



## WHISTLE BLOWING PROCEDURES

Procedures for receipt, retention and treatment of complaints of accounting, internal accounting controls, or auditing matters, fraud, conflict of interest, harassment, workplace violence, substance abuse, safety or other issues (“Whistle Blowing Procedures”).

### **Purpose**

The Audit Committee has established procedures for receipt, retention and appropriate treatment of complaints and for confidentially addressing anonymous submissions by employees and non-employees (shareholders, suppliers, etc.) concerning questionable accounting or auditing matters. As a matter of sound corporate governance, these procedures are designed to provide a readily understood, prompt and effective means of addressing such complaints or concerns.

### **Definitions**

“Anonymous” means unknown authorship, and without designation that might lead to information about the authorship. Anonymity is not compromised by assignment of code or other designation with which a person can communicate without revealing their identity.

“Complaint” means any adverse information provided to the company, whether in the form of a concern, a demand for remedial action, or a report of a suspected violation of law or company policy.

“Confidential” means authorized for access by only those persons who have a need to know. A need to know normally arises from an obligation to investigate or to take remedial or disciplinary action.

“Whistle Blower Hotline” means a telephone number, web page or e-mail address available for receiving anonymous complaints from any source. The Whistle Blower Hotline access number, web or e-mail address shall be posted on the company’s internal websites. It is suggested that the “Hotline” be an e-mail address accessed by the V.P. and CFO although phone access can also be utilized.



## Procedures

### 1. Submission and Receipt of Complaints

- a. Notwithstanding the availability of the anonymous complaint procedures (using the Whistle Blower Hotline), employees are free to bring complaints to their supervisor. Any complaints so received shall be handled as confidential and promptly forwarded to the V.P. and CFO.
- b. Both employees and non-employees may submit anonymous complaints to the Whistle Blower Hotline.

### 2. Retention of Records of Complaints

- a. In compliance with applicable laws and the company's document retention policies;
- b. Subject to safeguards that ensure their confidentiality and, when applicable, the anonymity of the complainant; and,
- c. In such a manner as to maximize their usefulness for overall compliance or governance programs.

### 3. Treatment of Complaints

- a. All complaints directed to the Whistle Blower Hotline will be investigated promptly and reported to the Audit Committee not later than at the Committee's next regularly scheduled meeting.
- b. All complaints, whether or not received anonymously, shall be treated as confidential;
- c. Although a person making an anonymous complaint may be advised that maintaining anonymity could hinder an investigation, the anonymity of the complainant shall be maintained, if permitted by law, until they indicate that they no longer wish to remain anonymous.
- d. Complaints received by the Whistle Blower Hotline shall be initially analyzed or screened by the V.P. and CFO to direct them to the appropriate department for handling. A summary report of items handled in this manner shall be provided



- quarterly to the Audit Committee Chair. Any complaints that fall within the intent of this policy shall be promptly reported by the V.P. and CFO, after making appropriate safeguards to assure anonymity, to the Audit Committee Chair.
- e. The Chair of the Audit Committee shall inform the Committee, in summary form or otherwise, of all complaints received, together with an initial assessment as to the treatment of each complaint.
  - f. The assessment, investigation and evaluation of complaints shall be conducted by, or at the direction of, the Audit Committee. As deemed appropriate by the Audit Committee, and at the company's expense, the Committee may engage independent advisors including legal counsel, investigators or forensic accountants other than the company's external auditor for the purpose of investigation or remediating any complaint.
  - g. Following investigation and evaluation of a complaint, the Audit Committee shall determine any recommended disciplinary or remedial action. Recommendations of the Committee shall be brought to the Board or to the appropriate members of Senior Management for authorization and/or implementation. If the action taken to resolve a complaint is deemed by the Audit Committee to be material or otherwise appropriate for inclusion in the minutes of the Committee, it shall be so noted in the minutes.
  - h. The Audit Committee will regard the making of any deliberately false or malicious allegations by an employee as a serious offence which may result in recommendations to the Board or to Senior Management for disciplinary action up to and including dismissal for cause.
  - i. Treatment of complaints shall include taking reasonable and necessary steps to prevent further similar violations.
  - j. Any effort to retaliate against any person making a complaint in good faith is strictly prohibited and shall be reported immediately to the Audit Committee Chair. Any allegations regarding such retaliation will be investigated and dealt with in accordance with this policy.



Complaints may be filed through any of the following:

1. E-mail: [wbhl@hinvest.ca](mailto:wbhl@hinvest.ca)
2. Telephone: 425-8761. This is a dedicated line direct to the Vice President and CFO and is voice message equipped.
3. Mail: Mark "Strictly Confidential"  
32 Akerley Blvd  
Dartmouth, NS  
B3B 1N1  
Attn: W.B.H.L.  
(Privacy cannot be assured)
4. Fax: Mark "Strictly Confidential"  
902-468-4770  
Attn: W.B.H.L.  
(Privacy cannot be assured)