



Canada Life™

Information Security Statement

Governance

An Information Security Policy exists and is supported by standards designed to establish a system of internal controls and accountability for the safeguarding of information assets.

Supporting standards outline the requirements determined necessary to comply with legal, regulatory or contractual obligations and will be approved using an auditable process.

Risk Management Approach

The sensitivity of each information asset will be determined based on its confidentiality, integrity and availability requirements as determined through the Information Classification Scheme.

Stewardship and Classification

Stewardship

Canada Life holds information which has been obtained from a number of sources. Some information is created by Canada Life or is otherwise acquired and held as proprietary information belonging to the Company. Other information is gathered from third parties (e.g. our customers, employees, clients, advisors and business partners) who have entrusted such information to Canada Life Limited as its steward.

Canada Life will designate information owners for all information assets. Information owners are responsible for meeting the Company's internal control requirements as defined by the Information Security Policy and its supporting standards.

Information Classification Scheme

The Information Classification Scheme will establish the sensitivity and related risk level to anyone handling the information asset. This scheme will determine the appropriate level of protection required to manage the risk associated with the information asset.

Access Control

Access Control

Canada Life will strictly limit access to information assets based upon the information asset's information classification. Access rights are managed and extended by the appropriate information owner.

Separation of Duties

Canada Life will divide key duties, responsibilities and processes to ensure no one has access to information assets in excess of their authority.

Personnel Security

Canada Life will conduct an information security awareness programme (which includes training and education) to ensure staff are aware of information security risks, the policy, supporting standards, safe practices and their responsibility. Canada Life reserves the right to conduct additional security and reference checks on its staff, based upon the classification of the information assets they are required to access or have exposure to based on their job duties.

Acceptable Use

All Canada Life staff will use information assets for business purposes and in a manner consistent with the assets' information classification, the Information Security Policy, the supporting standards, the Company's Code of Conduct or Business Conduct and other applicable business practices and procedures.

Physical and Environmental Security

Canada Life will define, implement and manage appropriate physical security measures in all locations, to protect information assets based upon the information classification scheme.

Note: This statement is intended only as a summary of current standards and guidelines within Canada Life (and certain of its affiliates). Nothing in this statement shall form part of any contract nor shall be construed as containing any representation or warranty on the part of Canada Life.



Canada Life

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