

**CANACCORD GENUITY GROUP INC.
SUPPLIER CODE OF CONDUCT**

Introduction

This Supplier Code of Conduct (the "Code") embodies the commitment of Canaccord Genuity Group Inc. and its operating subsidiaries (collectively, the "Canaccord Genuity Group") to ensure that the suppliers and vendors of goods and services to the Canaccord Genuity Group, together with their respective sub-contractors (collectively, "Suppliers"), conduct their business in accordance with the ethical standards and the Principles of Corporate Social Responsibility and Sustainability adopted by the Canaccord Genuity Group.

Suppliers are expected to be committed to the principles of operating with integrity, respecting people and communities and respecting our planet. Suppliers are encouraged to have policies and procedures in place that are consistent with these principles, as further described below, and otherwise are expected to adhere to the principles in this Code that apply to them.

The Canaccord Genuity Group will use best efforts to advise all Suppliers of the Code and the Code shall be posted on the Company's website. In this Code, "Canaccord Genuity", the "Company", "we", "us" and "our" refer to the Canaccord Genuity Group.

A. Operating with Integrity

(1) Compliance with Laws and Raising Concerns

Suppliers must comply with all applicable laws, rules and regulations as well as the ethical standards and restrictions imposed by those laws, rules and regulations. This Code must be read in conjunction with applicable laws and the contractual arrangements with Suppliers. In the event of a conflict between the Code and a Supplier agreement, the Supplier agreement prevails. Suppliers should raise any concerns about their compliance with the Code with their Canaccord Genuity Group relationship contact. Supplier personnel should raise any concerns about breaches of the Code or other improper conduct by the Supplier or the Company with their main business contact at Canaccord Genuity. In circumstances where contacting Canaccord Genuity may not be appropriate, Supplier personnel may also raise any genuine concerns anonymously by phone or over the internet by accessing the Company's third-party Integrity Line.

(2) Confidentiality, Privacy and Cybersecurity

Suppliers that have access to confidential information about the Company, its clients, prospective clients or other third parties must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated, and must use such information solely for the business purpose for which it was conveyed. Suppliers that have access to personally identifiable information about our employees or clients must treat such information in accordance with all applicable privacy laws. Suppliers that have access to our or our clients' data, including material non-public information, must have a cybersecurity program vetted by us to protect such data, comply with the contractual protective covenants imposed by us and be committed to the ongoing development, testing and improvement of their cybersecurity posture. All such confidential information must be maintained in a secure manner with industry appropriate technical, administrative, and operational controls and safeguards.

(3) Insider Trading

Suppliers that become aware of material non-public information relating to the Company, any of the Company's clients or any other issuer of securities are prohibited from buying or selling any

securities of those issuers or recommending that another person buy, sell or hold the securities of those issuers in violation of applicable law.

(4) Anti-Bribery, Anti-Money Laundering and Conflicts of Interest

We do not tolerate fraud, bribery, embezzlement or corruption in any form. Suppliers and those acting on their behalf may not offer, promise, authorize, recommend, give or receive anything of value if it is intended, or could reasonably appear as intended, to influence improper action or to obtain or retain an improper advantage for the Canaccord Genuity Group. Suppliers must never engage in any activities which cause the Canaccord Genuity Group to contravene any anti-money laundering, anti-terrorist financing or anti-bribery legislation.

Suppliers must not improperly benefit through their relationship with the Canaccord Genuity Group or allow other activities to conflict with acting in the best interests of the Canaccord Genuity. Suppliers are prohibited from using Canaccord Genuity Group names, brands, trademarks or logos or otherwise disclosing their business relationship with the Canaccord Genuity Group, without our express written permission.

B. Respecting People and Communities

(1) Equal Employment Opportunity

Suppliers are expected to afford equal employment opportunity 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.

(2) Diversity & Inclusion

Suppliers are expected to create a workplace where diversity and inclusion is encouraged in both hiring and promotion and in which all employees have the equal opportunity to realize their potential for excellence.

(3) Respect of Workers' Rights

Canaccord Genuity is committed to supporting the protection and advancement of human rights in our business and throughout our supply chain. We strive to conduct our business operations in ways that seek to respect, protect and promote the full range of human rights, such as those described in the United Nations Universal Declaration of Human Rights. Suppliers must be committed to building and preserving a safe, productive and healthy working environment for their employees based on mutual respect. This commitment includes not condoning or tolerating acts of violence, bullying or harassment against any employee. Suppliers must not tolerate any form of child labour, slavery, forced labour or human trafficking as part of their business or within their supply chain. Suppliers must not pay wages that are less than what are permitted under applicable labour laws in their jurisdiction(s) of operation. Suppliers must prioritize the occupational health and safety of their employees and meet legal, regulatory and contract specific requirements when performing their contractual obligations for the Canaccord Genuity Group.

C. Respecting Our Planet

(1) Environmental Protection

Suppliers must comply with all environmental laws, regulations and rules that apply to their businesses. We expect Suppliers to be committed to reducing their environmental impact in their day-to-day operations, including taking reasonable steps to reduce energy use, greenhouse gas emissions and water usage and to developing an environmental management program designed to promote responsible resource use initiatives and the measured and conscientious use of resources.

(2) Sustainable Practices

Canaccord Genuity expects Suppliers to develop policies that foster sustainable practices. Suppliers are expected to recognize the importance of sustainable development and responsible sourcing as integral to good business practice. Sustainable practices should include setting environmental and social goals, reporting on the progress in meeting those goals and having a supply chain management system which sources goods and services in an ethical, sustainable and socially conscious manner.