Whistleblower

POLICY

INTERNAL

*This document has been security classified using the CICT's information security classification framework as **INTERNAL** and will be managed according to Converge ICT Solutions Inc.'s quality and information security governance and compliance requirements.*

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1. Purpose

CONVERGE INFORMATION AND COMMUNICATIONS TECHNOLOGY SOLUTIONS, INC. (the "Company") is committed to the highest standards of ethical behavior. The Company encourages its officers, employees, consultants, suppliers and service providers to act with honesty, integrity, transparency and accountability. The whistleblower policy aims to embolden everyone and anyone to speak up, without fear of retaliation, about any detected activity that he/she considers to be illegal, dishonest, unethical or inappropriate.

2. Scope

This policy applies to all executives, officers, employees, and business partners of the Company including but not limited to suppliers, service providers, consultants and distributors. It covers tipping off of information, incidents, situations, problems or issues involving unethical, dishonest, illegal or inappropriate behaviors and practices, violations of company policies and/or fraud.

3. Policy Statements

3.1. Obligation to Report

Any person with knowledge of, or has observed, any of the following is required to file a report to the proper authorities:

- Acts which are illegal or in violation of the law
- Actual or suspected actions in violation of Company policies, rules and regulations
- Abuse or improper exercise of power and privileges
- Acts that can severely affect the Company's image and/or reputation
- Actions which amount to harassment, or which are unreasonable, unfair, dishonest, fraudulent. discriminatory, unethical, or unjust
- Other similar actions that are against the company's best interest or which are opposed to the Company's values

Crimes against persons or property (i.e. burglary, rape, assault, etc.) should be promptly reported to local authorities.

3.2. Reporting Process

3.2.1. The report can be made to any one of the following:

- The President, Chief Resource Office and/or Chief Operating Officers;
- Executives, Officers and/or Department Head of the unit concerned;
- Humans Resources and/or the Compliance Officer
- Ethics Committee
- CICT Legal team at compliance@convergeict.com

3.2.2. Reporting may be done through any means including but not limited to SMS text, letter, email or phone call. The person making the report may do so anonymously. However, the Company encourages that the person making such a report disclose his identity in case there is a need to clarify or verify the disclosure or in case there is a need for additional information before or during the conduct of the investigation or fact-finding.

3.2.3. Reporting must always be done in good faith. While proof beyond reasonable doubt is not expected, the person making the report should at least demonstrate some reasonable ground or cause for concern based on verifiable information and is ready to substantiate his claim or view.

3.3. Confidentiality

The identity of the person making the report as well as the disclosed information shall always be treated with strict confidentiality regardless of the outcome of the investigation. The Company shall take all necessary steps and make every effort to protect the identity of the whistleblower, unless compelled by law.

3.4. Protection from Retaliation or Harassment

The Company shall protect the person who reports in good faith from any form of retaliation, retribution, harassment or pressure. He/she must not be demoted, suspended, terminated, harassed or even discriminated solely because he/she reported a possible violation in good faith.

4. Investigation of Disclosures

4.1. Anyone who receives the disclosure must immediately escalate the same to the Head of Human Resources, the Ethics Committee or the CICT Legal team, who shall immediately conduct an investigation into the matter.

4.2. Whenever possible and appropriate, the Company may keep person making the report updated with the investigation, disposition and/or resolution of the issue/case.

5. Roles and Responsibilities

The Compliance Office and the CICT Legal team shall oversee the implementation of and/or compliance with this policy. It shall be responsible for the following:

- Ensure observance of this policy within the Company
- Conduct relevant trainings and awareness campaign concerning this policy
- Periodically submit a report to the President and Board of Directors

6. Related document references

- Code of Business Ethics

- Managing Workplace Investigation Procedure