



Whistleblower Policy & Reporting Hotline: Clearview Connects

The Laurentian Bank of Canada ("The Bank") has published an updated Whistleblower Policy and has improved its anonymous submission process by signing an agreement with an independent Third-Party Service Provider: Clearview Strategic Partners.

Clearview provides multiple channels through which anyone can voice their concerns anonymously. Persons calling from Canada or the United States may use toll-free phone numbers as well as make submissions through a website form.

While the Bank ensures to take all concerns seriously and will investigate all credible complaints, be mindful that not providing sufficient details and information can limit the ability of the Bank to thoroughly investigate a report.

Online Portal & Toll-Free Telephone Number

<https://www.clearviewconnects.com/home>

1-866-876-2843

Please refer to our updated Whistleblower Policy as well as Clearview's [Guidelines](#) for reporting instructions and frequently asked questions.

Concerns within the scope of this Policy

Breaches of the Bank's Code of Ethics, Laws and Regulations – examples include: conflicts of interest; illegal, deceptive sales practices; manipulation of rate or price setting; money laundering and terrorist financing; other violations of governing laws and regulations; and non-adherence to internal compliance policies;

Breaches in Financial Reporting – examples include: non-disclosure of material facts, falsification or destruction of business or financial records; misrepresentation or suppression of financial information; non-adherence to internal financial reporting Policy or standards set by professional orders / controls and including management over-rides;

Breaches in Accounting Practices and Auditing Matters – examples include: all accounting rules and procedures that have been adopted by the Bank, as well as those dictated by various professional orders, for recording transactions, the valuation of certain assets, liabilities and income and expenses; and auditor independence concerns;

Suspected Fraudulent Activity – examples include: theft; insider trading; staff dealing in their own accounts; market manipulation and market abuse; and corrupt practices including giving or receiving bribes, kick-backs for selecting a particular supplier or other improper benefits or any unethical conduct in dealing with third parties;

Retaliation or Retribution Against an Individual Who Reports a Concern Under this Policy – examples include: statements, conduct or actions involving discharging, demoting, suspending, harassing or discriminating against an individual reporting a concern, or participating in an investigation, in good faith in accordance with this Policy; and

Other Unethical Activities or Behaviours Not Covered by an Existing Process – Any person who has serious concerns that a matter is not in alignment with the Bank's values but is unsure whether the matter is within the categories described above, should report the matter.

Concerns outside the scope of this Policy

This Policy does not cover client or shareholder issues for which other communication channels and recourses have been established, including client complaints, client problem resolution, and breach of client confidentiality or privacy. Those types of issues should continue to be directed to the problem resolution channels established for those purposes. In the event that an individual wishes to raise a concern and feels uncomfortable pursuing these other channels, they may always contact the Senior Vice President, Internal Audit through one of the communication channels available to them, including through the Third-Party Service Provider.