

IWA–Forest Industry Pension and LTD Trusts (the “Trusts”) and Plans (the “Plans”) Whistleblower Policy and Procedures

The IWA–Forest Industry Pension and LTD Plan Trustees (the “Trustees”) have developed various policies and procedures to have services provided to plan members and beneficiaries by qualified personnel in a competent and empathetic manner that minimizes conflict and maximizes confidence in the trust and plan.

1. Policy statement

This policy provides a means whereby a complainant may, in good faith, report issues and/or concerns in connection with a serious violation of a trust or plan policy or procedure.

In responding to a complaint, the trustees and administration will: act fairly with respect to any individual named in the complaint; seriously consider the issue raised; review the information or allegations in the complaint.

The trustees and administration will not retaliate against any complainant for reporting in good faith serious violations pursuant to this policy. “Good faith” means that a complainant reasonably believes that the complaint is true and has not been made either for personal gain or for any ulterior motive.

2. Nature of complaints

The trustees have adopted the following procedures to facilitate the submission, on a confidential and anonymous basis, of complaints, reports and concerns by any person (“complainant”) regarding: (i) accounting, internal accounting controls, or auditing matters, (ii) actual or potential violations of laws, rules or regulations, and (iii) other suspected wrongdoing (a “serious violation”).

3. Protection of complainants

This policy and related procedures offer protection from retaliation to complainants with respect to matters that are, or could give rise to, serious violations, provided the complaint is made:

- in good faith, in a manner that is consistent with the trusts’ and plans’ values, particularly respect for others;
- in the reasonable belief of the complainant that the conduct or matter covered by the complaint constitutes, or has the potential to constitute, a serious violation; and
- pursuant to the procedures contained in section 5 below.

No complaint that satisfies these conditions shall result in any retaliation or threat of retaliation against the complainant. This means that the trustees and its advisors, employees and agents shall not penalize, discharge, demote, suspend, threaten, harass or otherwise discriminate (collectively, “retaliate” or “retaliation”) against any complainant for calling attention to suspected illegal or unethical acts. Any act of retaliation shall itself be treated by the trustees as a serious violation of the trustees’ policy and could result in disciplinary action up to and including discharge. This protection extends to anyone providing information in relation to an investigation.

4. Confidentiality

The trustees will treat all complaints by complainants as confidential and privileged to the fullest extent permitted by law. A complainant is encouraged to put his/her name to any complaint he/she makes, but it may also be made anonymously, as provided in section 5 below.

5. How to make a complaint?

Any complaint under this policy may be submitted to the Grant Thornton CARE program, through one of the following four secure channels, all of which allow the complainant to remain anonymous, if the complainant so wishes:

1. By telephone: toll free number 1.855.484.CARE (2273)
2. Online at: <https://www.GrantThorntonCARE.ca>
3. By secure email at: UseCARE@ca.gt.com
4. By surface mail to: CARE Program
Grant Thornton LLP
200 King Street West
Box 11
Toronto, Ontario M5H 3T4

Any complaint should include all relevant information pertaining to the serious violation, such as dates, places, persons/witnesses, numbers, etc., so that a reasonable investigation can be conducted.

Complaints may also be submitted in any form to General Counsel or another senior manager. If the complaint involves the Chief Executive Officer or Chief Investment Officer, it can be submitted directly to a trustee. The CARE program is organized so that complaints about specific individuals are sent to their supervisors or other persons that are sufficiently independent to ensure appropriate action is taken.

5. Investigation

Upon receiving a complaint, a representative from the Grant Thornton CARE program will facilitate anonymous communication between the complainant and management of the Plan Office through the receipt of information provided in any form (i.e. verbal, electronic) and will continue communication between all related parties until the matter is resolved by the Plan Office. All initial reports are communicated to an individual designated by the Plan Office to receive and process such information and commence internal resolution procedures.

If the receiving manager determines that the complaint is covered by this policy, an investigation will be commenced. The investigation may be conducted by Plan Office legal counsel or an external investigator, and the investigator may enlist internal or external advisors (accounting, human resources etc.) as appropriate.

Where either the complainant(s) and/or respondent(s) are bargaining unit employees the complainant(s) and/or respondent(s) are entitled to any union representation or involvement provided for in the *collective agreement* or otherwise provided for by law.

The investigator shall have access, during an investigation, to all books and records of the trusts and plans. Trustees, advisors, employees and agents are expected to fully co-operate in the investigation. In conducting any investigation, the Grant Thornton CARE program and/or the individual designated by the Plan Office shall use reasonable efforts to protect the confidentiality of the complainant.

Investigations will be conducted as quickly as possible, taking into account the nature and complexity of the complaint.

It is recommended that the complainant regularly check on the status of the complaint, this is an important component of resolving the issue. In addition, if there are any questions or requests for additional details, these will be posted for the complainant to respond, where possible. The complainant's continued participation remains anonymous and can be critical in resolving the complaint. The complainant can access his/her reported concern by noting the logon credentials provided following the initial reporting submission. It is recommended that complainant keep a record of this information for without it, he/she will not be able to view the status of his/her concern or respond to any follow up questions.

6. Reporting to the Board of Trustees

General Counsel shall report to the trustees, annually, the aggregate, the number, the nature, and the outcome of complaints received and investigated under this policy.

Notwithstanding the above, General Counsel shall promptly report to the trustees any complaint that may have material consequences for the trusts and plans.