

WHISTLEBLOWER POLICY

PURPOSE OF THIS POLICY

Extendicare Inc. and its affiliates (collectively, the “**Company**”) are responsible for, and committed to dealing responsibly, openly and professionally with, any genuine concern persons may have about any act, omission, practice, procedure or policy carried out by any person of the Company, any irregularity, malpractice, danger to our residents/clients or any other person, financial malpractice, breach of legal obligations or damage to the environment. We adhere to the highest ethical standards as such standards are critical to the Company achieving its vision of “Helping People Live Better”.

To support that goal, the Company has established this Policy to establish rules and procedures for our employees and other stakeholders, including, residents/clients and their families (“**concerned parties**” each a “**concerned party**”), to report their concerns regarding actual, potential or suspected violations of the Company’s Code of Business Conduct or any Company policies (the “**Code**”) or of applicable laws and regulations (“**General Matters**”), matters relating to health and safety and resident/client care issues (“**Clinical Matters**”) and matters regarding accounting, internal accounting controls or auditing matters (“**Financial Control Matters**”) (collectively, “**Reportable Matters**”).

The Company’s Board of Directors (the “**Board**”) has approved this Policy and the Governance and Nominating Committee of the Board oversees management’s monitoring of compliance with the Code and the administration of this Policy.

Management will actively seek to inform and educate concerned parties of this Policy.

MAKING A REPORT

Submission Protocol

Any concerned party may submit any good faith report regarding an actual, potential or suspected Reportable Matter.

Anonymity

Concerned parties wishing to make a report under this Policy may do so on an anonymous basis. All reasonable steps will be taken by the Company to maintain the anonymity of a person who makes a report on an anonymous basis; however, the source or nature of the report, or the steps required to be taken to investigate the report may, as a practical matter, make it difficult or impossible to maintain such anonymity. Where this is the case, you will be advised accordingly.

Submitting a Report

If you have a concern about a workplace practice or event, you should initially discuss it with your manager. He or she will attempt to resolve the matter as promptly as is reasonably possible. There may, however, be circumstances where you feel unable to approach your manager or anyone else in the Company and in these circumstances you can raise your concerns by submitting reports using any of the following confidential means, all of which are provided by an external service provider, Clearview Strategic Partners:

- Email, or complete a concerns report through the [website](https://www.extendicare.com/contact/);
<https://www.extendicare.com/contact/>
- Submit a voicemail or;
- Talk to a facilitator through the toll-free hotline: 1-866-888-6043.

This Policy is not intended to replace the other methods concerned parties have traditionally used to communicate with the Company, but rather to facilitate communication where such traditional methods do not, for whatever reason, seem possible or appropriate. Reportable Matters reported outside of the above described confidential means will be addressed through normal management processes.

PROCEDURES

Investigation of Reports

Following the receipt of any report regarding a Reportable Matter, the Chief Legal Officer and Chief Human Resource Officer will assess if further investigation is warranted and engage, based on the nature of the Reportable Matter, with the appropriate internal resources (for example, Internal Audit) to assist in addressing the Reportable Matter. In the event that a concerned party does not desire any of these individuals to review the Reportable Matter in the first instance, the Reportable Matter will be reviewed by the Chair of the Governance and Nominating Committee.

For all reports received, outside legal, accounting or other advisors may be engaged at the expense of the Company to conduct or to assist in any investigation of reports received. Investigations conducted will seek to obtain as much evidence as is reasonably possible in a timely and impartial manner. All concerned parties have an obligation to cooperate with all investigations instituted under this Policy.

All reports relating to Reportable Matters made under this Policy will be treated as confidential, regardless of whether or not made anonymously, and will only be accessible to people that have a 'need to know', which will normally arise from an obligation to investigate or to take remedial or disciplinary action on the basis of the information contained in the report. For clarity, sharing information about a report of a Reportable Matter in a manner required by this Policy will not be considered a breach of confidentiality.

The Company will, to the extent possible and appropriate, advise concerned parties who submit a report of the results of the investigation and its resolution. If, after having followed the procedural steps set out above, a concerned party remains genuinely and reasonably dissatisfied with the outcome, they may raise their concern, on a confidential basis with: the relevant regulatory authority; a member of parliament or senate; or a professionally qualified lawyer for the purposes of obtaining legal advice.

Internal Reporting

Unless circumstances warrant otherwise, reports relating to Reportable Matters will be reported quarterly to: (a) the Company's Quality and Risk Committee (relating to Clinical Matters), (b) the Company's Audit Committee (relating to Financial Control Matters) (c) the Human Resources Committee (relating to employee misconduct) and (d) the Company's Governance and Nominating

Committee (relating to “General Matters”), as well as the Board regarding all reports received and investigations conducted over the preceding quarter.

Record Retention

The Company will retain as a part of its records any reports relating to Reportable Matters for a period of no less than seven (7) years.

UNFOUNDED ALLEGATIONS:

If a concerned party makes an allegation in good faith that is not confirmed by subsequent investigation, no action will be taken against such party. However, malicious or unfounded allegations may result in disciplinary action being taken against such party.

PROTECTION OF WHISTLEBLOWERS

This Policy exists to, among other things, ensure that concerned parties are protected from any form of harassment, coercion, penalty, threats of discrimination and, in the case of employees, any adverse employment consequence, including, discharge, suspension, demotion or transfer (“**retaliation**”) in connection with complaints or concerns brought forward in good faith under this Policy or otherwise reported or disclosed to any third-party inspector or regulatory authority (or in a proceeding), in each case in accordance with applicable laws and, as applicable, this Policy.

An individual who retaliates against someone who has reported a violation in good faith under this Policy will be in breach of this Policy and will be subject to discipline, including by way of potential termination of employment.

Concerned parties who believe that they have been targeted for discrimination, retaliation or harassment as a result of having submitted a report should advise the Chief Legal Officer and Chief Human Resources Officer.

APPENDICES

Whistleblower Policy posters: [CLICK HERE](#)