



## Whistleblower Hotline

### Our Commitment

Violations of Zedcor Inc.'s (the "**Corporation**") Code of Business Conduct and Ethics or applicable laws, rules and regulations can result in serious damage to the Corporation, its reputation and the reputations of its employees. Accordingly, if an employee has knowledge of any possible violation of the Code of Business Conduct and Ethics or any possible breach of applicable laws, rules or regulations or any possible wrongdoing or questionable practices regarding accounting or auditing matters or internal accounting controls (collectively called an "**Alleged Wrongdoing**"), that employee is encouraged to report such.

The report should be made to the employee's immediate supervisor, if appropriate. If the employee is of the view that it would be more appropriate under the circumstances to take the Alleged Wrongdoing to higher levels, due to either the nature of the Alleged Wrongdoing or, if earlier reports through normal channels have not been acted upon, then that employee has the right to directly contact:

- (i) the Chair of the Audit Committee through the Whistleblower Hotline to report an Alleged Wrongdoing that relates to any theft, fraud, questionable accounting (including internal accounting controls) or auditing matters or any other financial matters; or
- (ii) the Chair of the Corporate Governance, Nominating and Compensation Committee or Chief Executive Officer of the Corporation to report an Alleged Wrongdoing that relates to any matter other than those financial matters described in subparagraph (i) above.

Complaints will be handled on a strictly confidential basis and may be submitted anonymously provided that if the employee does identify his/herself, disclosure of the person's identity and the confidential information submitted may be disclosed to the extent required to permit a thorough and effective investigation or may be required to be disclosed by law. Unless required by law, the Corporation shall not make, nor shall it tolerate, any effort to ascertain the identity of the employee making an anonymous report.

Each complaint will be thoroughly investigated to ensure there are sufficient grounds and evidence supporting it. Upon confirmation of the Alleged Wrongdoing, the matter will be resolved by appropriate action.

The Corporation and its directors, officers and employees shall not retaliate against any employee who reports, in good faith, an Alleged Wrongdoing or a retaliatory act or who assists in the investigation of the Alleged Wrongdoing. The term "*in good faith*" means that the reporting employee should have evidence or reasonable grounds for believing that an Alleged

Wrongdoing or retaliatory act has occurred and must act without malicious intent or personal agenda. Reports of Alleged Wrongdoings or retaliatory acts that were not made in good faith will be viewed as a serious disciplinary offence and may be subject to sanctions, including termination of employment for cause without notice or payment in lieu of notice.

To access the Whistleblower Hotline for complaints described in subparagraph (i) above, employees can use any of the methods outlined below.

An independent, third party, has been selected to provide a confidential and anonymous communication channel for reporting concerns.

To access the Whistleblower Hotline to have messages delivered directly to the Audit Committee or the Corporate Governance, Nominating and Compensation Committee, employees and stakeholders can use any of the following methods:

1. Internet – <https://reporting.cornerstonegovernance.com/>

2.

When prompted for a LOGIN ID, type in:

**zedc48EC**

3. Toll free telephone and fax number:

**1-888-650-7768 (Canada and the United States)**