

CONTRIBUTIONS COMPLIANCE POLICY

Summary

As a leading insurance brokerage firm, IAG (“the Company”) upholds the highest professional standards in confidentiality and compliance when managing client and third-party information and business best practices. We regularly conduct reviews with the insurers with which we place business to ensure that our clients’ policies are held in compliance throughout every step of the policy placement and management process.

IAG may choose to contribute to charitable and not-for-profit organizations.

Defining Contributions

A contribution, as it relates to this policy, is defined as a willing donation of money to a charitable or not-for-profit organization and includes:

- A payment budgeted as marketing or advertising on behalf of services, events or products sold or offered by a charitable or not-for-profit organization; or
- A payment made indirectly to a charitable or not-for-profit organization on behalf of a client (i.e. a payment made to a client or a client’s event planner to “buy a table” at a dinner the client has organized for fundraising purposes or as a benefit to a charitable organization).

Contributions do not include giving one’s time or conducting pro bono work or providing other non-financial forms of support to a charitable or not-for-profit organization. All contributions made by IAG to charitable or not-for-profit organizations must be approved according to a process adopted pursuant to this policy.

Any contribution made by IAG must:

- Be consistent with all applicable laws, regulations and government policies;
- Be Free of any intent or understanding, express or implied that any business decision will be influenced thereby, and must be unlikely to create the appearance of any such intent or understanding; and
- Must not benefit, or appear to benefit, a government official or any director, manager or employee of a client or supplier.

IAG will not reimburse any contribution made by an individual colleague or group of colleagues, unless otherwise approved prior to the donation offer by IAG ownership.

COLLEAGUE RESPONSIBILITIES

Conflicts of Interest

If an IAG colleague has a real or potential conflict of interest in making a charitable donation to an organization, the colleague must provide an immediate and full disclosure of the interest to IAG's President and cease participation in the donation process, if required.

If an IAG colleague, or family member of an IAG colleague, has any financial or ownership interest in the organization receiving the donation from IAG.

Interests are defined as:

- Any personal benefit in financial, reputational or representational nature within the organization; and
- Any paid or unpaid managerial or supervisory position within the organization.

Family members are defined as:

- A spouse or partner, parent, child or sibling; or
- The spouse or partner of a parent, child or sibling.

Colleague Contributions

If an IAG colleague would like to make a charitable contribution, the donation must first be proposed in writing and approved by IAG ownership. Any contribution made by an IAG colleague, manager or director must:

- Be consistent with all applicable laws, regulations and government policies;
- Be free of any intent or understanding, express or implied, that any business decision will be influenced by way of the contribution; and
- Not benefit or appear to benefit a government official or director, officer or employee of a client or supplier.

Approval Process

IAG's directors and managers must review all donation proposals for approval before a colleague makes a charitable donation on behalf of the Company. Each approval process must include:

- The name and location of the recipient organization, the monetary amount intended for donation and the purposes for which the donation will be used or applied by the recipient(s); and

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- All proposal, transactional, communication (including email) and tax-related records (including charitable registration number and tax receipts/confirmation of payment). This record retention procedure applies to all approved and denied proposed contributions.

Additional Eligibility Standards

IAG will not make any contribution to:

- An individual;
- A religious or partisan political organization; or
- An organization which due diligence reporting or other information indicates has engaged in conduct which could harm the reputation of IAG or its clients.

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

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