

Responsible Lobbying and Government Relations Policy

SECTION 1 – POLICY

GreenShield's lobbying and government relations activities support our mission of Better Health for All. This policy applies to Green Shield Holdings Inc. and its subsidiaries and covers our interactions with public office holders and public servants at the federal, provincial, territorial, and municipal levels.

SECTION 2 – OUR APPROACH TO RESPONSIBLE LOBBYING

GreenShield engages in public-policy discussions, supported by evidence-based information and/or informed by reliable data, where we believe we can contribute to a positive impact on society, especially in relation to access to health services and related regulatory frameworks.

GreenShield has zero tolerance for bribery and corruption. All lobbying activities are conducted honestly, ethically, and in full compliance with applicable laws, regulations, and codes of conduct. Organizational funds or in-kind resources are not used to support political candidates, parties, or campaigns.

SECTION 3 – LAWS, REGISTRATIONS, AND USE OF INTERMEDIARIES

GreenShield and its representatives comply with all applicable federal, provincial, territorial, and municipal lobbying laws, regulations, and codes of conduct, including the federal Lobbying Act and relevant provincial lobbyists' legislation and guidance. Lobbying activities are registered and reported to the appropriate authorities where required, and registrations are kept accurate and up to date.

Where GreenShield works with external consultant-lobbyists or industry associations, we expect them to comply with applicable lobbying laws and codes of conduct and to act consistently with this policy. Where required by law, consultant-lobbyists engaged by GreenShield must register and report their lobbying activities independently.

SECTION 4 – GOVERNANCE, CONTROLS, AND RESPONSIBILITIES

This policy is approved by the Green Shield Holdings Inc. Board of Directors and reviewed at least every three years, or sooner if there are material changes in lobbying laws, registrations, or GreenShield's government relations structure. The Board oversees GreenShield's lobbying activities as part of its broader responsibility for our social and environmental impact and stakeholder governance.

In conjunction with legal counsel, the Vice President, Government and Public Affairs is responsible for overseeing compliance with lobbying laws and this policy, maintaining required registrations and reports, and advising employees and Directors on how the rules apply to their interactions with public office holders. Only authorized GreenShield employees and Directors may engage in lobbying on behalf of GreenShield, in line with this policy and applicable law.

SECTION 5 – RAISING CONCERNS AND COMPLAINTS

Stakeholders, including employees, Directors, customers, partners, and members of the public, may raise concerns about GreenShield's lobbying practices or broader business conduct through GreenShield's existing complaints mechanisms, including the Ethics Hotline and our public customer complaint resolution process. Concerns raised in good faith are handled promptly, fairly, and confidentially, and individuals are protected from retaliation.