



# Olympia Code of Ethics and Business Conduct

## Policy Statement and Rationale

The Board of Directors (the “**Board**”) of Olympia Financial Group Inc. (“**Olympia**”) has adopted this Olympia Code of Ethics and Business Conduct (the “**Code**”). This Code is an express statement of the ethical standards that Olympia expects of all of its employees, consultants, subsidiaries and third parties that provide services to Olympia (each an “**Olympian**”). Adherence to this Code is not optional. The employment or retainer of any employee or consultant or third party who is found to have breached this Code may be terminated for cause as a result of such breach.

This Code is intended to foster a corporate culture of trust, honesty, integrity and accountability within Olympia. It also provides Olympians with:

1. guidance in recognizing potential unethical conduct; and
2. a mechanism to report potential unethical conduct to the appropriate Olympia personnel.

No code or policy can anticipate every situation that may arise. Accordingly, this Code is intended to serve as a source of guiding principles for Olympians. It is the Board’s expectation that all Olympians shall comply with both the terms of this Code and its intended spirit.

Olympians are encouraged to bring questions about particular circumstances that may implicate one or more of the provisions of this Code to the attention of Human Resources, General Counsel or the Chief Compliance Officer, who may consult with inside or outside legal counsel as appropriate.

## Olympia’s Values

It is Olympia’s expectation that each Olympian will perform their duties in a manner that promotes and is consistent with Olympia’s values. These values are:

- Connection - We build long-term relationships by collaborating with our clients and industry participants.



- Accountability - We are a trusted business partner operating with transparency and integrity.
- Innovation - We leverage technology to continuously improve how we serve our customers.

Olympia's values underly and inform the "With Us it's Personal" mission statement that has guided and continues to guide Olympia's behaviour, allowed Olympia to build relationships and delivers value to Olympia's clients, employees, shareholders, communities and other stakeholders.

## Conflict of Interest

Each Olympian must avoid conflicts of interest with Olympia. Any situation that involves, or may reasonably be expected to involve, a conflict of interest with Olympia, should be disclosed promptly to either the General Counsel or the Chief Compliance Officer.

A "conflict of interest" can occur when an Olympian's personal interest is adverse to – or may appear to be adverse to – the interests of Olympia as a whole. Conflicts of interest also arise when an Olympian, or a member of their immediate family, receives improper personal benefits because of their position with Olympia. In addition, a conflict of interest situation can arise when an Olympian takes actions or has interests that may make it difficult to perform his or her duties to Olympia objectively and effectively.

This Code does not attempt to describe all possible conflicts of interest that could arise. Some of the more common conflicts from which an Olympian must refrain, however, are set out below:

- Relationship of Olympia with third-parties. Olympians may not engage in any conduct or activity with a third-party that is inconsistent with Olympia's relationship with such third-party.
- Compensation from non-Olympia sources. Olympians may not accept compensation (in any form) for services performed for Olympia from any source other than Olympia.
- Gifts and Entertainment. Olympians and members of their families may not accept gifts from persons or entities who deal with Olympia, where any such gift has more than a nominal value or where the acceptance of such gift could create the appearance of a conflict of interest.
- Personal use of Olympia's assets. Olympians may not use Olympia's assets, labor or information for personal use unless approved by the President.
- Financial Matters. Olympians and members of their immediate family may not accept any loans from Olympia nor guarantees by Olympia of any obligations of an Olympian or their immediate family, unless authorized by the Board.



## Corporate Opportunities

Olympians are prohibited from:

- Taking for themselves personally opportunities related to Olympia's business that are discovered using Olympia's property, information or position.
- Using Olympia's property, information, or position for personal gain.
- Competing with Olympia for business opportunities, unless approved by the President.

## Confidentiality

Olympians should maintain the confidentiality of information entrusted to them by Olympia and other confidential information about Olympia that comes to them, except when disclosure is authorized by a superior or legally mandated. For purposes of this Code, "confidential information" includes all non-public or proprietary information relating to Olympia.

## Fair Dealing

Olympians shall deal "fairly" with Olympia's customers, suppliers, competitors, employees and consultants. "Fair dealing" means the avoidance of unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. This Code provision will have no effect on existing legal rights and obligations of Olympia and its Olympians.

## Financial Crime

Fraud, theft, embezzlement, and any other such corrupt practices are strictly prohibited. Money laundering, terrorist financing, bribery and corruption, activities that may violate applicable economic sanctions and tax evasion are serious crimes that have damaging effects on global economies, countries, communities and businesses. Olympia supports efforts to detect and prevent these financial crimes through our commitment to operate with integrity. It is very important that we know and comply with all applicable laws and Olympia policies designed to prevent, detect and report these crimes.

## Compliance with Applicable Policies Laws, Rules and Regulations

Employees and consultants shall comply with all applicable policies laws, rules and regulations, including insider-trading laws.



## Olympia's Assets

Olympians shall protect Olympia's assets and ensure that they are used efficiently and only for legitimate business purposes. Theft, carelessness and waste have a direct impact on Olympia's profitability.

## Reporting Potential Unethical Conduct

Olympians should communicate any suspected violations of this Code promptly to either the General Counsel or the Chief Compliance Officer. Violations will be investigated, and appropriate action will be taken in the event of any violations of the Code. Olympia will not allow retaliation for reports made in good faith.

Reports made regarding alleged violations will, to the fullest extent possible, be maintained confidential, subject to the need to conduct an adequate review and to applicable laws and regulation.

## Compliance

The Code will be made available and accessible to all employees, consultants and subsidiaries electronically on a continual basis. The Code will be made available to third-parties concurrently with their retainer by Olympia. Any questions regarding the Code, its application or interpretation should be directed to the Chief Compliance Officer. Every employee and consultant are required to confirm electronically, on an annual basis, that they have read, understood and have complied with the Code. Individuals will be, as determined by the Chief Compliance Officer, educated about the importance and expectations of, including any revisions or changes to, the Code.

Any individual found to have violated this Code may face disciplinary action commensurate with the nature of the offense. Such action may include termination of their office, employment or contract position without notice. Where a violation results in the violation of securities laws, Olympia may refer the matter to the appropriate regulatory authorities. Potential penalties, fines or imprisonment may ensue as a result.

Waivers of the Code may only be granted in writing by the Chief Executive Officer and Chair of the Board of Directors, provided such waivers do not result in the violation of any laws, regulations or may be considered a breach of the fiduciary duty or best interests of clients.

## Code Review and Assessment

This Code will be reviewed at least annually by the Corporate Governance Committee, to ensure that it remain consistent with regulatory requirements, and with overall goals and objectives of Olympia. This Code may only be changed by the written action and approval of the Board.



## Approval

Board of Directors

**Approved By**

August 16, 2024

General Counsel

**Policy Owner**