

THE EDGE BENEFITS CODE OF ETHICS

The Code of Ethics has been adopted to always ensure the highest standard of business ethics.

- "You" and "your" mean an employee, board member, and/or independent contractor.
- "We", "us", "our" and "Company" mean, collectively and individually, The Edge Benefits Inc., its subsidiaries, or any entity which it may direct or control. A subsidiary for the purpose of this policy is any corporation in which The Edge Benefits directly or indirectly has the power to elect the majority of the Board of Directors of that Corporation.
- The "Code" means The Edge Benefits Inc. Code of Ethics.

You must observe the highest standard of business ethics at all times. You must conduct business affairs in accordance with this Code of Ethics and must avoid any possible conflict of interest with your duties and responsibilities. You are expected to act with honesty and integrity. Honesty and integrity are characterized by truthfulness, freedom from deception or fraud, and fairness. There is no exception to this principle.

Please note that any personal information The Edge Benefits collects about you in the course of your employment may be subject to routine review and audit at any time, including review and/or audit by third parties retained by The Edge Benefits, for the purpose of detecting any breach of the Code of Ethics, including any fraud or misappropriation of corporate funds or assets.

You have a responsibility to acquire knowledge, to make decisions, and to accept responsibility for your own actions. You should seek to use the authority given to you by the Company in the best interest of the Company.

Compliance with this Code of Ethics is a condition of employment or continued employment with the Company. If you do not adhere to this Code of Ethics, you are subject to disciplinary measures, which may include privilege revocation, suspension and/or termination, with cause, of employment, and possibly the laying of criminal charges.

If you have any doubt about the application of the Code of Ethics, you should discuss the matter with your People Manager. If you become aware of a contravention of the Code of Ethics, you must escalate the matter using the channels available to you (please refer to the section called "Ethics Reporting").

Situations that involve ethics and values are often complex. No policy can completely cover every workplace situation. Sometimes, a law or policy clearly dictates the outcome. More often, it is necessary to interpret the situation. When faced with a decision, ask yourself these questions about the choice you are considering:

1. Is it legal? A correct decision will not violate any law or regulation.
2. Does it comply with company policy and this Code?
3. How does this decision affect others (customers, suppliers, partners, competitors, the community, other employees, or you)?

4. How does the decision look to others? An innocent action can result in the appearance of wrongdoing or create an unintended sense of obligation between parties.
5. How would you feel if this decision were made public? Could the decision be honestly explained and defended?
6. Have the implications of this decision been fully explored, or would additional advice be helpful?

The Company and you must at all times comply with all applicable laws and regulations. You are not permitted to engage in, and the Company does not tolerate, any activity that achieves results through the violation of the law or through unethical business dealings.

In all interactions with our customers, suppliers, and competitors, you must respect the laws regulating pricing, the terms and conditions of sale, and communications and dealings with customers, suppliers, competitors, and trade associations.

As a condition of employment, you are responsible for complying with all company policies and procedures as found in our Employee Policy Manual (and any associated changes from time to time), understanding how they apply to the work that you do, or how they impact you directly. Examples provided for ease of reference include (but are not limited to):

- Harassment
- Violence in the Workplace
- Information Security Standards and Guidelines
- Acceptable Use Policy
- Fraud Policy
- Privacy Policy
- Health and Safety

If at any time you have questions, please contact your People Manager.

You must perform your duties conscientiously, honestly, and in the best interests of the Company. You (and your immediate family) must not use your position, or the knowledge gained through employment with the Company, for private or personal advantage or in such a manner that an actual or perceived conflict of interest arises between your interests and those of the Company. If you feel that a course you have pursued, are pursuing, or are contemplating pursuing may involve you in a conflict of interest, you should immediately make all the facts known to your People Manager. The manager may engage with People & Culture to determine the appropriate course of action.

If this code does not address your situation, please consult your People Manager. While it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of situations which might involve conflicts and, therefore, should be avoided:

Personal Insurance Policies

You cannot make amendments to policy and system records for your own personal insurance contracts or those of your immediate family members. If amendments are required to your personal insurance policies,

they should be referred to another staff member to complete on your behalf ensuring proper rating, risk selection, and product understanding. This includes the administration of any medical or other tests required for life insurance underwriting.

Compensation

You may not receive commissions or other compensation related to the sale of any product of the Company, except as specifically provided under the terms of your employment.

Improper Payments and Gratuities

You (and your immediate family) must not use or accept any payments, gifts, entertainment, or other favours, or promises thereof, of such value that might be interpreted as an actual or perceived conflict of interest with any person or organization in which the Company has or is likely to having business dealings. It is not the intent of this policy to preclude your acceptance of an occasional meal or refreshment or modest entertainment that is provided in the normal course of business relationships with other people.

Personal Investments

You (and your immediate family) must disclose any substantial interest which you may have in any entity which has engaged in or may engage in transactions with the Company. You must avoid obtaining financial interests, such as stock ownership, partnership participation, management, employment, or consulting agreements, or any other contractual arrangements with other entities where such involvement is or may appear to be inconsistent with your duties to the Company.

Conflicts of Duty

If your participation in charitable, educational, religious, or civic activities results in an actual or perceived conflict of interest, you are required to excuse yourself from any discussion and/or decision-making issues in which discussion and/or decision-making for issues in which the conflict exists.

Political Activity

The Company respects your right to privacy about personal political activity and will not attempt to influence any such activity. Company funds, goods, or services must not be used as contributions to political parties, and company facilities must not be made available to candidates or campaigns unless authorized by a member of the Executive Management Team of the respective organization.

Use of Company Property

You must use company property properly and for the business use for which it is intended and provided. Company property includes every physical tangible item and every electronic information system in the work place.

Theft, misappropriation, or misuse of company property is prohibited.

All software used on company equipment must be properly purchased or licensed and you must honour all software copyrights and restrictions.

The Company reserves the right, without prior notice, to examine the e-mail, personal file directories, and other information stored on, or transmitted via its computers in the event of any suspected violation of any company policy or of any law.

Detailed information respecting the Company's information systems is provided in the Acceptable Use Policy.

Proprietary Subject Matter

All interests in inventions and improvements (whether or not patentable), suggestions, proposals, writings, computer programs, and software, including interests in copyright made, conceived, or invented by you (“Proprietary Subject Matter”), either solely or jointly with others during the course of your employment with the Company are the property of the Company. You have no interest in or rights to such property. You are responsible for the proper use and management of the Company’s proprietary subject matter and for respecting the property rights of others. All proprietary subject matter must be returned to the Company upon termination or as may be requested by the Company. No copy or reproduction of any proprietary subject matter may be kept by you without written consent of the Company.

Excepted from this requirement is proprietary subject matter made, conceived, or invented by you prior to employment with the Company which is embodied in a Canadian patent, trademark, or copyright registration, or application filed with the federal government prior to your commencement of employment with the Company, or as otherwise agreed to in writing.

Company Funds

You must use good judgment to ensure that appropriate value is received by the Company for expenditures. If you have access to company funds in any form, you must at all times follow prescribed procedures for recording, handling, and protecting such funds.

Privacy and Confidential Information

You must protect and ensure the privacy and confidentiality of all information obtained as a result of your employment with the Company. You must not disclose, use, release, or discuss any personal or confidential information you have had access to or obtained during your employment except as required to perform your work duties as permitted by the Company’s Privacy Code, or otherwise required by law, including after your employment terminates.

A Privacy Officer has been designated within the company to address any concerns which may arise with respect to privacy. You can obtain information about privacy by contacting the Privacy Officer.

Media Relations

In addition to everyday communications with outside persons and organizations, the Company will, on occasion, be asked to express its views to the news media on certain issues. When communicating publicly on matters that involve company business, you must not presume to speak for the Company on any matter unless you are certain that the views you express are those of the Company, and it is the Company’s desire that such views be publicly disseminated. If you are approached by the media to speak on behalf of the Company, you should immediately contact your supervisor/manager or a member of the Executive Management Team.

You should take care to separate your personal roles from your company position when communicating on matters not involving company business. You should be especially careful to ensure that you are not identified with the Company when pursuing personal, political, or charitable activities unless this has been specifically authorized in advance by the company.

Social Computing

The potential impact of your words and actions on the organization’s reputation is multiplied in the realm of social media where the audience is large, and comments are permanently recorded. You are expected to reflect the company’s values and exhibit professionalism and respect in any public forum.

If you post comments related in any way to the Company, then you should, when possible, disclose your association with the organization and include a disclaimer such as: “the opinions expressed are my personal views and do not necessarily reflect those of The Edge Benefits”.

You may not post information or opinions related to the business of the Company frequently or repeatedly without the approval of the Operations and Finance departments.

Similarly, no site may be created for the purpose of providing information on insurance or financial services without the prior approval of these departments.

If you would like to post any of the company's logos, you must have prior approval from the Marketing department.

Ethics Reporting/Whistle Blowing

At The Edge Benefits, it is our corporate commitment to provide an environment where open communication is available to every employee without fear of personal or professional reprisal. Employees are encouraged to report sensitive workplace information relating to our Code of Ethics including issues such as:

- Conflict of interest
- Discrimination
- Ethics violation
- Falsification of company records
- Fraud/theft
- Harassment
- Malicious damage
- Proprietary information release
- Safety/security/environmental violation
- Substance abuse
- Violation of policy/regulatory issues
- Workplace violence

We encourage that reporting of issues begin at the supervision or Executive Management Team level.

Honest and Fair Treatment of Customers

At The Edge Benefits, we place fair treatment of our customers at the heart of our culture and are committed to building valuable relationships with our customers that help them protect and grow their assets. We do this by ensuring customers are at the heart of our mission, vision and values in everything we do.

In this regard, our customers should be confident that we:

- Develop and market products in a way that pays due regard to the interests of customers;
- Provide customers with clear information before, during and after the point of sale;
- Reduce the risk of sales which are not appropriate to customers' needs;
- Ensure that any advice given is of a high quality;
- Deal with customer complaints and disputes in a fair manner; and
- Protect the privacy of information obtained from customers.