

**Creststreet Asset Management Limited
("Creststreet" or "CAML")**

Whistleblowing Policy

POLICY

Introduction

Creststreet Asset Management Limited ("CAML") has adopted the following whistleblowing policy to be followed by all employees, consultants, officers and directors.

The Creststreet Code of Business Conduct and Ethics requires all employees, consultants, officers and directors observe a high standard of care and conduct their day-to-day business affairs in a fair, honest and ethical manner. Creststreet shall always maintain a workplace where concerns or complaints regarding questionable business practices or situations where employees, consultants, officers and directors believe that policies or procedures have not been followed can be raised without discrimination and in confidence.

Purpose of Policy

All directors, officers, employees and consultants of CAML are encouraged to promptly report either orally or in writing to their immediate supervisor, all evidence of activity by a director, officer, employee or consultant that may constitute any of the following:

- questionable accounting practices;
- inadequate internal accounting controls;
- the misleading or coercion of auditors;
- disclosure of fraudulent or misleading financial information;
- instances of corporate fraud;
- any material misrepresentation in any written or oral disclosure made by or on behalf of CAML
- breaches of the CAML policy on trading in securities; and
- other activities which may violate the Creststreet Code of Business Conduct.

In instances where a satisfactory response is not received from your immediate supervisor, or if you are uncomfortable addressing your concerns to your supervisor, the employee may contact any senior officer of CAML or the Chairman of the Audit Committee at the address mentioned below or by email.

In the case of questions relating to accounting, accounting procedures or control procedures, questions or comments may be directed either orally or in writing to the Chairman of the Audit Committee at the address mentioned below or by e-mail

Mr. Stuart Hensman
Chairman of the Audit Committee
C/O 70 University Avenue
Suite 1450
Ontario, Canada
M5J 2M4

Employees, consultants, officers and directors are encouraged to provide as much specific information as possible when communicating the complaint.

Procedures for Receiving and Addressing Complaints and Concerns

Complaints regarding accounting, internal accounting controls or auditing matters and concerns regarding questionable accounting or auditing matters should be reported to the Chairman of the Audit Committee, or raised by sending a written communication to the Chairman of the Audit Committee in an envelope marked “Private and Confidential – Audit Committee Policy Regarding Complaints and Concerns Procedures”. If the complaint or concern is anonymous, there must be clear, accurate and sufficient details, as there will be no opportunity to have the information clarified.

General Complaints and Concerns

Upon receipt of a complaint, the Chairman of the Audit Committee will record the complaint or concern and act to resolve any issue by offering to meet with the complainant or communicating with that person through another appropriate means. Each of the complaints and concerns will be thoroughly investigated and appropriate action taken. All complaints and concerns and their disposition will be advised to the Audit Committee at the meeting next following the date of the complaint or concern. The Chairman may call a special meeting sooner to deal with the complaint or concern.

Confidentiality

Each complaint or concern will be treated as confidential, and the anonymity of the complainant or person, if requested, will be preserved.

Prohibition Against Retaliation

CAML including any, affiliates and subsidiaries will not discharge, threaten, harass, discipline, withhold or suspend payment of salary and/or benefits, demote, transfer or otherwise take any disciplinary or retaliatory action against any employee, consultant, officer or director who in good raises a concern, files a complaint, reports any suspected wrongdoing, or who discloses or provides information or assistance in connection with any internal investigation or governmental proceeding or inquiry.

Logs

The Chairman of the Audit Committee will ask the Secretary of the Board to supervise the maintenance of a log (the “Logs”) of all complaints and concerns received from any source.

Complaints and Submission of Concerns Reports

Each complaint and concern will be separately documented by the Chairman of the Audit Committee. Such documentation shall include a report that contains a complete description of the allegation(s), the action(s) taken (including investigative and/or disciplinary action), the status of the file as pending or closed and, if closed, a statement describing the final disposition of the case. All documentation with respect to a complaint or a concern shall be retained by the Secretary.

Audit Committee Oversight

The Audit Committee will have full access to the respective logs, complaints and concerns reports and related documentation at all times, except for any information that may be used to identify a complainant or filer who has requested anonymity.