
	<b>Whistle Blower Policy</b>			Page 1 of 3	
	<b>Department</b>	CORP	<b>Document No.</b>	CORPPOLI-0006	
	<b>Label/Project No.</b>	Whistle Blower	<b>Revision</b>	0.00	
	<b>Document Type</b>	Policy	<b>Revision Date</b>	2021-04-01	

## PURPOSE

The purpose of this policy is to encourage current and former employees and sub-contractors of STRAIT to communicate issues of serious concern regarding STRAIT’s business practices.

## POLICY STATEMENT

STRAIT is committed to always conducting itself with honesty and integrity. If, at any time, this commitment is not followed or appears in doubt, STRAIT will seek to identify and remedy such situations. Accordingly, it is the policy of STRAIT to ensure that when an individual has reasonable grounds to believe that a STRAIT employee has committed, or is about to commit, a “whistle blower event” the employee or subcontractor has the right to:

- disclose this information, and
- be protected from reprisals.

And be assured that:

- all parties to an investigation will be treated fairly and equitably,
- confidentiality will be maintained to the greatest extent possible, and if,
- wrongdoing is found, appropriate remedial and disciplinary actions will be taken.



This policy is in accordance with Federal and Provincial Legislation and is located on the STRAIT Group Website:

<https://strait.ca/>

## DEFINITION – “WHISTLE BLOWER EVENT”

For the purposes of this policy, a whistleblower complaint may be submitted if any one of the following incidents occurs:

- Accounting, auditing, or other financial reporting fraud or misrepresentation.
- Violations of federal or provincial laws that could result in fines or civil damages payable by STRAIT, or that could otherwise significantly harm STRAIT’s reputation or public image.
- Unethical business conduct in violation of any STRAIT policies or codes.
- Danger to the health, safety, or well-being of employees, subcontractors, vendors and/or the public.

	<b>Whistle Blower Policy</b>			Page 2 of 3	
	<b>Department</b>	CORP	<b>Document No.</b>	CORPPOLI-0006	
	<b>Label/Project No.</b>	Whistle Blower	<b>Revision</b>	0.00	
	<b>Document Type</b>	Policy	<b>Revision Date</b>	2021-04-01	

## PROCEDURE

A complaint may be submitted in writing to any member of the STRAIT senior executive team (Vice President or higher).

The written statement should include the following information:

- Description of the activity.
- The location or locations at which the activity took place or occurred.
- The name of the law, regulation or STRAIT policy, practice that is being violated if known.
- Date complainant became aware of the activity.
- Name of individual or individuals suspected of the activity.
- Steps taken (if any) prior to making complaint or allegation (i.e., spoke with supervisor).



The written statement can be submitted to a member of the STRAIT senior executive team via email at [whistleblower@strait.ca](mailto:whistleblower@strait.ca) or via STRAIT's WorkHub Portal (preferred method). The complainant shall expect a confirmation of receipt of the complaint as soon as it received by STRAIT.

Whistleblower reports are meant to alert the senior executive at STRAIT of policy breaches and other inappropriate activities and behaviors and is intended for serious and substantiated allegations only. Hearsay does not warrant whistleblower reports. Personal issues should be first dealt with directly with other parties or their supervisors.

The complainant will not be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against as a result of communicating a genuine concern. Any STRAIT employee or subcontractor found to be in violation of this policy when dealing with a complainant may be subject to termination of employment.

An individual is not required to prove the truth of an allegation, but they are required to act in good faith, and to provide sufficient evidence to show that there are sufficient grounds for concern. The amount of contact between the complainant and the investigating body will depend on the nature of the issue and the clarity of the information provided. The investigating body may seek further information from the complainant.

Any individual who does not act in good faith in reporting a suspected violation may be subject to disciplinary action up to and including termination of employment or relationship with STRAIT.

	<b>Whistle Blower Policy</b>			Page 3 of 3	
	<b>Department</b>	CORP	<b>Document No.</b>	CORPPOLI-0006	
	<b>Label/Project No.</b>	Whistle Blower	<b>Revision</b>	0.00	
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All complaints will be treated as confidential and sensitive. In addition, the complainant shall be provided the opportunity to remain anonymous, save and except in those circumstances where the nature of the disclosure and/or the resultant investigation make it necessary to disclose identity (for example, legal investigations or proceedings). In such cases, all reasonable steps shall be taken to protect the complainant from harm because of having made a disclosure.

## INVESTIGATION

Once a complaint is brought forward an investigation will commence. The member of the STRAIT senior executive team in receipt of the complaint may enlist the assistance of other employees, legal counsel, accounting, or other advisors as may be appropriate to conduct the investigation. A report will be prepared, and any legal or other action will be taken as appropriate. Each complaint will be treated as confidentially as possible and with due care. The results of the investigation will be shared with the complainant to the extent possible and within reasonable time.

## APPLICABILITY

This Policy applies to all current and former employees and subcontractors of STRAIT and its subsidiaries.