



Whistleblowing Policy

Last Updated: February 2026

cordiantcap.com





Version History

Version	Published	Updates
V.1	Feb 2026	First version of the policy in its current format



1. Purpose

Cordiant Capital Inc. (“Cordiant”), together with its wholly owned subsidiaries and affiliated companies (collectively, the “Cordiant Group”), is committed to conducting its business with honesty, integrity, and in compliance with applicable laws, regulations, and professional standards.

The purpose of this Whistleblowing Policy (the “Policy”) is to provide a mechanism for reporting suspected wrongdoing, misconduct, or dangers related to the activities of the Cordiant Group, and to ensure that such concerns are addressed in a timely, confidential, and appropriate manner.

This Policy supplements the whistleblowing provisions set out in the Cordiant Group’s Standard of Conduct (the “Code”) and is intended to raise awareness of the firm’s approach to whistleblowing.

2. Scope

This Policy applies to all directors, officers, employees, temporary workers, and contractors of the Cordiant Group (collectively, “Employees”).

All Employees are required to:

- Comply with applicable whistleblowing laws in the jurisdictions in which the Cordiant Group operates; and
- Adhere to the whistleblowing provisions set out in the Code.

This Policy does not replace normal business communications or the firm’s complaints management process for client-related matters.

3. Responsibilities

All Employees are responsible for:

- Using this Policy and the procedures set out herein appropriately and in good faith;
- Acting in accordance with the Code; and
- Complying with applicable legislation in all jurisdictions in which the Cordiant Group conducts business.

4. What is Whistleblowing

Whistleblowing is the reporting of suspected wrongdoing, misconduct, or dangers in relation to the Cordiant Group’s activities.

This may include, but is not limited to:

- Fraud, bribery, corruption, or other criminal activity;
- Breaches of laws, regulations, or regulatory obligations;
- Breaches of internal policies or the Code;
- Conflicts of interest not properly disclosed or managed;
- Miscarriages of justice;



- Health and safety risks;
- Environmental damage;
- Retaliation against individuals who raise concerns in good faith;
- Any other matter identified in the Code.

Suspected wrongdoing should be reported as soon as possible.

5. How to Raise a Whistleblowing Concern

Employees are encouraged, where appropriate, to raise concerns internally. In most cases, concerns may be raised with:

- The Chief Executive Officer;
- The Executive Chairman; and/or
- The Chief Compliance Officer (“CCO”).

Where an Employee prefers not to raise a concern internally, or where doing so would be inappropriate, concerns may be reported through the following confidential channels:

- **Telephone:** 514-847-4344
- **Email:** Mathieu.Deschamps@nortonrosefulbright.com
- **Written communication:**
Mr. Mathieu Deschamps
Norton Rose Fulbright Canada
Suite 2500
1 Place Ville Marie
Montréal, Québec H3B 1R1
Strictly Confidential

Reports should include sufficient, precise, and relevant information (including dates, locations, individuals involved, and any supporting details) to allow for a reasonable investigation.

Where the reporting individual wishes to be contacted, a telephone number or other contact information should be provided. Receipt of complaints will be acknowledged where the reporting individual identifies themselves.

6. Confidentiality and Anonymity

The Cordiant Group encourages Employees to raise concerns openly. However, concerns may be raised confidentially, and all reasonable efforts will be made to protect the identity of the reporting individual.

If it becomes necessary for investigators to know the identity of the reporting individual, this will be discussed with that individual where possible.

Anonymous reports are not discouraged and will be taken seriously. However, Employees should be aware that anonymity may make it more difficult to conduct a thorough investigation or to verify the credibility of allegations. Where concerns about retaliation exist, appropriate measures will be considered to preserve confidentiality.

The Cordiant Group cannot guarantee anonymity where the reporting individual has disclosed the matter to others.



7. Non-Retaliation

The Cordiant Group strictly prohibits retaliation against any individual who raises a concern in good faith or participates in an investigation under this Policy.

Protection against retaliation applies regardless of whether the reported concern is ultimately substantiated, provided it was made in good faith. Any act of retaliation may itself constitute a breach of the Code and applicable law.

Nothing in this Policy limits an individual's right to report concerns directly to a regulator or law enforcement authority.

8. Investigation

Upon receipt of a report, the Chief Executive Officer and the Chief Compliance Officer, and/or external legal counsel, shall record the matter in a secure complaints log and open a file maintained in a secure location.

It will first be determined whether the concern falls within the scope of this Policy. If so, an investigation will be initiated.

Investigations may involve internal personnel or external legal, accounting, human resources, or other advisors, as appropriate. Investigators shall have access to all relevant books and records, and all directors, officers, employees, and agents are expected to cooperate fully.

Investigations will be conducted as promptly as reasonably possible, taking into account the nature and complexity of the issues raised. Reasonable efforts will be made to protect confidentiality throughout the process.

Records relating to whistleblowing reports and investigations will be retained for a minimum of three (3) years.

9. Legal and Regulatory Framework

This Policy is designed to comply with applicable whistleblower protection laws, including:

- Canadian employment and securities legislation;
- Provincial regulatory requirements, including those applicable in Québec; and
- Where applicable, U.S. whistleblower protection frameworks, including the Sarbanes-Oxley Act and the Dodd-Frank Act.

10. Review

This Policy is reviewed periodically and may be amended to reflect changes in applicable laws, regulations, or governance practices.