

Updated: September 2024

Ardenton Whistleblower Policy

Ardenton is committed to conducting business with honesty, fairness, and integrity. All employees must maintain the highest standards in line with the Company's Code of Business Conduct and Ethics (the Code) and all other policies and procedures.

The Company has established these procedures for the receipt, retention and treatment of complaints regarding breaches of the Code, any other Ardenton policy, any violation of law or other corporate misconduct or any accounting, internal accounting controls or auditing matters.

Purpose

The purpose of this Policy is to encourage the reporting of breaches of the Code, any other Ardenton policy, any violation of law or other corporate misconduct or any accounting, internal accounting controls or auditing matters.

While reporting would generally occur through the normal channels within Management of the Company, there may be instances where an individual believes it is inappropriate or it is difficult for such matters to be reported through these channels. In these cases, Ardenton believes it is important that all employees or others have an avenue through which to express concerns in a way that protects them from retaliation by the Company and protects their identity.

Application

- This Policy applies to all such as directors, officers, full time and part time employees, independent contractors and consultants of Ardenton and its subsidiaries. Any third party, however, may use the complaint procedures outlined in this Policy to make the Company aware of a reportable matter.
- Any person reporting a concern under this Policy is referred to as a *whistleblower*.

Reporting a Concern

The Company encourages the reporting of breaches of the Code, any other Ardenton policy, any violation of law or other corporate misconduct or any accounting, internal accounting controls or auditing matters that involve the Company or its Personnel in any way. A whistleblower may elect to remain anonymous.

Concerns can be reported in the following ways:

- Directly to Ardenton's Board of Directors - concerns may be expressed in writing and sent by mail to:

Representative of the Board of Directors

(PERSONAL & CONFIDENTIAL, TO BE OPENED BY ADDRESSEE ONLY)

Ardenton Capital Corporation
220-1100 Melville Street
Vancouver BC V6E 4A6 Canada

- Directly to a Third-Party Reporting Website – concerns may be reported using an independent, secure reporting website hosted by IntegrityCounts, using the following link:
www.integritycounts.ca/org/ArdentonGroup

Information a Whistleblower Needs to Report

To assist the Company in the response to or investigation of a concern, the report should contain as much specific, factual information as possible to allow for proper assessment of the nature, extent, and urgency of the matter.

If possible, you should include the following information:

- details of the event, matter, or issue that is subject of the report;
- the name of each person involved;
- if the complaint involves specific event or events, the approximate date and location of each event; and
- any other additional information, documentation or other evidence available to support the complaint.

Investigation

The representative of the Board of Directors will ensure that all reports are investigated promptly and appropriately. Depending on the outcome of the investigation, the representative of the Board of Directors will ensure that appropriate corrective and disciplinary actions are taken.

Feedback

Where a whistleblower has made their identity known or where a whistleblower has reported their concerns using the third-party reporting website, the whistleblower will receive updates on the progress of the investigation.

Confidentiality and Anonymity

The Company will fully maintain the confidentiality or anonymity of the whistleblower where possible, as permitted by law and by the investigation. In some cases, however, it may not be possible to proceed with or properly conduct a complete investigation unless the whistleblower identifies themselves. Whistleblowers should be cautioned that their identity might become known for reasons outside of the control of the Company as a result of the investigation.

The identity of other persons subject to or participating in any inquiry or investigation relating to a report will be maintained in confidence subject to the same limitations.

Protection against Retaliation, Harassment or Victimization

The Company is committed to ensuring that a whistleblower is not disadvantaged in any way or subject to retaliation, harassment or victimization for validly raising concerns about suspected reportable behavior.

The Company will not tolerate any retaliation, harassment or victimization (such as dismissal, demotion, discrimination or bias) and shall take appropriate action to protect whistleblowers who raise any concerns under this Policy in good faith.

The Company may take action against those who submit false or deliberately inaccurate reports under this Policy.

All directors, officers, employees, independent contractors and consultants of Ardenton and its subsidiaries are expected to comply with this Policy. This Policy will be strictly enforced, and violations will be dealt with immediately, including subjecting the transgressor to corrective and/or disciplinary action, including without limitation, dismissal or removal from office.

Reporting and Retention of Records

The representative of the Board of Directors will maintain a log of all complaints, tracking their receipt, investigation and resolution and will prepare a summary to be presented to Ardenton's Board of Directors on a quarterly basis. Copies of complaints and the log will be maintained by the representative of the Board of Directors in a confidential manner. Records of any complaints will be maintained by the representative of the Board of Directors or its designee for a period of at least seven years.

Policy Accessibility and Review

This Policy is distributed to all staff, received at the time of hire, and accessible at all times as published on the Company's website. Ardenton will review this Policy on a regular basis to ensure it remains relevant and in accordance with legislation. Any recommended changes must be approved by the Board of Directors or its delegated committee.