



# WHISTLEBLOWER POLICY

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<b>POLICY NO:</b>	419	<b>APPROVAL DATE:</b>	May 24, 2016
<b>TITLE:</b>	Whistleblower Policy	<b>REVISION DATE:</b>	September 18, 2019
<b>SECTION:</b>	Human Resources	<b>AUTHORITY:</b>	Aquatera Corporate Team
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## PURPOSE

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The purpose of Whistleblower Policy is to provide all Aquatera Utilities Inc. and each subsidiary of Aquatera Utilities Inc. (henceforth called the "Aquatera Group") Employees, Officers, Directors and third parties with a confidential and anonymous means for the reporting of any unethical conduct, including breaches of policies and procedures, concerns about accounting practices and internal controls and auditing matters.

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## SCOPE

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The Aquatera Group is committed to integrity and ethical behaviour in the workplace and requires its Employees, Officers and Directors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As Employees and representatives of the Aquatera Group we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

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## POLICY STATEMENT

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The Whistleblower Policy is intended to encourage and enable Employees and others to raise serious concerns on a confidential and anonymous basis without fear of retaliation. The Aquatera Group will address and correct inappropriate conduct and actions. It is the responsibility of all Employees, Officers and Directors to report concerns about violations of the Aquatera Group's Code of Conduct or suspected violations of law or regulations that govern the Aquatera Group's operations or adversely impact the Aquatera Group customers, shareholders, employees, investors, or the public at large.

Complainants are encouraged to follow the guidelines set forth in the Whistleblower Procedures document.

Reports of workplace wrongdoing may be made in confidence to the Management / Supervisory staff, Human Resources, the Chief Financial Officer, the Chief Operating Officer, The Chief Executive Officer, the Chair of the Audit and Risk Committee, the Chair of the Board or anonymously by contacting our reporting hotline which is managed by an independent third party called ConfidenceLine (see appendix for complete contact information).

This policy is consistent with the Company's Code of Conduct Policy.

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## **DEFINITIONS**

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Whistleblowing – ‘Whistleblowing’ is when an employee raises a concern about malpractice or wrongdoing within an organisation. The person raising the concern is the ‘whistleblower’. Typically, the concerns raised are high-profile ones for employers: health and safety, financial mismanagement or corruption, environmental matters or criminal activities.

Complainant - Any person that submits a complaint or report of wrongdoing.

Respondent - Someone who's alleged conduct is the subject of a complaint.

Wrongdoing- Any illegal action or violation of company policy.

Retaliatory Acts - Retribution, or reprisal against any Complainant as a result of their reporting an incident of wrongdoing, or against any employee that participates in an investigation relating to the allegation of wrongdoing.

# Appendix

## Confidential Contact Information:

Interim Chairman of the Board of Directors (Jim Smith): [jsmith@aquatera.ca](mailto:jsmith@aquatera.ca)  
or phone 780.832.4466

Chairman of the Audit and Risk Committee (Dave Urness): [durness@aquatera.ca](mailto:durness@aquatera.ca)  
or phone 780.402.5891

Chief Executive Officer (Vaughn Bend): [vbend@aquatera.ca](mailto:vbend@aquatera.ca)  
or phone 780.538.0432

Chief Financial Officer (Jeff Pieper): [jpieper@aquatera.ca](mailto:jpieper@aquatera.ca)  
or phone 780.830.5032

Chief Operations Officer (Jeff Johnston): [jjohnston@aquatera.ca](mailto:jjohnston@aquatera.ca)  
or phone 780.832.8820

Human Resources Manager (TBA): [@aquatera.ca](mailto:@aquatera.ca)  
or phone 780.814.2902

Independent Third Party: [www.aquaterawhistleblower.confidenceline.net](http://www.aquaterawhistleblower.confidenceline.net)  
or phone toll free: 1.800.661.9675