Canada Post Pension plan **Ethical Practices** 



# Table of Contents

	Foreword	01
<b>1.0</b> 1.1 1.2 1.3 1.4	Introduction Application of the Practices Compliance with the Practices Reporting of concerns Questions or feedback	02 02 03 03 03
<ul> <li><b>2.0</b></li> <li>2.1</li> <li>2.2</li> <li>2.3</li> <li>2.4</li> <li>2.5</li> <li>2.6</li> </ul>	Code of Conduct Practice How to use the Code of Conduct Practice Conflict of interest and anti-fraud considerations Anti-fraud Conflict of interest – Duties to Canada Post and duties to the CPPP Conflict of interest – Entertainment and favours Compliance	04 04 04 04 05 05
3.0 3.1 3.2 3.3 3.4 3.5 3.6 3.7 3.8 3.9 3.10	Personal and Insider Trading Practice Trading with inside information Insider reporting Personal trading CPPP Insider Personal Trading Limitations for CPPP Insiders Covered Accounts Trading Accounts Segregated Accounts Segregated Accounts Exempt trades Pre-clearance of trades 3.11 General 3.12 Pre-clearance limits 3.13 Limit or stop-loss orders 3.14 Pre-clearance for options 3.15 Short-term trading 3.16 Limited opportunities (private placement, initial public offering [IPO]) and broker preferences 3.17 Exceptions	06 07 07 07 08 08 08 09 09 09 09 09 09 10 10 10
3.18 3.19 3.20 3.21 3.22 3.23 3.24	Disclosure of accounts and annual certification Reporting of activity in Trading Accounts Audit of Segregated Accounts Confidentiality and personal information Review procedures Restricted List Compliance Form 1 – Certificate of Compliance Form 2 – Broker Direction Letter	11 11 12 12 12 12

# Foreword

As an employee of Canada Post Corporation (Canada Post) who is part of a team that administers, invests for or supports the Canada Post Pension Plan (CPPP), you are part of one of the largest single-employer sponsored pension plans in Canada. More important, you help support the present and future retirement needs of more than 88,000 pension plan members and beneficiaries.

Canada Post administers its own pension plan and pension fund for its employees and accomplishes these important responsibilities, while respecting best governance principles and practices.

Canada Post's vision is for all pension plan members to have a financially secure retirement, and its mission is to prudently administer and invest CPPP assets for the benefit of its members. Each of us is responsible for assisting in this, while preserving and enhancing the reputation of the CPPP.

The Canada Post Pension Plan Ethical Practices (Practices) set out what is expected of all of us who are part of the CPPP. The Practices address policies and guidelines specific to the CPPP and do not replace, derogate from or modify any of your duties under the *Canada Post Code of Conduct*.

Contained in the Practices is the Personal and Insider Trading Practice established to ensure we are carrying out our investment activities using the highest level of integrity, and to protect you and the CPPP from civil liability and reputational harm.

As you read the Practices, I hope you appreciate, as I do, that it reflects rigorous standards of integrity as well as our commitment to act in the best interests of the members and beneficiaries of the CPPP.

Doug Greaves Vice-President Pension Fund and Chief Investment Officer

# 1.0 Introduction

As part of its commitment to prudent administration of retirement benefits, Canada Post Corporation (Canada Post) has established these Canada Post Pension Plan Ethical Practices (Practices).

Canada Post is the administrator for the Canada Post Corporation Registered Pension Plan (RPP), containing defined benefit and defined contribution components, a supplementary retirement arrangement applicable to both components of the RPP, a group retirement savings plan and a voluntary savings plan. Collectively, these are referred to as the Canada Post Pension Plan (CPPP). The CPPP also encompasses all investments established to meet all obligations under each element of the CPPP.

In this document, we, us, our and ourselves refer to Canada Post and the CPPP. You, your and yourself refer to an employee or executive of Canada Post, including the President and Chief Executive Officer.

These Practices address policies and guidelines specific to the CPPP and do not replace, derogate from or modify any of your duties under the *Canada Post Code of Conduct*. As a Canada Post employee, you are expected to abide by and comply with both the *Canada Post Code of Conduct* and these Practices. When reading the *Canada Post Code of Conduct*, you should remember that your clients are pension plan members. While highly unlikely, to the extent you consider the *Canada Post Code of Conduct* and these Practices to be in conflict in a specific situation, you must contact your team leader.

These Practices cannot address every situation in which you may find yourself, and they do not preclude the use of common sense and good judgment. Rather, they provide a set of requirements and ethical behaviour to be used as a guide for the day-to-day business conduct. In addition, the Canada Post values (found in the *Canada Post Code of Conduct*) are to be used as a reference when determining an appropriate course of action. Again, when considering these values, remember that your clients are pension plan members.

If you have management or executive responsibilities, you are expected to help the members of your team understand how the Practices apply to their day-to-day activities.

## 1.1 Application of the Practices

These Practices apply to any Canada Post employee who works for, supports or otherwise deals with the Canada Post Pension Plan, including the President and Chief Executive Officer. If you are uncertain as to whether these Practices apply to you, please speak with your team leader.

These Practices do not apply to members of the Board of Directors of Canada Post, including its Pension Committee, or to members of both the Investment Advisory Committee (IAC) and Pension Advisory Committee (PAC) of Canada Post. As part of their regular governance practices, each member of the Board of Directors of Canada Post is bound by its standards of conduct, and each member of both of the IAC and PAC are bound by their respective code of conduct.

#### 1.2 Compliance with the Practices

You are expected to act in the spirit of our values and to comply with these Practices. It is imperative that you familiarize yourself with these Practices and ensure that you fully understand the scope of this document. You are bound by the prescriptions of these Practices and the onus is on you to ensure your full compliance with them. Failure to do so could result in sanctions up to and including dismissal from Canada Post.

You must also comply with the code of ethics and standards of professional conduct of any professional organization to which you belong (e.g. Canadian Institute of Chartered Accountants [CICA] and Chartered Financial Analyst [CFA] Institute). Where these standards differ from these Practices, you must always comply with the higher standard.

Reporting on overall compliance with these Practices will be made to the Pension Committee of the Board of Directors of Canada Post on an annual basis.

### 1.3 Reporting of concerns

These Practices were created to maintain the highest standards of ethical behaviour. Canada Post is committed to creating an open and transparent work environment in which employees are free to report any concerns about wrongdoing within the workplace. Although cases of serious wrongdoing are rare, it is important for you to feel free to report such cases, without fear of reprisal.

You have the responsibility to report any activity by other colleagues or third parties that appear to violate these Practices, applicable laws, rules, regulations or regulatory policies. The CPPP's success depends on your ethical behaviour.

In the event that you know of any serious wrongdoing, you may contact Canada Post's independent third-party reporting service, Clearview Strategic Partners Inc., if following internal channels is not possible or advisable. Your identity will be protected and reports will be thoroughly investigated. All reports made in good faith can be made without fear of any form of reprisal and with the assurance that the information will be kept confidential.

Refer to Canada Post's policy on *Disclosure of Serious Wrongdoings in the Workplace* (*whistleblowing*) on Intrapost for more detailed information on how to disclose improper activities to the third-party reporting service online, by telephone or in writing.

#### 1.4 Questions or feedback

If you have any questions or feedback about these Practices, please send an email to **pension.services@canadapost.ca**.

# 2.0 Code of Conduct Practice

### 2.1 How to use the Code of Conduct Practice

In most situations, personal values and honesty can guide our decisions and actions. There are situations, however, where issues will arise. The Code of Conduct Practice (Conduct Practice) contains guidelines for

- identifying and dealing with conflicts of interest,
- mitigating risks of fraud,
- ensuring your personal trading follows the practice requirements for our employees.

### 2.2 Conflict of interest and anti-fraud considerations

Our conflict of interest and anti-fraud policies and procedures ensure that we meet all of our legal and fiduciary duties and are intended to help you

- identify real, potential or perceived conflicts of interest or fraud;
- minimize the chance that you will find yourself in a conflict of interest;
- resolve any existing conflict of interest;
- mitigate the risk of fraud.

Accordingly, you must comply with Canada Post's Conflict of Interest Policy and Anti-Fraud Policy. When reading these policies, you must remember that

- your clients are members of the CPPP, not customers of Canada Post;
- references to Canada Post, the Corporation, "corporate" or the company are references to the CPPP.

In addition, you must act in accordance with the conflict of interest guidelines contained in each of the CPPP's Statement of Investment Policies and Practices.

The following circumstances are of particular importance to the CPPP.

#### 2.3 Anti-fraud

While fraud encompasses a large number of behaviours, fraud in the CPPP context includes the payment of pension benefits to a phantom retiree or beneficiary, falsification of pension data and similar behaviours.

# 2.4 Conflict of interest – Duties to Canada Post and duties to the CPPP

Canada Post has two distinct roles, one as a pension plan sponsor (employer) and one as a plan administrator. As an employee of Canada Post working for the CPPP, it may appear that your duties to one or the other may conflict. While this may appear to be the case, recent judicial decisions indicate that a situation of conflict exists when there is a substantial risk that the representation of the interests of pension plan members would be materially and adversely affected by duties owed to Canada Post. This is a very complicated issue; accordingly, if you believe you are in a conflict in a specific situation, you must contact your team leader.

### 2.5 Conflict of interest – Entertainment and favours

We are particularly sensitive to the public's perception of how we deal with entertainment and favours.

Subject to limited exceptions described in this Conduct Practice, you must not accept entertainment or favours from or offer these to existing and potential investment partners, contractors and other parties or entities

- in exchange for, or as a condition of, exercising your duties;
- to induce certain behaviour while carrying out your duties and responsibilities;
- when it results in, or could appear to result in, preferential treatment.

Examples of favours include gifts, cash incentives, preferred pricing, loans at preferred rates or secret commissions or kickbacks.

#### You may accept

- gifts or mementos with a nominal value of \$100 if they do not, in any way, compromise
  or can be perceived to compromise your integrity or objectivity, or the integrity or objectivity
  of the CPPP as a whole, they are appropriate and are a reasonable expression of courtesy
  or appreciation, and they do not impose a sense of obligation or result in any kind of
  special treatment for the donor;
- a transaction completion memento if approved in advance by your team leader.

#### You must

- discourage existing and potential investment partners, contractors and other parties or entities from offering inducements that conflict with this Conduct Practice;
- advise existing and potential investment partners, contractors and other parties or entities that we can maintain a business relationship only if they also comply with this section of the Conduct Practice;
- return any inappropriate gifts with an explanation of the standards to which we hold ourselves under the Conduct Practice;
- always ask your team leader if you are in doubt.

If you have a real, potential or perceived conflict of interest as described above, you can neither approve the transaction nor participate in any discussions to approve it.

You must disclose any suspicion of fraud or any conflict of interest, either perceived or actual, to your team leader.

#### 2.6 Compliance

You are responsible for complying with this Conduct Practice. Failure to do so could result in sanctions up to and including dismissal from Canada Post.

# 3.0 Personal and Insider Trading Practice

The Personal and Insider Trading Practice (Trading Practice) is established to ensure that we carry out our investment activities with the highest level of integrity, and to protect you and the CPPP from the risk or perception of insider trading, and the potential for civil liability and reputational harm.

This Trading Practice also helps you meet your obligations under the Financial Investments section of the Canada Post *Conflict of Interest Policy*.

#### 3.1 Trading with inside information

Canada Post's position as a significant participant in pension investment markets may provide you with access to information about public companies from markets around the world. You may be given confidential information from various sources attempting to influence our investment decisions. This information is referred to as inside information if it

- relates to specific securities or a specific company, as opposed to a sector or region;
- is material would reasonably be expected to have a significant effect on the market price or value of the company's securities, such as information about a reorganization, an acquisition, financing, a new business or product innovation, a significant change in earnings or credit arrangements, or the departure of a senior executive;
- has not been publicly disclosed has not been disseminated through a press release, regulatory filing or a public or open meeting.

Securities laws prohibit trading in securities using inside information, whether for the CPPP or in personal accounts. You are also prohibited from disclosing inside information to others (tipping), except in the necessary course of business. This Trading Practice describes your basic obligations while you have access to confidential information, including inside information, in the course of your duties. In particular, internal portfolio managers, analysts or other investment personnel who have contact with senior officers of public companies and others in the investment industry, must assess any information they receive from these contacts and determine that it is not inside information before trading or recommending trading in the securities of those companies.

If you are managing investments on behalf of the CPPP you may be restricted in fulfilling your fiduciary role if you possess, or if the CPPP is considered to possess, inside information. Therefore, it is essential that we accurately determine whether you have received inside information and, where appropriate and possible, take action to isolate the inside information, such as through ethical wall procedures, to preserve the ability to manage the CPPP's investments.

If you have received inside information about a company, you must contact the Compliance Trading Officer immediately to inform that your responsibilities include trading in or advising on that company and other Canada Post employees may be aware of the inside information. Legal Affairs at Canada Post with input from the Compliance Trading Officer, will determine whether to contact representatives of the company or add the company to the Black List (see Restricted List below).

Always ask your team leader, Legal Affairs at Canada Post or the Compliance Trading Officer if you are in doubt.

#### 3.2 Insider reporting

If you are considered to be an insider of an issuer of securities in which we hold significant investment holdings, contact Legal Affairs to clarify whether or not you need to file a report of activity in trading accounts.

#### 3.3 Personal trading

Your personal trading is subject to more stringent scrutiny than what applies to institutional trading because of both insider trading prohibitions and fiduciary duties to avoid conflicts of interest. You cannot trade in securities of a company or in related derivative securities, such as options:

- if you have or are deemed to have inside information about the company,
- if using your knowledge of the CPPP's trading or trading intentions gives you a personal advantage,
- if the trading opportunity provides you a benefit that is not generally available to public investors and it is given by a party doing or seeking to do business with the CPPP or influence its investment decisions.

In addition to the above general prohibitions, you are subject to other specific restrictions designed to prevent and detect prohibited trading if you are described as a CPPP Insider, as defined below. If you are determined to be a CPPP Insider, you will be subject to pre-clearance of trades, disclosure obligations, and restrictions related to investment opportunities and broker preferences, collectively named Restrictions.

#### 3.4 CPPP Insider

You will be considered a CPPP Insider if, as part of your job duties, you are involved in analyzing, recommending or making investment decisions or have access to systems containing investment information, as part of your daily duties.

You may also be considered a CPPP Insider if you work with or close to employees involved in decision making, or if you regularly have the opportunity to see written information or hear discussions, relating to investments.

It may also be necessary to temporarily designate you as a CPPP Insider if you are not ordinarily considered a CPPP Insider but are identified as potentially having access to inside information that could be used for your personal benefit, despite not having such access in the normal course of your duties.

In all cases, you will be advised if you are a CPPP Insider. As a CPPP Insider, you are subject to the Personal Trading Limitations described below.

### 3.5 Personal Trading Limitations for CPPP Insiders

As a CPPP Insider:

- you must pre-clear all trades except trades in exempt securities and managed accounts,
- you cannot trade in securities that are on the CPPP Restricted List,
- you must disclose information about your investment activities to the external audit firm that will verify you have complied with these guidelines.

These limitations apply to investment accounts you influence, direct or control (directly or indirectly) and normally apply to accounts where

- you are involved in making investment decisions,
- you have a significant influence on investment decisions,
- you are involved in voting decisions or have voting control.

These limitations also apply to investment accounts you hold and accounts that are not in your name (if you influence, direct or control them), such as accounts held

- by a corporation, partnership or other entity;
- by an investment club or other similar organization;
- by a member of your family or an associate;
- in trust for you, a member of your family or an associate.

An associate is

- a corporation you own or control shares in, directly or indirectly, when the shares represent more than 10% of the voting rights;
- your business partner who is acting on behalf of your partnership;
- a trust or estate you have a beneficial interest in, or for which you serve as trustee or in a similar capacity.

These limitations prohibit you from trading in your personal accounts using knowledge of anticipated CPPP trading or portfolio information.

#### 3.6 Covered Accounts

The Restrictions apply to trades in all personal brokerage accounts, collectively named Covered Accounts, which may include Registered Retirement Savings Plans (RRSPs), Registered Education Savings Plans (RESPs) and Tax-Free Savings Accounts (TFSAs), for which you, as a CPPP Insider, direct trading, have trading authority, or give investment advice about specific securities. This also includes the accounts of your family members or associates where you influence the trading decisions. It excludes accounts that are

- managed by a portfolio manager on a discretionary basis, or held in a blind trust;
- held in your name, alone or jointly with another, if you do not have trading authority or influence trades made for the account;
- controlled by a mutual fund dealer, bank or insurance company in which only exempt trades are permitted.

#### 3.7 Trading Accounts

A Trading Account is any Covered Account in which non-exempt trades are made or in which both exempt and non-exempt trades are made (see Exempt trades below).

#### 3.8 Segregated Accounts

A Segregated Account is any Covered Account in which only exempt trades are made, until such time as a non-exempt trade is made.

#### 3.9 Exempt trades

The Restrictions do not apply to trades where

- neither institutional trading nor personal trading could affect the price of the securities, the securities are easily available, and you do not have inside information about the securities or the company;
- you, as a CPPP Insider, do not influence the trade or its timing.

All other trades are non-exempt trades.

Examples of exempt trades include trades that are

- in bank deposits or guaranteed investment certificates;
- in debt securities issued or guaranteed by a government entity or by a world or regional development bank or monetary fund;
- in corporate debt instruments with maturities of 90 days or less;
- in units of open-ended mutual funds, segregated funds, pooled trust funds or Exchange Traded Funds (ETFs);
- purchases made under automatic Dividend Reinvestment Plans (DRIPs) or share purchase plans, but not sales from these plans made at your direction as a CPPP Insider;
- the result of a corporate action or expiry or a right (involuntary trades);
- in index products (options, futures or other derivatives that track published indices);
- in commodities or derivatives on commodities.

If you are unsure as to whether a proposed trade is exempt, contact the Compliance Trading Officer to obtain confirmation prior to trading or to pre-clear the trade.

#### 3.10 Pre-clearance of trades 3.11 General

All trades in Covered Accounts, other than exempt trades, must be pre-cleared through the Compliance Trading Officer by email or telephone.

Pre-clearance to trade will only be granted if, at the time of your request:

- you, as a CPPP Insider, certify that you are not aware of any pending or contemplated institutional trades in the securities and are not aware of any inside information regarding the company; and
- the company is not listed on the Restricted List.

#### 3.12 Pre-clearance limits

Non-exempt trades in each Covered Account must be pre-cleared separately. However, a single transaction pre-clearance may be used to cover multiple trades of the same security in the same account. Where pre-clearance is declined, as a CPPP Insider, you must avoid disclosing to the broker that the company is on the Restricted List.

Pre-clearance grants you, the CPPP Insider, the permission to trade the same day only. If the trade is not executed the same day, it must be pre-cleared again the next day. International trades must be executed before the opening of markets in Canada the next day, such as 9 a.m., Eastern Time.

Where pre-clearance is granted and the company is subsequently put on the Restricted List, the pre-clearance will be revoked. You will be advised of the revocation and must immediately make best efforts to instruct your broker not to execute further trades. However, trades made prior to being advised of the revocation and based on the initial pre-clearance will not violate the pre-clearance requirement.

#### 3.13 Limit or stop-loss orders

A limit or stop-loss order may not be used to extend pre-clearance beyond the one-day limit. The order must be pre-cleared daily.

#### 3.14 Pre-clearance for options

Each trade in a Covered Account to buy, sell or exercise an option requires separate preclearance of the underlying securities. However, pre-clearance is not required to allow expiry of an option, nor is pre-clearance required when an option is closed out as a result of action by a third-party buyer to exercise an option previously sold from the Covered Account.

#### 3.15 Short-term trading

Frequent trading may create a perception that employees are using their access to information not available to public investors in order to profit personally. Therefore, as a CPPP Insider, you are discouraged from making frequent opposite or in-and-out trades (a purchase following a sale, or the other way around) in the same or equivalent security within a 48-hour period.

# 3.16 Limited opportunities (private placement, initial public offering [IPO]) and broker preferences

As a CPPP Insider, you must avoid receiving benefits in the form of limited investment opportunities or preferences from brokers or investment managers (either of individual or pooled accounts or funds). Therefore, you must request an exception before participating in treasury offerings of any equity security, whether made under a prospectus, by private placement, or in any secondary offering linked to a new or listed security, such as offerings of special warrants or sales from control blocks, regardless of whether the CPPP is buying securities in the offering.

In addition, to avoid the perception that you are being given special personal treatment in exchange for favouring the business relationship of a brokerage firm with the CPPP, you may not use the same individual broker for both personal and business trading purposes, or receive reduced fees or account perquisites or benefits not available to other clients.

#### 3.17 Exceptions

If as a CPPP Insider, you have sought pre-clearance for a trade which has been denied, or wish to execute a trade that is otherwise restricted under this Trading Practice, you may request an exception to permit the trade by submitting a review request to the Compliance Trading Officer. Exceptions must be approved prior to trading. Approval may be granted where you have demonstrated that you

- would not be trading against CPPP's interest,
- do not possess inside information about the trade,
- would not be using knowledge of anticipated institutional trading or holdings for personal advantage,
- would not be receiving a personal benefit from the broker that is unavailable to investors generally.

### 3.18 Disclosure of accounts and annual certification

You must disclose your Covered Accounts by submitting Form 1 – Certificate of Compliance below to the external audit firm (designated from time to time by the CPPP) within 30 days of becoming a CPPP Insider and an amended Form 1 within 10 days of opening, changing or closing a Covered Account. This includes both Trading Accounts and Segregated Accounts. You must also submit an amended Form 1 within 10 days of a Segregated Account becoming a Trading Account.

An updated Form 1 must be submitted annually as a certificate of compliance with this Trading Practice.

The personal information collected on or pursuant to Form 1 will be used solely for the purposes of administering the Canada Post Pension Plan Personal and Insider Trading Practice.

### 3.19 Reporting of activity in Trading Accounts

As a CPPP Insider, you must report your activities in all Trading Accounts by either

- directing your brokers to provide duplicate account statements and trade confirmations for all Covered Accounts to the external audit firm, using Form 2 – Broker Direction Letter below; or
- directing your brokers to provide to the external audit firm duplicate trade confirmations and monthly activity summaries showing, for each trade or transfer made in the account during that month, the date and nature of the activity (buying/selling or transferring in/out) and the name of the security.

This reporting requirement continues for 30 days after you cease to be a CPPP Insider. Segregated Accounts are exempt from this reporting requirement.

### 3.20 Audit of Segregated Accounts

Annually, a sampling of your Segregated Accounts will be audited by the external audit firm. You must provide to the auditor original account statements for each Segregated Account or other satisfactory evidence of activity in the account for the time period specified. Account information will be reviewed to identify any potential personal trading violations. Such potential violations will be reported to the Compliance Trading Officer. Any actual violation will be reported to Canada Post Legal Affairs (see section 3.24 Compliance below).

#### 3.21 Confidentiality and personal information

All information about your personal trading received by the external audit firm will be kept confidential and used to administer and monitor compliance with this Trading Practice. This information will only be disclosed if necessary for the administration of this Trading Practice or to others, as required by law and in accordance with the Canada Post *Employee Privacy Policy*.

#### 3.22 Review procedures

The Compliance Trading Officer is responsible for ensuring the required forms have been completed to enable pre-clearance monitoring. The external audit firm reconciles the trading as reflected on trade confirmations with pre-clearance information and with information on account statements or summaries. It also reviews reports comparing your trades with the CPPP trading activity to monitor inappropriate use and potential personal trading violations. Any such potential violations will be reported to the Compliance Trading Officer. Any actual violation will be reported to Canada Post Legal Affairs (see section 3.24 Compliance below).

#### 3.23 Restricted List

The Restricted List is used to identify and monitor securities that you and the CPPP are not permitted to trade. The content of the Restricted List is confidential. The Restricted List is maintained by the Compliance Trading Officer. Generally, entities are added to the Restricted List as a result of disclosures made by individuals and at meetings through the investment activities of the CPPP. Typically, entities are removed from the Restricted List once the subject matter is publicly disclosed or the CPPP no longer has an involvement with the entity. The Restricted List must not be distributed to and may not be accessed by anyone other than the Compliance Trading Officer, Canada Post Legal Affairs employees and the external audit firm, as required, unless an exception is made to allow confidential disclosure in the necessary course of business.

The Restricted	l List	consists	of the	following	parts:
----------------	--------	----------	--------	-----------	--------

Section	Restriction	Application	Monitoring
Black List	Possession of inside information (a statutory prohibition on trading)	Institutional trading	Pre-trade block and post-trade reporting
	• Stand-still or lock-up agreement (a contractual obligation not to trade)	Personal trading in Covered Accounts	Trade pre-clearance and post-trade reporting
Grey List	<ul> <li>Current or proposed Institutional Trading or</li> <li>Review of a potential investment prior</li> </ul>	Personal trading in Covered Accounts	Trade pre-clearance and post-trade reporting
	to receiving inside information (fiduciary duty or conflict of interest prohibition)		

#### 3.24 Compliance

You are responsible for complying with this Trading Practice. Failure to do so could result in sanctions up to and including dismissal from Canada Post.

Annual Certification

□ Change to my account(s)



Canada Post Pension Plan Personal and Insider Trading Practice

## Form 1 – Certificate of Compliance

- 1. **Trading Practice Compliance:** As a CPPP Insider, as defined in the Canada Post Pension Plan Personal and Insider Trading Practice (Trading Practice), I have read and agree to comply with the Trading Practice.
- 2. **Broker Direction:** I have instructed and do authorize my broker(s), using the Trading Practice Form 2 Broker Direction Letter, to disclose personal information including trades and holdings in my Trading Accounts) to the external audit firm for use on behalf of Canada Post Corporation and its pension plans.
- 3. **Covered Accounts:** I confirm that the accounts listed below comprise all of my Covered Accounts in accordance with the Trading Practice. I certify that I do not direct trades or influence investment decisions in securities in any account other than those listed below, except accounts in which only exempt trades are permitted.

	Account #1	Account #2	Account #3
Name of account holder (including account belonging to family member or associate)			
Account type	Trading	Trading	Trading
(Trading or Segregated)	Segregated	□ Segregated	Segregated
Account number			
Brokerage firm (name and address)			
Individual broker name (if assigned)			

Please state "none" anywhere in the chart if you have nothing to disclose. If necessary, attach an additional sheet.

The personal information collected on or pursuant to this certificate will be used solely for the purposes of administering the Canada Post Pension Plan Personal and Insider Trading Practice.

CPPP Insider (signature)

Date

CPPP Insider (printed name)

CPPP Insider (email address / telephone number)

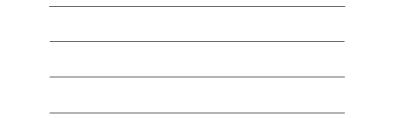
Return completed forms to the external audit firm.



Canada Post Pension Plan Personal and Insider Trading Practice

## Form 2 – Broker Direction Letter

Date:	
То:	► Name of brokerage firm
	Contact name and email address
	Mailing address
Re:	► Name of CPPP Insider and name of account holder, if different
	► Trading account numbers



If possible, the information should be sent in electronic form rather than paper copies using a secure electronic document delivery system. Please contact the external audit firm to make arrangements for electronic delivery.

The undersigned acknowledge that personal information including the duplicate account statements and trade confirmations are being provided to the external audit firm for the sole purpose of complying with reporting obligations under the Canada Post Pension Plan Personal and Insider Trading Practice and administering the Canada Post Pension Plan Personal and Insider Trading Practice.

CPPP Insider (signature)

CPPP Insider (printed name)

Copy of this Form 2 must be forwarded to the external audit firm.

Ce document est également disponible en français sur le site Web **retraitescp.com**. This document is also available in French at **cpcpension.com**.

Revised: January 2016

