
Whistle Blower

Policy

#460

Taiga Building Products Ltd. ("Taiga" or the "Company") is committed to the highest standards of openness, honesty and accountability. In line with that commitment, we expect directors, officers, employees and others that we deal with who have serious concerns about any aspect of Taiga's activities and operations to come forward and voice those concerns.

This policy document makes it clear that employees can report wrong-doings or suspected wrong-doings without fear of victimization, subsequent discrimination or disadvantage. This Whistle Blower Policy is intended to encourage and enable employees to raise serious concerns within the Company rather than to overlook a problem or seek a resolution of the problem outside the Company.

This Policy applies to all directors, officers, employees and contractors working for Taiga. It is also intended to provide a method for other stakeholders (suppliers, customers, shareholders etc.) to voice their concerns regarding the Company's business conduct.

A whistleblowing or reporting mechanism invites all directors, officers, employees and other stakeholders to act responsibly to uphold the reputation of their organization and maintain public confidence. Encouraging a culture of openness within the organization will also help this process. This Policy aims to ensure that serious concerns are properly raised and addressed within the Company.

What is Whistleblowing?

Employees are often the first to realize that there may be something seriously wrong within the Company. However, they may decide not to express their concern because they feel that speaking up would be disloyal to their colleagues or the Company. They may also fear recrimination, harassment or victimization. In these circumstances, they may feel it would be easier to ignore the concern rather than report what may just be a suspicion of wrong-doing.

A culture of turning a "blind eye" to such problems means that the alarm is not sounded and those in charge do not get the chance to take action before real damage is done. Whistleblowing can therefore be described as giving information about potentially illegal and/or underhanded practices i.e. wrong doing.

What is wrong doing?

Wrong doing involves any unlawful, illegal or otherwise improper behaviour and can include:

- An unlawful act whether civil or criminal;
- Breach of Taiga's Code of Business Conduct and Ethics;
- Breach of or failure to implement or comply with any approved Taiga policy;
- Knowingly breaching federal or provincial laws or regulations;
- Unprofessional conduct or conduct that is below recognized, established standards of practice;
- Questionable accounting or auditing practices;
- Dangerous practice likely to cause physical harm / damage to any person/property;
- Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to the Company;

- Abuse of power or authority for any unauthorized or ulterior purpose;
- Unfair discrimination in the course of employment or provision of services.

This list is not definitive, but is intended to give an indication of the kind of conduct which might be considered "wrong doing".

Who is protected?

Any director, officer or employee who makes a disclosure or raises a concern under this Policy will be protected if that person:

- Discloses the information in good faith;
- Believes it to be substantially true;
- Does not act maliciously or make knowingly false allegations; and
- Does not seek any personal or financial gain.

Who should you contact?

In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Human Resources Department or anyone in management whom you are comfortable in approaching.

In all cases of serious concern and particularly for suspected fraud or securities law violations, or when you are not satisfied or comfortable speaking with your supervisor, employees and other stakeholders should report concerns to:

1. Confidential Whistleblower Email Address to Internal Audit and Audit Committee Chair:

Whistleblower@taigabuilding.com

2. Audit Committee Chair

800-4710 Kingsway
Burnaby, BC V5H 4M2
604-438 1471

How the Company will respond

The Company will respond positively to your concerns. Where appropriate, the matters raised may: be investigated by management, the Board of Directors, an internal audit, the Audit Committee or through the disciplinary process; be referred to the police; be referred to the external auditor or external legal counsel or form the subject of an independent inquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Procedure

Within ten working days of a complaint or concern being raised, the responsible officer will write to you: acknowledging that the complaint or concern has been received; indicating how he/she proposes to deal with the matter; giving an estimate of how long it will take to provide a response; telling you whether any initial enquiries have been made; and telling you whether further investigations will take place and if not, why not.

The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Company will seek further information from you.

The Company will take steps to minimize any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Company will arrange for you to receive advice about the procedure.

The Company accepts that you need to be assured that the matter has been properly addressed. Therefore, subject to legal constraints, the Company will inform you of the outcomes of any investigation and any corrective action taken.

Time Frames

Complaints or concerns will be investigated as quickly as possible. It should be borne in mind that it may be necessary to refer a matter to an external agency and this may result in an extension of the investigative process. It should also be borne in mind that the seriousness and complexity of any complaint or concern may have an impact on the time taken to investigate a matter. A designated person will indicate at the outset the anticipated time frame for investigating the complaint or concern.

Prevention of recriminations, victimization or harassment

The Company will not tolerate an attempt on the part of anyone to apply any sanction or detriment to any person who has reported to the Company a serious and genuine complaint or concern that person may have about an apparent wrongdoing. Retaliation against someone who has reported a violation in good faith is subject to discipline.

Confidentiality and Anonymity

The Company will respect the confidentiality of any whistle blowing complaint or concern received by the Company where the complainant requests that confidentiality. However, it should be appreciated that it may be easier to follow up and to verify complaints or concerns if the complainant is prepared to give his or her name.

False and Malicious Allegations

The Company is proud of its reputation for the highest standards of honesty and integrity. It will therefore ensure that substantial and adequate resources are put into investigating any complaint or concern which it receives. However, the Company will regard the making of any deliberately false or malicious allegations by any director, officer or employee of the Company as a serious disciplinary offence which may result in disciplinary action, up to and including dismissal for cause.