

CONFLICTS OF INTEREST POLICY

Summary

IAG (“the Company”) upholds the highest professional standards in confidentiality and compliance when managing client and third-party information and business best practices. We also ensure that the Insurers with which we place business are compliant through every step of the policy placement and management process.

Defining Conflicts of Interest

IAG’s conflicts of interest policy establishes the framework for managing business conflicts of interests between clients and describes the process by which potential conflicts will be resolved. This policy applies to all directors and colleagues of the Company. IAG is committed to establishing and maintaining effective systems, controls and procedures which are designed to identify, prevent and manage conflicts of interest in the course of our business.

We define a business conflict of interest as a situation in which an engagement with a particular client results in an interest, real or apparent, that is contrary to the interests of IAG or any client of IAG.

Business conflicts of interest may include:

- Conflicts of interest that exist between IAG clients;
- Conflicts of interest that exist between IAG clients and insurers; and
- Conflicts of interest that exist between IAG colleagues and insurers.

Identifying Conflicts of Interest

When considering circumstances that may qualify as a conflict of interest, IAG colleagues are held responsible with taking into account whether:

- IAG could make a financial gain or avoid a financial loss at the expense of a client;
- IAG has an interest in the outcome of a service provided to the client, which is not mutually beneficial with the client’s interest in the outcome;
- The interest of IAG client is different from the interest of another IAG client involved in the same matter of interest; and

- The product or service provided to the client will require IAG to investigate, offer an opinion or question the work performed on behalf of another IAG client.

In the event that an IAG colleague is unsure whether a situation represents a business conflict of interest, he or she is required to address this potential issue with the management of IAG.

Managing Conflicts of Interest

Our procedures for identifying, preventing and managing business conflicts of interest include:

- Addressing conflicts that are deemed significant based on an assessment of the level of risk involved in offering a particular product or service to a client;
- Identifying which products or services have the most risk for a potential conflict; and
- Contain a description of the communication protocols and information systems that will be used to manage potential conflicts.

Once a business conflict of interest has been identified, the colleague(s) involved and directors notified must manage the conflict promptly and immediately notify the clients to which the conflict pertains. One or more of the following procedures may provide potential resolutions for a conflict:

- Disclosing the relationships to the relevant parties;
- Obtaining consent from the party at risk;
- Establishing information barriers (ethical boundaries); or
- Declining the service engagement or policy placement opportunity with the client.

Internal Escalation and Communications Procedures

When a conflict has been identified, IAG management will be responsible for managing the review and resolution of the conflict. If the colleagues are unable to resolve a conflict, the issue will be escalated for review and resolution to the President of IAG in conjunction with IAG's legal advisors.

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Transparency and Auditing

Each IAG colleague will be required to maintain adequate records of the actions taken to manage a conflict. These records may include correspondence with a client in any form, including electronic documents (e-mail) or disclosures in contracts. Implementation of this policy will apply to all IAG colleagues and be considered part of each colleague's professional responsibilities to IAG.

At a minimum, IAG will internally audit its business conflict of interest procedures annually, and on a case-by-case basis as potential conflicts are identified, to prevent similar conflicts from arising in the future. IAG will make appropriate changes to its policies based on each annual review, as required, and the findings from these audits will be reported to IAG's President.

For more information about our privacy policies and procedures, please contact our Compliance Officers:

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