



Laurentian Bank
Supplier Code of Conduct



**LAURENTIAN
BANK**

Seeing beyond numbers.™

Overview and Application

At Laurentian Bank¹, we believe that we can change banking for the better by Seeing beyond numbers™. We strive to help our customers to bring their hopes and dreams to life. Our commitment to our customers is why we are firmly committed to upholding the highest standards of ethical conduct. Since 1846, Laurentian Bank has built a reputation of acting with honesty, integrity and transparency in everything that we do. This ongoing commitment to an ethical culture is a top priority and allows us to keep the trust instilled in us by our customers, employees, shareholders, communities and the public.

Our suppliers² are our partners when it comes to delivering on our purpose. When doing business with or on behalf of Laurentian Bank, we expect our suppliers to demonstrate ethical decision-making and practices. We require that suppliers comply with the principles outlined in this Code, and all applicable laws and contract terms. Just as we expect of our employees, we expect our suppliers to **Make the Better Choice** when confronted with ethical dilemmas.

This Supplier Code of Conduct outlines at a high level our expectations for suppliers to live up to our values, act ethically, and integrate environmental, social and governance best practices into their practices. We require employees and suppliers to be aware of, understand, and comply with the principles of the Supplier Code of Conduct. This Supplier Code of Conduct is incorporated by reference in our contractual arrangements. A breach of any provision of the Supplier Code of Conduct may be grounds for termination of a supplier's relationship with us. We will contact law enforcement authorities if laws are broken. Further, we expect that suppliers will have their own detailed internal policies and procedures that support and align with these expectations.

Our purpose

We believe we can **change banking** for the better. By **seeing beyond numbers** to bring hopes and dreams to life. Better begins when everyone feels like they belong and has the **chance to thrive**.

¹ Refers to Laurentian Bank of Canada and each of its subsidiaries. Also referred to as "the Bank".

² Supplier is an individual or a legal entity that provides a service or product to Laurentian Bank. Such arrangements include outsourced activities, functions and services, products purchased for use/consumption, use of independent professionals; utilities (e.g., power sources, telecommunications); and other relationships involving provision of services or the storage, use or exchange of data.

Note that in some cases, certain categories of suppliers, may be required to sign off on the Employee Code of Conduct, as opposed to this Supplier Code of Conduct.

Protecting Workers and Providing a Safe, Respectful, and Inclusive Workplace



Laurentian Bank strives to use diverse suppliers for our business needs because this is important to address financial inequities in our communities. We seek to work with suppliers who perform at a high level and add a diverse perspective to Laurentian Bank.

Further, at Laurentian Bank, we are committed to a work environment where people feel respected, are treated fairly, and feel supported. We require that our suppliers have strict standards respecting human rights, employment, and labour standards. Suppliers must provide a work environment that is safe and free from harassment, violence, discrimination, bullying and any other disrespectful behaviour.

Just as Laurentian Bank is committed to a workplace that reflects the diversity of our customers and our communities, we also encourage suppliers to have in place practices to encourage an inclusive and diverse workforce. For the inclusion of persons with disabilities, goods and services provided to Laurentian Bank should meet all accessibility standards.

Commitment to Environment, Social and Governance (ESG)

A commitment to ESG is central to Laurentian Bank's strategy. We are making the better choice by putting sustainable business practices and strong corporate governance into place and expect our suppliers to do the same.

Protecting Information and Assets

Our assets are the tools and information that we use every day. When using Laurentian Bank assets, suppliers must ensure their proper and efficient use, and protect them against loss, theft, damage, fraud, and unauthorized use and access. This includes taking robust measures to keep IT systems and information, including confidential information, secure. Laurentian Bank systems must be protected against risks such as viruses, data breaches, cyber incidents and unauthorized access.

Conducting Business Fairly and with Integrity

Insider Information

Suppliers may, due to the nature of their work, have access to material non-public information, also known as insider information, about

Laurentian Bank or other public companies that could affect the price of the securities of a public company. This includes any information that is not public and that investors would consider when deciding to trade on the security. When this is the case, suppliers are prohibited from trading the securities of the entity and must not share the insider information with others.

Competition and Antitrust

Competition and antitrust laws protect consumers by maintaining competition in the market. This means that suppliers cannot share information or make agreements with competitors that could undermine competition, such as working with competitors to set prices or to make agreements to not solicit customers.

We expect our suppliers to not engage in this behaviour and alert us if they become aware of any such anti-competitive behaviour in the course of their engagement with Laurentian Bank. You may share any concerns with your relationship manager or the Chief Ethics Officer at ethics.helpline@laurentianbank.ca.

Anti-Bribery and Anti-Corruption

Laurentian Bank takes a zero-tolerance approach to bribery and corruption. We require suppliers to comply with all applicable Anti-Bribery & Anti-Corruption laws, regulations and guidelines in conducting their affairs.

We do not participate in bribery, kick-backs, or other corrupt business practices. Suppliers must not directly, or indirectly, engage in any such activity or use any other means to obtain an undue or improper advantage in their business relationships.

Further, suppliers must never engage in any conduct that would put Laurentian Bank at risk of violating any Anti-Bribery & Anti-Corruption laws or anti-money laundering laws. You can share any concerns with your relationship manager or the Chief Ethics Officer at ethics.helpline@laurentianbank.ca.



Taxation

Suppliers must comply fully with all their obligations in relation to all taxes due within the jurisdictions they operate. Suppliers must not participate in tax evasion or facilitate tax evasion by others. We expect our suppliers to have contracts, policies, systems, and/or procedures in place to ensure all who act for them or on their behalf, also comply with such obligations.

Books and records

Suppliers are required to maintain accurate, complete and appropriate books and records to demonstrate compliance with applicable law, regulatory requirements, and the Supplier Code of Conduct. Suppliers must not use any undisclosed or unrecorded accounts for any purpose.

Representations

Suppliers must not knowingly cause, assist or engage in any activity that contributes towards, or facilitates, any financial or other material misrepresentation, including providing inaccurate, incomplete or otherwise misleading information about its financial condition or the financial effect of a transaction.

Anonymous Whistleblower Hotline

At Laurentian Bank, we are committed to fostering the highest standards of ethics and integrity across our organization, among our employees, directors and suppliers. We have implemented an anonymous Whistleblower Hotline through which suppliers may report suspected wrongdoing in a confidential and anonymous manner. An independent third-party service provider is used to receive concerns on behalf of the Bank to protect the integrity of the process and ensure suppliers' anonymity is preserved.

The Whistleblower Hotline can be accessed through the following channels:

Online Portal: clearviewconnects.com

Phone: 1-866-876-2843

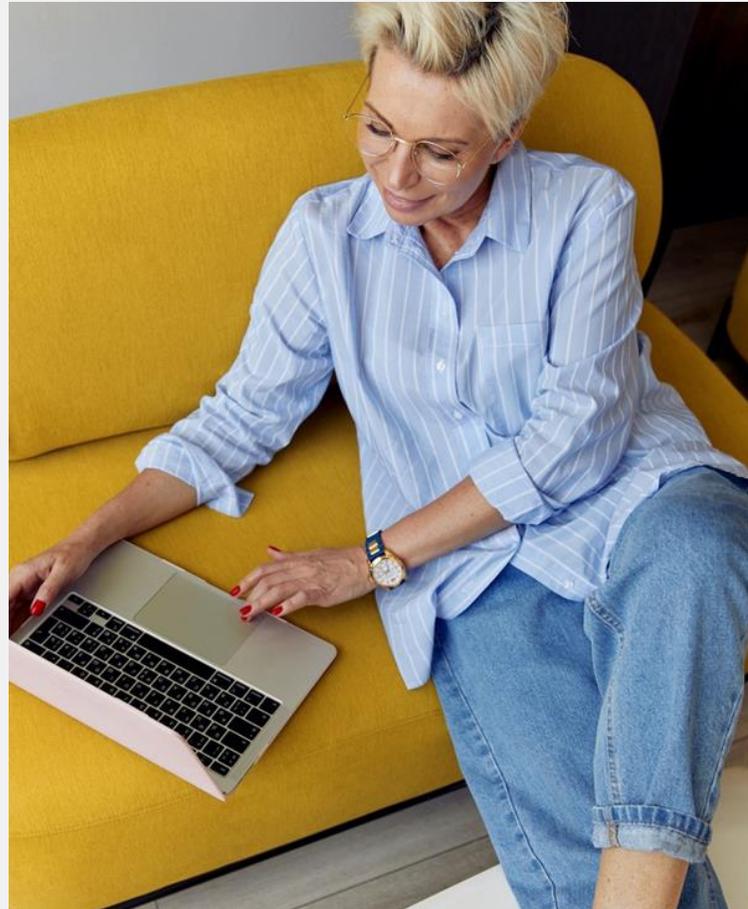
In addition, suppliers may notify the government or regulatory body that regulates financial institutions or law enforcement.

To make a report about a federally regulated financial institution, please refer to the Financial Consumer Agency of Canada's "Making a complaint about financial products and services" section. You can also contact the Office of the Superintendent of Financial Institutions through the following channels:

Phone: 1-800-385-8647

Email: information@osfi-bsif.gc.ca

The Bank maintains a zero-tolerance approach towards retaliation against anyone who, in good faith, raises a concern or partakes in an investigation. All allegations of retaliation will be thoroughly investigated and addressed without delay.



Avoiding Conflicts of Interest

A conflict of interest arises where personal interests interfere with – or have the potential to conflict with or be perceived to conflict with – Laurentian Bank’s interests. Suppliers must exercise reasonable care and diligence to prevent any situations, events or activities that could result in an actual, potential or perceived conflict of interest. Suppliers must not attempt to gain advantage or preferential treatment as a result of the conflict situation.

If a Supplier becomes aware of a potential, perceived or actual conflict of interest, you must immediately disclose it to your relationship manager or the Chief Ethics Officer at ethics.help@laurentianbank.ca.



Gifts and Entertainment

Giving or receiving gifts, entertainment or other benefits have the potential to create situations of conflict of interest.

While exchanging customary business courtesies may be appropriate in certain situations, giving or receiving a gift or offer of entertainment is not appropriate if it is extravagant, too frequent, creates a sense of obligation, is done with the intent to influence a business decision or may be perceived as being done with the intent to influence a business decision.

Cash or cash equivalents such as gift cards are not permitted.

No gifts or entertainment may be exchanged while a formal procurement process (such as a Request for proposal or qualification) is pending.

We expect our suppliers to not engage in inappropriate gift-giving or entertainment and alert us if they become aware of any such activity in the course of their engagement with Laurentian Bank. You can share your concerns with your relationship manager or the Chief Ethics Officer at ethics.help@laurentianbank.ca.



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