



Code of Conduct

2026

About goeasy Ltd.

goeasy Ltd. is a leading Canadian provider of non-prime consumer lending solutions, offering a suite of financial products through its easyfinancial, easyhome, and LendCare brands.

goeasy offers unsecured and secured instalment loans, point-of-sale financing, and lease-to-own merchandise through its omni-channel model, which spans online, mobile, and hundreds of locations nationwide.

Driven by its team members' dedication to expand access to credit for underserved communities and helping customers strengthen their financial futures, goeasy has proudly served more than 1.6 million customers while building an award-winning culture. Shares of goeasy Ltd. are listed on the Toronto Stock Exchange (TSX) under the symbol GSY. For more information, visit www.goeasy.com.



Our Vision

**“Provide everyday
Canadians a
path to a better
tomorrow, today.”**

Our Values

goeasy's core values are as follows:



We play as a team

We are a high performing team that is accountable to each other, dedicated to achieving the goals of our organization, and proud of how we work together to serve our customers.



We are relentless in finding a way

We do what it takes to make it happen and are relentless in our pursuit of success. We drive results by executing well-thought-out ideas and take time to celebrate our successes and learn from our experiences.



We operate with respect and integrity

We create meaningful relationships with our customers built on transparency and respect. We take pride in choosing to do the right thing and demonstrate integrity through our actions and decisions.



We embrace technology and innovation

We have the passion and courage to think differently about everything we do and are committed to changing the rules of the game through technology and innovation.



We are invested in our communities

We work where we live and take action to make a positive difference in the lives of others.

Waterstone
CANADA'S
MOST ADMIRABLE
CORPORATE
CULTURES



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Section 1

Introduction





1.1 About the Code of Business Conduct

The Code of Business Conduct (the “Code”) has been designed to promote a responsible, productive, and ethical work environment for all goeasy business units, subsidiaries and employees, contractors, members of the Board of Directors. The Code contains guidelines on desired and appropriate behaviour while working for goeasy, inside and outside of our work spaces, and who you should contact if you have concerns or questions about the areas covered herein. References in the Code to goeasy, or to the Company, are generally intended to mean goeasy Ltd. and all of its subsidiaries companies (including RTO Asset Management Inc. easyfinancial Services Inc. and LendCare Capital Inc.) as a group, as applicable.

1.2 Your Responsibilities

In your role at goeasy, you are entrusted with the responsibility to adhere to all company policies and comply with municipal, provincial, and federal laws in Canada, as well as other applicable jurisdictions. It is crucial for you to fully understand and faithfully follow the laws and policies relevant to your position. This includes the policies in the Code and all other Company policies, including, but not limited to the Code, operations manuals/handbooks, management and policy manuals, and any other applicable operating

standards, controls, and procedures. All employees, managers and directors throughout the term of their employment shall:

1. Serve the company diligently, honestly, and faithfully, applying their best efforts to promote and advance the interests and goodwill of the Company.
2. Conduct themselves in a manner that supports and does not compromise the company's interests at all times.
3. Dedicate your full working time and attention to the business and affairs of the Company generally and specifically to their duties hereunder.

Your commitment to these standards is fundamental to our integrity and ongoing success. Failure to comply with these guidelines can lead to disciplinary measures, including termination of employment, potential recovery of damages, and the filing of criminal charges. It is your responsibility to ask questions to be informed, make appropriate disclosures, and bring potential problems to management's attention.

1.3 Policy Changes

Over time, new concepts and updates may need to be introduced and existing policies revised. While the Company reserves the right to make these changes with or without notice, the Company will endeavour to let you know about any changes affecting your employment in a timely fashion.

Section 2

Speaking Up and Reporting



2.1 Speaking Up

At goeasy, when we see something that goes against our values, our goals, the Code, or the law, we speak up. Understanding this is very important as a team member at goeasy.

Employees must not follow or carry out instructions that they know or reasonably believe to be unethical, unlawful, or in violation of this Code or Company policies, regardless of the source of those instructions.

You have several ways to report concerns. You should choose the reporting channel that feels right for you. If a concern is not addressed, or you believe appropriate action has not been taken, you are expected to escalate the matter through another reporting channel, including Human Resources, Internal Audit, Legal, or the Confidential Hotline.

The main channels for reporting issues or concerns include:

- Your manager or Department leader
- Human Resources (HR@goeasy.com)
- Legal Department (Legal@goeasy.com)
- Internal Audit (OperationalCompliance@goeasy.com)
- Our Confidential and Anonymous Hotline SafeSpace (detailed in 2.2), which can be contacted by:
 - Calling Toll Free at 1(800) 461-9330
 - Going to goeasy.integrityline.com and submitting your concern online

After a concern is raised, it will undergo a confidential, professional review and, if the concern is substantiated, it will result in the appropriate remediation including corrective action to address misconduct.

We are committed to investigating all reports thoroughly and promptly. Under no circumstances will an employee that has

filed a complaint in good faith or cooperated in an investigation be subject to any form of reprisal or retaliation. Anyone doing so will be subjected to disciplinary action, up to and including termination. If you believe that you have been subjected to discrimination, harassment or retaliation, or that you have witnessed it in the workplace, please report it promptly to Human Resources or by way of the Confidential Hotline.

In addition, fraud related reports are reported to the VP Internal Audit and Compliance and Chair of the Audit Committee on the Board of Directors.

2.2 Confidential Hotline for Reporting Concerns

goeasy believes it is important you feel secure when raising concerns. For issues that you feel require anonymity or involve sensitive information, goeasy maintains a Confidential Hotline called SafeSpace, which is operated by a third party named EQS Group.

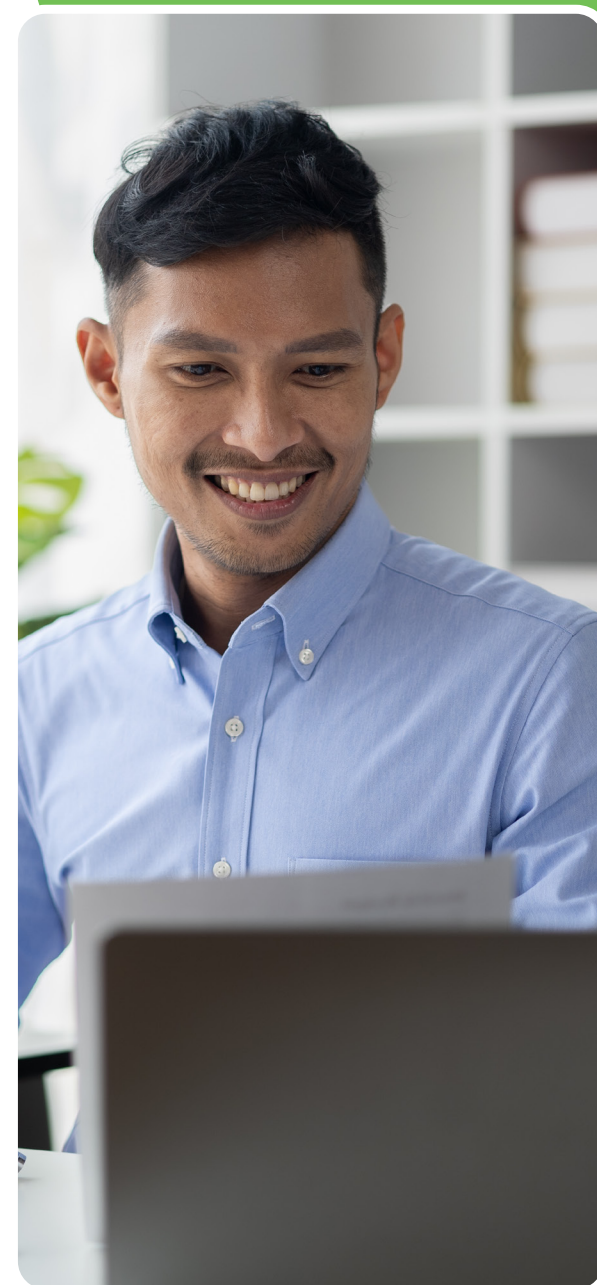
To make a report to SafeSpace, you can toll-free at 1(800) 461-9330. You can also submit your concern online at goeasy.integrityline.com

This hotline ensures that your identity remains confidential, and you may choose to remain anonymous, understanding that doing so may affect the thoroughness of investigations.

The Company will promptly and thoroughly investigate all complaints filed through the Hotline. The complainant will be informed of any follow up and closure of the matter, as appropriate.

2.3 Assistance with Investigations

Where an investigation has been launched the employee, active or inactive, is required to participate and cooperate in the investigation process either by phone or in person, and this includes employees on leave of absence.



Section 3

Acting with Honesty & Integrity



3.1 Applicable Laws

At goeasy, we are committed to the highest standards of business conduct across all jurisdictions where we operate.

If the Code or goeasy requires you to take an action or prohibits you from taking action that you believe is in violation of a law, or if you believe there is a conflict between the applicable laws of two or more jurisdictions, please speak with Human Resources, Legal, or contact the Confidential Hotline.

The Code may also impose standards that exceed legal requirements in certain jurisdictions. In keeping with the Company's commitment to meet the highest standards of business conduct wherever it does business, all employees and directors must comply with all aspects of the Code, even if local laws do not require it. Conversely, there may be laws in certain jurisdictions that may not specifically apply outside of those jurisdictions, and therefore, are not specifically addressed in the Code. You are responsible for knowing and following all such laws and policies that relate to your job.

3.2 Fair Dealing

Fairness and honesty are the cornerstones of our interactions at goeasy. Whether dealing with customers, suppliers, competitors, or fellow employees, you must uphold integrity in every action. You must not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, falsification, misrepresentation of facts or any other intentional unfair dealing practice. Employees are not

permitted to falsify, forge or tamper with any documents and any violation will result in disciplinary action up to and including termination.

3.3 Fraud

We maintain zero-tolerance towards fraud and goeasy requires all employees to comply with our Fraud Policy at all times.

Reporting Fraud: Should you suspect or become aware of any fraudulent activities, it is your duty to report these immediately—no matter how minor they may seem—to Human Resources, Internal Audit, the Legal Department, or through the Confidential Hotline. All reported incidents of fraud are taken seriously and investigated thoroughly, which may result in disciplinary measures up to and including termination of employment.

3.4 Insider Trading or Disclosure of Information

All employees and directors at goeasy are not permitted to trade securities or to tip others to trade securities of goeasy or other companies when you are aware of inside information that has not been made available to the public. Inside information is any material information that could be considered important by a person in deciding whether to trade in a company's stock. Examples include, but are not limited to, the following: information relating to sales, inventory, margins, earnings, significant proposed acquisitions, planned stock splits, proposed changes in dividends and other information that has the potential to affect the stock price of goeasy or

another company. As a rule, if the information makes you think of buying or selling the stock of goeasy or another company, it probably will have the same effect on others and likely is inside information.

Trading on inside information not only undermines our corporate integrity, but it can have severe legal consequences. Each provincial Securities and Exchange Commission and/or similar agencies are authorized to bring a civil lawsuit against anyone who trades on inside information (or who provides another person with inside information) and against the Company. Insider trading is also a crime subject to criminal penalties, including jail terms.

To further safeguard against unethical trading practices, goeasy enforces blackout periods which generally begin on the day after the last day of a fiscal quarter and end two business days following the public release of the financial results for that fiscal quarter. During these periods, all senior Company employees (directors, divisional vice presidents, vice presidents, senior vice presidents, executive vice presidents, president, CEO), Board of Directors and employees with access to material information, regardless of role, must adhere to the Company's blackout periods without exception. Furthermore, any senior Company employees or members of the Board of Directors wishing to purchase Company stock must first obtain approval in writing from the CEO.

3.5 Non-Disparagement

We uphold the dignity of our workplace and the reputation of our company. All current and former employees & contractors must refrain from making disparaging, defamatory, or negative statements about the Company, its employees, contractors, volunteers, or any affiliated individuals, whether in public or private settings. This includes, but is not limited to, comments made in person, in writing, through electronic communication, or on social media platforms.

Should concerns or disagreements arise, we encourage all individuals to address these issues through the appropriate internal channels, such as discussing them with management or contacting Human Resources. Open and constructive communication is valued, and conflicts should be resolved in a professional and respectful manner.

3.6 Conflicts of Interest

At goeasy, we are committed to the highest ethical standards in all business dealings, which necessitates that every decision must align solely with the company's best interests, not personal gain. Employees are expected to avoid any actions that create or could appear to create conflicts of interest with the company.

Questions about potential conflicts of interest and disclosure of these situations as they arise should be directed to Human Resources, or the Confidential Hotline.

Prohibited Compensation: By default, employees may not receive any form of compensation from anyone other than the Company for doing their job, including accepting tips from customers. Moreover, employees may not obtain a financial interest from any supplier, vendor, distributor, landlord or competitor of the Company. Any exceptions must first receive written approval from the CEO. An improper financial interest is one that creates or appears to create a conflict of interest with the Company.

Bribes and Improper Payments: Employees or agents of the Company must never accept bribes or directly or indirectly offer, promise to pay or authorize the payment of money, products, services or anything of value to any government official or agent in any country or jurisdiction in order to influence acts or decisions of government officials, to receive special treatment for the Company or for personal gain. All goeasy employees must abide by any applicable local laws. Employees working with government officials should request further guidance from the General Counsel to ensure compliance with any applicable anti-corruption laws. For more information, contact the Legal Department (Legal@goeasy.com).

Gifts and Entertainment: Employees should not accept anything of value from anyone, including a current or prospective supplier, vendor, distributor, landlord or competitor of the Company when doing so might compromise, or appear to compromise, the objectivity of your business decisions.

If a conflict of interest exists, and there is no failure of good faith on the part of the employee or director, goeasy generally will allow a reasonable amount of time for the employee or director to correct the situation in order to prevent undue hardship or loss. Decisions regarding these matters are made at the discretion of your Business Unit President or the CEO, with a focus on what is best for the company.



3.7 Doing Business and working with Spouses, Relatives or Friends

At goeasy, we prioritize the company's best interests in all business dealings, including those involving family and friends.

Approval Process: Before engaging in any business relationship where there might be a direct or indirect reporting line to extended relatives, friends, partners, and spouses; you must secure written approval from your Senior Leadership Team representative and Human Resources. Direct reporting relationships of a permanent nature between spouses or immediate relatives (parents, children, siblings, etc.) is strictly prohibited to avoid conflicts of interest.

Additionally, employees cannot pressure others within the company to hire a relative or friend as an employee, supplier, vendor, distributor, or landlord of a goeasy property. Employees are also prohibited from leasing merchandise, obtaining loans, or accessing accounts for family members or close personal friends, to maintain integrity and impartiality in our business practices.

3.8 Fraternalization

At goeasy, we recognize and respect the rights of employees to freely pursue personal relationships. Employees are expected to use good judgement to ensure that personal relationships do not adversely affect their job performance, the management of others, or the overall workplace environment.

Inappropriate Conduct Guidelines: Workplace conduct arising from a romantic relationship, intimate relationship or friendship between employees is deemed improper if the conduct creates an uncomfortable or inequitable work environment for others or there is sharing of confidential and private information. Displays of favoritism, public affection, or decisions driven by personal relationships rather than the company's interests are deemed unprofessional. If these circumstances arise, the Human Resources team will preside over appropriate remediation to remove the inappropriate conduct.

Disclosure of Relationships: Employees who find themselves in an intimate relationship or friendship with a co-worker should use tact, appropriate judgment and common sense. Employees in a reporting-line relationship with someone that they are dating or romantically involved with must inform both their next level of management and Human Resources. goeasy will then work with both individuals to segregate their employment responsibilities from their personal relationship, if possible, to uphold the integrity of our workplace. If a conflict of interest cannot be rectified by the Company via role change or reporting line amendment, the employees involved in the relationship will be asked to either (1) resign or (2) end the relationship, the latter if they need to retain employment with the Company.

Consequences of Non-Disclosure: Failing to disclose an intimate relationship with your manager or subordinate employee (reporting line in amalgam) is a serious offence. Employees found in contravention to this policy will be subject to

disciplinary action up to and including termination. Should it be found that any financial privilege or benefit was conferred to either employee, directly or indirectly, as a result of the relationship, the Company reserves the right to pursue remediation.

3.9 Employee Purchases and Loans

At goeasy, we require that all employee product purchases and loans can only be processed through the appropriate corporate channels. Employees must adhere to the Employee Purchase Policy process to purchase new merchandise. Employees are not permitted to purchase merchandise through the store lease method or cash sales.

Restrictions on Borrowing Products: Employees are prohibited from "borrowing" products from the store.

Handling Pre-existing Financial Commitments: Employees hired from our leasing customer base or those with existing loans through easyfinancial or Lendcare must either settle their accounts in full, return the merchandise, or convert their accounts to employee purchase agreements payable through payroll deductions within 30 days of the start of their employment.



3.10 Secondary Employment

goeasy permits that employees may engage in secondary employment under certain conditions, ensuring that such activities do not compromise their responsibilities to the company. Secondary employment is permissible provided it:

- Does not interfere with the employee's primary duties at goeasy.
- Is conducted outside of company premises, does not occur during business hours, and does not utilize company resources or confidential information.
- Is not in competition with any of goeasy's operations, revenue, or interests.
- Is lawful and adheres to ethical standards.
- Does not conflict with the employee's obligations to goeasy.
- Does not potentially harm the company's reputation or brand.

Employees are prohibited from working for or receiving compensation from any supplier, vendor, distributor, landlord, or competitor of goeasy, or any entity that does business or seeks to do business with the company, except as explicitly described in section 3.8 of this policy.

3.11 Mortgage Licenses

At goeasy, only employees with a valid provincial mortgage license registered under the easyfinancial Services Inc. Brokerage are permitted to engage with customers about the Secured Personal Loan (SPL) product. Unlicensed employees must refer customer

inquiries to a licensed colleague. Speaking to a customer about the SPL product, or documenting SPL applications without a license is prohibited. This ensures compliance with regulatory standards.

Employee License Disclosure and Restrictions: Licensed employees are specifically restricted from holding active positions within any other licensed mortgage brokerage. New or current employees holding an active license with another Brokerage or holding an active license within any regulated sector other than the Mortgage sector must immediately disclose this information to the Company's Broker of Record and a member of the Human Resources team in writing.

3.12 Outside Service as a Director or Officer

Approval for For-Profit Companies: Employees wishing to serve on the Board of Directors of another for-profit company or as an officer must first obtain approval from your Business Unit President or the CEO. This policy ensures that such engagements do not conflict with the interests of goeasy.

Guidelines for Non-Profit Organizations: Similarly, serving as a director, trustee, or officer of a non-profit organization is generally permissible on an individual basis during personal time. However, if representation of the company is involved, prior approval from the CEO is required. For any questions regarding this policy, employees are encouraged to contact Human Resources or the CEO directly.

Section 4

Our Workplaces



4.1 Diversity, Equity and Inclusion

At goeasy, we believe that we can only be the best when people are able to bring their best selves to work every day. This means that we are committed to cultivating and preserving a work culture where we celebrate who we are, where everyone feels seen and heard and where every employee can fulfil their potential.

We are committed to maintaining practices throughout our operations to prevent discrimination on the basis of any protected status including but not limited to race, skin colour, sex, sexual orientation, gender identity or expression, nationality, citizenship, religion, age, marital status, family status, political beliefs, genetic characteristics, disability and conviction for an offence for which a pardon has been granted or record suspension has been ordered.

We ensure that all our employment practices, from hiring and training to promotions and transfers, are conducted with a strong commitment to fairness and equal opportunity. Furthermore, we recognize the importance of accessibility and inclusivity in our recruitment processes. We are dedicated to providing reasonable accommodations upon request to persons with disabilities, ensuring that all candidates have the opportunity to participate fully and fairly throughout the hiring process.

Our commitment extends beyond mere compliance with legal requirements; we

actively cultivate a culture where diverse perspectives are embraced and where every individual feels supported and valued. Our commitments to DEI include:

Diversity: Bringing together what makes us different. This means we are committed to:

- Having a workforce that is as rich in diversity as the Canadian population.
- Encouraging diversity of talent, abilities, thinking and experiences.

Equity: Providing each employee with what they need to succeed. This means we are committed to:

- Measuring and managing equity in access to opportunities and programs for all.
- Designing platforms and programs all eligible, qualified, employees can access without barriers or discrimination.
- Providing additional support and resources for growth for members of historically marginalized groups.

Inclusion: Ensuring that every employee feels seen and heard. No matter who you are, there is a place for you here. This means we are committed to:

- Measuring inclusion and acting where necessary.
- Ensuring our employees, programs and policies use inclusive and mindful language.
- Designing employee experiences that recognize the needs of our diverse talent.



4.2 Our Employee Resource Groups (ERGs)

goeasy has established employee-led Employee Resource Groups (ERGs) to further enhance our inclusive work environment. These groups help create a safe space for our employees in which there is an environment of support and understanding to help marginalized groups feel connected. They also provide our employees with opportunities for personal growth, professional development, and community engagement.

Women at goeasy (WAG)

Women at goeasy, formerly known as Women in Leadership, was created in 2015 and has been successfully investing in the growth of our female colleagues through learning and development opportunities, mentorship, and social and community engagement.

Afro-Canadian Development and Empowerment (ADE)

Established in 2020, our ADE committee promotes racial equity by supporting Black talent through mentorship, career development, and policy changes. The committee has led to impactful initiatives, including Black History Month education and observation, formal racial sensitivity training for leaders and has spearheaded meaningful changes to goeasy's policies, including the Business Code of Conduct, reinforcing goeasy's commitment to a diverse and inclusive workplace.

CIRCLE

Our CIRCLE ERG was developed in 2022 to create awareness, promote collaboration and increase knowledge with respect to indigenous peoples, their history, and culture. The ERG supports our Indigenous employees and communities through a variety of programs and events to build awareness and allyship, including education and observation of the annual National Day for Truth and Reconciliation.

PRIDE

PRIDE aims to create a safe and inclusive environment and culture where all employees, regardless of sexual orientation, gender identity or expression, feel included, valued, and empowered to achieve their full potential. PRIDE was created to promote awareness, advocate for equality, and provide a platform for education and support for those within and connected to the 2SLGBTQIA+ community. To foster inclusivity and acceptance, our PRIDE ERG focuses on education, training, awareness and advocacy to promote inclusivity and acceptance.

Wellness

Created in 2024, the Wellness Committee is dedicated to supporting employees' mental, physical, and financial wellbeing by sharing practical tips, resources, and benefits. It aims to foster a psychologically safe workplace where employees feel supported, can recognize changes in mental health, and access the help they need, while also equipping them with the tools, habits,



4.3 Anti-Harassment and Anti-Discrimination

goeasy is dedicated to fostering a workplace where everyone is treated fairly without distinction, exclusion or preference.

goeasy recognizes that all employees, contractors, and members of the Board of Directors have the right to work without sexual, racial or any other form of harassment and will do everything in its power to enforce this statement. Harassment may be defined as an attitude that translates into words, actions or gestures that are undesired or ought to reasonably be known to be unwelcome and have a negative effect on a person's physical or psychological dignity or integrity or lead to an unfavourable working environment. It is generally repetitious, however serious one-time offenses can also be considered as harassment or discrimination.

4.4 Health and Safety

At goeasy, we are committed to maintaining a safe and healthy environment for all employees, customers, and the communities where we operate. There is zero-tolerance for those that intentionally put others at risk for injury.

The Company's Health and Safety policy is designed and intended to reduce or eliminate accidents that cause suffering, loss of time and income, loss of profits and property. This includes proactive measures to eliminate workplace hazards that could lead to accidents, injuries, or security issues. Our comprehensive Health and Safety policy mandates regular training, adherence to industry standards, and compliance with legislative requirements to ensure the well-being of everyone associated with

our operations. All employees are equally responsible for minimizing accidents within company facilities.

All employees are expected to contribute to a safe working environment, with adherence to health and safety requirements regarding the operation and maintenance of facilities and equipment.

4.5 Anti-Workplace Violence

We maintain a zero-tolerance policy for workplace violence. Acts or threats of physical violence, including intimidation, harassment, which includes bullying and/or coercion, are strictly prohibited and will result in immediate disciplinary action. Acts or threats of violence include conduct that is sufficiently severe, offensive or intimidating to alter the employment conditions at goeasy or to create a hostile, abusive or intimidating work environment for one or several goeasy employees.

To ensure the safety and security of all employees, no firearms or weapons are allowed on any company property or in company vehicles at any time.

4.6 Substance Use at Work

Employees shall not use, be under the influence, sell, possess, purchase, distribute or transfer illegal drugs of any kind on Company premises or in Company vehicles. Smoking and vaping are prohibited within all company facilities and vehicles. Consuming alcohol or recreational marijuana during work hours is strictly prohibited, except for alcohol, which may be consumed by employees of legal drinking age at Company-sponsored functions, when it is made available, in moderation. If consuming

alcohol, employees are encouraged to use public transportation or alternate methods of transportation to return home from Company-sponsored functions. Should an employee consume alcohol, legal or prescription drugs during business hours, employees must remain fit for work in order to undertake their professional obligations throughout business hours.

Employees who are required to take prescription drugs, including prescribed medical marijuana, that could impair their physical or cognitive abilities on the job, must reach out to the HR team to discuss potential accommodations that may be required.

At Company-sponsored events where alcohol is present, employees are expected to act responsibly, remain fit for participation, and conduct themselves in a manner consistent with their professional obligations for the duration of the event. Where alcohol is present at a Company-sponsored event, a Regional Manager (for field-based teams) or Director level employee (for corporate teams) must be present for the entirety of the event to provide appropriate oversight and leadership presence, unless otherwise approved by Human Resources.

4.7 Further Policies and Information on our Workplaces

Our commitment to fair employment practices is fundamental to creating a respectful, inclusive, and equitable workplace. We encourage all employees to familiarize themselves with our policies related to fair employment practices found on "The Hub" our company intranet. Furthermore, the Code of Business Conduct Addendum contains more information on subjects such as timekeeping, employee vacations and use of goeasy's facilities.

Section 5

Safeguarding Our Assets & Information



5.1 Confidentiality and Non-Disclosure

As an employee of goeasy, you are entrusted with access, or exposure to, confidential and proprietary information regarding the Company's business, all of which are the property of the Company.

Employees must never remove, copy, transmit, or share confidential or proprietary Company information with any third party, including friends, family members, former employees, media, or external organizations, unless expressly authorized in writing by the Company.

Confidential information includes, but is not limited to:

- Trade secrets
- Industrial and/or operational processes
- Patents and Product development plans
- Customer information including customers' or potential customers' specific needs and requirements, and customer lists
- Pricing information
- Marketing methods and plans
- Financial results that have not been publicized
- Business plans and budgets
- All other systems, methods, procedures, compilations of information, records and so forth which are owned and shall continue to be owned solely by the Company

Our Responsibility to Protect Confidential Information: Throughout your tenure at goeasy, and continuing indefinitely thereafter, you are obligated to hold in confidence and refrain from disclosing the Company's Confidential Information. You must not,

except in connection with the performance of your duties with the Company, directly or indirectly use, convey, disclose or reveal, or attempt to use, convey, disclose or reveal, any confidential information, unless approved by the Company in writing, and at the sole discretion of the Company,

Legal and Regulatory Compliance: If disclosure is mandated by a governmental or regulatory body, please contact the Legal Department (Legal@goeasy.com) immediately to allow goeasy to take appropriate measures to comply with legal requirements while protecting its interests.

5.2 Privacy

goeasy is committed to the protection of personal information through our comprehensive Privacy Policy, which outlines our practices in handling personal information during commercial and employment activities. All employees and directors must adhere to this policy at all times to safeguard the privacy and security of all personal and sensitive information.

Restrictions on Disclosure: Personal information related to employment, customer accounts, or any other sensitive data must not be disclosed to other employees or external parties without explicit authorization from the Chief Privacy Officer, who currently serves as our Chief Legal Officer. Unauthorized disclosure is strictly prohibited and subject to disciplinary action.

Requests for information may be directed to the Legal Department (Legal@goeasy.com) or visit our website at **www.goeasy.com**.

Security of Company Devices: Employees in possession of a Company mobile or personal device (BYOD) such as laptops, tablets, cellphones, etc., used for company purposes must ensure these devices are secured with appropriate measures such as passwords and encryption. All such devices must adhere to goeasy's IT Security policies to prevent unauthorized access to personal information.

Personal Device Use: Employees are not permitted to record workplace meetings on their personal devices. As well as take photographs or record videos on company premises for personal or social media use, particularly when company branding, logos, or confidential areas may be visible in the background. Such use without leadership authorization is subject to disciplinary action.



5.3 Intellectual Property Rights

During your tenure with goeasy, any and all ideas, designs, procedures, formulas, inventions, improvements (whether patented or not), trade names, logos, and written materials produced by you that relate to your employment scope or are of interest to the company, will be considered the exclusive property of goeasy. This encompasses all forms of intellectual property (collectively referred to as "Intellectual Property") created during the period of your employment.

Disclosure and Confidentiality: You are required to promptly disclose any such Intellectual Property to goeasy and maintain confidentiality unless express written consent is provided by goeasy for disclosure to others.

Upon request by the Company, you shall execute any and all applications, assignments and other instruments which the Company shall deem necessary in order to apply for and obtain patents, copyrights, industrial designs and/or any official documents relating to exclusivity of the invention, design or copyright of Canada or any foreign country for such Intellectual Property and in order to assign and convey to the Company the sole and exclusive right, title and interest in and to such Intellectual Property. In particular, respecting writings or other copyrightable materials, the Company may claim authorship as an employer or work made for hire.

5.4 Accuracy of Company Records

At goeasy, maintaining accurate and secure records is vital for our successful operation. All employees

are responsible for ensuring that all information, including financial accounts, expense reports, timekeeping records, and other transactions, is accurately recorded and properly authorized in line with our company policies.

Financial Recording Standards: goeasy's accounting and financial records must reflect in an accurate, complete and timely manner and in reasonable detail, every business transaction undertaken by the Company, and must conform to applicable legal requirements and goeasy's system of internal controls.

Responsibility for Internal Controls: All employees and directors who have control over goeasy's assets and transactions are responsible for establishing and/or maintaining a system of internal controls in their area of responsibility designed to (a) prevent unauthorized, unrecorded or inaccurately recorded transactions; and (b) permit the preparation of financial statements according to International Financial Reporting Standards.

Document Retention and Legal Compliance: Company documents may not be destroyed, unless otherwise stated in the Company's Record Retention Policy. Any communication that leads to a legal claim either civil or criminal must also be retained. For further guidance on document retention please contact the Legal Department.

Reporting Concerns: If you have any concerns about the Company's financial controls, accounting, financial reporting or auditing please contact the Confidential Hotline or the Company's Internal Audit Department.



5.5 Social Media, Email and the Internet

Appropriate Use of Digital Platforms: At goeasy, we expect all employees to use digital communication platforms, including social media, email, and the Internet, responsibly and professionally. It is strictly prohibited to post, send or forward email or text messages or access internet sites that contain libelous, defamatory, pornographic, offensive, racist or obscene remarks, pictures or any other material that a reasonable person would deem inappropriate. If you receive an e-mail or message of this nature, you must promptly delete it.

Representation on Social Media: Employees must not use social media to express personal opinions as those of goeasy, as such representations could significantly impact the company's brand and reputation. Further, social media should not be used for any internal or work-related activities or to discuss confidential or proprietary information.

Work-Related Use: Employees are permitted to access social networking sites, such as Facebook, Instagram and X, during business hours only if it is specifically work related, and during breaks for personal reasons. Confidential work-related information may not be shared with anyone outside the business, through any of these social networking sites, this includes publishing KPI's or milestones that would otherwise not be disclosed to the general public.

Monitoring and Enforcement: goeasy reserves the right to monitor digital activities and will contact the authorities if illegal activity is discovered on any employee's computer, Internet, or email accounts. Violations of privacy or breaches of confidentiality, including making libelous or defamatory comments about the company or its employees, may result in disciplinary action up to and including termination of employment, and possibly legal action.

5.6 Loss Prevention and Theft

At goeasy, safeguarding the company's assets and ensuring their proper and efficient use is a collective responsibility. All employees and directors must take every precaution reasonable to protect the Company's assets and ensure their proper and efficient use. Loss prevention efforts is the direct responsibility of managers and their teams, who must work collaboratively to prevent accidental loss and misuse of assets.

Zero-Tolerance Policy: goeasy maintains a zero-tolerance policy towards any manipulation of assets or accounts, theft, fraud, or behavior that contravenes company policies and procedures. Any employee found engaging in such activities will face strict disciplinary actions, up to and including termination of employment. We expect all employees to fully and always adhere to all company policies and procedures to maintain the integrity and security of our operations.

Surveillance and Security Measures: To further ensure the security and safety of all of our employees and customers, goeasy locations are equipped with recorded video and/or audio surveillance which may, if applicable, be used during an internal or legal investigation.

Reporting Suspicious Activities: If you observe suspicious activities or behaviors that could compromise the company's assets or security, you are encouraged to report these immediately. To report suspicious activities, contact the Company's Confidential Hotline or the Operational Compliance department (formerly Branch Audit) at OperationalCompliance@goeasy.com

5.7 Authorization Policy

goeasy has implemented a robust Authorization Policy as a key component of our internal control system to maintain fiscal responsibility and operational integrity. This policy defines specific dollar value limits associated with each employment position, outlining the value of goods or services that can be procured by any employee on behalf of the Company.

Contractual Authority: Furthermore, the Authorization Policy specifies which employees are able to execute and ratify contracts that bind the Company to current or future activities, and financial obligations on behalf of the Company.

Section 6

How We Interact With The World



6.1 Environmental, Social and Governance (ESG) Practices

We operate with a purpose beyond making a profit. Our commitment to shaping a better tomorrow extends beyond helping to improve the lives of our customers and employees, as it serves to guide our teams' actions and underpins the values and policies that govern our organization. As we extend our purpose beyond profit, we strive to relentlessly focus on our Environmental, Social and Governance (ESG) practices as we look to generate long-term value for our stakeholders and ensure a sustainable tomorrow for generations to come.

6.2 Supporting our Communities

goeasy is deeply committed to making a positive impact on society through our strong emphasis on giving back to the communities in which we live and work. With a retail footprint that serves over 85% of the Canadian population, our connection to these communities is defined by more than our physical locations. By donating our time, talents, and resources, we're working to make a difference at home and abroad through our long-standing local and global charitable partnerships.

6.3 Supporting our Environment

Over the past several years, we have put new environmental initiatives into practice as we continue to seek opportunities to reduce our carbon footprint and minimize our use of natural resources. We are committed to supporting a greener future by managing our environmental impacts and prioritizing sustainable environmental practices which include reducing our paper and plastic usage, as well as reducing our energy and emission consumption.



6.4 Commitment to Good Governance

At goeasy Ltd., we recognize that strong governance strengthens stakeholder trust and supports our commitment to long-term, sustainable growth. It is integral to our business operations and forms the backbone of our ethical practices and corporate accountability. This commitment is evidenced by our adherence to rigorous governance standards, transparency in our operations, and a proactive approach to compliance with legal and regulatory requirements. Our governance framework includes comprehensive policies and procedures that address conflicts of interest, insider trading, and the protection of company assets.

6.5 Representing goeasy and Handling Media or Activist Inquiries

At goeasy, we prioritize maintaining clear, accurate, and consistent communications with our communities. As such, employees are required to receive explicit authorization before making any public appearances or statements on behalf of the company. This includes speaking at events, interacting with the media, or responding to inquiries from activists. Under no circumstances may employees speak on behalf of goeasy to the media or activists unless expressly authorized to do so in writing.

Authorization Process for Representing goeasy:

- For Public Events: If you believe you need to represent goeasy publicly, whether at conferences, seminars, or community events, you must obtain

prior approval from your Executive Leadership Team member and the Corporate Communications team (email mediainquiries@goeasy.com.)

- For Media and Activist Inquiries: Direct all media inquiries from journalists or activists to mediainquiries@goeasy.com. Employees are not permitted to speak to or represent the company in media without prior approval. It's important to protect confidential information and customer privacy, and ensure any use of company materials is approved in advance by the Corporate Communications (mediainquiries@goeasy.com) and Legal team (legal@goeasy.com).

In addition, we believe that your Personal Conduct is an extension of your role at goeasy. Therefore, ensure that your personal conduct and associations, both online and offline, reflect goeasy's values and do not compromise your professionalism or the company's integrity and reputation.

By adhering to these guidelines, we ensure that all representations of goeasy are managed professionally and align with our corporate objectives and ethical standards.

6.6 Political and Religious Activities

Participating in Activities Outside of Work: At goeasy, we respect and support the right of all employees to engage in political and religious activities on their personal time. In doing so, employees are responsible to make it clear they are acting in their individual capacity and not on behalf of the Company.

Accommodations for Religious Practices: Employees seeking accommodations for religious

practices can reach out to their direct manager or Human Resources. goeasy is committed to providing reasonable accommodations to support the observance of religious commitments, reflecting our respect for the diversity of our workforce.

6.7 Complaints to Government Agencies

Handling External Complaints: Occasionally, an applicant, customer, or current or former employee may file, or threaten to file, a complaint against the Company with a government agency. If you are aware of such a complaint being filed or if you are approached in relation to one, it is imperative to contact the Legal Department immediately. goeasy strictly prohibits any adverse action against individuals making or reporting complaints in good faith.

6.8 Government Proceedings and Requests for Information

Cooperation with Government Inquiries: goeasy is dedicated to upholding the law and cooperating fully with government inquiries. If you are requested to provide information to a government body, or if government representatives visit your workplace, promptly inform Human Resources or the Legal Department before providing any information. Our policy requires that all interactions with government officials are handled professionally, ensuring that information provided is accurate and not misleading or obstructive.