

Ethical Reporting

At the Ian Martin Group, we have an Ethical Reporting Policy because we want all coworkers to feel they can safely be heard – even when raising a particular issue is difficult.

We expect our coworkers to act in a manner consistent with our beliefs around Freedom & Responsibility. It is a high standard; we acknowledge that anyone may fall short at times. If you believe that a coworker has not behaved in an legally or ethically sound manner, we ask you use good judgement and seek to resolve the issue in a constructive manner. We recommend you do one of the following (in proportion to the severity of the issue):

- Have a conversation with your co-worker and seek to resolve the issue; or
- Use the Conflict Resolution practice
- Report the issue to the Board Delegate (Philippe Straforelli; philippe@straforelli.com; 604-562-8245);

or

• Report the issue through Confidence Line (details below).

We have set up a relationship with Confidence Line to allow employees to make completely anonymous ethical reports. We have done this to assure you that you can be heard, even if you are too uncomfortable to report the issue by other means.

An investigation will be conducted into all ethical reports made directly to the E-team, the Board Delegate or through Confidence Line. The party responsible for the investigation (Tim Masson, Loree Bennett or the Board) will make every effort to keep the identity of the individual who made the report (if it is known) confidential. The party responsible for the investigation will seek to resolve the issue to their best judgment.

The company will not retaliate against any employee who makes an ethical report. The company will not tolerate any employee engaging in retaliatory conduct toward a person who has made (or who he/she believes has made) an ethical report.

The ConfidenceLine™ e-Web reporting system offers a secure, state of the art, web reporting communications process that allows for direct and confidential communication between you and The Ian Martin Group. Visit: http://www.ianmartin.confidenceline.net