

Mandate: Board of Directors	Title: Whistleblower Policy	Effective Date: August 4, 2011
	Revised: December 1, 2017	Authority: Board of Directors

Whistleblower Policy

General Policy Statement

SCM Insurance Services Code of Conduct ("Code") requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

If any employee has any concerns about the Corporation's handling of any of its financial or business transactions, and is uncomfortable with discussing this with management, he or she is encouraged to contact either:

1. SCM's Ethics Reporting Hotline
Phone: 1-888-455-9951
Website: www.ethicsline.ca
2. SCM's Audit Committee Chair, Ron Lalonde
Email: lalonder@rogers.com

Such concerns may be submitted anonymously.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with the Whistleblower Policy.

Conduct Expectations

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against an individual who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within SCM Insurance Services.

Reporting Violations

The Code addresses SCM Insurance Services open door policy and suggests that employees share their questions, concerns, suggestions or complaints with an appropriate individual who can address them properly. In most cases, an employee's manager is in the best position to address an area of concern. However, if you are not comfortable speaking with your manager or you are not satisfied with your

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manager's response, you are encouraged to speak with an individual in the Human Resources Department or any management representative whom you are comfortable in approaching.

If these channels have been followed and employees still have concerns, or if employees feel the matter is so serious that it cannot be discussed with any of the above, they should contact **EthicsLine** SCM Insurance Services independent third party Ethics Reporting Hotline service at 1-888-455-9951 or submit an anonymous report via our EthicsLine e-web reporting service by logging onto www.ethicsline.ca or contact the Chair of the Audit Committee directly.

Accounting and Auditing Matters

An important part of the governance process in SCM Insurance Services is the Audit Committee which consists of the three (3) independent members of the Board of Directors of the company. One of the roles of the Audit Committee is to ensure that the financial affairs of the company are conducted in a legal and ethical manner.

The Chair of the Audit Committee of the Board of Directors may be contacted in lieu of contacting the Ethics Line on any matter. The Audit Chair will address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

Acting in Good Faith

Filing a complaint concerning a violation or suspected violation of the Code requires you to act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The sender will receive an acknowledgement of receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Investigations will be conducted by independent persons such as auditors, Chair of the Audit Committee, CHRO, and/or legal counsel.