

# Summary Whistleblower Policy

This document is a summary (the "Summary") of Laurentian Bank of Canada ("LBC") Whistleblower Policy (the "Policy"). In the event of a conflict between the content of this Summary and the provisions of the Policy, the Policy shall prevail.

#### 1. PURPOSE AND SCOPE

The Policy established the enterprise-wide framework for the reporting of incidents or serious concerns of wrongdoing. The Policy applies to Laurentian Bank of Canada and each of its subsidiaries and affiliates. It also applies to employees of any third party which is not affiliated to LBC and sells LBC products or services ("Third Party").

#### 2. POLICY REQUIREMENTS

The Policy encourages any employees, directors and contractors of LBC and any Third Party to report any act that contravenes LBC's values, policies and procedures, any applicable laws and regulations and any voluntary codes of conduct and public commitment ("Wrongdoing"). This includes any breaches in accounting rules, procedures and controls, financing reporting or auditing matters as well as any actual or potential retaliation as a result of reporting a Wrongdoing or for assisting in an investigation.

The Policy establishes the process available to any complainants to report a Wrongdoing through confidential and anonymous channels. The Policy requires all reported Wrongdoings to be investigated on a fair, impartial, timely and confidential basis, considering the nature and complexity of the issues involved and to take measures to protect the confidentiality of the identity of any complainant and any information that could reasonably be expected to reveal their identity.

The Policy contains a clear prohibition against anyone retaliating against a complainant who, in good faith, has reported a wrongdoing about any matter, provided information, facilitated the process, or took part in any investigation within the scope of the Policy.

The Policy is reviewed at least every three years by the Corporate Risk Committee of LBC and the Audit Committee of the Board of Directors of Laurentian Bank.

#### 3. REPORTING OF WRONGDOINGS

Wrongdoings can be reported in the following manner:

### By e-mail or mail to:

Bindu Cudjoe, Chief Legal Officer and Corporate Secretary of Laurentian Bank of Canada 1360, boul. René-Lévesque Ouest, Suite 600 Montréal (Québec) H3G 0E5

E-mail: Bindu.Cudjoe@lbcfg.ca

## By using the anonymous Whistleblower Hotline (phone or online web portal):

Online Portal: ClearView Connects (<a href="https://www.clearviewconnects.com">https://www.clearviewconnects.com</a>)

Telephone: 1-866-876-2843

#### By notifying to any of the following government agencies:

Financial Consumer Agency of Canada Commissioner 427 Laurier Avenue West. 6th Floor

Ottawa ON K1R 1B9

Telephone: 1-866-461-FCAC (3222)

Office of the Superintendent of Financial Institutions (OSFI)

255 Albert Street, 12th Floor Ottawa, Ontario K1A 0H2 Telephone: 1-800-385-8647

E-mail: information@osfi-bsif.gc.ca

Facsimile: (613) 990-5591