

## Radical Compliance

We commit to conducting business in compliance with the spirit of all applicable laws, rules and regulations in the markets in which we participate. As such, a culture of compliance is essential to our operations and drives everything we do. Every employee, contractor, board member, partner and client must demonstrate their commitment to our culture of radical compliance through adherence to the spirit of the law and our Code of Conduct. Violations of the Code of Conduct or other company policies can result in disciplinary action, including termination of employment for cause.

## Our Promise to Each Other

No matter where we are, who we are or what role we play, we represent the face of Planswell.

- 1) **Be kind:** Treat everyone with kindness and respect, no matter what they look like, where they come from, or where they sit within the company's organizational chart or ecosystem. Act from a place of mutual respect and good will. Look out for one another, and treat those around you with love and care.
- 2) **Be present:** Show up to meetings on time. Pay attention. Fulfil the commitments you make. In your words and actions, show that you are fully engaged in Planswell's mission.
- 3) **Be loyal:** Side hustles and hobbies are great, but employees must limit them to their own personal time and avoid anything that could compete or conflict with Planswell.

- 4) **Be positive:** When you're building an amazing company from the ground up, there will be peaks and valleys; highs and lows. We will make mistakes. Everything that happens with this team is part of a learning experience. Wear your scars like a badge of honour. Focus on finding solutions.

## Our Promise to Our Clients

At Planswell, our goal is to provide the world's most actionable financial planning experience to everyone, for free. We're here to make a positive difference in people's lives. We will always remember that the interests of our clients come before our own.

Any client, partner or representative that assists in the distribution of products and services on behalf of Planswell also abides by the Financial Services Commission of Ontario's ["Treating Financial Services Consumers Fairly Guideline"](#).

## Equal Treatment

Planswell supports that every individual has the right to equal treatment with respect to employment without discrimination or harassment on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status or disability or any other protected ground under applicable human rights legislation.

We are committed to providing equal employment and advancement opportunities to all individuals. Employment decisions (such as promotions)

at Planswell will be based on Planswell's judgment of merit and abilities, and not on any non-job related factor.

## Healthy & Safe Work Environment

Planswell is committed to taking every reasonable precaution to minimize the risk of work-related injuries, illnesses and accidents.

### **In compliance with the applicable legislation, you must:**

- Learn any safety rules that pertain to your work and comply with them
- Eliminate any unsafe conditions and fire hazards, or report them immediately
- Report any defective equipment or potentially hazardous work procedures
- Immediately report any accidents or injuries, no matter how minor

On top of that, you are invited to raise any ideas regarding safety improvement to our Head of People Operations. Any employee who violates the safety rules, causes hazardous or dangerous situations, or fails to report or, where appropriate, remedy such situations may be subject to disciplinary action up to and including termination of employment for cause.

## Security

Employees and contractors should take reasonable steps to prevent actual or potential security threats to yourself, colleagues, visitors and customers, and to report any security incidents to a member of the leadership team or board of directors immediately. While working in home office settings, it is still important to restrict access to your workstation and ensure that it is kept safe and secure whenever you are not present. Cybersecurity is also

extremely important and you need to be vigilant about all unsolicited emails / links that you receive and report any suspicious links / emails that you receive. As part of our physical security risk management efforts, Planswell uses routine video surveillance in common areas. Video surveillance can act as evidence in investigations of offences or claims against Planswell.

## Protecting Personal Information

You are expected to treat information entrusted to Planswell by our clients, suppliers, competitors and employees in a confidential manner and not access it, use it or disclose it except in the course of your duties and responsibilities. Your obligation to maintain confidentiality of information continues even after you leave Planswell.

Under [The Personal Information Protection and Electronic Documents Act \(PIPEDA\)](#), “personal information” includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type;
- Opinions, evaluations, comments, social status, or disciplinary actions; and
- Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs)

Personal information in your custody must be safeguarded at all times. Personal information must be kept private and should never be left unattended - we must not discuss or disclose any personal information to anyone outside of Planswell unless we are required to disclose by law or have received consent by the client to disclose such information. Any loss or

exposure of personal information must be reported to your manager immediately.

## Social Media

Remember that what we do and say online matters - just like what we do and say at work. Sharing personal information about our clients or employees without appropriate permission, as well as posting any comments that could harm Planswell's reputation is prohibited.

## Conflict of Interest

A conflict of interest may occur when private interest interferes in any way — whether it is actual, potential or perceived — with the interests of Planswell. Employees shall not accept or engage in any activity, business or employment, either during or after working hours, that would conflict with Planswell's interests or diminish their ability to render to Planswell the full, loyal, and undivided service, as agreed upon in their employee contract. Subject areas where a conflict of interest exists or may arise include:

- Employment by or financial interest in a client or supplier, or a company that competes with Planswell
- Engaging in outside employment that could deprive you of the attention required to perform your duties to Planswell properly, or which could affect your judgment to act solely in Planswell's best interest;
- Relationships between two individuals (whether relatives or in an intimate relationship) who have a reporting relationship, or where one has influence over the other's employment activities. If such a

consensual relationship develops, it is the more senior (in role) person's responsibility to immediately report the relationship to their manager or any member of the leadership team or the board of directors.

- Using confidential information about Planswell, its employees, customers or suppliers for your personal gain or the personal gain of your family, friends or others

Employees must disclose all potential conflict of interest situations of which they are aware to the applicable department head or any member of the leadership team or board of directors.

## Anti-Bribery & Anti-Corruption

Planswell is committed to conducting business with integrity. We prohibit corruption and bribery in all its forms. All those associated with Planswell, as customers, contractors or employees are to be treated fairly and without favouritism.

We must not, directly or indirectly, accept, request, offer, promise or grant a bribe, payment or anything that can be considered as such (gifts, offers of entertainment, employment or benefits of any kind) to or from any third party that may appear to influence the actions, inactions or decisions, with the intent to obtain an improper advantage, retain business or obtain undue influence over that third party's actions. Reasonable actions in the normal course of business including meals, entertainment events, bonuses, commissions and so on are allowed.

We are all responsible for educating ourselves on how to recognize corrupt activities and ensure that we are not involved in any such type of activities, whether directly or indirectly.

Any breach of this policy can result in disciplinary action being taken and ultimately can result in dismissal. If you suspect or observe anything that you think might be a breach of this policy, you have an obligation to report it to a member of the leadership team or board of directors. All reports made in good faith will be treated with confidentiality and without reprisal.

## Workplace violence, harassment and discrimination policy

Planswell is committed to building and preserving for its employees a safe, productive and healthy working environment based on mutual respect. In pursuit of this goal, Planswell does not condone and will not tolerate acts of violence, harassment, or bullying against or by any Planswell employee. Please refer to our Workplace Violence, Harassment and Discrimination Policy for more information.

## Raising Concerns

You are responsible for seeking guidance and raising concerns about compliance with this Code or the law. Planswell will ensure that all questions and concerns raised are addressed appropriately. If you need guidance, have questions or are unsure about the right thing to do, please speak with a member of our leadership team or send an anonymous email to conduct [at]

planswell [dot] com and it will be reviewed and responded to by the leadership team.

## Reporting Misconduct

You have a duty to report actual or possible breach of this Code or other Planswell policy that you become aware of to your direct manager or any member of the leadership team or board of directors, or, if you are uncomfortable, by sending an anonymous email to conduct [at] planswell [dot] com. Planswell will ensure that all reports will be addressed promptly and thoroughly. We will make every effort to keep the identity of the person making the report and the details confidential, and will only disclose information to the extent necessary to investigate and address the situation.

## Non-Retaliation

There will be no retaliation of any form for speaking up, reporting a possible misconduct in good faith, or participating in an investigation of a breach of this Code. Retaliation can include behaviours that punish or deter someone from raising a concern. If you have encountered any form of retaliation, please bring it up with a member of our leadership team or board of directors immediately.