

ClearView Ethics Hotline Reporting Guide

Your voice matters. Speak up with confidence. Report wrongdoing or unethical conduct. Ask questions safely and securely. Share your ideas and suggestions. Remain anonymous.

Who is ClearView?

ClearView Connects™ (ClearView) is a third-party ethics reporting / whistleblowing solution that provides a secure, anonymous and confidential way for you to raise concerns or report unethical workplace behaviour to Sun Life. ClearView provides the Ethics Hotline reporting platform, while Sun Life handles the review and investigation of any reports submitted through that platform.

How does the ClearView Ethics Hotline work?

There are several ways that you can submit a report – choose the one that's most comfortable for you: use ClearView's website, speak with a ClearView agent, leave a voicemail report or mail a hard copy report.

You decide whether to provide your name and contact information in your report, and if you don't, ClearView will protect your anonymity. Once you submit a report, the data is stored on ClearView's highly secure servers in Canada. ClearView is committed to the highest standards of data security and privacy protection.

When a report is submitted, the ClearView system immediately notifies Reviewers at Sun Life that a report has been submitted. Reviewers are Sun Life employees who have the skills and expertise to investigate and resolve reports. Reviewers may be a Business Group's Senior Compliance Officer, their delegate, or someone from Human Resources, Legal Counsel, Corporate Investigations Unit or the Code Office.

ClearView let's you communicate with Sun Life's Reviewers anonymously. Whether you submit your report through the ClearView website or an agent, you will receive a system-generated login ID and password. This will let you see your report, check its status, add comments, ask questions or attach documents. Be sure to check your report regularly, because your Reviewer may have follow-up questions and will tell you how the report is being addressed.

What can be reported to the ClearView Ethics Hotline?

Topics that can be reported include (but are not limited to):

- Activity against Clients; agent misconduct
- Bribery, corruption or kickbacks; Risks that threaten our integrity and security, including by way of foreign interference
- Conflict of interest
- Discrimination
- Diversity, equity and inclusion issues
- Fair treatment of client concerns
- Fraudulent or inaccurate accounting, auditing or financial reporting
- Harassment
- Harm to people (including human trafficking, forced labour or child labour) or property
- Health, safety and environment concerns
- Improper gifts or gratuities
- Insider trading
- Intimidation and retaliation (whistleblower protection)
- Manipulation or falsification of data
- Misuse of Sun Life assets (IT, information, property)
- Money Laundering, Terrorist Financing & Sanctions Evasion
- Theft, embezzlement or fraud
- Violations of laws or regulation, or of our policies or procedures

What should not be reported to the ClearView Ethics Hotline?

You should not use the Ethics Hotline for:

- Client inquiries
- Customer service complaints
- Donation or partnership inquiries
- Media relation inquiries
- Product and services inquiries (insurance, investments, financial advice, asset management)
- Regional office inquiries
- Shareholder or investor inquiries
- Sun Life career opportunity inquiries

What information should I include in my ClearView Ethics Hotline report?

To help us assess your report effectively, please provide as much detail as you can.

This will help us to determine how to escalate the issue and whether it constitutes a breach of Sun Life's internal policies or Code. If you have this information, always provide the following:

- **Who:** Who is the allegation against (name, team, process)?
- **What:** What happened that caused concern?
- **When:** When did the event(s) occur?
- **Where:** Where did the event(s) occur (email, conference call, electronic chat, in person meeting)?
- **How:** How were you or others impacted?

How does ClearView protect my anonymity?

Your anonymity is protected in a number of ways:

- *If you use ClearView's website:* Your report is automatically encrypted, and your IP address is not tracked.
- *If you call the Ethics Hotline and speak to a ClearView agent:* The call is not recorded, and caller ID is not used. The report is entered into the ClearView system using your exact words.
- *If you call the Ethics Hotline and leave a voicemail report:* Your message is entered into the ClearView system exactly as you left it, and your voicemail message is deleted. Caller ID is not used.
- *If you send your report by mail:* Anonymous handwritten reports are transcribed into the system, and all typewritten reports are scanned and uploaded. All original hard copies are destroyed. Only ClearView personnel can access the P.O. Box.
- *In all cases:* The report data stays on ClearView's secure servers – in Canada.

Submit a Report



Go to www.clearviewconnects.com



Send your report to: P.O. Box 11017 Toronto, Ontario M1E 1N0 Canada



Toll Free Numbers

- Australia 1300 849 145
- Bermuda 1 866 737 3559
- Canada 1 866 737 3559
- China 400 120 4014
- France 09 70 01 95 45
- Germany 0800 181 5367
- Hong Kong 800 966 034
- India 000 800 050 1408
- Indonesia 007 803 321 8265
- Ireland 1800 903 368
- Italy 1-416-386-4667 (Call collect¹)
- Japan 0800 222 1150
- Korea 00308 491 0202
- Luxembourg 800 27 309
- Malaysia 1 800 81 3463
- Mexico 800 099 0527
- Philippines (PLDT Landline/Smart) 1800 1322 0175
- Philippines (Globe) 1800 8918 0153
- Spain 518 880 630
- UK 0330 808 4790
- USA 1 866 737 3559
- Vietnam (Vinaphone) 1208 52321
- Vietnam (Mobifone) 121 020 155
- Vietnam (Viettel) 122 80 884

¹ Make a collect call to ClearView. Contact your local operator for assistance.