

Foresters guide to making
business decisions

Updated 2011

Code of ethics

Through all that we do, we inspire others to follow our leadership.

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Why ethics are important at Foresters

Everyone associated with Foresters is expected to do the right thing, in the right way, for our members.

Everyone associated with Foresters is expected to know the Code and comply with it at all times.

Establishing a standard for ethical behavior is not only good business, it is critical for Foresters™. We must live and operate by the highest standards of conduct and service at all times to justify the confidence our members and others place in us.

Our ethical principles guide us in all that we do. These simple – yet powerful – principles should be front and center.

Foresters ethical principles

- Conduct ourselves with the highest standards of professionalism, honesty, fairness and respect – for others as well as for Foresters assets and resources.
- In matters related to our duties at Foresters, ensure we serve the best interests of our members.
- Avoid situations that place us in a conflict with our obligations to Foresters and our members.

Foresters Code of Ethics plays an important role in clarifying appropriate conduct and, along with Foresters Compliance Management Program and key competencies, is part of an overall program intended to encourage, inspire and reward proper conduct and to prevent misconduct.

Application

Foresters Compliance Management Program and this Code of Ethics applies to all directors, officers, employees, representatives, contract employees, independent contractors, and suppliers of Foresters, its subsidiaries and affiliates worldwide, except First Investors Consolidated Corporation and its subsidiaries. The First Investors family of companies is governed by the First Investors Code of Ethics at this time.

The Code of Ethics sets out broad parameters of conduct; however, more specific information can be found within corporate or local policies, guides and training materials, as well as contractual arrangements and professional standards. A list of some of the corporate policies that support the Code is found at the end of this document.

Where to go for help

Foresters does not permit retaliation of any kind for good faith reports of misconduct or unethical behavior.

When neither the Code of Ethics, nor supporting sources of information, directly addresses a situation, it is our responsibility to seek additional clarification and guidance. Since it is impossible to anticipate every situation that will arise, it is important that we have a way to approach questions or concerns. The best place for an employee to begin, is to address questions to his or her manager or executive. Anyone can also direct questions or issues to a member of Foresters Human Resources, Law, or Internal Audit departments, or contact Foresters Chief Compliance Officer or Divisional Compliance Officer.

In addition to seeking clarification to guide us in our own conduct, each of us has a responsibility to report potential or suspected unethical behavior or business practices, possible conflicts of interest, or illegal activity that involves others. Employees should raise these types of issues with their manager or executive first or make use of any of the options described on the following page, which are available to everyone covered by the Code of Ethics. In addition to the internal reporting mechanisms, for more serious concerns of suspected unethical or fraudulent activity, or in cases where employees or others making a report wish

to remain anonymous, Foresters offers an outside, independent service provider option.

If someone believes that he or she has been instructed to act in a manner that may be contrary to this Code but fails to report the matter within a reasonable period of time, this will be viewed as acceptance of the activity and is a breach of this Code.

Anyone, who in good faith reports suspected misconduct or other potential breaches under the Code of Ethics, is protected from all forms of reprisal or retaliatory action. All allegations will be appropriately and sensitively investigated, as determined by Foresters.

Foresters may discipline and/or terminate its relationship with any director, officer, employee, representative, contract employee, independent contractor, or supplier who violates this Code or its supporting policies and guidelines. If violating the Code also violates the law, prosecution may also result.

Where to go for help (continued)

To discuss questions or concerns or to report suspected violations, choose among several internal reporting options:

Raise the matter with a Foresters manager or executive; or

A Human Resources representative at Foresters House, Toronto

- 416 429 3000, extension 4247, and ask for a Human Resources Consultant or Manager, or
- Toll free at 1 800 461 8431, or
- Electronic mail at humanresources@foresters.com; or

A member of the Law, Compliance, or Internal Audit departments within Foresters House, Toronto 416 429 3000, and ask for a representative of any of the above-named departments; or

A member of the Board of Directors or a Chairman/Chairwoman of a specific Board Committee (for example, the Chairman of the Compensation, Ethics and Governance Committee or the Chairman of the Audit Risk and Investment Committee)

- 416 467 2579, ask for the General Counsel & Executive Secretary and Chief Compliance Officer

For more serious issues of suspected unethical or fraudulent activity, or when anonymity is preferred, choose our outside, independent reporting service:

Unethical activity includes conflicts of interest, misrepresentation, money laundering, bribery, privacy concerns, and other misconduct.

Fraudulent activity includes theft, forgery, embezzlement, identity theft, misuse of Foresters assets, and falsification of financial and other records or reports.

Groups or individuals reporting concerns are encouraged to identify themselves in order to help any investigation. However, this reporting option also allows anonymous reporting for significant or sensitive matters.

Contact Global Compliance Services:

- Toll free in North America at 1 877 201 9201
- Toll free in the U.K. at 0800 89 0011 or 0 500 89 0011

Then a recorded message will prompt you to dial the rest of the number 877 201 9201

- Electronically at <https://www.compliance-helpline.com/foresters.jsp>, or
- Write to:
Foresters c/o AlertLine Anonymous
13950 Ballantyne Corporate Place,
Suite 300
Charlotte, NC 28277

Ethics in the workplace

Foresters is committed to ensuring a healthy and productive work environment where the dignity and worth of employees and all individuals with whom we engage is respected.

Foresters is committed to hiring, training and other employment practices and programs that are designed to encourage employees to attain the highest levels of performance. All employment decisions are based strictly on ability, performance and qualifications. Foresters is an equal opportunity employer and, as such, does not discriminate against anyone on the basis of race, color, gender, disability, ethnic or national origin, age, religion or creed, sexual orientation, marital or family status, civil status, pregnancy or other grounds covered by human rights legislation or local regulations.

Treat others with respect

At Foresters, treating others – customers, suppliers, co-workers, volunteers, and all those with whom we engage – with respect is an important principle. Foresters does not tolerate any form of workplace violence or harassment and will take reasonable steps to both prevent and deal proactively and effectively with any form of workplace violence or harassment when it occurs.

Workplace harassment involves engaging in a course of vexatious comment or conduct in the workplace that is known or should reasonably be known to be unwelcome or offensive – whether written or oral, - unwelcome or offensive conduct, comment, gestures, or contact based on or related to race, color, sex, disability, ethnic or national origin, age, religion or creed, sexual orientation, marital or family status, civil status, pregnancy or other grounds covered by human rights legislation or local regulations.

Sexual harassment is a particular form of workplace harassment that involves unwelcome sexually-oriented behavior based on gender or sexual orientation and is also expressly prohibited.

Workplace violence involves attempting or exercising physical force against a worker in the workplace that causes or could cause them physical injury. It also includes making statements or demonstrating behaviors that could be reasonably interpreted as a threat to exercise physical force against them that could cause them physical injury.

For more information on what constitutes workplace harassment, sexual harassment or workplace violence or on steps to take if you or someone you know has been the victim of harassment, please refer to our Respect in the Workplace Policy, Workplace Violence and Harassment Awareness Program or contact a Human Resources representative.

Behave professionally – align yourself with Foresters purpose and key competencies

As we go about our day-to-day work, it's important that we not lose sight of why Foresters exists and why it's important that we continue to succeed and grow. The reasons are clearly set out in our purpose statement.

Ethics in the workplace (continued)

Foresters purpose

Foresters exists solely to enrich the lives of its members, their families and the communities where they live. Honoring our rich tradition of caring, we champion the well being of families through quality life insurance, unique member benefits and inspiring community activities.

There are three ways in which we bring our purpose to life:

We deliver on our promise to help our members with their need for financial security by providing quality protection, savings and investment products.

We offer unique member benefits that help our members and their families get more out of life.

We provide opportunities for community involvement through meaningful Foresters-sponsored events and family activities.

Through our key competencies we measure our success not only by our results but on how we achieve them. Our commitment to integrity means:

- We are honest, open and trustworthy.
- We treat others with courtesy and respect, even in difficult or emotional situations.
- We accept only the highest of ethical standards.
- We pay attention to how things get done, not just to the end results.
- We are open-minded and value the opinions, styles and backgrounds of others.

Professionalism at Foresters is synonymous with Foresters purpose and our key competencies.

Foresters key competencies

Focus on Performance

- Passion
- Results Orientation
- Decisiveness

Commitment to Accountability

- Integrity
- Personal Accountability
- Sharing Knowledge

Dedication to Service

- Customer Focus
- Innovation
- Collaboration

Ethics in business relationships

Never discuss proprietary information with a supplier or give unfair advantage to a particular supplier.

Foresters relies on outside suppliers for many types of goods and services – from complex technology providers to cafeteria services, office supplies and other business needs. It is essential that our business relationships with suppliers are developed and maintained with absolute integrity, respect and with the highest professional expectations of each other.

Choose suppliers fairly

When representing Foresters, we all must regularly demonstrate professionalism by choosing suppliers fairly. The expenditure of Foresters funds must be properly approved prior to purchase, and all such expenses must be justifiable business expenses. In the case of major procurements, proper risk assessment must be completed and approved prior to the commitment of funds or commencement of service or product delivery.

Each of us has a duty to provide value for money expended. This means that we choose suppliers – through fair competition – on the basis of merit, competitiveness, price, reliability and reputation.

Share information sensitively

We need to develop strong and lasting relationships with our suppliers. We want to make it as convenient as possible for suppliers to do business with us – in a way that is consistent with our organizational plans, objectives and standards. We must at all times be aware of the effects of our actions on our suppliers and keep them as well informed as we can about our plans and intentions that may affect them.

In keeping suppliers informed, we want to avoid “loose talk” – spreading rumors or speculation or providing incomplete information that could mislead. We all must take care not to make promises Foresters cannot keep or take unfair advantage of others. This would specifically include avoiding actions that would be considered manipulative, concealing or abusing information, misrepresentation of material facts or other unfair dealing practices.

We must also take care not to discuss Foresters business, particularly plans involving major purchases, in public places or where we could be overheard by visiting suppliers or with family, friends or members who happen to be associated with supplier or prospective supplier organizations.

For additional information on this subject, please refer to Foresters Procurement Policies and Procedures.

Ethics in community relationships

Through all that we do, through our members and employees who volunteer, we are inspiring others to follow our leadership.

Foresters is truly a unique organization. For more than 135 years Foresters has been guided by a very powerful principle: the growth and prosperity of our members and their families is linked to the communities in which they live. We measure our success not only by Foresters financial strength, but also by the positive impact we have on our members, their families and communities.

Treat others honestly and fairly

Building lasting relationships with community partners is an important part of who we are and what makes us different in the marketplace. Just as we need to earn the trust and confidence of our members and suppliers, we need to do so with community partners. We must treat all community partners with high standards of honesty, fairness and courtesy and continually seek and share feedback so we can improve on the impact we jointly make to meet our – and our partners’ – community investment objectives.

Take care in representing Foresters in the community

All of the guidelines that apply in the workplace and with business partners who supply Foresters with goods and services have similar application to our community stakeholders. Simply put, we need to act

with absolute integrity, respect and with the highest professional expectations of each other.

Participation in volunteer activities in support of children’s causes is strongly encouraged. Foresters branch system provides numerous opportunities for employees and others to pursue such volunteer work. It is important for all of us to understand that this Code of Ethics applies to our involvement within volunteer activity associated with Foresters name. A Volunteer Code of Conduct for our branch system leaders and volunteers is available from the Membership department at Foresters House.

Care should be taken to avoid becoming involved with a volunteer association or participating in voluntary activities that could harm our own or Foresters reputation.

Conflicts of interest

Not only must an actual conflict of interest be avoided, but we must all take care not to enter into actions or situations that could give the appearance of a conflict.

We must all ensure that Foresters members' interests are our most important priority. This means that we must not further our own personal interests to the detriment of Foresters broader organizational interests or enter into activities which may be viewed as being in competition or conflict with Foresters business objectives.

Avoid personal benefits

The best way to avoid a conflict of interest between ourselves and the organization is to fully disclose – at the earliest opportunity – the potential for conflict to a person in a position of authority, such as a manager or executive of Foresters. In all situations where a friend or family member has a financial interest in a matter that may come before Foresters, each of us has a duty to disclose this immediately. In particular, full disclosure must occur before participating, voting on, or otherwise causing Foresters to enter into any contractual arrangement with a party with whom there could be potential for conflict or the appearance of conflict.

Prevent situations where there is potential for conflict

Another way to avoid a conflict of interest is to prevent being placed in a situation where there is potential for conflict in the first place. Guidelines covering a number of common situations are included here. However, these guidelines do not cover every situation we might encounter. At all times, common sense should guide us and, when in doubt, we should seek clarification and advice from a member

of the Law, Internal Audit or Human Resources departments or contact Foresters Chief Compliance Officer or Divisional Compliance Officer.

Outside interests.

Every person is free to participate in outside board, vocational or political activities on his or her own time. Foresters time or property should not be used to conduct such activities, and these outside interests should not interfere with our ability to fulfill our responsibilities to Foresters, our members and other customers, nor cause harm to Foresters reputation.

Work product.

Any work product programs, computer systems, training courses or other materials created in our roles with Foresters – remain the property of Foresters and cannot be sold or shared with others outside the organization without the express, written authorization of Foresters.

Conflicts of interest (continued)

Bribery, Gifts and favors.

Bribery is a criminal offence in most countries. Organizations and their directors, officers and employees can face serious consequences if they are found in violation of bribery laws.

Bribery generally means giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. This could include seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered as part of a tender process.

When negotiating or entering into contracts or other formal arrangements with individuals and firms for professional services or products, we must be governed solely by the merits of the arrangement to provide benefit for Foresters and our members. We must not be influenced or attempt to influence by bribes, gifts, favors, kickbacks, rebates, or other personal benefits. Similarly, we must avoid giving or promising gifts, favors or personal benefits to stakeholders with whom we require support, such as government agencies or related personnel.

Whether in the position of receiving or giving – gifts, favors, entertainment or other incentives – must be avoided altogether or be of nominal value.

Take care when forming business associations with friends and family members

A conflict can occur when we do business with persons who are, or who later become, friends or family. To prevent the possibility of a conflict or special treatment, Foresters expressly prohibits the employment of family members or those who are closely associated together – such as in the case of co-habitation, a romantic or other intimate relationship – when they are in a position to report to one another or influence any decisions regarding the hiring, promotion, performance assessment, supervision, salary review, or termination of one to the other.

This policy also applies when individuals become related or form close relationships after the reporting line was put in place.

Should we find ourselves in one of these situations, or any situation that could place us in a position of potential for conflict, it is our responsibility to fully disclose this to a manager or executive. To ensure complete objectivity, Foresters

will encourage one or the other individual to voluntarily transfer or resign from his or her role, or in the absence of such a decision, will remove one or both employees from their roles.

Caution should also be taken in entering into other types of business associations with friends and family members. Full disclosure of the nature of a personal relationship is required when contracting or making other arrangements for the purchase of goods and services – whether or not we, as individuals, are a party to the transaction.

Immediate and full disclosure of the nature of a personal relationship with another employee or supplier – regardless of when the relationship is formed – is our responsibility.

Professional standards

Act in a way that inspires the confidence and trust our members and customers place in us.

Follow the higher standard – Foresters or applicable professional guidelines

Foresters engages a wide variety of professionals in the course of conducting its business, serving members and other customers, and sponsoring or participating in community activities.

Many professionals, and others of us covered under this Code of Ethics, are compelled to abide by professional or regulatory guidelines or standards that govern our conduct. Actuarial, accounting, audit, investment, and legal staff, for example, must ensure compliance with applicable standards of professionalism, ethics and conduct. Many others of us have similar guidelines or standards that we must follow. It is important for all of us to recognize and acknowledge that, in situations where this Code and other applicable standards are inconsistent or in conflict, we must abide by the higher standard.

Investment professionals, in particular, are required to comply with an industry-accepted Investment Code of Conduct. Such individuals must review and sign an annual declaration in respect of the Investment Code of Conduct and provide this to Foresters.

Ensure ethical market conduct

Licensed insurance agents and contact center representatives must also comply with the rules and regulations required to maintain required licenses and professional qualifications, as well as applicable Foresters policies, procedures and guidelines. Specifically, these individuals

are expected to know and abide by those Foresters policies, established and modified from time to time, to ensure the best advice is provided based on customer needs. Such individuals must also have full and up to date knowledge of all of the financial products, benefits and services offered by or through Foresters, as well as Foresters supporting tools, systems and methods.

Regardless of role, all of us must act in the best interests of our members and customers and behave in a way that continually reaffirms their confidence in us. We must determine our customer's needs, make recommendations that best meet those needs, and provide service and support throughout the relationship. We must always demonstrate urgency and fairness in handling of complaints or disputes. Advertising, promotional or other materials we provide to customers and members must be clear as to purpose and honest, accurate and fair as to content. They must be as simple as possible and easy to understand, while also being factual and based on the principles of fair dealing and good faith.

Handling information

Improper disclosure of information can have very serious effects – potentially resulting in legal action against us or against Foresters or which can impair Foresters image or someone’s reputation.

In most roles within Foresters, we have access to confidential information about Foresters, our members, and other customers, staff, and about other organizations with whom Foresters does business. It is our responsibility to treat all such information carefully and guard it from disclosure to anyone without legitimate business purpose. In particular, records and files of Foresters directors or employees must only be accessed when required for legitimate business purpose and the information contained within must be maintained as confidential.

We all have a duty to protect confidential information even after we are no longer associated with Foresters and must ensure we return any files, records or confidential information in our personal possession when our relationship with Foresters comes to an end.

Protect members’ and other customers’ personal information

In the course of regular business, we collect and retain personal information about our members and other customers. Their personal information must be protected. We should only request or release personal information to individuals within Foresters when ours and others’ responsibilities require access to such confidential information to perform our jobs effectively. When releasing personal information in these circumstances, we should clearly acknowledge that the information is confidential and must be handled appropriately.

Outside Foresters, members’ and customers’ personal information must not be released unless we have their consent for the release, or assurance that it is required by law, or when there is proper and valid legal or Foresters authority to do so.

If we find ourselves in a situation where an unauthorized person or firm requests the disclosure of personal information about our members or other customers, it is our responsibility to exercise caution, tactfully decline, and seek additional guidance from a manager, executive, or from a representative of the Law, Compliance, Internal Audit or Human Resources departments.

Care should also be taken to ensure our workplaces – desks, offices, and common areas – do not provide unauthorized access to confidential information.

For more information about handling information, refer to Foresters Privacy Policy and Foresters Clean Desk Policy.

Maintain books and records with care

Foresters is required to maintain accurate and reliable records to meet its legal and financial obligations and to manage its affairs. Foresters books and records should reflect accurately all business transactions. Undisclosed or unrecorded revenue, expenses, assets or liabilities are prohibited.

Handling information (continued)

In particular, those of us who are responsible for accounting or record keeping must be diligent in enforcing proper practices. We must not alter, conceal or falsify any document or record.

All of us must comply with Foresters records retention policies. These policies describe how long documents and records must be maintained in order to operate effectively and to satisfy financial, legal and regulatory retention requirements.

These policies also provide directions for the proper destruction and disposal of records.

For more information about maintaining records, refer to Foresters Records Retention Policy and Transitory Documents Policy.

Respect copyrights and licenses

Much of the information, materials or assets we use in the course of our involvement with Foresters are protected by copyright laws or subject to licensing requirements. For example, computer software, books, trade journals and magazines fall into this category. There may also be copyrights on other items such as presentations, slides, training materials, or work product of suppliers, consultants or others. It is illegal

to reproduce, distribute or alter copyrighted material without proper authorization. We must also take care to avoid violating licensing agreements by installing or using software or other materials that are subject to such agreements.

For additional information specifically relating to software, refer to Foresters Computer Software Use Policy, or consult a member of Foresters Information Security area within our Information Technology department.

Handling money and other resources

The basic responsibility of all financial institutions under the law is to have procedures in place to prevent, detect and report suspected money laundering activities or suspected terrorists and terrorist organizations.

In financial matters, absolute integrity is required

When handling money, or instruments representing money, in the course of conducting Foresters business, we must understand that we are doing so “in trust.” All funds collected on behalf of Foresters or its members or customers must be properly receipted and expeditiously forwarded to appropriate authorities within Foresters. Under no circumstances shall anyone associated with Foresters make any personal or other use of such funds. Everyone covered under this Code of Ethics must know and respect the difference between our own personal money, members’ or customers’ funds and Foresters funds. Commingling of funds – that is, placing together business and/or member or other customer funds and/or personal funds – is expressly prohibited. All transactions involving the transfer of funds must be handled completely, accurately and in a timely manner.

In financial matters, absolute integrity is required.

Follow anti-money laundering and anti-terrorism laws and guidelines

Money laundering is a term that describes the process of transforming money resulting from criminal activity into “clean” money

whose original source is difficult to trace. Financial institutions may become targets of terrorists or criminals intending to money launder.

Anti-money laundering and anti-terrorism legislation set out guidelines, to which Foresters is subject, that require us to maintain programs, policies and practices to ensure compliance. We must all ensure that we identify and verify the true identity of customers and report suspicious activities or large cash transactions of \$10,000 or more to the Chief Compliance Officer. In particular, each of us who handles money, or is involved in the process of establishing new customer accounts, must know and comply with such programs, policies and procedures.

For additional information, refer to Foresters Anti-Money Laundering and Anti-Terrorism Compliance Procedures, or consult Foresters Chief Compliance Officer.

Use of Foresters property, equipment, systems and other business assets

Foresters assets – business machines, equipment, vehicles, buildings, business systems, telephones, computers, photocopiers, corporate credit and calling cards, electronic mail, voicemail, traditional mail systems, for example – are to be used

Handling money and other resources (continued)

only for Foresters business. This does not prevent the occasional, minimal personal use of such assets, if appropriately disclosed and approved, and if such use is not in conflict with the provisions of this Code or applicable policies.

When personal charges beyond a minimal level are incurred using Foresters assets, it is our responsibility to report and reimburse such amounts immediately to Foresters. Examples of assets and services that should not be used personally without prompt payment include: couriers, limousines, mail, long-distance telephone, office supplies, and printing services, among others.

In particular, communications systems, electronic mail systems and Internet access are to be used only for Foresters business, or minimally for personal use as described within this section of the Code. Communications systems are the property of Foresters and we cannot expect personal privacy for communications that we send, receive, or store on these systems. Particular care must be taken in the use of these types of systems to ensure compliance with this Code and applicable policies.

For more information, please refer to Foresters E-Mail and Internet Policy, Foresters Information Systems Security Policy, Third Party Network Access Agreement or seek the guidance of a member of Foresters Information Security area within our Information Technology department.

Protecting Foresters reputation

Maintaining Foresters integrity and good reputation is a responsibility we all share, and it depends directly on the decisions we make each day.

Foresters has expended significant resources towards the creation and protection of our name, logos, and other trademarks. Such properties are owned by Foresters, and we must all take care to ensure their use is restricted to legitimate Foresters business purposes and only on such terms and conditions established by Foresters.

Upholding Foresters public reputation is a responsibility all of us share. We are all personally and professionally responsible for helping our organization maintain its integrity and good reputation. When we are representing Foresters in industry or public settings – through participation in conferences or speaking or presenting to individuals and groups, for example – we must take care to ensure we are qualified and competent to undertake these initiatives and be certain to distinguish our personal opinions and views from those of Foresters.

We must ensure that only those expressly authorized to respond to media or other public inquiries do so. If we are contacted by a member of the media or a representative of an industry or other association or group, we must direct all such inquiries to the Director of Public Relations.

Ethics, integrity and the law

Foresters is committed to conducting business with integrity and in full compliance with both the letter and spirit of all laws and regulations that govern our business.

This Code of Ethics is intended to supplement and enhance local laws or regulations, where applicable.

Know and comply with the law

It is our responsibility to ensure we understand the laws that affect our work and to make certain our conduct complies with those laws. We also have a duty to ensure we report others if we observe or become aware of a violation of laws or regulations or dishonest behavior. Specifically, we must not personally engage in, nor allow others to engage in, behavior that includes: fraud, theft, misappropriation of funds or organizational time, supplies, data, documentation, computer programs or computer time; receipt or payment of kickbacks or rebates; forgery or falsification of records or documents; and unauthorized modification or manipulation of computer programs or documents; among others.

Verbal or physical assault, possession or use of a weapon on any of Foresters premises and disregard of property or safety standards are all expressly prohibited. No one covered under this Code shall possess or use alcohol or illegal drugs while at work, while conducting Foresters business or while driving or riding as a passenger in any Foresters owned or rented vehicle. While alcohol may be served at some Foresters corporate, sales, branch, or community

events, we are all individually responsible for ensuring that our consumption is moderate and that professional behavior is maintained at all times.

Completing the Code of Ethics Acknowledgement and Conflict of Interest Disclosure

Foresters reputation for fairness and integrity rests on us. Our ethical behavior and judgments help ensure the high standards we have set for ourselves will be attained.

While this Code and Foresters Compliance Management Program should be referred to regularly, at least once annually we must all take time to review the Code of Ethics in its entirety and to complete an Acknowledgement and Conflict of Interest Disclosure form.

At any point in the year, when circumstances that affect our business relationship with Foresters change, we must disclose these by completing an updated Acknowledgement and Conflict of Interest Disclosure form.

Refusal to sign and submit such a form when requested, providing false statements, or deliberately withholding information that is required to be disclosed, will result in disciplinary action and possible dismissal.

Supporting policies

The Code of Ethics is supported and strengthened by a number of supporting corporate policies and guidelines, many of which have been mentioned throughout this Code. We have a duty to be familiar with all such policies and guidelines and to comply with them. We must also seek out additional guidance in situations where clarity is required.

Corporate policies that support the Code and which have been referred to within the Code include:

- Foresters Workplace Violence and Harassment Awareness Program
- Foresters Respect in the Workplace Policy
- Foresters Procurement Policy and Procedures
- Foresters Privacy Policy
- Foresters Clean Desk Policy
- Foresters Records Retention Policy
- Foresters Transitory Document Policy
- Foresters Information Systems Security Policy
- Foresters Computer Software Use Policy
- Foresters Anti-Money Laundering and Anti-Terrorism Compliance Procedures
- Foresters E-Mail and Internet Policy
- Third Party Network Access Agreement

Other sources of information include:

- Employment Agreements
- Foresters public and producer/agent websites
- Foresters Compliance Management Program
- Outlook Public Folders (Ethics & Integrity, Human Resources, Corporate Governance, Law, Internal Audit folders)
- Volunteer Code of Conduct
- Third Party Network Access Agreement

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