

Conflict of Interest

One important way we demonstrate our integrity in doing business is by ensuring that we each act in the best interests of Sun Life, our clients and shareholders. We are committed to not putting our own personal interests ahead of Sun Life, our client and shareholders, and avoid activities that can harm or reflect negatively on any of them. Many situations could give rise to a potential conflict of interest where our judgment or ability to act can be compromised. Actions we take on behalf of Sun Life cannot be influenced by the possibility of gain for ourselves or for anyone personally associated with us – that would be a conflict of interest. It is also important to avoid even the appearance of a conflict of interest.

Examples of situations that could give rise to a conflict of interest include the following:

- Circumstances or relationships that could cause our own interests to improperly influence business decisions or be perceived by others to be a conflict of interest.
- Direct reporting responsibility over an immediate family member.
- Business relationship with a family member or a business in which a family member is significantly involved.
- Client relationship whereby you are asked to act as a trustee, agent, power of attorney or executor (excluding family members).

Other sections of the Code set out some of the more common conflicts, but they are not exhaustive. If you have questions, speak to your manager or a compliance officer.

If you have knowledge about a possible conflict of interest, disclose it immediately.