

This participating account management policy has been established by the Board of Directors, in conjunction with the participating policyholder dividend policy, and may be amended by the Board from time to time at its discretion. The factors most likely to be considered in deciding whether to amend this policy include changes in applicable legal or regulatory requirements, professional guidelines, industry practices or significant business changes. The Appointed Actuary has overall accountability for the administration of this policy, having regard for relevant corporate policies.

The participating account is managed with regard to the Company's enterprise risk management framework through which the Board and management establish the Company's risk strategy, articulate and monitor adherence to risk appetite and risk limits and identify, measure, manage, monitor and report on risks.

As required by the Insurance Companies Act, the Company maintains accounts for its participating insurance policies separately from those maintained in respect of other policies. This facilitates the measurement of the earnings attributable to the participating account.

The participating account is maintained in respect of participating life insurance policies and small blocks of participating annuities and disability insurance policies that have been issued or assumed by the Company. The participating account is comprised of three main types of sub-accounts. The closed block sub-accounts for Canada Life, New York Life and Crown Life were established for participating insurance policies issued or assumed by the Company prior to demutualization and are comprised of the best-estimate liabilities associated with these policies. The ancillary sub-accounts are comprised of the liabilities associated with provisions for adverse deviation in respect of the policies contained in the closed block sub-accounts.

The open sub-accounts are maintained in respect of the participating insurance policies issued or assumed by the Company other than those within the closed block sub-accounts, and are comprised of the total liabilities associated with these policies, together with the participating account surplus. While some of these open sub-accounts have since been closed to new business after demutualization, the Canadian open sub-account remains open to new business. The Canadian open sub-account includes participating insurance policies issued or assumed in Canada and Bermuda.

The closed block sub-accounts are maintained in accordance with the closed block operating rules established by the Company for the closed blocks and approved by the Office of the Superintendent of Financial Institutions. The closed block operating rules govern the management of the various closed block sub-accounts, including investment income allocation, mortality costs, expense charges and taxes. The Appointed Actuary is required to provide the Superintendent and the relevant non-Canadian insurance regulators with reports and opinions about the operation of the closed block sub-accounts and ongoing compliance with the closed block operating rules as may be required.

Assets of the Company held within its general funds are allocated to the participating account and non-participating account segments for the purpose of allocating investment income to each account. Assets are allocated to each segment according to the investment guidelines established for the segments. These guidelines outline criteria for asset mix, liquidity, currency risk and interest rate risk. These guidelines are intended to recognize considerations such as the business objectives, liability characteristics, liquidity requirements, tax considerations and interest rate risk tolerance of each segment. Assets allocated to a segment may from time to time be reallocated to another segment within the same account or another account provided the assets exchanged comply with the investment policy of the respective segments. Any such exchanges are effected at fair value.

The Board of Directors reviews the investment strategy of each of the sub-accounts, and on an annual basis reviews and approves investment policies which govern investment activities for the participating accounts. The investment policies outline a number of principles for investing in assets, including risk tolerance and the approach to managing investment risk. Investment risk is managed through underwriting standards, exposure limits and specific guidelines governing asset classes and investment operations. The investment policies establish limits for the concentration of assets in single geographic areas, industries, companies and types of businesses as part of the risk management process. The Company may use derivative products for risk management purposes to hedge asset and liability positions.

The Company maintains one asset segment to support the liabilities of the open sub-account for policies issued in Canada and Bermuda, and of the Canada Life closed block sub-account and ancillary sub-accounts for policies issued in Canada. The assets supporting these liabilities are notionally divided based on investment needs and objectives into: (1) investments that are used to satisfy near term policy benefits (next 10 years) and (2) investments that are used to achieve longer term objectives of the participating account.

The investments used for the near term are primarily fixed income assets. The cashflows of these assets, together with the participating policy premiums are expected to provide for the policyholder benefits for the next 10 years. These benefits include dividends, death benefits, cash surrender values and other policy benefits such as waiver of premium.

The investments used to achieve the longer term objectives include a combination of 1 to 10 year fixed income assets, a total return bond pool, and a diversified pool of common stocks, private equity and real estate. As a result, the fixed income assets held to achieve the longer term objectives are expected to mature and be reinvested several times before being used to meet the policy benefits. The focus in managing these assets is to create value by reinvesting in a disciplined manner as investment spreads, interest rate levels and equity market conditions evolve and cycle. The performance of this part of the strategy is a key driver of changes in the dividend scale interest rate and this rate is an important contributor to changes in the dividend scale.

For all other sub-accounts (that is, the closed block sub-accounts for New York Life and Crown Life), the Company invests primarily in fixed income assets across a spread of terms. The target maturity profile of these

fixed income investments is shorter than the expected policy cashflows. This strategy is intended to produce returns that exhibit stability while providing policyholders with some participation in changing fixed income market conditions.

Investment income is allocated to the participating account in accordance with the Company's investment income allocation policy. Generally, investment income results are allocated directly to a segment based on the assets allocated to the segment. Each year the Appointed Actuary reviews the method used for allocating investment income to the participating account and reports to the Board of Directors on its fairness and equitableness.

Expenses and taxes incurred by the Company are allocated to the participating account in accordance with the Company's expense allocation and tax allocation policies.

Expenses are allocated by the area incurring the expense to the appropriate line of business. As a general principle, expenses are allocated to a line of business in accordance with its business activities. In addition, from time to time the Company makes significant expenditures/investments outside of regular business activities which may include but are not limited to transactions such as acquisitions, restructurings, and capital expenditures (e.g. major IT systems), the intent and effect of which is to reduce future expenses. The governing principle for fair and equitable treatment of such expenditures/investments is that expenses will be allocated to the lines of business recognizing both the benefit derived by the line of business from that expenditure/investment and the contribution made by the line of business to that expenditure/investment.

For the open sub-accounts, in general, expenses that are exclusively related to participating business are allocated directly to the participating account. Expenses related to both participating and non-participating business are allocated based on business statistics when the expenses vary based on those statistics, based on managers' estimates supported by time studies or other assessments, or in proportion to the total expenses allocated using all of the methods previously mentioned. For unusual items, management will determine and report to the Appointed Actuary the resulting allocation of expenses to each line of business, including the basis and justification for it.

For the closed block sub-accounts, expenses are charged based on pre-determined formulas in accordance with the closed block operating rules.

Taxes are allocated to the participating account using the characteristics of the participating and non-participating accounts that are determinative of the relevant tax costs. In accordance with the closed block operating rules, no taxes on profits are allocated to the closed block sub-accounts since it is expected that closed block pre-tax profit will cumulatively be zero over the lifetime of the closed block.

Each year the Appointed Actuary reviews the method used for allocating expenses and taxes to the participating account and reports to the Board of Directors on its fairness and equitableness.

Throughout the term of their policy, participating policyholders benefit from the financial strength and ongoing vitality of the Company. For policyholders in the open sub-accounts, this includes the benefit of participating account surplus, which includes the combined contributions to surplus made by, or expected to be made by, past and present participating policyholders. After their policy terminates, contributions to surplus made by policyholders remain in the participating account surplus.

The participating account surplus associated with the open sub-accounts is managed within the Company's capital management and enterprise risk management framework and with regard to regulatory requirements. Surplus is required for a number of purposes including to help ensure the Company can meet its obligations to participating policyholders, help ensure financial strength and stability of the Company, finance new business growth and acquisitions which may benefit the participating account, provide for transitions during periods of major change, and to avoid undue fluctuations in dividends; subject to items such as practical considerations and limits, legal and regulatory requirements, and industry practices.

A portion of earnings in the open sub-accounts for each financial period is retained in the participating account surplus. The earnings retained in the participating account surplus include items such as policyholders' contributions to surplus and the investment returns earned on assets allocated to the participating account surplus. The participating account surplus position is reviewed annually, having regard for the specific circumstances of the participating account. Based on the review, policyholders' future contributions to surplus may be adjusted by increasing or decreasing the dividend scale.

As permitted by the Insurance Companies Act, the Company may distribute to the shareholders a percentage of the amount distributed to policyholders from the open sub-accounts in respect of a financial year. Prior to any such distribution, the Appointed Actuary will confirm to the Board of Directors that the proposed distribution is permitted under the terms of the Insurance Companies Act. The proportion distributed to the shareholders will not exceed the prescribed amount as determined under section 461 of the Insurance Companies Act. Any distribution made to the shareholders will be published in the Company's annual report.

Under the terms of the closed block operating rules, no distribution to the shareholders may be made from the closed block sub-accounts. In accordance with the demutualization agreement, the amount by which the assets exceed the liabilities in the ancillary sub-accounts is transferred to the shareholders each quarter.

Glossary:

The Company: The Canada Life Assurance Company, which was amalgamated with The Great-West Life Assurance Company, London Life Insurance Company, London Insurance Group Inc. and Canada Life Financial Corporation on January 1st 2020.

Closed block sub-account and open sub-accounts: If a mutual insurance company demutualizes (see 'Demutualization' below), participating policyholders are divided into two categories. Eligible policies which

were purchased or assumed by the company before demutualization are accounted for in what is known as the 'closed block' or 'closed block sub-account'. Those purchased or assumed after demutualization are accounted for in what is known as the 'open sub-accounts'. The closed block sub-accounts are maintained in accordance with the closed block operating rules established by the Company for the closed blocks and approved by the Office of the Superintendent of Financial Institutions.

Demutualization: Demutualization is the process of a company changing from a mutual company owned by participating policy owners to a stock company owned by shareholders.

Dividend classes: Groupings of participating policies with certain product and policy attributes in common, which are used in determining how the amount to be distributed as policyholder dividends is divided among classes of policies when setting the policyholder dividend scale.

Dividend scale: The dividend scale outlines how the total amount available for distribution as dividends will be allocated to each individual policy in the form of policyholder dividends.

Participating account earnings: Earnings arise when the experience in the participating account for factors such as investment income, mortality, lapses, expenses and taxes is collectively more favourable than the assumptions for these factors used when pricing the participating insurance policies. The Company may distribute a portion of the earnings at the discretion of the Board of Directors in accordance with the Dividend Policy.

Provisions for adverse deviation: The valuation of liabilities involves estimates and assumptions about future events. Because of the risk that estimates will prove incorrect, liabilities include provisions for adverse deviation from the estimates of experience relating to future events.

Total return bond pool: A portfolio of fixed income assets which is actively traded. Assets are traded in response to factors such as changing market conditions and market opportunities.

Segments: The split of the assets of the Company held within its general funds for the purpose of determining asset allocation; each segment has investment guidelines established for the segment.

Sub-accounts: A participating account can be split into separate sub-accounts to better align the management of the accounts, including management of investments, to different parts of participating business.

Undue fluctuations: One of the uses that may be made of participating account surplus in the open sub-accounts is to help avoid undue fluctuations in dividends. The use of surplus for this purpose is limited to the occurrence of extreme events, and as such, is not a common occurrence.

Approved by The Canada Life Assurance Company Board of Directors on Dec 4, 2019, and effective on that day.