

## **WHISTLE BLOWER POLICY**

This Policy is intended to encourage directors, officers, employees and outsiders to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviours or practices).

1. The Whistleblower may promptly report the suspected or actual event to his/her supervisor or, if the Whistleblower is an outsider, to the Company's Legal Counsel.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower may report the event to the next highest level of management, including to an appropriate Board committee or member.
3. The Whistleblower can report the event with his/her identity disclosed or anonymously.
4. The Whistleblower shall receive no retaliation or retribution from the Company for a report that was provided in good faith (i.e. that was not done primarily with malice to damage the Company or another person).
5. A Whistleblower director, officer or employee who makes a report in bad faith may be subject to discipline, including termination from employment, removal from the Board, or other legal means to protect the reputation of the Company, its directors, officers and employees.
6. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local enforcement personnel.
7. Supervisors, officers or Board members who receive the reports must promptly act to investigate and resolve the issue.
8. The Whistleblower shall receive a feedback report within fifteen (15) business days of the initial report, regarding the investigation, disposition or resolution of the issue.
9. If the investigation of a report that was done in good faith and investigated by internal personnel is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
10. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this Policy, unless the issue requires investigation by law enforcement, in which case directors, officers and/or employees of the Company may be subject to subpoena.