we encourage acknowledging innovative contributions with positive feedback and stress the importance of thoughtful consideration before taking actions or communicating, always mindful of their impact on others.

The Vancity Group prohibits Inappropriate Workplace Behaviour which includes Bullying and Harassment, Discrimination, Sexual Harassment, or Misuse of Managerial/Supervisory Authority, as

defined below, and includes behaviour that, while not necessarily reaching the threshold of harassment or discrimination, is still disrespectful and has the potential to foster a negative work atmosphere. Any breach of this Policy may result in disciplinary measures up to and including dismissal.

Moreover, the Vancity Group prohibits any form of retaliation against individuals who, in good faith, report or participate in investigations regarding Inappropriate Workplace Behaviour. The Vancity Group is dedicated to addressing and resolving all complaints within the scope of the Policy and program while safeguarding the dignity, privacy, and rights of all involved parties.

The Vancity Group is committed to compliance with all applicable legislation and regulation relating to Inappropriate Workplace Behaviour. The following provides information and definition on types of inappropriate workplace behaviours:

Example	Description
Bullying and Harassment	<p>Bullying and Harassment is any inappropriate comment or conduct toward an individual that the person responsible for the comment or conduct knew or reasonably ought to have known would cause that individual to be humiliated or intimidated. Bullying and Harassment may involve a series of repeated incidents or a serious single incident.</p> <p>Examples of Bullying and Harassment include (but are not limited to):</p> <ul style="list-style-type: none">• threats,• demeaning “initiation” practices,• verbal or written abuse, including shouting, yelling, or swearing at others and name calling,• malicious rumours, gossip, or negative innuendos,• isolation and/or exclusion from work-related activities,• acts of aggression, or• vandalism of personal property. <p>Reasonable action taken by the Vancity Group, a supervisor, or manager relating to the management and direction of employees does not constitute Bullying</p>

	<p>and Harassment. Such action and decisions include, but are not limited to:</p> <ul style="list-style-type: none">• coaching and discipline,• appropriate managerial direction,• a difference in opinion,• delegation,• performance or attendance management,• constructive feedback, guidance, or advice, or• reasonable action taken by an employer or supervisor to manage performance or assign work.
Discrimination	<p>Discrimination refers to any action, inaction, threat, policy, practice, or employment condition that directly or indirectly leads to differential treatment or adverse consequences for an employee or prospective employee during the course of their employment or job application process. Such actions or practices are rooted in legally protected or prohibited grounds as specified under the applicable human rights legislation governing the workplace. These legally protected grounds include:</p> <ul style="list-style-type: none">• Indigenous identity• race,• ancestry• place of origin,• colour,• religion,• age,• sex,• sexual orientation,• gender identity or expression,• marital status,• family status,• disability (mental/physical),• political belief, and• conviction for an offense that is unrelated to employment or which a pardon has been granted. <p>Discrimination includes Sexual Harassment.</p>

	<p>Examples of Discrimination include (but are not limited to)</p> <ul style="list-style-type: none">• racial or ethnic slurs including racially derogatory nicknames,• unfairness in selection of work assignment based on factors relating to a prohibited ground of discrimination,• unwelcome remarks, jokes, innuendo or taunting about a person's body, age, marital status, gender, religion, accent, disability, or other prohibited grounds, or• patronizing behaviour, language, or terminology that reinforces stereotypes and undermines self-respect.
Sexual harassment	<p>Sexual Harassment is a form of Discrimination that involves any conduct or comment of a sexual nature or related to sex, gender identity or gender expression that is known or reasonably ought to have been known to be unwelcome, cause offense or humiliation, or would be reasonably perceived as placing a condition of a sexual nature on employment opportunities. Sexual Harassment can occur between individuals of the same or different genders, individuals of the same or different sexual orientations, and includes harassment on the basis that an individual is transgender.</p> <p>Examples of sexually harassing behaviours include (but are not limited to):</p> <ul style="list-style-type: none">• unwanted invitations to socialize, flirtations, advances, request for sexual favours or propositions or inquires or comments about a person's sex life;• unwelcomed remarks, questions, jokes or innuendo of a sexual nature, including sexist jokes, sexist comments, or sexual invitation,

	<ul style="list-style-type: none"> • leering, staring, or making sexual or obscene gestures; • unwanted physical contact such as touching, patting, pinching, hugging, including physical or sexual assault; • displays of, or email of, sexually explicit, sexist, or other offensive or derogatory material (including cartoons, pornographic materials, graffiti, sayings, offensive pictures, etc.), and/ or • derogatory or degrading remarks directed toward members of one sex, sexual orientation, gender identity or in respect of gender expression, conduct related to formerly consensual relationships or where there is a work-related power imbalance between persons in an otherwise consensual relationship.
Misuse of Managerial/Supervisory Authority	Misuse of Managerial/Supervisory Authority occurs when a person who supervises, or is in a position of authority, exercises that authority in a manner which serves no legitimate work purpose, and which ought to reasonably be known to be inappropriate. Misuse of managerial/supervisory authority does not include the good faith exercise of the employer's managerial/supervisory rights and responsibilities, nor does it include a single incident of a minor nature where the harm, by any objective standard is minimal.

Workplace safety (Personal integrity)

The health and safety of our employees is a key priority for the Vancity Group. As such, the Vancity Group has a well-established *Joint Health and Safety Program* that includes designation of Worker Safety Representatives and Joint Health and Safety Committees (JHSC).

Workplace safety is everyone's responsibility, but managers are responsible:

- for ensuring that employees are trained in safe work practices,

- that employees have been adequately oriented to ensure the safe performance of their work, and
- for taking timely action to address safety issues.

Employees must not be in the possession of, use or be under the influence of either drugs or alcohol when in the workplace. Violation of the *Fitness for Duty – Substance Free Workplace* is subject to disciplinary action up to and including immediate termination.

Employees are responsible for taking all reasonable steps to ensure their own health and safety in the workplace and that of coworkers.

This may be achieved by:

- working in the safest manner possible,
- reporting workplace hazards to your manager or Worker Safety Representative, and
- maintaining awareness and understanding of the Vancity Group's Health and Safety Program.

Safeguarding the Vancity Group and member assets

It is the employee's responsibility to protect and safeguard the property and assets of the Vancity Group and its members and these should only be used for legitimate business purposes.

This includes:

- Financial instruments (e.g., cash, cheque, debit card),
- Member, employee and corporate information and records,
- Capital assets (e.g. technology, systems), and
- Intellectual property.

The Vancity Group retains ownership of intellectual property created by the Vancity Group employees, which must not be retained or used by employees after leaving employment with the Vancity Group. Incidental personal use of the Vancity Group's assets such as telephones, computers or related software must be in accordance with the Vancity Group's *Electronic Communications Policy* and other policies that govern their use.

Privacy and Confidentiality of information

All information relating to the Vancity Group, its members, its employees, its vendors and to other businesses or individuals that you receive, transact with, or have access to in the course of your work is to be treated as Confidential. You may access such information only for legitimate business reasons. This includes:

- Viewing any member account without a legitimate business purpose is strictly prohibited.

- Viewing any employee account or file without a legitimate business purpose is strictly prohibited.
- All confidential information must be adequately safeguarded; and, when it is no longer necessary for business purposes, securely and appropriately disposed of as outlined in the *Confidentiality of Information and Records policy* and the *Document Retention and Destruction policy*.
- You may not use or keep any “personal” sales records of members, products, or service, or any other confidential information belonging to the Vancity Group after you have left your employment with us.

Employees must:

- Only disclose confidential information to external third parties when use or disclosure is authorized by the Vancity Group or required by an enactment or in court proceedings in keeping with the Confidentiality of Information and Records policy.
- Not use confidential information belonging to the Vancity Group after leaving employment with us.
- Report all privacy breaches (unauthorized access to, collection of, use of, or disclosure of personal information) to the Vancity Corporate Privacy Office.

Any breach of Confidentiality or Private Information may result in disciplinary action up to and including your termination of employment with Vancity Group.

Conflicts of interest

A conflict of interest is a situation in which your personal or business interests conflict directly or indirectly with your responsibilities to the Vancity Group or to members.

The Vancity Group employees must not:

- Attempt to influence Vancity Group policies or decisions so as to gain personal or business advantage for themselves or a related party,
- Use confidential information for any personal or business advantage for themselves or a related party,
- Use their office or position with the Vancity Group to attempt to gain personal benefits or to confer benefits upon other persons or businesses with whom or which they have common personal or business interests,
- Engage in lobbying activities that does not comply with the *Lobbying Activities Policy*,
- Engage in political activities on behalf of Vancity that does not comply with the *Political Activities and Contributions Policy*, or

- Use Vancity premises or its facilities for political activities other than in accordance with the *Political Activities and Contributions Policy*. Such activities include but are not limited to campaigning, fundraising, or actively promoting political parties or political causes.

Any breach of this may result in disciplinary measures up to and including dismissal.

The following are types of conflicts of interest employees may encounter:

Types	Description
Conducting financial transactions (for yourself and/ or those to whom you have a close personal relationship)	<p>To avoid any real or perceived irregular activity or conflict of interest, the employee must not record or approve financial transactions for themselves or for anyone who has a close personal relationship to them.</p> <ul style="list-style-type: none">• All personal and business transactions of someone with whom the employee is personally associated (including friends and relatives) must be handled at arm's length.• It is the responsibility of all employees to ensure that such transactions are handled by other employees and that these transactions are subject to the same treatment and scrutiny as any other member.• Such transactions must be processed by another employee who does not have authority over, and the employee's transactions must be subject to the same level of due diligence that is expected for a non-employee transaction.
Outside financial and business interests	<p>Employees must exercise caution in their financial dealings with members or suppliers to the Vancity Group. The rules governing transactions with 'related parties' are complex; approval of the Governance Committee and/ or the Board may be required.</p>

	It is a conflict of interest for the employee to conduct non- Vancity Group's business, on Vancity Group's time or to utilize Vancity Group equipment or facilities or to conduct outside business without prior approval of their immediate supervisor.
Member conflict	<p>Employees must be alert to conflicts of interest that may arise between the</p> <ul style="list-style-type: none"> • duties of the Vancity Group to two or more members, or • interests of the Vancity Group and its duty to its members. <p>Employees performing everyday banking transactions on behalf of other employees must do so with the discretion and degree of professionalism that they display in handling all member transactions.</p>

Reporting responsibilities - compliance with the Code of Conduct

Where an employee has committed a breach of this Policy or becomes aware of a potential or suspected breach such as fraud, corruption, dishonesty, unethical or improper activities, etc., they have a responsibility to report it immediately to a Manager, or where appropriate, use the Anonymous Reporting tool described in the section below titled "*Anonymous Reporting*".

Employees' manager is required to:

- Formulate a recommendation on what action should be taken including approval of the action or disciplinary action, if necessary, regarding violations of the terms of this policy and to consult with your Equity & People Consultant to implement any proposed actions.
- Report to the Manager, Fraud and Security Investigations all issues that involve potential fraud.
- Consult with the Corporate Secretary if uncertain as to the appropriateness of acceptance of a gift and report to the Corporate Secretary, all gifts that are assessed as not in compliance with this policy.
- Report to the Corporate Secretary all items that need to be reported to the Governance Committee.
- Report to The Chief Executive Officer, the Corporate Secretary, or the Chair of the Board of Directors or the Chair of the Governance Committee as appropriate any issue in which persons at senior management levels within the Vancity Group are implicated.

When unclear about the ethical course of conduct to adopt, employees should seek the advice of their immediate supervisor, Manager, or Equity & People Consultant.

- Employees will not be subject to retaliation of any kind for reporting, in good faith, a violation of this policy.
- Reports of concerns will be treated confidentially to the extent possible.

Employees are welcomed to present their concerns to the VP of Internal Audit if they believe to have evidence of a breach of this policy and if the appropriate authority to whom they have reported it appears to have taken no action.

The VP of Internal Audit must investigate any matter reported to them.

Anonymous reporting - compliance with the Code of Conduct

The Vancity Group has selected ClearView Strategic Partners Inc. ("ClearView") to provide a secure third-party reporting system, "ClearView Connects", that allows employees to anonymously report on

- unethical conduct and conflict of interest (such as bribery and corruption),
- irregularities of financial reporting and accounting,
- issues related to health and safety, environment,
- manipulation or falsification of data,
- harm to people or property,
- theft, embezzlement, fraud,
- violation of laws, regulations, policies & procedures, and
- any other violation of the Employee Code of Conduct

ClearView Connects sends reports directly to the Chief People Officer and Chief Risk Officer unless reports are particularly sensitive, in which case ClearView Connects sends reports directly to the Chair of Audit or the Corporate Secretary accordingly.

Reports can be submitted:

- by calling the confidential Hotline at 1-866-921-4491 and speaking directly to a live operator,
- by submitting a confidential and anonymous report online through ClearView Connects at www.clearviewconnects.com, or
- by mailing an anonymous report to:
ClearView
P.O. Box 90505,
Toronto, Ontario, M1J 3N7
(identify the organization as the Vancity Group).

For more information on this policy, please see our *Whistleblowing Policy*.

Cooperating with investigations - compliance with the Code of Conduct

Employees are expected and required to cooperate at all times if there is an investigation into activities, transactions or other activities, whether conducted by

- Internal Audit,
- Enterprise Compliance
- Fraud and Security,
- Equity & People, or
- Outside agents contracted by the Vancity Group.

To verify that the investigation is valid, employees are invited to contact the Corporate Secretary.

Compliance responsibilities - compliance with the Code of Conduct

Compliance with the Policy includes reporting of any violations or suspected violations to the appropriate people as set out in the *Reporting Responsibilities section*.

Failure to report any breach of the Policy could have serious consequences for the employee as well as for the wrongdoer.

Employees are responsible for:

- Ensuring awareness and understanding of this Policy, and
- Complying with all provisions during their employment with the Vancity Group.

Violations of this Policy may result in the Vancity Group:

- Taking appropriate action including potential termination of employment,
- Initiating civil or criminal proceedings depending on circumstances of the violation.

Other requirements - compliance with the Code of Conduct

This Policy is not intended to address all aspects of the conduct and behaviours required of Vancity Group employees.

Where an employee encounters a situation where they are uncertain about the correct actions to follow, they should consult with their:

- Immediate supervisor,
- Manager,
- Equity & People Consultant, or

- Director, Enterprise Compliance & Security.

Confirmation of awareness and adherence - compliance with the Code of Conduct

At time of hire and annually thereafter, all employees must review, complete an e-learning module and consent to the Code of Conduct. By consenting to the Code of Conduct, they confirm they have:

- read it,
- understand it, and
- sought additional information if required to assist understanding of it.

The employee's consent through electronic or digital means also indicates that the employee is aware of and agrees to adhere to this Code of Conduct.

Compliance

All employees and business leaders are responsible for ensuring the ongoing compliance to this Policy. They must report any breaches and refer to the compliance sections outlined within the Policy.

Obligation to Report

When an employee comes forward with a breach of the Policy, Vancity is legally obligated to investigate the matter. When it comes to exploring allegations, as a matter of law, respondents are entitled to know the allegations against them and have the opportunity to respond. Additionally, Vancity holds that your identity will remain confidential to the greatest extent possible but may have to share your identity when exploring allegations.

Escalation process

Staff are required to follow the escalation process as defined in the Code of Conduct. Refer to the section *Reporting responsibilities - compliance with the code*.

Related information

Related information:

- *Ethical Principles for Business Relationships*
- *Respect in the Workplace Policy*
- *Employment of Relatives*
- *Employee Privacy Code*
- *Electronic Communications Policy*
- *Information Security*
- *Fitness for Duty – Substance Free Workplace*
- *Management Signing Authority Policy*
- *Confidentiality of Information and Records*

- *Document Retention and Destruction Policy*
- *Whistleblowing Policy*
- *Whistleblowing Standard*
- *Handling a Privacy Breach*
- *Joint Health and Safety Program*
- *Political Activities and Contributions Policy*
- *Lobbying Activities Policy*