



CORPORATE POLICY

WHISTLEBLOWER POLICY

APPLIES TO: All Employees

General

Our goal at Woodbine Entertainment Group is to achieve the highest business and personal ethical standards as well as to comply with all laws and regulations that apply to our business. Adherence to these standards will help to ensure decisions reflect care and consideration for all our stakeholders.

Ethical business behaviour is the responsibility of every member of the Company's team and is reflected not only in our relationships with each other but also our customers, other organizations, suppliers, competitors, government and the public.

This Policy establishes procedures that allow employees of the Company and/or members of the public to confidentially and anonymously submit their concerns to the Company's Board of Directors regarding violations of laws or regulations that govern the Company's business, or violations of the Company's Code of Ethical Business Practices or the Code of Business Conduct and Ethics – Conflict of Interest Policy of the Board of Directors, without fear of retaliation.

Unlawful activities, or conduct in violation of the Code of Code of Ethical Business Practices or the Code of Business Conduct and Ethics – Conflict of Interest Policy of the Board of Directors, which are the subject of a complaint or submission, are referred to in this Policy as "Alleged Irregularities." Alleged Irregularities include, without limitation, improper or fraudulent accounting, documentation or financial reporting, and other improper conduct which is reasonably suspected to be in violation of applicable laws or Company policies.

Reporting Violations

It is the responsibility of all employees, Directors or officers to report Alleged Irregularities in accordance with this Whistleblower Policy.

The Company has retained Clearview Strategic Partners ("Clearview") to receive submissions and complaints received pursuant to this Policy. Clearview is a third party whistleblower services provider, and will treat all submissions anonymously if requested. Submissions and complaints may be provided by calling Clearview's toll-free number at 1-844-669-2011, online through Clearview's secure website at <http://www.clearviewconnects.com/> or by mail through Clearview's confidential post office box at P.O. Box 11017, Toronto, Ontario, M1E 1N0 . Clearview will report all submissions and complaints to the Company's Board of Directors as may be appropriate. Anonymous submissions and complaints will be submitted by Clearview to the Board of Directors on this basis.

No Retaliation

No employee, Director or officer who in good faith makes a report pursuant to this Policy shall suffer harassment, retaliation or adverse employment consequence. An employee, Director or officer who retaliates against someone who has made a report pursuant to this Policy, in good faith, is subject to discipline up to and including termination of office and/or employment.

Investigations of Complaints

The Company's Board of Directors will determine the appropriate course of action relating to any reported violations. Such course may include a full investigation of the violations, with or without the input or assistance of management. The Company's Board of Directors may retain independent investigators, legal counsel, accountants or other advisers to assist it in its investigations.

Acting in Good Faith

Anyone filing a complaint or submission pursuant to this Policy must be acting in good faith and have reasonable ground for believing the information disclosed is an Alleged Irregularity. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offence and an employee making such complaints or submissions may be subject to disciplinary action.

Confidentiality

Complaints or submissions made pursuant to this Policy may be submitted on a confidential basis and/or submitted anonymously. All complaints or submissions will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

All reports will be promptly investigated and, if warranted by the investigation, appropriate corrective action will be taken.

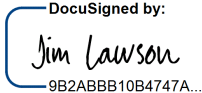
The Company shall retain records of complaints for a period of no less than seven (7) years as a separate part of the records of the Company's Board of Directors.

Approved and adopted by the Board of Directors.

Further Reference

Code of Ethical Business Practices
Respect in the Workplace

Policy #2-3
Policy #5-2

Approval:  _____
CEO

Date: August 11, 2021

ISSUED
July 2015

REVISED
July 2016, August 2021