

SBI Canada Bank **Whistle-Blower Policy**

Objective

SBI Canada Bank (hereinafter referred to as the “Bank”) is committed to encourage everyone employed by or engaged with the Bank, regardless of status, rank, position, or seniority as well as to all persons who attend the Workplace, including but not limited to all visitors, clients, suppliers, vendors, affiliates, representatives, agents or other intermediaries that sell the bank’s products or services etc., (hereinafter referred to as “third parties”), to report any violation or apparent violation of the Bank’s policies, practices, rules and requirements, or other wrongdoing, by employees or officers of the Bank.

Accessibility

The Bank has made available a brochure with title, “Whistle-Blower Policy” on its website. This brochure provides an overview of the Bank’s Whistle-Blower process in simple and clear language and could be used by customers and third parties.

Contact Details of Reporting Person

The contact details of the Reporting Person is as under:

Reporting Person : Chief Operating Officer
E-mail : coo@sbicanada.com
Address : Chief Operating Officer
SBI Canada Bank
Suite # 1000, 10th Floor
220 Bay Street
Toronto, Ontario M5J 2W4

If the violations involve or are against the Reporting Person or P & CEO, it may be reported directly to the Chair of the Conduct Review Committee of the Board (CRCB) in the following manner. As regular mail, addressed to:

Reporting Person : Chair of the Conduct Review Committee of the Board
Address : Chair of the Conduct Review Committee of the Board
SBI Canada Bank
Suite # 1000, 10th Floor
220 Bay Street
Toronto, Ontario M5J 2W4

Additional Mechanism for Action or Reporting

In addition to the methods defined Complainant has the choice of reporting instances of wrongdoing directly to the regulatory bodies such as the following:

- Commissioner of the Financial Consumer Agency of Canada (FCAC)

Financial Consumer Agency of Canada
427 Laurier Ave West, 6th Floor
Ottawa, ON K1R 5C7

- Office of the Superintendent of Financial Institutions (OSFI)

Office of the Superintendent of Financial Institutions
255 Albert Street
12th Floor
Ottawa, Ontario-K1A 0H2

- Or any other government agency or body that regulates or supervises financial institutions or law enforcement agencies.

Confidentiality

The reporting person would take measures, as deemed appropriate, to ensure that an employee's identity, and any other information that might reveal their identity, as well as any advice provided to them is kept confidential and shared strictly on "need to know" basis.

Fear of Retribution

The Bank wishes to encourage and facilitate all employees, and third parties, to report violations. The Bank will protect the identity of the employee / third party reporting a possible violation, to the extent it can do so, while meeting its legal and other duties.

Exceptions to Confidentiality

Bank may identify breaches of consumer provisions as a result of investigating a report of wrongdoing. In such cases, the Bank will assess whether the breach should be reported to FCAC as outlined in the FCAC's Mandatory reporting guide for federally regulated financial institutions. When reporting, Bank is required to identify that it became aware of the breach through a whistleblowing report. A record of all the reports of wrongdoing it receives and investigates, including any anonymous reports of wrongdoing and any received by or in relation to a Third Party would be maintained

Bank may consider disclosing the identity of an employee / third party, and/or information that could reasonably be expected to reveal their identity to FCAC, OSFI, a government agency or body, or a law enforcement agency, if the disclosure is necessary for the purposes related to an investigation.

In event Bank is required to disclose the identity of parties involved to the regulatory or legislatures bodies, it would use the most secure medium as identified by the Reporting person to transfer of identifying information to FCAC, OSFI, government agency or body, or law enforcement agency if this information is considered necessary for purposes related to an investigation. In such circumstances Bank will inform parties involved when their identity or information has been disclosed, and to whom.

If the Bank has disclosed the identity of the employee / third party or any information that could reasonably be expected to reveal their identity, the Bank will make every reasonable effort to inform them of the disclosure.

Whether the disclosure was made by the Bank or a whistleblower, the recipient of the whistleblower complaint, i.e., FCAC, OSFI, government agency or body or law enforcement agency, may disclose to each other the identity of the employee / third party and information that could reasonably be expected to reveal their identity for purposes related to an investigation.
