



Laurentian Bank's Statement on Anti-Corruption

Laurentian Bank of Canada, its subsidiaries and affiliates is committed to conducting its affairs in compliance with all laws applicable to its operations around the world and to the highest standards of ethics, integrity, honesty, fairness and professionalism.

Laurentian Bank generally conducts business in jurisdictions that are inherently lower risk for corruption and Laurentian Bank has a zero tolerance towards unethical business activities. As such, Laurentian Bank has an Anti-Bribery Anti-Corruption Policy as a key governance tool in our Anti-Bribery and Anti-Corruption program (Program) that incorporates the following legislation and related guidance:

- Canada's Corruption of Foreign Public Officials Act and Criminal Code
- Quebec's Corruption Act
- U.S. Foreign Corrupt Practices Act
- U.K. Bribery Act

Program

The Anti-Bribery and Anti-Corruption Program is designed to safeguard Laurentian Bank's reputation, comply with applicable legal / regulatory requirements and is the responsibility of every employee and director. That is why Laurentian Bank's Program has the following elements:

- **Global ABAC Policy** establishing LBCFG's zero tolerance for bribery and corruption, including the prohibition of facilitation payments
- **Code of Ethics** with Anti-Bribery / Corruption stipulations, requiring an annual attestation by all eligible employees and contractors
- A **Whistleblower Policy** internal points of escalation, incident management and reporting, and a confidential whistle blower hotline
- **Periodic communication**, supplemented by enterprise training to promote awareness of Program requirements
- **Internal controls**, including pre-approving specified gifts and hospitality; strategic transactions due diligence; third-party (e.g., vendors, agents and corporate sponsored charitable contributions) due diligence
- **Independent monitoring** and periodic review to assess the effectiveness of the Program
- **Contractual requirements** for certain vendors and suppliers addressing anti-bribery and anti-corruption requirements