



## **WHISTLEBLOWER POLICY**

### **POLICY STATEMENT**

Canadian Bank Note Company, Limited (the “Company”) is committed to conducting its business with the highest standards of ethical behaviour. Any reference to the Company in this Policy includes its subsidiaries.

Employees, officers and directors of the Company (collectively “Employees”) as well as agents and consultants of the Company (collectively the “Representatives”) and Company customers and suppliers are expected to be vigilant against any conduct by the Company, or its Representatives, which could represent, for example:

- a breach of any state, national, federal, or provincial law or regulation;
- a breach of any Company policy including, but not limited to, the Company’s Anti-Bribery Policy; Conflict of Interest Policy; Gifts, Hospitality, Donations and Sponsorships Policy; and Disrespectful Behaviour, Harassment and Violence in the Workplace Policy;
- abuse of authority;
- an act of discrimination or retaliation;
- misuse of Company resources;
- dangerous practices that could cause physical harm or property damage

Employees and Representatives must also be vigilant against activities which could be perceived as being corrupt and/or associated with bribery as even the perception of corruption can lead to severe reputational and economic consequences.

This Policy will be communicated to all Employees and Representatives and will be incorporated into the Company’s ongoing ethics training program. In addition, this Policy will be announced on the Company’s external Internet website where directions will be provided as to how Employees, Representatives or external third parties (such as the Company’s customers or suppliers) may report misconduct.

## HOW TO REPORT MISCONDUCT

Employees and Representatives who become aware of violations of law or policy relating to the Company are urged to follow normal internal administrative processes and immediately report the circumstances to their immediate supervisor, or to a higher level of Company management, or to the Vice-President Corporate Affairs, or the Chief Executive Officer of Canadian Bank Note Company, Limited.

External third parties such as customers or suppliers are urged to bring any such misconduct to the attention of the Vice-President Corporate Affairs of Canadian Bank Note Company, Limited.

The Vice-President Corporate Affairs can be reached at:

**+1-613-722-3421** or via email at: [general.counsel@cbnco.com](mailto:general.counsel@cbnco.com)

To deal with those rare circumstances where a person wishing to report is uncomfortable contacting the Vice-President Corporate Affairs directly, the Company has retained **WhistleBlower Security®**, a corporation based in Vancouver, Canada, as an independent, third-party service provider to provide a confidential and anonymous reporting procedure based on a toll-free telephone ethics ‘hotline’, sometimes also referred to as a “whistleblower hotline”. Any individual who wishes to express their concerns to the Company about reportable misconduct but does not wish to do so through internal Company channels may contact WhistleBlower Security by calling the following toll-free telephone number (or in certain jurisdictions, calling collect) to speak with an experienced WhistleBlower Security professional (in English, French or Spanish) or by using email, Internet, or facsimile:

Call: **1-866-921-6714** (available 24 hrs./day, 7 days/week)

Email: [Canadianbanknote@integritycounts.ca](mailto:Canadianbanknote@integritycounts.ca)

Web: [www.whistleblowersecurity.com](http://www.whistleblowersecurity.com) – Click on “File A Report”

Mail: PO Box 91880 West Vancouver, British Columbia, Canada, V7V 4S4

Fax: **1-604-926-5668**

This discreet reporting service has been established to ensure that unethical behaviour or past, ongoing, or potential violations of law or Company policies, can easily and effectively be reported in a confidential manner. Individuals who are reporting their reasonable and substantiated concerns, in good faith, can do so without fear of reprisal, retaliation or adverse employment consequences.

## WHAT HAPPENS IF A REPORT IS MADE TO THE HOTLINE?

Upon being contacted on the ethics ‘hotline’ by a reporting individual, WhistleBlower Security will record whatever information the caller is prepared to disclose in sufficient detail to create a report and enable the Company to initiate an investigation of the issue. Unless the caller is prepared to disclose their identity, they may, at their own discretion, remain anonymous. In such circumstance WhistleBlower Security will then assign the caller a discreet caller ID number in order for them to be able to track the complaint and, by the same means, provide the caller with a

confidential reference for making future follow-up contact with WhistleBlower Security should they wish to do so.

The Company is immediately advised by WhistleBlower Security whenever an intake call has been received and a report initiated by means of the reporting 'hotline'

## **PROTECTION AGAINST REPRISALS**

Any reporting individual who feels they have been subjected to an act of reprisal, retaliation or adverse employment consequences as a result of having reported an actual or potential ethics violation should immediately report such circumstances to their immediate supervisor, or to a higher level of Company management, or to the Vice-President Corporate Affairs, or the Chief Executive Officer. Their complaint will be investigated by the Vice-President Corporate Affairs and where considered necessary, corrective action will be taken.

## **INVESTIGATION**

All reports are promptly and thoroughly investigated by the Company to determine if the behaviour in question represents misconduct in accordance with this Policy as described above.

If the report is substantiated the Company will take appropriate corrective action.

If in the course of its investigation, the Company determines that the reported allegations were made in bad faith, were knowingly false, or were made for a malicious purpose, the Company will consider this to be serious misconduct on the part of any individual found to be initiating the unwarranted report.

## **ANNUAL REPORTING**

On an annual basis the Vice-President Corporate Affairs will report to the President and Chief Executive Officer a summary of 'hotline' complaints made during the year representing:

- a) number of complaints received;
- b) categories and descriptions of complaints;
- c) status and outcome of complaint investigations; and
- d) any investigation findings and recommendations implemented in resolution of a complaint.

Reviewed and Approved April 20<sup>th</sup>, 2018

  
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Ron Arends  
President & CEO