



Ethics Hotline Policy

Scope:

This policy applies to all Spanish Cove Retirement Village employees, including part-time, temporary and contract employees.

Purpose:

Spanish Cove Retirement Village is committed to the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and Spanish Cove Retirement Village's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required, then they should follow our existing grievance procedure.

Policy:

The whistleblowing policy is intended to cover serious concerns that could have a significant impact on Spanish Cove Retirement Village, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with company policy, including the Code of Business Conduct; or
- Otherwise, amount to severe improper conduct.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

Safeguards:

Harassment or Victimization

Harassment or victimization of an individual submitting a hotline reports is not tolerated.

Confidentiality

Every effort will be made to protect the reporter's identity by our hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal or external investigation by our company into a reported issue. It is possible that as a result of the information provided in a report the reporter's identity may become known to us during the course of our investigation.



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Safeguards: Continued

Anonymous Allegations

The policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Malicious Allegations

Malicious allegations may result in disciplinary action.

Procedure:

Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

Website: www.lighthouse-services.com/spanishcove.com

English speaking USA: 833-350-0009

Spanish Speaking USA and Canada: 800-216-1288

E-mail: reports@lighthouse-services.com (must include company name with report)

Fax alternative for written documents: 215-689-3885 (must include company name with report)

Reporters to the hotline will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation because of the information you have provided. Reports are submitted by Lighthouse to Spanish Cove Retirement Village or its designee, and may or may not be investigated at the sole discretion of our company.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, HR representative, or to the Administrator.



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Procedure: Continued

Timing

The earlier a concern is expressed, the easier it is for us to take action.

Evidence

Although you are not expected to prove the truth of an allegation, the employee submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

How The Report Will Be Handled:

The action taken will depend on the nature of the concern. The Corporate Compliance and Ethics Committee receives a copy of each report and follow-up with reporter concerning actions taken. A Quarterly Corporate Compliance and Ethic Committee report is provided to Spanish Cove Board of Directors for their review.

Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Feedback to Reporter

Whether reported directly to Spanish Cove Retirement Village personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.



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How The Report Will Be Handled: Continued

Outcome of an Investigation

At the discretion of the company and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.

Spanish Cove Retirement Village reserves the right to modify or amend this policy at any time as it may deem necessary.