

Whistleblower Policy

Horizon Utilities Corporation – Policies & Procedures

Purpose

Every director, officer or employee of the company has an ongoing responsibility to report any activity or suspected activity of which he or she may have knowledge which appears to be prohibited by Horizon Utilities' Code of Conduct.

Horizon Utilities recognizes that a person wishing to make such a report may not feel comfortable doing so within the normal management framework of the Company. This policy has therefore been established in order to provide a vehicle in accordance with Horizon Utilities' Code of Conduct Policy, for any such person to report the circumstances outside the normal management framework with the assurance that such person shall be free from retaliation or discrimination for having disclosed or reported suspected or actual illegal or unethical conduct by another employee, officer or director of the Corporation.

Policy Statement

Horizon Utilities is committed to fostering a workplace conducive to open communication regarding the company's business practices. In an effort to further this commitment, this policy (i) establishes guidance for the receipt, retention and treatment of verbal or written reports received regarding accounting, internal controls, auditing matters, disclosure, fraud and unethical business practices; (ii) establishes guidance for providing company employees a means to make reports in a confidential and anonymous manner; and (iii) makes clear the company's intention to discipline, up to and including termination of employment, any person determined to have engaged in retaliatory behaviour.

The creation and implementation of this policy in no way implies that there is an indication of suspected or real issues of unethical or illegal conduct by any employee, officer or director. This policy aligns with the highest standards of governance and further supports Horizon Utilities' Code of Conduct and the Board of Directors Governance Guidelines and provides an open and transparent demonstration that such conduct is clearly unacceptable at all levels of the organization.

Procedure

This policy, and additional information regarding conflict resolution resources, shall be provided to all employees, officers and directors and made generally available through the Company intranet.

The Chair of the Board of Directors' HR/Governance Committee, the President & CEO, and the Vice President Human Resources are designated to be the recipients of all the reports filed under this policy and will designate, at his or her discretion, the appropriate individual(s) to communicate and facilitate the necessary Company action.

Retention of Reports

Reports filed under this policy will be controlled and documented by the Chair of the HR/Governance Committee or the Vice President Human Resources. All related documentation shall be maintained for six years in secured files and only the named parties shall have access to the files.

Treatment of Reports

All reports will be taken seriously and addressed promptly, discreetly and professionally. Employees are encouraged to identify themselves to the contact of their choice, but they ultimately have the right to remain anonymous. If a person desires to remain anonymous, that desire will be respected. Discussions and documentation regarding reports will be kept in strict confidence to the extent appropriate or permitted by policy or law. Should the person submitting the report identify himself or herself, the recipient of the report will communicate to the employee the steps to be taken to address the report and the results of any Company actions initiated.

Retaliation

Retaliation against any employee that files a report or voices a concern under this policy is strictly prohibited. Employees determined to have engaged in retaliatory behaviour or who fail to maintain an employee's requested anonymity may be subject to discipline, which could result in termination of employment. Any employee who feels that he or she has been subject to any behaviour that violates this policy should immediately report such behaviour to his or her supervisor, Human Resources, the President & CEO or the Vice President, Human Resources or the Chair of the HR/Governance Committee.

Misleading or False Reports

Employees who knowingly file misleading or false reports, or reports without a reasonable belief as to truth or accuracy, will not be protected by this policy and may be subject to discipline, including termination of employment.

HR/Governance Committee Review of Reports

A summary of reports received under this policy will be communicated to the HR/Governance Committee on a quarterly basis (or a more frequent basis should conditions warrant more timely action).

Contact to Report

Employees may contact either the Chair of the HR/Governance Committee of the Board, the President & CEO, or the Vice President Human Resources.

- Committee Chair – HR/Governance Committee
Margaret Nelligan: 416-865-7710 mnelligan@airdberlis.com
- President & CEO
Max Cananzi: 905-317-4902 max.cananzi@horizonutilities.com
- Vice President Human Resources
Brenda Schacht: 905-521-4902 brenda.schacht@horizonutilities.com

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