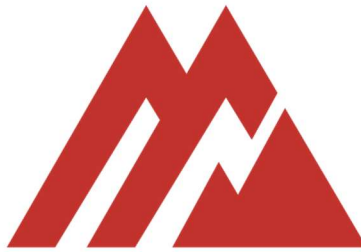


# CODE OF CONDUCT



# MAX FINANCIAL

Last updated August 2019

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The following constitutes the MAX FINANCIAL code of conduct for advisors.

## Principles:

1. Act with integrity
2. Act with competence and diligence
3. Act with fairness
4. Maintain confidentiality of personal information
5. Act with professionalism
6. Act in accordance with the letter and spirit of the law
7. Conduct business objectively
8. Reporting of pending regulatory investigations
9. Marketing & promotional materials

## Act with Integrity

- Honesty
- Reliability
- Ethics
- Act in client's best interest
- Do not be party to, or condone, any activity that is illegal, dishonest, fraudulent, and/or deceitful

Personal and professional integrity is the cornerstone of your business. Integrity requires honesty, reliability and ethical behaviour at all times in order to earn and maintain the trust and confidence of your clients. It requires that you act in your clients' best interests when providing products and services. Integrity means you will not participate in or condone activities that are illegal, dishonest, fraudulent or deceitful.

## Act with competence and diligence

- Develop and maintain the level of knowledge and skill required to assist clients
- Continuous learning and professional development
- Recognize limitations; use resources available

Competence is demonstrated in the knowledge and skills you apply when providing products and services. It is acquired through education, training, and experience, and maintained through continuous learning that enhances your professional development. Competence includes the wisdom to recognize the limitations of your knowledge, and when consultation with or referral to another individual is in your client's best interest. Diligence means that you provide prompt and thorough service based on your clients' needs and objectives.

## Act with Fairness

- Present accurate and complete facts related to product, service and company information
- Be impartial
- Be equitable
- Avoid conflict of interest
- Disclose conflict of interest

Fairness is treating others with the same respect and dignity with which you would want to be treated. You must remain impartial in order to provide services and products suitable for your clients. To act fairly, you must avoid conflict of interest, or the appearance of conflict of interest. Where a conflict of interest exists or has the potential to exist, disclose it promptly.

## Maintain confidentiality of personal information

- Safeguard all personal and confidential information, whether in paper or electronic format
- Respect the confidence of clients
- Comply with privacy legislation and company guidelines

Your business is based on a trust which can only be maintained when you hold all personal information in strictest confidence. You are responsible for protecting confidential and personal information against theft, loss, unauthorized access, disclosure, destruction or misuse. You must take all precautions to safeguard personal and confidential information disclosed to you and in your possession, whether it's held in paper or electronic format. Compliance with federal and provincial privacy legislation and with MAX FINANCIAL guidelines on privacy demonstrates your commitment to confidentiality.

## Act with professionalism

- Maintain highest standard of professional conduct
- Conduct business in a way that reflects positively on the profession

Your conduct should always reflect positively on the profession. Maintain a high standard of professional conduct with your clients and other financial service providers. Avoid activities that negatively affect the quality of your service. You must act with the highest standards of ethics expected by the regulators, the industry and MAX FINANCIAL.

## Act in accordance with the letter and spirit of the law

- Know and comply with all legislation and regulations governing your business
- Monitor activities of employees
- Know the rules, regulations, policies and guidelines that apply to you, your business and your relationship with clients

You must comply with all legislation, regulations, guidelines, and company standards that govern your business. You must know the requirements that apply to your business, including but not limited to: product related regulations and guidelines, anti-money laundering legislation and guidelines, anti-terrorist financing legislation, suitability requirements, privacy legislation and guidelines. You must regulate yourself and your employees, ensuring your activities meet both the letter and the spirit of the law.

## Conduct business objectively

- Place clients' interests above self-interest

You must always place your clients' interests above your own interests, acting on the instructions of your clients. Your recommendations must be based on fact and presented in an impartial way, allowing your clients to make an independent, informed decision.

## Notification to Carriers, regulators and MGA

It is your duties to report pending regulatory inquiries or investigations to the Carrier and in some cases to the regulators. When the issue is related to the sale of Carrier products, the Carrier should be notified within two (2) business days.

As a representative, through our signed agreement, you are required to notify us of any pending regulatory inquiries or investigations concerning your business practices. Representatives who fail to advise the Agency of conduct issues by regulatory authorities that may require additional management monitoring create risk for us.

## Marketing and promotional materials

In accordance with your advisor agreement with carriers, you are required to ensure that all marketing and promotional materials to be used by our representatives which refer to carrier products, trademarks or logos, regardless of media, are submitted to carriers for pre-approval in writing prior to publication or distribution.

Marketing and promotional materials include but are not limited to:

- Direct marketing campaigns;
- Sales promotions;
- Advertising promotions;
- Advertisements in printed materials such as newspapers, magazines, company pamphlets and business cards;
- Posters in public places;
- Video and audio commercials;
- Electronic media advertisements and Websites on the Internet;
- Business cards and letterhead;
- Agency signage.

Any questions or concerns about this code of conduct can be directed to MAX FINANCIAL office, or email to the Compliance Officer, [krishna@max.financial](mailto:krishna@max.financial).

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