

Whistleblower Policy

Policy Statement

NAV CANADA (the “Company”) provides mechanisms for any person to confidentially report known or suspected Wrongdoing on the part of any NAV CANADA employee, officer, or director.

Policy Application

This policy applies to all NAV CANADA:

- Officers, directors, employees and contract workers.
- Workplaces and operations.
- Agents and vendors.

This policy applies to any known or suspected, Wrongdoing on the part of any Company officer, director, employee, contractor, agent, or vendor, be it planned, ongoing, or in the past.

Company Commitments

NAV CANADA commits to:

- Investigate all reports of Wrongdoing that meet the definition of Wrongdoing, in a timely, objective, and thorough manner.
- Identify corrective measures that will be taken as a result of an investigation.
- Maintain the confidentiality of Wrongdoing reports, reporters, investigations, and outcomes.
- Prevent retaliation in any form against anyone making a report of, or participating in the investigation of, Wrongdoing.
- Provide a confidential mechanism for any person to make a report of Wrongdoing (i.e., Sentinel).
- Seek the full and objective truth in the investigation of a report of Wrongdoing.

Non-investigation

The Company will not investigate a report of Wrongdoing if:

- The report is more appropriately addressed by another Company policy or procedure.
- The report is frivolous, vexatious, or has not been made in good faith.
- The report does not deal with a Wrongdoing.
- The report does not provide enough information to permit an investigation.
- There is another valid reason for not investigating the report.

Expectations of Individuals

The individuals to whom this policy applies are encouraged to:

- Report any known or suspected Wrongdoing to the Company using the resources provided.
- Participate fully and honestly when asked to participate in an investigation into reported Wrongdoing.

Prohibitions of Individuals

The individuals to whom this policy applies are not permitted to:

- Retaliate against any person who makes a report of, or participate in the investigation of, potential Wrongdoing.
- Make a frivolous, vexatious, knowingly false or otherwise bad faith report of Wrongdoing.
- Disclose the identity of a whistleblower or the details of a report of Wrongdoing without express authorization from the Chief Legal Officer.

Version Control

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Corporate Secretary Approved by: Executive
Management Committee
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