



**FARMERS EDGE INC.
(the "Company")**

WHISTLEBLOWER POLICY

Our Commitment

Violations of the Company's Code of Conduct and Business Ethics or applicable laws, rules and regulations, can result in serious damage to the Company, its reputation and the reputations of its Team Members. Accordingly, if a Team Member has knowledge of any possible violation of the Code of Conduct and Business Ethics or any possible breach of applicable laws, rules or regulations or any possible wrongdoing or questionable practices regarding accounting or auditing matters or internal accounting controls (collectively called an "**Alleged Wrongdoing**"), that Team Member is encouraged to report such.

The report should be made to the Team Member's immediate supervisor, if appropriate. If the Team Member is of the view that it would be more appropriate under the circumstances to take the Alleged Wrongdoing to higher levels, due to either the nature of the Alleged Wrongdoing or, if earlier reports through normal channels have not been acted upon, then that Team Member has the right to directly contact:

1. the Chair of the Audit Committee and the Corporate Secretary through the Whistleblower Hotline (described below) to report an Alleged Wrongdoing that relates to any theft, fraud, questionable accounting (including internal accounting controls) or auditing matters or any other financial matters; or
2. the Executive Vice President, People and Culture, of the Company to report an Alleged Wrongdoing that relates to any matter other than those financial matters described in subparagraph 1 above.

Complaints will be handled on a strictly confidential basis and may be submitted anonymously provided that if the Team Member does identify him/herself, disclosure of the person's identity and the confidential information submitted may be disclosed only, and to the extent required, to those individuals who need to know of the complaint in order to permit a thorough and effective investigation or as may be required to be disclosed by law. Unless required by law, the Company shall not make, nor shall it tolerate, any effort to ascertain the identity of the Team Member making an anonymous report.

Each complaint will be investigated, as appropriate, to ensure there are sufficient grounds and evidence supporting it. Upon confirmation of the Alleged Wrongdoing, the matter will be resolved by appropriate action.

The Company and its directors, officers and other Team Members shall not retaliate against any Team Member who reports, in good faith, an Alleged Wrongdoing or a retaliatory act or who assists in the investigation of the Alleged Wrongdoing. The term "*in good faith*" means that the reporting Team Member should have evidence or reasonable grounds for believing that an

Alleged Wrongdoing or retaliatory act has occurred and must act without malicious intent or personal agenda. Reports of Alleged Wrongdoings or retaliatory acts that were not made in good faith will be viewed as a serious disciplinary offence and may be subject to sanctions, including termination of employment for cause without notice or payment in lieu of notice.

To access the Whistleblower Hotline for complaints described in subparagraph 1 above, or for Alleged Wrongdoings that Team Members prefer to report anonymously, Team Members can use any of the methods outlined below.

An independent, third party, has been selected to provide a confidential and anonymous communication channel for reporting concerns.

1. Internet – <https://farmersedge.confidenceline.com>
2. Toll free telephone numbers:
 - North America: 1-877-417-3030
 - Brazil: 0021-80033881766
 - Australia: 0011-80033881766
 - Russia: 810-80033881766