CANACCORD GENUITY GROUP INC. HUMAN RIGHTS STATEMENT

Introduction

Canaccord Genuity Group Inc. and its operating subsidiaries (collectively, the "Canaccord Genuity Group") are committed to conducting our business operations in ways that respect, protect and promote the full range of human rights, such as those described in the United Nations Universal Declaration of Human Rights. This Human Rights Statement sets out some of the key steps we have taken to uphold our commitment to human rights.

The Canaccord Genuity Group will advise all employees of this Human Rights Statement and this Human Rights Statement shall be posted on the Company's website. In this Human Rights Statement, the "Company", "we", "us" and "our" refer to the Canaccord Genuity Group.

Code of Business Conduct and Ethics

Our board of directors has adopted a firm-wide <u>Code of Business Conduct and Ethics</u> (the "Code") which embodies our commitment to conducting our business in accordance with all applicable laws and the highest ethical standards. Our Code highlights that having concern for the personal dignity and individual worth of every person is an indispensable element in the standard of conduct that we have set for ourselves. To that end, our Code contains required standards of conduct for our employees including with respect to ensuring equal employment opportunities for all employees without regard to any impermissible criterion or circumstance.

All of our employees, officers and directors are expected to adhere to the principles and procedures set forth in the Code and are required to review and certify their acknowledgement and understanding of the Code in writing on an annual basis.

Equal Opportunity Employer

We are committed to affording equal employment opportunities to all qualified persons without regard to any impermissible criterion or circumstance, including race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability or other legally protected status. In addition to the obligations in the Code, across our organization we have implemented policies and measures to support equal employment opportunities in our businesses.

Respect of Workers' Rights / Modern Slavery Act Statements

We are committed to building and preserving a safe, productive and healthy working environment for our employees based on mutual respect. As a result, we do not condone or tolerate acts of violence, bullying or harassment against any employee. Further, we do not tolerate any form of child labour, slavery, forced labour or human trafficking as part of our business or within our supply chain. The Company and its suppliers are prohibited from paying wages that are less than what are permitted under applicable labour laws in their jurisdiction(s) of operation.

Our principal subsidiaries in the United Kingdom and Australia also publish on our website antihuman trafficking and anti-slavery statements pursuant to the *Modern Slavery Act 2015* (UK) and *Modern Slavery Act 2018* (Australia), respectively. These statements confirm our commitment to conducting business ethically and ensuring that there is no slavery or human trafficking in any of our supply chains.

Professional Development and Oversight

Human rights matters are integrated into a number of our onboarding, training and/or professional development learning programs and topics include ethics (compliance with our Code), health and safety, advancing diversity, anti-discrimination, employee and customer accessibility and fair business dealings. In addition to oversight by the board of directors, the Canaccord Genuity Group promotes human rights through its Global Operating Committee, Global Diversity, Equity & Inclusion Committee and ESG Committee which are all supported by our global Human Resources, Legal and Compliance departments.

Diversity & Inclusion

Our firm-wide <u>Diversity Policy</u> promotes equal opportunities for all current and potential employees. We believe that diverse teams create better business outcomes, and we are committed to fostering an inclusive environment where all employees and clients can thrive, and where opportunities are based on skill and merit, without bias. We are committed to continuous education and advancement of the policies and processes that address inequality as they relate to both the employee and client experience. As part of our commitment to building a diverse and inclusive workplace, we have established a Global Diversity, Equity & Inclusion Committee comprised of representatives from each of our primary businesses and regions where we operate. The Global Diversity, Equity & Inclusion Committee engages with senior leadership to provide recommendations and guide, build and adapt our diversity and inclusion policies over time, ensuring that they grow and evolve with the business.

Corporate Social Responsibility and Sustainability and ESG Reporting

We understand that a commitment to the environment and sustainable practices is an integral part of upholding human rights globally. Accordingly, our board of directors has adopted the <u>Principles of</u> <u>Corporate Social Responsibility and Sustainability</u> which sets out our commitment to the principles of operating with integrity, respecting people and communities and respecting our planet. We also periodically publish an updated <u>Environmental, Social and Governance (ESG) Report</u> on our website which reports on steps taken by us to advance these principles.

Supplier Code of Conduct

We have adopted a <u>Supplier Code of Conduct</u> which is posted on our website and made available to our suppliers. Our suppliers are expected to be committed to the principles of operating with integrity, respecting people and communities and respecting our planet. These principles include affording equal employment opportunities, respecting the rights of workers and supporting diversity & inclusion in their workplaces.

Complaints and Reporting

Under the Code, we have designated various directors and senior officers across our business as "Appropriate Ethics Contacts" for employees to contact should they believe that they have identified potential or actual breaches of the Code. In addition, the Canaccord Genuity Group has a <u>Whistleblower Policy</u> which includes procedures for reporting breaches of specific Company policies. Any Canaccord Genuity Group employee with a genuine belief that there has been a breach of this Human Rights Statement by the Company or its employees is also able to make a confidential, anonymous submission through the Company's third-party <u>Integrity Line.</u> The Company prohibits any retaliation against an employee for having made any good faith complaint regarding a breach of our policies or for otherwise having participated in an investigation of a complaint.