

## Whistleblower Policy

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### INTENT

BluMetric Environmental Inc. (BluMetric™) is committed to integrity and ethical behavior in the workplace.

This policy has been adopted to ensure that all employees, directors or contractors understand that they are to report any wrongdoing that may adversely impact the Company, the Company's customers, shareholders, employees, investors, or the public at large, and that this may be done without fear of retaliation or a negative impact on their employment status at BluMetric.

### DEFINITIONS

Appropriate Authority - Any delegated employee or individual who has the authority to make final decisions regarding employees, wrongdoing, harassment claims, and resulting actions. At BluMetric, the Appropriate Authority for matters related to human resources or staff issues is the BluMetric Human Resources Department at [hr@blumetric.ca](mailto:hr@blumetric.ca). For matters related to accounting, auditing, financial mismanagement, fraud or other illegal action, the Appropriate Authority is the Chair of the Audit Committee, Vijay Jog ([vjog@blumetric.ca](mailto:vjog@blumetric.ca)) and/or BluMetric corporate legal counsel Virginia Schweitzer ([VSchweitzer@fasken.com](mailto:VSchweitzer@fasken.com)).

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.

Adverse Employment Action - Any demotion, suspension, termination, unfavourable transfer, denial of promotion, denial of benefits, threat, harassment or denial of compensation as a result of the reporting of wrongdoing, or any manner of discrimination against an employee in the terms and conditions of employment because of any other lawful act done by the employee pursuant to this policy, or any applicable Canadian legislation.

## GUIDELINES

Individuals, employees, contractors, supervisors and managers who believe they have witnessed an act or acts of wrongdoing or is given a complaint of wrongdoing or retaliation, shall report the incident(s) immediately to their supervisor or Appropriate Authority.

### Procedures for Handling Complaints of Workplace Wrongdoing

Once the Complainant lodges a complaint with their supervisor or the Appropriate Authority, a discussion will take place that shall be kept confidential, to the extent allowed by the law. If desired by the Complainant, no written record will be kept of this initial discussion. During this discussion, the recipient of the complaint will explain all options available to the Complainant.

If the complaint remains informal, the Appropriate Authority will take steps to create an informal resolution that is acceptable to both the Complainant and Respondent.

If the Complainant wishes to proceed further with a formal complaint, the Complainant must then provide a written statement regarding the alleged workplace wrongdoing. The Respondent must then, on company letterhead, respond to each complaint, either admitting, denying, or explaining the allegations against them. The Respondent must sign his or her statement, which will then be attached to the original complaint.

The Appropriate Authority is responsible for determining and administering the methods and means for addressing complaints. The Appropriate Authority is also responsible for:

- Determining the veracity of allegations of wrongdoing or retaliation.
- Determining whether or not a reported act is indeed wrongdoing.
- Administering punitive or corrective actions if allegations are true.
- Administering punitive actions if allegations were knowingly falsely made.

At the conclusion of an investigation, the investigator must create a written report including a statement regarding any and all findings that have been proven, and a statement of decision on whether or not a wrongdoing has occurred or a Policy has been violated. A copy of the investigative findings shall be provided in writing to the Complainant and the Respondent.

### Records and Report Handling Procedures

In all cases, the BluMetric's Human Resources department shall retain records of all formal and informal investigations, resolutions, reviews and report findings for a minimum of five (5) years or for as long as any administrative or legal action arising out of the complaint is pending.

### Disciplinary Actions

Upon concluding that an instance of workplace wrongdoing has indeed occurred, the Respondent will be subject to disciplinary action, which may result in suspension of duties, or outright termination of employment and possible legal action depending on the severity of the action. Disciplinary actions imposed by the Appropriate Authority will be determined on the basis of the

facts of each case and the extent of harm to BluMetric Environmental Inc.'s interests and business goals.

#### Confidentiality

All records of workplace wrongdoing reports and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law.

BluMetric will do everything it can to protect the privacy of the individuals involved and to ensure that the Complainant and the Respondent are treated fairly and respectfully. BluMetric will protect this privacy so long as doing so remains consistent with the enforcement of this Policy and adherence to the law.

#### Assurance Against Retaliation

This Policy encourages employees to freely express – in a responsible and orderly fashion – their thoughts, opinions, and feelings regarding workplace wrongdoing complaints. Retaliation by the Respondent, or anyone acting on behalf of the Respondent, against the Complainant, is strictly prohibited and will result in appropriate disciplinary action. Retaliation by the Respondent, or anyone acting on behalf of the Respondent, against any witness providing information about a workplace wrongdoing report, is also strictly prohibited. Acts of retaliation include (but are not limited to) interference, coercion, threats, and restraint.

This Whistleblower Policy will not be used to bring fraudulent or malicious complaints against employees. Any complaint made in bad faith, if demonstrated as being such through convincing evidence, will result in disciplinary action being taken against the individual lodging the fraudulent or malicious complaint.