

107 EXCHANGE INSURANCE BROKER, INC.

WHISTLEBLOWER POLICY

The Corporation's Whistleblower Policy provides a formal mechanism and an avenue for Directors, officers, employees, suppliers, business partners, contractors and subcontractors, and other third parties to raise concerns about a perceived wrongdoing, malpractice, or a risk involving the company.

The policy likewise provides an assurance that a whistleblower will be protected from reprisals, harassment, or disciplinary action or victimization for whistleblowing. The whistleblower may submit a written report directly to the Office of the Compliance Officer, or by email to or through a face-to-face meeting with any member of the Whistleblower Committee composed of one representative each from Legal & Regulatory Department, Human Resources and Corporate Services, and Internal Audit Division.

There is an established investigation process to look into reported violations of company policies, rules, and regulations. All reports are treated in confidence and discussed with the Audit Committee who monitors the resolution and closure of all reports.