

## **SUPPLIER CODE OF ETHICS**

Aimia Proprietary Loyalty Canada Inc., Aimia Canada Inc., and its affiliates (Aimia) are committed to conducting business with the highest degree of integrity and in accordance with legal standards. The Aimia Supplier Code of Ethics (the “Code”) is intended to ensure that suppliers, subcontractors, and other third parties (“Suppliers”) understand and agree to comply with the following standards in all business dealings related to Aimia.

If you are confronted with a situation that raises an issue under this policy, ask yourself these questions:

- Is the life, health or safety of anyone, or the environment, endangered by the action?
- Is it legal?
- Does it feel honest, fair and ethical?
- Does it compromise anyone’s trust or integrity?
- Would the public disclosure of the activity in any way be embarrassing to you, Aimia or any other affected parties?

Aimia Suppliers must communicate these standards to all applicable individuals as well as their own subcontractors delivering products or performing services for Aimia. Those subcontractors must comply with the Aimia supplier’s contractual obligations, legal requirements and this Code – including, for example, any notification and approval requirements.

Questions about this Code may be directed to any of the following:

- The Supplier’s usual Aimia vendor manager or employee contact,
- Aimia’s Director of Procurement,
- Aimia’s Assistant General Counsel, Privacy and Ethics Officer, and/or
- Aimia’s Business Ethics Hotline at [www.clearviewconnects.com](http://www.clearviewconnects.com)

### **Compliance to laws and regulations**

Aimia Suppliers must ensure they operate in compliance with all applicable laws and regulations.

### **Anti-money laundering**

Money laundering refers to individuals or entities who try to conceal illicit funds or conduct/fabricate transactions to make these funds appear legitimate. Our Suppliers must not condone, facilitate, or support money laundering.

### **Anti-Corruption**

Our Suppliers must not directly or indirectly offer bribes, kickbacks, or anything else of value that could be interpreted as an attempt to fraudulently or unethically obtain or retain business on behalf of Aimia. Offering gifts to bribe is never permitted.

### **Conflicts of Interest**

Suppliers shall ensure they do not participate in conduct or situations in which personal interests or the potential for personal gain may interfere with the best interests of Aimia or risk compromising the reputation of Aimia. Personal interests may include the interests of family or friends.

Suppliers must proactively disclose any obligation, commitment, relationship or interest that could conflict or may be perceived to conflict with his or her duties to or interests of Aimia.

## **Loans, gifts, and entertainment**

At Aimia, the giving or receiving of gifts or gratuities cannot conflict—or appear to conflict—with the Company’s commitment to high standards of business ethics. Suppliers and their personnel shall not offer or provide, either directly or indirectly, Aimia or its personnel (including family members) with gifts. Aimia considers as a gift the transfer, without equivalent consideration, of any item or benefit, tangible or intangible, having more than a nominal value, including – but not limited to – services, loans, cash/money or cash equivalents (such as gift cards), travel, travel vouchers, rebate, gratuities of any kind, favors, meals, refreshments, entertainment, hospitality, promises, tickets to entertainment or sporting events, weekend trips, golf outings, loans of equipment, or other thing or benefit. Gifts must never be given with the intent to gain or retain a business advantage. Gifts must be of modest value, legally permissible and reasonably related to a legitimate Company business purpose. Also see Anti-corruption section above.

## **Business with family and friends**

Our Suppliers must avoid potential conflict of interest that could arise from negotiating with or otherwise interacting with an Aimia employee that is a close friend or a family member including parent, siblings, spouse, children, in-laws, grandparents, grandchildren, step-relatives, or other person regularly residing in the same household.

## **Records**

Our Suppliers must not intentionally disseminate false or misleading information or omit critical information that is essential to avoid misinformation. All business documentation, including but not limited to, invoices, and other financial or operational records, must be prepared accurately, in a timely fashion and appropriately reflect the nature and substance of all underlying transactions, payments, and events.

## **No Discrimination, valuing diversity and respect**

We believe that a diverse workforce is critical to success and competitiveness in the global marketplace. We expect our Suppliers to value and support diversity and respect in the workplace. Suppliers shall not discriminate against, or harass, any person on the basis of that person’s race, color, religion, gender, age, place of origin, ancestry, sexual orientation, mental or physical disability, marital status, family status or any other legally protected classification.

## **Human Rights, Child Labour, and Wage and Hour Laws**

Our Suppliers must support and protect internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. Our Suppliers must conduct business in a manner consistent with all applicable employment and human rights laws and regulations wherever they operate. This means, in part, that they provide reasonable working hours and fair wages for those who work on their behalf and, that they never condone, facilitate, or support the use of child or forced labour, or human trafficking practices.

## **Environmental Protection**

At Aimia, we conduct our business in ways that are lawful and sensitive to the environment and expect our suppliers to do the same, such as undertaking initiatives that promote greater environmental responsibility.

### **Confidential information**

We expect our Suppliers to take all appropriate security and legal measures required to protect Aimia’s confidential information, including information that is entrusted to Aimia by third parties. Suppliers must ensure that they do not make use of, or disclose or transfer to any unauthorized individual or entity information which Aimia states is, or which could reasonably be determined to be a trade secret, confidential or proprietary information of Aimia, or its clients.

Suppliers will respect the privacy of personal information which they may hold or have access to in the course of delivering products or services to Aimia.

### **Fair Competition**

We expect our Suppliers to conduct their business fairly and in respect with Competition laws—sometimes referred to as “antitrust” laws. Suppliers shall not engage in collusive bidding, price discrimination, anti-competitive, antitrust, or other unfair trade practices.

### **Monitoring and Compliance**

Suppliers shall be responsible for complying with the standards and requirements of this Supplier Code of Ethics and to monitor their own business activities. Suppliers shall conduct periodic internal reviews, inspections, and audits to ensure their compliance with this Supplier Code of Ethics and its applicable requirements. Additionally, Suppliers are responsible for ensuring that the standards and requirements of this Code are communicated and understood by their personnel working on or in support of Aimia projects, jobs, contracts, agreements, and orders. Suppliers will be held responsible for the conduct and actions of their employees.

Suppliers shall maintain appropriate records to substantiate compliance with the terms and conditions of this Code of Ethics and provide such evidence to Aimia upon request. Aimia may terminate a Supplier relationship for violation of this Supplier Code of Ethics.

### **Application**

This Supplier Code of Ethics is a general statement of Aimia’s expectations and requirements with respect to its Suppliers. This Code should not be read in lieu of, but in addition to, any Supplier obligations set forth in a) requests for proposals, invitations to bid, or other solicitation documents, or b) agreements by and between Aimia and the Supplier. In the event of a conflict between this Code of Ethics and any Aimia solicitation documents or applicable agreements, the terms of Aimia’s applicable solicitation documents or agreements shall prevail.

Any suspected violations should be reported to:

- Aimia’s Assistant General Counsel, Privacy and Ethics Officer  
525 Viger Ave. West, Suite 1000; Montreal QC, H2Z 0B2
- Or, Aimia’s Business Ethics Hotline at [www.clearviewconnects.com](http://www.clearviewconnects.com)

### **Aimia Supplier Code of Ethics and Acknowledgement**

I, on behalf of \_\_\_\_\_ hereby acknowledge and  
[the name of the supplier/contractor/sub-contractor]

agree to abide by the principles and business practices set out in this Code.

Authorized Signatory Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date: \_\_\_\_\_