



# Canada Life™

## Fraud Prevention

Canada Life is firmly committed to fraud prevention and has a comprehensive fraud prevention policy in place which is supported by the executive directors, senior management and staff alike.

In general terms, fraud can be committed in three ways:

- False representation.
- Failing to disclose.
- Abuse of position of trust.

Any business is susceptible to fraud (or attempted fraud) and the reasons and mechanisms for committing it are increasing. Canada Life appreciates that fraud could, in extreme circumstances, threaten the solvency of the Company, its competitiveness, reputation and integrity and, as a result, it takes fraud prevention seriously. Canada Life views fraud prevention as the responsibility of all staff and it is essential to the preservation of its own and its customer's financial and non financial assets.

The Canada Life Fraud Prevention policy applies to all employees, agents and consultants and volunteers working for Canada Life.

Any member of staff who suspects fraud should report it immediately and in accordance with the Canada Life Fraud Prevention policy.

Any suspicion, report or incidence of fraud will be taken seriously, investigated thoroughly and aggressively pursued, up to and including notification to the police and regulators and where possible through to criminal prosecution. In addition, where a member of staff has been found to act fraudulently, disciplinary action which may include termination of employment or engagement with Canada Life will also be pursued. Canada Life will make every effort to recover losses from the fraudster.

Canada Life operates a 'whistle-blowing' policy that contributes towards having appropriate measures in place to prevent fraud. This policy enables internal reporting of concerns to be made by staff without fear of retribution or reprisal.

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