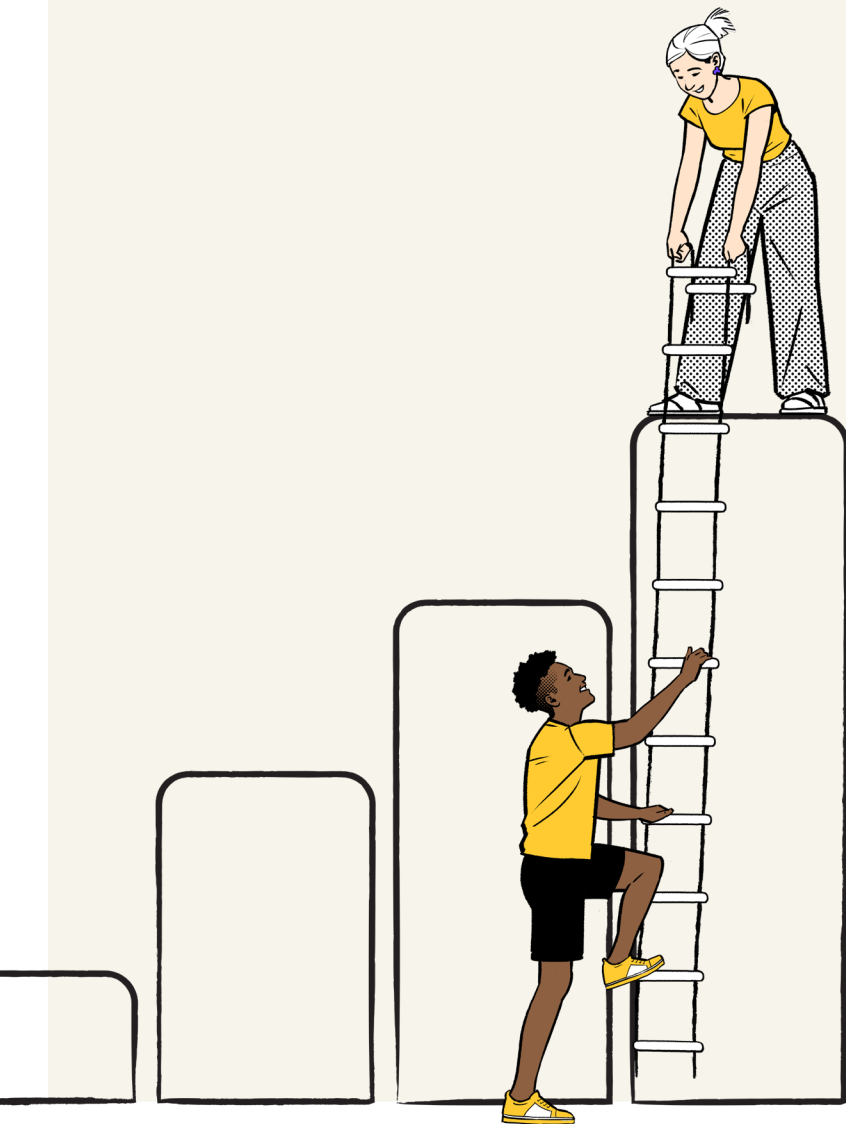




Code of Conduct

Acting with Integrity and Respect for each other, our business partners, customers, stakeholders and the law.



February 2025

A key message from Vincenza Sera and Andrew Moor

As representatives of Canada's Challenger Bank™, the work we do is vitally important to society. Our license to provide Banking services to Canadians put Equitable Bank in a coveted position. Accordingly, our legal license to operate under the Bank Act comes with tremendous responsibility granted only to institutions that meet and abide by strict prudential, regulatory and legislative criteria.

Arguably, however, it is our social license that is the most valuable as it is based on public trust. Trust that takes years to earn and, as even the largest of banks can attest, can be destroyed overnight with unethical behaviour.

Knowing this to be true, we must always hold ourselves and one another accountable for living our Values every day and acting with the utmost integrity in all our interactions.

About Our Code

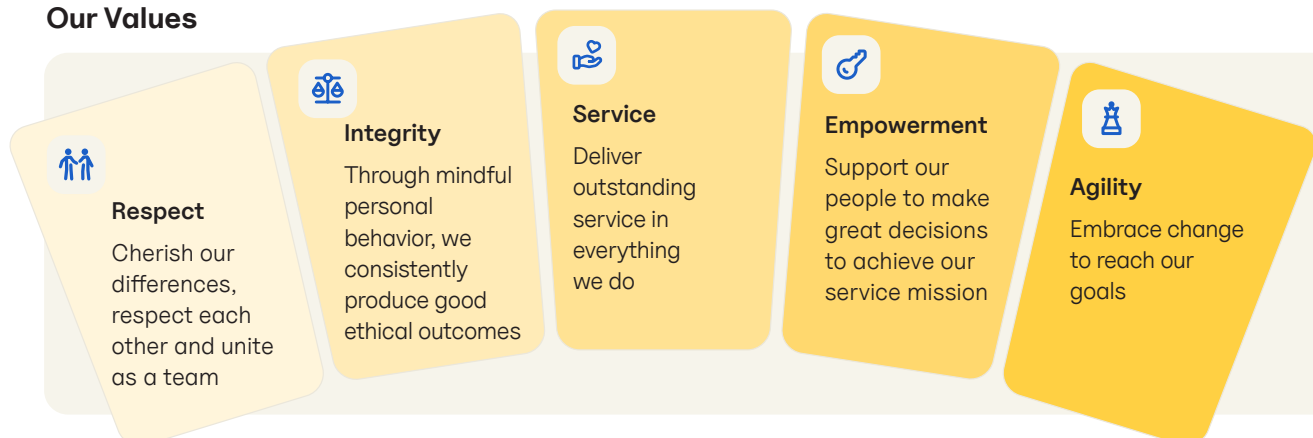
Our Code of Conduct (the "Code") exists to support our Values and reflects Equitable Bank's longstanding commitment to behaving ethically and with integrity. More than this, it provides guidance for how to act in a complex world of competing interests and promotes clear expectations that each one of us must meet in making decisions of how to conduct our business and ourselves.

Recognizing that our world is not static, our Code is reviewed by our Board of Directors and updated whenever necessary to address emerging issues. This year, you will see new guidance in several areas including anti-competition, protecting customers, protecting the Bank and our speak up culture.

Understanding our Code is the first step in embracing it. If you are uncertain about any aspect, we invite you to chat about it with someone you trust. Your manager, HR or Compliance are here to support you.

Each day, we make critical decisions in our quest to drive change in Canadian banking to enrich people's lives. Let's be absolutely sure that we are always personally mindful about following the laws and our policies and doing the right thing even, and perhaps especially, when no one is watching.

Our Values



Sincerely,

Vincenza Sera
Chair of the Board

Andrew Moor
President & Chief Executive Officer

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Our Values

At Equitable Bank and its subsidiaries (hereinafter referred to collectively, the “Bank”), our Values define who we are and guide everything we do. They reflect our commitment to our people, customers, partners, shareholders and the public. We strive to embody our Values in our culture and interactions, conducting ourselves with integrity, honesty, fairness and professionalism. We treat everyone with respect, fostering a positive, diverse, and inclusive environment that builds trust and strengthens our reputation. Our Values shape our decisions and actions, driving us forward as Canada’s Challenger Bank™. They remain constant across all situations, guiding how we operate as individuals and as a team. This philosophy underpins “the way we do things” and is essential to our success. The Bank’s reputation is built and protected on these Values, which inspire our actions and decisions, and provide a benchmark for all of us.



Respect

Cherish our differences, respect each other and unite as a team by celebrating success, focusing on each other’s well-being and ensuring a diverse and inclusive workplace for all.



Integrity

Through mindful personal behavior, we consistently produce good ethical outcomes by aspiring to be ethical and honest, and having the courage to speak up and ask questions—even when it is hard.



Service

Deliver outstanding service in everything we do, such as showing empathy and listening, keeping commitments with appropriate follow-through and doing all that is possible within bounds.



Empowerment

Support our people to make great decisions to achieve our service mission confidently and ask for clarity whenever there is uncertainty.



Agility

Embrace change to reach our goals by quickly adapting to the changing environment, challenging the status quo and using sound judgment to push forward.

Refer to Our Values-Based Behaviours which outline clear behavioural expectations for all employees, by level, to ensure that we are living out these core Values.



Our Role in Supporting the Code

The Code is a reflection of our Values and principles. As employees and directors of the Bank, we represent the Bank both in and out of work. Complying with the Code is mandatory and serves as a central guide to connect our corporate values to a common understanding of what practices are acceptable and which are not, as we are all responsible for “doing the right thing”. Living our Values fosters a positive working environment and is the key to our continued success.

The Code applies to all Bank employees, contract workers and the Bank’s Board of Directors.

We all have a role to play in ensuring that the Code and our Values are promoted throughout the Bank. From our Board of Directors, who review and approve the Code, to our Chief Executive Officer (CEO) who ensures the Code is duly implemented and monitored, to our Chief Human Resources Officer who promotes awareness, adherence and compliance with the Code. Upholding the Code in our daily work and interactions is a primary means by which we foster the desired culture at the Bank.

We are all expected to:

- Understand our responsibilities under the Code and its supporting policies and comply at all times;
- Complete any required training on the Code and its supporting policies;
- Confirm annually on our understanding of and compliance with the Code;
- Ask for guidance or clarification when necessary; and
- Report suspected or actual breaches of the Code and/or its supporting policies.



People managers have an enhanced role by leading by example and should:

- Promote their teams’ awareness, understanding of, and accountability to the Bank’s Values, the Code and our policies to ensure ongoing compliance and the fostering of our desired culture;
- Model and reinforce our Values through words, actions and decisions both in and out of work;
- Ensure all employees that report to you understand and comply with the Code;
- Foster an environment that encourages open communication, ethical behavior and the ability to escalate and seek clarification when required; and
- Promptly escalate concerns and reports of possible or actual misconduct as required.

Compliance with the Code, including its supporting policies, is mandatory. Any violations will be taken seriously and may result in corrective or disciplinary action.

Compliance with Laws and Regulations

The Bank is subject to laws, rules, regulations and prescribed practices. It is our responsibilities to know, understand, and follow requirements that apply to our individual activities at the Bank. Failing to comply may expose the Bank and ourselves to civil, criminal and regulatory penalties, and can potentially harm the Bank's reputation and lead to adverse client outcomes. Our enterprise and departmental policies and procedures outline expectations and guidance on how we need to comply. Business Unit Compliance Officers and Compliance staff are always available to help ensure we understand these requirements. All employees are expected to report any actual or potential compliance issues to the Business Unit Compliance Officers or the Compliance team.

Anti-Money Laundering, Anti-Terrorist Financing and Sanctions Evasions

Equitable is committed to supporting global efforts to detect and deter money laundering, terrorist financing and sanctions evasions through our commitment to operate with integrity. Our business must be conducted in full compliance with all laws and regulations relating to anti-money laundering, anti-terrorist financing and sanctions evasion activities and follow both the letter and spirit of the law. Employees must remain vigilant and exercise good judgement if they have any concerns relating to money laundering, terrorist financing or sanctions evasion. Concerns should be reported as soon as practicable to their manager or in accordance with our **Anti-Money Laundering and Anti-Terrorist Financing Policy** and related procedures. The Bank's Chief Anti-Money Laundering Officer should be consulted for any questions or concerns. Failure to detect and deter these financial crimes may expose the Bank to the risk of legal sanctions, financial penalties and reputational damage.

Anti-Competition

The Bank competes vigorously in the marketplace and must do so ethically and legally. We all have a responsibility to understand and comply with competition and anti-trust laws. We do not collude or make arrangements with other competitors or third parties to do any of the following that would impede free and fair competition:

- Fix the price of products or services
- Restrict the supply of products and services
- Divide or allocate customers or markets

Make agreements with other bidders on how to respond to a tender (bid rigging). Other examples of anti-competitive activities:

- Tied-selling imposing undue pressure on or coercing customers to purchase any of our products or services as a condition of approving their request for another product or service
- Sharing non-public information about the Bank with competitors
- Misleading and inaccurate communications and advertisements comparing the Banks's products and services with those of our competitors

Regulatory Inquiries & Audits

We are required to fully cooperate during all audits, investigations, or other lawful requests made by the Bank's internal departments, internal and external auditors, regulators, or government agencies. We must not in any way obstruct, hinder or delay any such audit or investigation. All information provided should be truthful and accurate, and documents or records should never be concealed, altered or destroyed.

Always consult your manager or the Legal Department before responding to any requests for audits, investigations or other information.

Managing Conflicts of Interest

Integrity means acting honestly, in accordance with our Core Values, and in the best interests of the Bank and its clients, guided by our Values, while performing our duties. Our personal interests cannot interfere, or appear to interfere, with the interests of the Bank. Decisions we make at work should not include consideration of our own interests. Conflicts can arise where a personal interest compromises or affects a decision at work but could also arise between the Bank and its third parties. Conflicts could involve other businesses, family and social obligations or connections and could involve current or prospective employees, directors, customers, service providers, government officials, business partners or regulators.

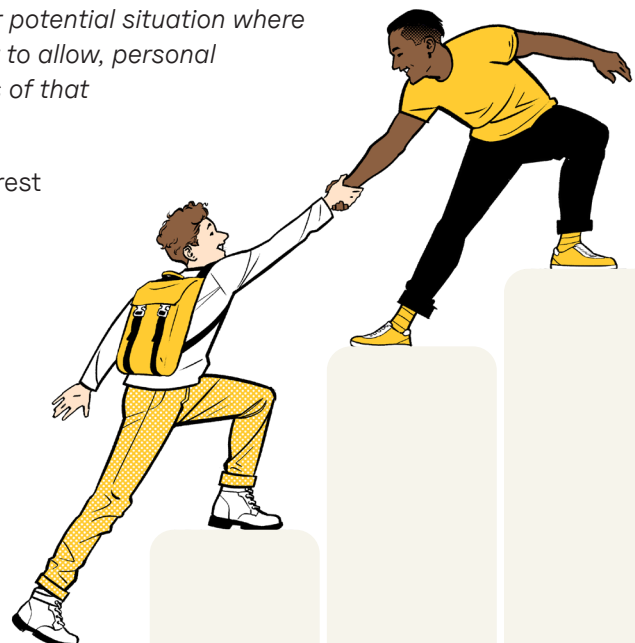
We have an ongoing responsibility to identify, disclosure, manage, and if necessary, eliminate conflicts of interest. Any actual, perceived or potential conflict of interest is to be declared to our business unit head (or, in the case of a director, to the Chair of the Board of Directors) as set out in the Bank's **Conflict of Interest Policy**. When in doubt about whether a conflict of interest exists, speak with your business unit head or contact Compliance.

A conflict of interest includes any actual, perceived or potential situation where the duties or position of an individual allow, or appear to allow, personal benefits or benefits to friends, relatives or businesses of that individual.

Types of situations that could cause a conflict of interest include, but are not limited to:

Outside Business Activities

Our participation in activities or roles outside of work must not interfere or conflict with our job performance at the Bank and cannot be undertaken at a competitor of the Bank. These activities need to be disclosed to the Bank and properly assessed for potential, perceived or actual conflicts of interest.



Examples of Outside Business Activities may include:

- Managing a personal business
- Working part-time at another company
- Volunteer work
- Any involvement in the real estate sector

Payment for services must not be accepted from any customer, business partner, service provider or competitor of the Bank and/or any directors without receiving prior approval from your business unit head.

Please refer to the Bank's Conflict of Interest Policy for further details.

Managing External Directorships

The Bank encourages participation in communities. For example, we may take on directorships or similar leadership roles at companies, organizations, clubs, associations or foundations. If so, the role must not compromise our ability to do our best work for the Bank and its customers. We must be careful to avoid actual, potential or perceived conflicts of interest and potential reputational issues. Roles and relationships must be assessed to ensure we comply with the Code and Bank policies on disclosure and approval. Generally, it is not acceptable to act as an officer or director of a customer's business.

We must obtain prior approval from the CEO for directorships or other involvements with publicly traded, private for-profit, not-for-profit, or venture capital entities/organizations. Prior approval is not required to serve on the board of private family businesses that have no relation to the Bank and its business.

Family Members and Close Personal Relationships

It is possible for our personal relationships to have an effect on our work at the Bank. We must understand the actual or perceived effects that personal relationships can have in order to avoid situations that would reflect negatively on the Bank. This can occur in a number of situations:

- a direct supervisory relationship with a family member or close friend;
- a working relationship where we may have the ability to favourably impact compensation, work conditions or promotion prospects of a close friend or family member, including selecting or approving a service provider or vendor to the Bank;
- two employees become romantically involved;
- family and friends who are clients of Equitable Bank. We must make sure personal, family and friend dealings with the Bank are handled at an arm's length.

In circumstances where family members or close friends are, or become, involved in any business activity related to the Bank, we must disclose the nature of our relationship to the Chief Human Resources Officer so appropriate actions can be taken. Our **Employee Handbook** provides additional guidance.

Gifts and Entertainment

We must consider the motive behind any gift or entertainment to ensure it is within the spirit of business courtesy and relationship management, particularly within the credit-granting functions. In addition, we must be comfortable that the gift or entertainment does not create a sense of obligation (or perception of same), influence a business decision, or could be perceived to be extravagant or excessive. We may not accept, offer or give, directly or indirectly for ourselves or for anyone else, gifts or entertainment that are not reasonable and appropriate within the circumstances. We must also never solicit gifts at any time.

The **Employee Handbook** provides additional guidance, including an obligation to report Gifts and Entertainment. If there is any doubt about whether a gift is reasonable and appropriate, we should seek guidance from Management or Compliance.

Protecting Equitable Bank Customers

Customer Information and Assets



Customers entrust us with the privacy of their personal information and it is our duty to protect the privacy and security of all personal information obtained while conducting our business. We limit the collection, use and disclosure of such information in accordance with applicable laws. We must ensure that all personal information under our control, regardless of format, is protected against theft, loss, unauthorized access, use or disclosure.

In the event of a potential or actual privacy breach, we must report them to Compliance.

We must also safeguard customer assets and only use them in accordance with customers' directions, the Bank's policies and regulations.

Sales Practices

We are committed to helping our customers meet their financial goals. We must never mislead clients or potential clients about a product or service, including omitting certain information. To ensure that our sales practices are fair, not misleading and reflect this commitment, we:

- are knowledgeable about our products and services that we recommend
- recommend appropriate products and services based on understanding individual customer needs
- clearly and accurately explain in plain language, terms and conditions including appropriate disclosures of products and services
- do not pressure or coerce our clients for any reasons
- obtain proper and informed consent from customers in line with laws, regulations and the Bank's policies
- ensure that all sales representations, marketing and advertising information is full, fair and transparent



Protecting the Bank

Proprietary Information and Assets

As employees of the Bank we have access to Bank information about our clients and the Bank that are not available to the public. We have a duty to safeguard this information and use it only for intended business purposes. Fraud, misappropriation of property and other forms of misuse will not be tolerated and have the potential to risk the integrity and security of the Bank's operations.

We must ensure the proper use and protection of the Bank's proprietary information. Bank information, whether believed to be material or not, is confidential and we must treat it as such unless it is publicly disclosed. This information is critical to our business and could be useful to our competitors or otherwise harmful to the Bank if disclosed. The Bank's proprietary information should only be disclosed internally for legitimate business purposes, and should not be disclosed externally without prior approval, unless required by law.

Some examples of proprietary information are:

- the Bank's client lists
- financial documents
- legal documents
- business processes
- corporate strategies

Bank assets and equipment like laptops, phones, file storage and other software should only be used for legitimate business purposes. Following these guidelines protect the Bank against fraud, loss, damage, theft, vandalism, sabotage, and unauthorized access, use or disclosure. When using Bank devices to conduct work we should communicate only through approved electronic messaging channels and should maintain a professional tone.

Examples of Bank assets include:

- Bank intellectual property
- corporate records
- information systems
- mobile devices

When we work off-site, we must ensure that all assets used for Bank purposes are kept safe at all times. Bank assets must be returned to the Bank upon termination of employment.

Further information on the handling of material and confidential information is contained in the **Bank's Disclosure Control Policy**. The destruction of any Bank information must be handled according to the **Bank's Records Management Policy**.

Always take precautions against accidentally disclosing confidential information - mark it appropriately, never discuss in public places, and protect your laptops, computers, iPads, iPhones and other mobile devices.

Physical Security

We all have a role to play in maintaining the security of our premises. The Bank's premises hold valuable information and assets and any risk to those could affect the integrity and security the Bank. The Bank has physical security protocols that we must comply with to ensure the safety and security of the Bank's premises, assets, and individuals. We must always use our assigned access cards, limit leaving paper records, policies, or other sensitive information in easily accessible places, comply with facility-specific access restrictions, and immediately report any lost or stolen access credentials. Failure to comply with the protocols may result in physical security breaches.

Examples of physical security breaches include:

- accessing restricted areas without proper authorization
- allowing unauthorized individuals into secured zones
- disabling or tampering with surveillance systems,
- mishandling or failing to secure sensitive physical records or equipment

We are all responsible for reporting any suspicious activity or security concerns to the designated physical security team or through the Bank's incident reporting channels. Adherence to physical security requirements are monitored, violations may result in disciplinary action.

Use of Information Systems

We must comply with the Code and any Bank policies governing the use of the Bank's equipment, systems, computer networks, applications, software, computers and portable devices, as well as the messages communicated within them. Where we are permitted to use our personal equipment for Bank work, we must follow the policies associated with that use. We should exercise caution when using email, as statements could be misunderstood or potentially used against us or the Bank in legal proceedings. The Bank's internet connection or devices should never be used to access, transmit or download content that is inappropriate, or used to create harassing, defamatory, offensive or obscene content.

The Bank reserves the right to monitor telephone and email conversations, all computer records, internet use and personal file directories to ensure compliance with the Code, compliance with supporting policies and procedures, and in certain circumstances to address suspected non-compliance and/or employee performance. Access to social media platforms should only be used for legitimate business purposes. We are expected to use the Bank's information systems in accordance with the Bank's **IT Security Handbook Standard**.

Always remember email and internet activity is monitored.

Accuracy of Bank Records

We must exercise the same ethical standards of integrity and honesty in recording our business as we do in conducting it. Proper use and protection of the Bank's information includes our duty to maintain accurate, timely and complete records. Individuals involved in the preparation of the Bank's accounting, financial reports and records must accurately reflect the Bank's business activities in accordance with our policies, procedures and regulatory requirements. We must never conceal, alter or falsify any document or record.

Professional Conduct and Personal Integrity

We must act in a professional manner and with personal integrity in all our dealings with colleagues, business partners, customers, stakeholders and the public. We must live our Values in all our interactions.

Electronic Communications/Social Media

Electronic communications and social media, whether it is business-related or personal, is subject to the guiding principles of the Code. Social media refers to network websites and mobile apps that allow users to create, share and exchange content. Digital communications refers to any other online platforms such as email, online discussion forums, website/ blogs, phone calls and text messages. We must ensure that we do not communicate or post anything that is confidential, proprietary, or could be harmful to the Bank or client's interests or reputation.

Personal use of external or internal digital communications and social media should be done responsibly as we could be considered to represent the Bank both in and out of work. As with other communications, it is important that our business and corporate social media use is appropriate and consistent with the Bank's communication guidelines and strategy. As employees of the Bank, we are indirect representatives of the brand, particularly where we denote our position with the brand on personal social media pages. We must be aware that any information posted online may be accessed, read or disseminated, and there can be no reasonable expectation of privacy with respect to any information posted online. We need to consider the potential impact our posts may have on the Bank's reputation, in addition to our own reputation, and be guided by our Values and the standards set out in the Code.

Some guidance when using social media and electronic communications include the following:

Do:

- use appropriate and professional language
- consider the appropriateness of using your work e-mail address as a point of contact for personal contacts
- be alert to fraudulent activities and social engineering which look to manipulate employees into divulging confidential personal or business information or granting access to secure systems

Do Not:

- post material obtained from or associated with the Bank that is or could be damaging to the interests or reputation of the Bank;
- use Bank logos, trademarks, or other proprietary materials without prior approval;
- promote specific Bank products and services as these may require certain mandatory disclosures when targeted at the public;
- include confidential information relating to customers, employees or the Bank which includes posting to any public or external site



One of the ways the Bank communicates is through media/ press. Media refers to any news outlets, television networks, magazines, newspapers, broadcast outlets, radio, podcasts, and online news sites. As a result, employees may encounter being contacted independently by media personnel for media enquiries related to the Bank. Only authorized employees who have been designated as spokespeople for the Bank may respond to media inquiries or post content on behalf of the Bank. All other employees must refrain from commenting on the Bank, its business activities or competitors in any online public forum. If contacted to comment on the Bank in any way by means of a media request or through social media or any electronic communications, please reach out to the General Counsel or Public Relations and Communications department for guidance and support.

The Bank recognizes that employees may use a wide range of messaging technologies to directly solicit, advertise, market and promote its commercial activities to brokers and new prospects. Such messaging must adhere to prescribed consent, content and unsubscribe requirements when sending commercial electronic messages, installing computer programs or altering/re-routing data or messages. Employees must not use personal e-mail accounts for business purposes. For more information, please refer to the **Electronic Messaging Corporate Policy**.

Always remember content posted online is public and permanent.

Insider Trading

In the course of our duties, we may become aware of sensitive confidential information that others may consider important in deciding to buy or sell the securities of EQB Inc. (“EQB”). We do not trade in shares of EQB, or any other company, while in possession of undisclosed material information or during a blackout period (as applicable), and we do not “tip” others. Please consult the **Insider Trading Policy** and related Procedures for further information on the Bank’s practices regarding the trading of securities.

Tipping occurs when you, outside of the necessary course of business, tell another person (including your family members and friends) about material Bank information that has not been disclosed to the public. Tipping is prohibited by securities law.

Short Selling

All employees and directors are prohibited from:

- short selling (selling a security that you do not own) EQB securities;
- entering into any contract that creates a short sale of an EQB security; and

Criminal Records

If you are charged with, and/or found guilty of a criminal offence, you must inform Human Resources immediately. There may be employment consequences if you are charged or found guilty of an offence, including termination of employment.

*The **Employee Handbook** and our HR policies speak to ethical business conduct. You must familiarize yourself with these and act accordingly.*

Fraud

We are prohibited from engaging in any form of fraud or corruption, including activities that deceive, manipulate, or exploit the Bank, its customers, or stakeholders for personal or financial gain. It is the responsibility of all employees and contractors to act with integrity and to promptly report any suspected instances of fraud or corruption through the Bank’s designated reporting channels. Examples of fraud include but not limited to: accessing customer accounts without proper authorization for personal gain, falsifying financial records, misappropriating funds or assets.

For more information, refer to the **Enterprise Fraud Risk Management Policy**.



Corruption

The Bank has an obligation to conduct business in a fair and ethical manner and adhere to the anti corruption legislation in Canada, such as the Corruption of Foreign Public Officials Act. We prohibit (indirectly or directly) the offering, accepting, or soliciting of bribes, kickbacks, or promising of/to, or other forms of improper inducements to or from customers, suppliers, service providers or public officials that would compromise the integrity of business decisions.

Alcohol and Drug Use

While at work, we are required to be fit at all times to perform our assigned duties. We must not be impaired by the use of alcohol, cannabis or prohibited substances. Employees and directors must ensure that they are not in possession of illegal drugs or under the influence of drugs (both legal and illegal) while on our premises, conducting business, or attending corporate events which would impair one's ability to perform assigned duties.

Violence & Harassment in the Workplace

The Bank is committed to protecting employees, customers and others from violence and harassment, and to providing a safe work environment in which all individuals are treated with respect and dignity. We are committed to promoting a transparent culture that does not tolerate violence and harassment and encourages reporting of any incident or concern in good faith without fear of retaliation or reprisal. The Bank will ensure that all incidents, complaints or concerns of violence and harassment are investigated within a timely and fair manner, respecting the privacy of all concerned as set out in the **Violence & Harassment in the Workplace Policy**. Please contact Human Resources for questions or concerns.

Fair Treatment

We are committed to conducting all our affairs with fairness and equity. Treatment of employees and directors, as well as other stakeholders such as customers, business partners or service providers, should always be honest, fair and respectful regardless of race, religion, colour, country of or ethnic origin, language, marital or family status, disability (includes mental and physical), gender identity, sexual orientation or age. We will not tolerate any behaviour that could be viewed as discriminatory.

We treat our co-workers, customers and others with respect and dignity at all times.



Code Compliance

We demonstrate our commitment to the Code by agreeing to comply with its guiding principles and our Values at the commencement of our employment. Annually, we will be asked to acknowledge our commitment and attest to our compliance with the Code. Our annual acknowledgement confirms that we have read, understood, and complied with the Code and its supporting policies and procedures. We will also be expected to ask questions when unclear about our responsibilities or unsure about the right thing to do, cooperate fully with internal investigations, if necessary, and report any actual or potential breach of the Code immediately.

Always feel free to speak to your manager or Human Resources if you have any questions.

Speak Up Culture

There will be no retaliation for asking questions, speaking up, or making a report about misconduct in good faith. Equitable is committed to non-retaliation and the preservation of a culture where we are encouraged to do the right thing. When we are unsure or witness something that doesn't align with our Values and the Code or Bank's policies, we are empowered to ask questions and raise concerns through one of many available channels without fear of retaliation. We all have a duty to report actual, suspected or potential breaches of this Code or any other Bank policies. We can confidentially and, if desired, anonymously report an actual or potential breach to the Chief Human Resources Officer or Chair of the Audit Committee. Alternatively, both the Ethics Hotline and online reporting tool are anonymous, administered by an external service provider and available seven days a week, 24 hours a day. They can be contacted as follows:

Issue ¹	Contact Information	Policy
Privacy breaches	Privacy Office (privacyoffice@eqbank.ca)	Privacy Policy
AML	AML Department (amlcompliance@eqbank.ca)	AML Policy
Whistleblower concern (also including Unauthorised access or misuse of Bank assets, Fraud, Misrepresentation of Financial Statements)	1-855-382-TALK (1-855-382-8255) OR Online report: https://app.mycompliance.com/report?cid=tet	Whistleblower Policy
Harassment/discrimination	Human Resources (HR@eqbank.ca)	Violence and Harassment in the workplace
Breaches of the Code	Chief Human Resources Officer (chro@eqbank.ca) Chair of the Audit Committee (auditchair@eqbank.ca)	Code of Conduct and Employee Handbook
Complaints related to Equitable Bank products or services	Refer to https://www.equitablebank.ca/resolving-customer-complaints	Complaint Handling Policy & Procedure
Insider Trading	Legal Department (trades@eqbank.ca)	Insider Trading Policy
Conflict of interest	V.P. and General Counsel	Conflict of Interest Policy
Media Inquiries	Public Relations and Communications (press@eqb.com)	Disclosure Control Policy

¹The Bank will not tolerate any form of retaliation against anyone who reports a concern, in good faith, relating to illegal or unethical conduct or a breach of any policy

Investigations

Investigations will be handled in a confidential, respectful and lawful manner. All potential breaches of the Code or Bank's policies will be treated seriously and appropriate disciplinary action will be taken, if necessary. In the event of breaches, action may include, but is not limited to, written warnings, demotion or re-assignment of employee, suspension with or without pay, or termination of employment.