

CODE OF CONDUCT & ETHICS

Revised July 2018

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MESSAGE FROM THE PRESIDENT & CEO AND THE CHAIRMAN OF THE BOARD

Building and keeping customers' trust and respect is critical for ATB Financial and for the entire financial services industry. Our customers give us their personal information and their life savings. They entrust us with their retirement planning and home and business financing. Our job is to always do what is right for them and for ATB Financial.

ATB's reputation as a trustworthy financial institution is shaped by the actions, choices and decisions each of us makes everyday. ATB is committed to conducting its affairs to the highest standards of ethics, fairness and professionalism and is committed to providing accurate and reliable financial reporting. To support these goals, *ATB Financial Code of Conduct and Ethics* (the Code) outlines the principles and standards of conduct that should guide our actions. We must all:

- Conduct ourselves in a fair and objective manner and take appropriate steps to ensure our conduct is free of any real or potential conflict of interest.
- Consider how colleagues and customers will perceive our actions.
- Strive always to exercise our best judgment.
- Be vigilant about our own actions.
- Raise our hands if we see something we think is not best for our customers or our organization.
- Have the courage to stand up for what is right.

Each of us is expected to know and abide by these principles and standards.

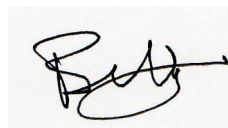
In a rapidly changing world, things are not always black and white nor can we foresee every circumstance where a difficult decision might be required. However, principles of ethical conduct are timeless and can assist us in making the right choices. Each of us has the responsibility to keep these principles top of mind, to think carefully about our actions and follow the spirit and scope of the Code. And if you are unsure, it is your obligation to ask.

When you think about it, the Code supports the 10 ATBs and exists to ensure we are at our best.

Thanks for everything you do to maintain the trust of our customers and the reputation of ATB.



Curtis Stange
President and Chief Executive Officer



Brian Hesje
Chairman of the Board

I. INTRODUCTION

The *ATB Financial Code of Conduct and Ethics* (the **Code**) outlines the principles and standards of conduct that should guide the behaviour of all ATB Financial team members, in all the areas of expertise and strategic service units, at all times whether working at ATB's premises, on the road or at home. Suppliers are expected to follow similar principles and share ATB's commitment to ethics and integrity.

The Code also outlines the responsibility of ATB team members to report actual or suspected breaches of the Code by themselves or others. To support this, ATB has developed a [Safe Disclosure Program](#) to facilitate the confidential disclosure and investigation of actual or suspected breaches of the Code, without fear of reprisal for such disclosure. As part of the [Safe Disclosure Program](#), ATB has established the [Safe Disclosure Framework](#) which sets out how ATB will manage and investigate reports or improper or unethical activity under the Code. To facilitate the disclosure and investigation of significant serious matters in or relating to ATB or its subsidiaries that a team member believes may be unlawful, dangerous to the public or injurious to the public interest, ATB has also developed the [Public Interest Disclosure Framework](#).

The Code is the foundation for other ATB compliance programs about privacy, occupational health and safety, anti-money laundering, business continuity, and information security. It is important to understand how these compliance programs relate to the Code. ATB will provide you with the necessary information and training to make the connections and to comply.

As a financial institution, we must be above reproach and hold ourselves to the highest ethical standards. When faced with difficult decisions, we have a duty to Albertans to make choices that are not only morally and legally correct, but ones that will also stand the test of public scrutiny. ATB's executive and leaders are responsible to model ethical behaviour and to set the tone for those they lead.

The Code is principle-based.

- A principle is a timeless rule or standard that defines appropriate behaviour. It guides our thinking and behaviour in a given situation (as in "follow your principles"). An example of a principle is the Golden Rule: Treat others as you would expect them to treat you.
- Values are the things we deem important in our culture.

Principles help us understand what values look like in action. Principles are more specific than values, but not as black and white as policies or business rules. Principles guide us in the grey areas where policies do not exist. Policies and business rules provide important additional detail and support the principles.

VALUE	PRINCIPLE	POLICY/BUSINESS RULES	
Definition	A cherished ideal	A timeless rule that guides our thinking and behaviour in a given situation	A set of specific standards or behaviours directed and enforced by authorities
Example	Integrity	Act objectively.	ATB's business rules around processing team member loans

In this rapidly changing and complex world, we cannot create rules or policies to cover all possible ethical situations. Instead, we operate from a foundation of trust where we believe, with the right education and support; team members will do the right thing.

Each of us will need to make sure we thoroughly understand the principles, and talk with the appropriate person when we face difficult situations. With a rules-based approach, some people assume if the rules are silent on an issue, it is okay to proceed. With a principles-based approach, the same assumption cannot be made. If in doubt, ask.

II. THE PRINCIPLES

The following six principles are the foundation for the *Code*:

1. Conduct yourself with honesty and integrity.
2. Act objectively.
3. Respect confidentiality and privacy.
4. Honour your commitments.
5. Behave in a professional manner.
6. Uphold the law, rules and regulations.

1. Conduct yourself with honesty and integrity.

We are committed to creating and fostering an environment of trust. Trust is the cornerstone of the financial services industry. Trust is built through the many moments of truth where we have the opportunity to demonstrate honesty and integrity.

This principle means choosing to:

- Place the interests of customers and ATB above your own interests.
- Spend ATB's money and use ATB's assets in a prudent manner, as if they were your own.
- Express if you feel unfairly treated.
- Admit and correct your mistakes.
- Have the courage to tell the truth and support others to do the same.

Scenario - Gifts

Raymond is the Director, Business & Agriculture at an urban hub. He deals with a variety of customers, but most of his portfolio centers on mid-sized commercial loans.

He is surprised one morning to receive a rather heavy package in the mail from DKO Enterprises, a large customer of Raymond's who recently secured a commercial loan with ATB Financial. Raymond opens the package, which contains a beautiful sculpture with a thank you card from the President of DKO Enterprises.

While admiring the sculpture, Raymond considers whether or not he should accept the gift. He does not want to offend DKO by declining the gift, but at the same time he feels uncomfortable accepting the sculpture, as he wants to remain objective and be perceived by others as remaining objective in his decision-making. He estimates that the gift has a value in excess of \$1,000.

Raymond sends his Vice-President, John, a written memo describing the gift, his desire not to offend the customer by declining the gift, his concern about the perception of his objectivity if he does accept the gift, and finally his request for approval to accept the gift. After carefully reviewing and discussing the matter with Raymond, John sends Raymond a written reply (and keeps a copy) stating that Raymond may accept the gift on behalf of ATB Financial provided:

- *The sculpture remains in the workplace as property of ATB Financial, and*
- *Raymond notifies DKO in writing thanking them for the sculpture and indicating the gift has been accepted on behalf of ATB Financial.*

2. Act objectively and no self-dealing.

Our customers, suppliers and competitors have a right to expect we will conduct our business relationships fairly and openly. There is no place for personal or competing interests.

This principle means choosing to:

- Not put yourself or ATB in a conflict of interest.
- Excuse yourself from situations where your relationships may bring (or may be perceived to bring) your impartiality into question, such as involvement with your own accounts or those of family members (self-dealing).
- Pursue outside activities including supplemental employment as freely as any other citizen, as long as they do not interfere or conflict with your employment duties at ATB.

Scenario - Self-Dealing

Rahim, a new team member in a mid-sized urban branch, is given a portfolio of personal loans to administer, including a few loans that were only partially completed by his predecessor.

One of the loans Rahim is asked to finalize is a home improvement loan. After reviewing the loan, Rahim can see the appropriate security is in place and that this is a loan that ATB Financial should grant. Then he realizes the customer requesting the loan is his sister-in-law.

Even though the loan application is sound and warrants approval, Rahim recognizes it is a conflict of interest to approve a loan for a family member; therefore, he approaches his leader to reassign the account to another team member.

DID YOU KNOW...

Making a deposit to your sister-in-law's account, checking the balance of your account through SAP, withdrawing cash through SAP from a branch coffee fund on which you have signing authority, and activating a bank card for your child's account are all forms of Self-Dealing.

3. Respect confidentiality and privacy.

Our customers expect that their financial, business and personal information is protected at all times. Similarly, team members expect their personal information to be accurate, safeguarded and used only for the intended purpose it was collected. Each of us has an obligation to maintain a duty of confidentiality and to protect the privacy of personal information.

This principle means choosing to:

- Only access and use information that you have a business reason to use.
- Only disclose information under the circumstances permitted by ATB's privacy and confidentiality policies.
- Maintain the strictest secrecy with respect to customer and team member information both during and after your employment with ATB.

Scenario – Privacy

Alison is a Relationship Manager in a large urban branch. She is very excited about the upcoming wedding of her best friend Julie in six months. On Monday, Alison helped Julie to select a pattern for a very lavish and expensive wedding dress from Brides-R-Us. The dress takes four months to make. Julie is going to put down a \$1,500 down payment on the dress on Friday.

On Wednesday morning, during their regular overdraft meeting, Alison discovers that Brides-R-Us, an ATB Financial customer whose account is managed by her co-worker, is severely delinquent on their loan payments and is teetering on the verge of bankruptcy.

Following the meeting, Alison immediately picks up the phone to call Julie and tell her not to put the down payment on the dress due to the financial status of Brides-R-Us. Suddenly, Alison remembers that the information she has just learned regarding the financial position of Brides-R-Us is confidential and cannot be disclosed to Julie. In addition, the information is personal information subject to PIPA and the customer has not consented to disclosure.

Alison realizes that she is in a difficult position, but Brides-R-Us, like all ATB Financial customers, has a right to expect complete confidentiality of information regarding their account. ATB Financial is also legally obligated to protect the privacy of the information. She reluctantly puts down the phone.

If you have any doubt regarding the appropriateness of disclosing customer information to another party as outlined above, contact your Leader or Vice-President for direction prior to releasing information.

4. Honour your commitments.

People rely on the word of ATB team members. Team members need to support organizational commitments and ATB needs to support team members to deliver on their commitments to customers and other team members. As an organization, we need to stand behind our words and actions. Our credibility depends on it.

This principle means choosing to:

- Follow through on your commitments, even when it is difficult to do so.
- Take responsibility for the effects of your actions, be they environmental, social or financial.

Scenario – Time and Attention to Duties

Charles is the Leader of a mid-sized, rural branch. He is very personable, outgoing, and active in the community. As part of his marketing strategy, Charles will often entertain prospective customers by taking them golfing, during which he will endeavour to strengthen his relationship with customers and promote additional products and services to match their needs. These golf games often last four hours or more.

One morning while Charles was having coffee with a customer at the local coffee shop, the customer complained about a local businessman.

"I'm so frustrated with the guy. Every time I try to make an appointment to see him, I'm told that he's away from the office for the afternoon. It seems like he's always at some convention or on holidays or something. I'm seriously considering switching companies."

Charles suddenly had an unpleasant thought - "Do people think the same thing of me? I know that my time away from the branch is time well spent on developing or maintaining business, but how do the townspeople perceive this? Have I lost any customers because of this?"

Charles decides that when he gets back to the branch, he'll review the timing and frequency of his promotional activities.

5. Behave in a professional manner.

Our personal conduct has a direct effect on the reputation of ATB as a place to work and conduct business.

This principle means choosing to:

- Only provide advice, recommendations or services for which you have the necessary knowledge, skills and experience, and/or are licensed to provide.
- Communicate and act in a way that does not embarrass yourself or ATB, both during and after work hours.
- Be in financial good standing
- Provide a high quality of service to all customers and team members, respecting their rights and differences.

DID YOU KNOW....

You should not provide speculative information or advice to customers regarding interest rate changes, market conditions, or other unpredictable events, which may influence a customer's decision to purchase or not purchase a specific ATB Financial product or service.

You are not permitted to provide advice to a customer on any matter not directly or reasonably related to the provision of ATB Financial's services, including such things as income tax, estates, real estate, and legal advice, unless you have the proper professional accreditation and the provision of such advice is considered to be within the scope of your employment responsibilities with ATB Financial.

In cases where a legal or ethical relationship exist (for e.g. a trustee or guardian), a greater legal duty arises because of the confidence, good faith and reliance placed. This means additional efforts must be undertaken to meet your obligations.

6. Uphold the law, rules and regulations.

To “do the right thing” starts with compliance to the law. ATB and team members are subject to, and expected to comply with, the laws of Alberta and Canada, and the expectations of our regulators.

This principle means choosing to:

- Comply with both the spirit and intent of the law, and not just the words of the law.
- Hold yourself accountable to the highest standard when you are subject to multiple jurisdictions or codes of conduct. This includes laws in other jurisdictions that prohibit certain transactions with government officials or other foreign entities.
- Meet all fiduciary obligations in circumstances where a fiduciary relationship exists (See the definition of “fiduciary relationship” in Appendix B).
- Report financial and/or accounting irregularities, or instances of non-compliance with law, rules and/or regulations.
- Cooperate fully with investigations and audits.

DID YOU KNOW.....

A technical defence to breaking the law might avoid prosecution or a conviction, but may still be considered a breach of the principle to uphold the law, rules and regulations. You have an obligation to report being charged with an offense under the law, or regulation or by a self-regulating body (for e.g. IIROC)

III. RESPONSIBILITIES

Each team member:

Understand, comply, ask for help and advice, report

As an ATB team member, you are responsible for ensuring that you:

- Read and understand the Code and stay current on updates to the Code.
- Comply with the principles in the Code every day. Failure to do so is a serious matter and may result in disciplinary action of you including reprimands or termination of your employment or relationship with ATB
- If you are unclear about your responsibilities or how to deal with an ethical situation, ask for help and advice from your leader or any of the designated contacts (see the [Getting Help](#) section below and [Contact List](#) in Appendix A).
- Report any actual or suspected breach of the Code by you or others as soon as you become aware of it (see [Reporting](#) section below)
- Document the issue, the resolution, and to whom the issue has been escalated. Keep this documentation on file to support how the issue has been addressed.

Managers:

Lead, respond, escalate, document

In addition to the responsibilities listed above for every team member, as a leader you are also responsible to:

- Lead by example (role modeling the principles in the Code) and ensure the Code is followed.
- Respond to questions from team members who report to you quickly and take action to resolve or escalate any actual or suspected breach of the Code as soon as practical.
- Ensure that any actual or suspected breach of the Code that is reported to you is reported to the appropriate person as soon as practical (see [Reporting](#) section below).
- Document the issue, the resolution, and to whom the issue has been escalated. Keep this documentation on file to support how the issue has been addressed.

Designated contacts:

Advise, refer, report, document

In addition to the responsibilities listed above for team members and leaders, as a designated contact (see the [Contact List](#) in Appendix A) you are also responsible to:

- Advise leaders on the appropriate course of action to take regarding any issue reported to you as soon as practical.
- Refer the issue to other designated contacts or the Ethics Committee if you require help or advice to resolve the situation.
- Ensure that any actual or suspected breach of the Code that is reported to you is reported to the appropriate person as soon as practical (see [Reporting](#) section below).
- Document decisions and actions taken.

Ethics committee:

Advise, document, update, report

ATB's Ethics Committee consists of the President and Chief Executive Officer, Chief People Officer, Chief Risk Officer and General Counsel, Vice-President Corporate Operations, and Corporate Secretary. The Vice-President, People & Culture, the Chief Compliance Officer and the Vice-President, Internal Audit support this committee. The Ethics Committee is responsible to:

- **Advise** designated contacts and decide on appropriate courses of action for matters referred to it by any designated contacts.
- **Document** decisions and actions taken.
- **Review and Recommend** changes as required to keep the Code and [Safe Disclosure Program](#) current and relevant.
- **Report:**
 - At least annually, to the Governance and Conduct Review Committee of the Board on matters relating to the Code; and
 - As soon as practicable, to the Audit Committee of the Board on all good faith reports relating to alleged improper activity involving financial controls or financial irregularities.

IV. MORE INFORMATION

At ATB, we all have a responsibility to seek guidance and raise concerns about compliance with the Code and we all have a duty to report actual or suspected breaches of the Code.

While the Code outlines the ethical behaviour expected, it cannot anticipate every situation. By speaking up and raising concerns, you help ensure ATB does the right thing, help protect clients' interests and assets, and safeguard ATB's reputation. If you need guidance, have questions or are unsure about the right thing to do, you should speak with your leader, any of the designated contacts (see the [Contact List](#) in Appendix A) or the Designated Officer.

V. REPORTING

a. Obligation to Report

It is critical to ATB's success and reputation that all team members follow the Code. Promptly reporting actual or suspected breaches of the Code may also protect ATB and its team members as ATB may be required to report certain types of breaches to law enforcement or regulatory authorities and ATB or the team member involved could be subject to civil, criminal or regulatory sanctions, penalties, or fines.

Each team member has a duty to report actual or suspected breaches of the Code (see [How to Report](#) section below). This includes violations of the Code, ATB policies and the law. You must promptly report if:

- you have breached the Code; or
- you become aware of a breach, or suspected breach, of the Code by any other team member or any other situation that could put ATB at risk of loss or harm.

Each leader and designated contact:

- has a duty to promptly address and document decisions or actions taken of all actual or suspected breaches of the Code that are reported to him or her as sent out in the Code of Conduct; and
- may report all actual or suspected instances of *Wrongdoing* (see [Glossary](#)) that are reported to him or her to the Designated Officer or via the [Safe Disclosure Reporting System](#) (see [How to Report](#) section below).

b. [Consequences of Not Reporting](#)

Adherence to the Code is a condition of employment. Failure to comply with the Code, including failure to report an actual or suspected breach of the Code by yourself or others, is a serious matter and may result in disciplinary action of you including reprimands or termination of your employment or relationship with ATB.

Leaders or designated contacts that fail to respond to a request for help or advice in a timely manner may also be subject to disciplinary action.

c. [Protection from Reprisal](#)

ATB is committed to conducting its affairs to the highest standards of ethics, fairness and professionalism and to providing accurate and reliable financial reporting. To support these goals, as part of its [Safe Disclosure Program](#), ATB is committed to protecting any team member, vendor, director or officer from reprisal for speaking up and making a good faith report of actual or suspected breaches of the Code or for participating in an investigation involving such matters.

Reprisal can include adverse compensation or workplace consequences such as negative performance evaluations, creating a hostile work environment, harassment, demotion, dismissal or giving someone tasks intended to alienate or discourage him or her.

If you believe you've encountered any form of reprisal, follow the reporting procedures in the [How to Report](#) section below to ensure the situation is addressed promptly.

For more information please see the [Safe Disclosure Program](#).

d. [How to Report](#)

ATB wants all team members to be comfortable reporting an actual or suspected breach of the Code and encourages team members to:

- speak with their leader first;
- if a reasonable resolution cannot be obtained from your leader, contact any one of the designated contacts, a member of the Ethics Committee or the Designated Officer (see the [Contact List](#) in Appendix A); or

- if you are not comfortable reporting actual or suspected breaches of the Code, you may file a confidential, anonymous report through the [Safe Disclosure Reporting System](#) (see the [Contact List](#) in Appendix A).

Please note: To assist ATB in meeting its legal obligations, all actual or suspected instances of *Wrongdoing* (see [Glossary](#)), including a reprisal related to *Wrongdoing*, may be reported:

- directly to the Designated Officer by completing the [Public Interest Disclosure Report Form](#) and sending it to the Designated Officer (see the [Contact List](#) in Appendix A) :
- via the [Safe Disclosure Reporting System](#).

Wrongdoing (see [Glossary](#)) relates to significant serious matters in or relating to ATB or its subsidiaries that a team member believes may be unlawful, dangerous to the public or injurious to the public interest, but does not cover normal work place issues.

e. [Investigations, Inquiries and Reviews](#)

All reports will be investigated promptly and thoroughly, as appropriate. ATB keeps these reports confidential, and a report of misconduct or information is disclosed only to the extent necessary to investigate and address the situation. Further details on how ATB will manage a report that relates to an actual or suspected breach of the Code are set out in the [Safe Disclosure Framework](#), which is a component of the [Safe Disclosure Program](#).

If you feel your concern has not been appropriately resolved, and if your matter relates to actual or suspected *Wrongdoing*, there are other, alternative options available to you (see [Public Interest Disclosure \(Whistleblower Protection\)](#) section below).

VI. PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWER PROTECTION)

Day to day workplace issues that fall short of *Wrongdoing* should be dealt with using the procedures outlined above. However to facilitate the disclosure and investigation of significant serious matters in or relating to ATB that a team member believes may be unlawful, dangerous to the public or injurious to the public interest, ATB has developed the [Public Interest Disclosure Framework](#), which is a component of the [Safe Disclosure Program](#).

The [Public Interest Disclosure Framework](#) only applies to conduct which qualifies as *Wrongdoing* which generally includes only significant serious matters in or relating to ATB and those persons involved in conducting its affairs (and in relation to ATB). *Wrongdoing* means:

- (a) A contravention of an act or regulation;
- (b) An act or omission that endangers life or safety of others or endangers the environment;
- (c) Gross mismanagement of public funds or a public asset; or
- (d) Knowingly directing or counselling an individual to commit a wrongdoing.

The [Public Interest Disclosure Framework](#) does not apply to actual or suspected breaches of the Code that fall short of *Wrongdoing* (such as team member performance issues or the contravention of an act outside of the workplace and unrelated to ATB). The [Public Interest Disclosure Framework](#)

includes information on how to report suspected instances of *Wrongdoing*, ensures team members who file good faith reports of *Wrongdoing* are protected from reprisal and establishes time lines for investigations of reports.

Concerns of *Wrongdoing* may be made in writing to the Designated Officer or via the [Safe Disclosure Reporting System](#). In certain instances, such as an imminent threat to health, safety or the environment, team members may file a report directly with the *Public Interest Commissioner* (see the [Contact List](#) in Appendix A); however, team members are encouraged to exhaust ATB’s internal procedures before engaging the Commissioner. If a team member is unsatisfied with the outcome of ATB’s internal procedures, the team member may make further disclosure to the *Public Interest Commissioner* (see the [Contact List](#) in Appendix A) and in the case of a suspected reprisal may complete the [Reprisal Complaint Form](#). Please see the [Public Interest Disclosure Framework](#) for further details. Instances of reprisals related to *Improper Activity* should be reported as set out in the [How to Report section above](#).

If you have any questions regarding the [Public Interest Disclosure Framework](#) please contact the Designated Officer.

VII. GETTING HELP AND ADVICE

A copy of this Code can be found at atb.com. Further information can be obtained from the following resources:

IF YOU HAVE QUESTIONS ABOUT...	PLEASE SEE THIS REFERENCE
Team member conduct	<ul style="list-style-type: none"> • Team Member Conduct
Privacy and confidentiality	<ul style="list-style-type: none"> • Privacy Compliance, Information Access and Security • The Privacy Statement • The Privacy Code
Occupational health and safety	<ul style="list-style-type: none"> • Occupational Health and Safety Policy
Money laundering and terrorist financing	<ul style="list-style-type: none"> • Anti-Money Laundering and Anti-Terrorist Financing Acts • Anti-Money Laundering/ Anti- Terrorist Financing Policy

Information technology and telecommunications use and security	<ul style="list-style-type: none"> • Telecommunications • ATB Information Security Policy • Network Security • Computing Hardware and Software
Processing team member loans	<ul style="list-style-type: none"> • Team Member Loans,
External employment	<ul style="list-style-type: none"> • Team Member Conduct (refer to Supplementary Employment & Political Involvement)
External communications and media relations	<ul style="list-style-type: none"> • Disclosure Policy
Entertainment and business development	<ul style="list-style-type: none"> • ATB Expense MasterCard
Harassment	<ul style="list-style-type: none"> • Team Member Conduct (refer to Harassment)
Social media usage	<ul style="list-style-type: none"> • Social Media Guidelines for ATB Financial Team Members
Wrongdoing	<ul style="list-style-type: none"> • Public Interest Disclosure Framework; or • Contact the Designated Officer

APPENDIX A: CONTACT LIST

In addition to your leader, the following leaders and executives are available to discuss any actual or suspected breach of the Code or questions or concerns regarding the Code. Unless noted, each of the following designated contacts are located at ATB Place 2100, 10020-100 Street, Edmonton, AB T5J 0N3:

People & Culture

Liz Stretch | Chief People Officer, People & Culture | 3699 63 Avenue NE, Calgary AB T3J 0G7
403-801-5853 | Transit #195 | lstretch@atb.com

Maureen Galway | Vice-President, People & Culture | 780-408-7104 | Transit
#350 | mgalway@atb.com

Privacy

Chike Unaegbunam | Director, Regulatory Compliance and Chief Privacy Officer | 780-408-7588 |
Transit #426 | privacyofficer@atb.com

Legal Services

Stuart McKellar | General Counsel, Vice-President Corporate Operations, & Corporate Secretary |
780-408-7314 | Transit #110 | smckellar@atb.com

Information Security

Keith Stewart | Head of Information Technology & Service Delivery | 780-392-2834 | Transit #131 |
kstewart@atb.com

Internal Audit

Aaron Friedenthal | Internal Audit | 780-903-8485 | Transit #140 | afriedenthal@atb.com

Compliance

Renee Oxley | Chief Compliance Officer | 780-408-6503 | Transit #426 | roxley@atb.com

Chief Risk Officer

Lisa McDonald | Chief Risk Officer | 780-408-7248 | Transit #380 | lmcdonald@atb.com

President's Office

Curtis Stange | President and Chief Executive Officer | 780-408-7181 | Transit # 100 |
cstange@atb.com

Board of Directors

Dianne Pettie | Chair, Governance and Conduct Review Committee | Transit # 110 | dpettie@atb.com

Brian Hesje | Chair, Board of Directors | Transit # 110 | bhesje@atb.com

Safe Disclosure Reporting System

Telephone HotLine (Live Operator), 1-866-521-1686

Telephone HotLine (Voicemail), 1-866-521-1686

Internet <http://www.clearviewconnects.com>

In writing: ClearView Connects, PO Box 11017, Toronto, Ontario, M1E 1N0

Public Interest Commissioner

Public Interest Commissioner | 780-641-8659 | 403-592-3106 | 1-855-641-8659 | 10303 Jasper Avenue NW, Suite 2800|Edmonton, AB |T5J 5C3| info@plc.alberta.ca | www.yourvoiceprotected.ca

APPENDIX B: GLOSSARY

Customer	Includes ATB Financial: <ul style="list-style-type: none"> • Borrowers • Depositors • Purchasers of investment products
Designated Officer	The individual appointed by the CEO to investigate allegations of Wrongdoing under the Public Interest Disclosure Framework . Currently, the Designated Officer appointed is: <p>Stuart McKellar General Counsel, Vice-President Corporate Operations & Corporate Secretary 780-408-7314 Transit #110 smckellar@atb.com</p>
Family	Includes an team member's spouse or partner and any of the following relations of an team member or spouse: <ul style="list-style-type: none"> • Parents • Guardian • Grandparent • Grandchild • Child • Sibling • Uncle • Aunt, or • The spouse of any of the above
Fiduciary relationships	A legal or ethical relationship where one party acts in a trustee capacity for a second party who is expected to benefit from the relationship. The beneficiary places confidence, good faith and reliance in the trustee to act for his or her sole benefit and interests
Safe Disclosure Reporting System	An independent, confidential and anonymous reporting channel for financial and ethical concerns.
Team Member	Includes all individuals employed by ATB Financial (and all of its subsidiaries) including the following: <ul style="list-style-type: none"> • Permanent full-time or part-time team members • Probationary full-time or part-time team members • Term team members • Casual team members Also includes individuals (a) working on ATB premises for a period longer than three (3) months or (b) who have access to ATB systems and confidential information in the course of their work

Wrongdoing

In relation to ATB and those persons involved in conducting its affairs, means:

- (a) A contravention of an act or regulation;
 - (b) An act or omission that endangers life or safety of others or endangers the environment;
 - (c) Gross mismanagement of public funds or a public asset; or
 - (d) Knowingly directing or counselling an individual to commit a wrongdoing.
-