

External Stakeholder Whistleblower Policy

1. Scope

Canary requires its directors, officers, and employees (each, a "Canary Individual") to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Canary, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Purpose

- 1. The purpose of this external whistleblower policy (the "Policy") is to:
 2. Encourage and enable Canary customers, workers, suppliers, communities, investors, and the environment ("Stakeholders") to raise concerns regarding suspected illegal or unethical conduct or practices, or violations of the Canary's policies on a confidential and, if desired, anonymous basis.
 3. Protect Stakeholder Individuals from retaliation for raising such concerns.
 4. Establish policies and procedures for Canary to:
 - 1. receive and investigate reported concerns; and
 - 2. address and correct inappropriate conduct and actions.

Reporting Responsibility

- 1. Each Canary Individual has the responsibility to report in good faith any concerns about actual or suspected violations of the Canary's policies or any federal, state, or municipal law or regulation governing the Canary's operations (each, a "Concern"). Appropriate subjects to report under this Policy include but are not limited to financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices, such as:
 1. Fraud.
 2. Theft.
 3. Embezzlement.
 4. Bribery or kickbacks.
 5. Misuse of the Canary's assets.
 6. Undisclosed conflicts of interest.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law and/or ethical standards.

No Retaliation

- 1. No Canary External Stakeholder who in good faith reports a Concern or participates in a review or investigation of a Concern shall be subject to harassment, retaliation, or, in the case of an employee, adverse employment consequences because of such report or participation. This protection extends to Canary External Stakeholders who report in good faith, even if the allegations are, after an investigation, not substantiated.
 2. Any Canary Individual who retaliates against someone who in good faith has reported or participated in a review or investigation of a Concern will be subject to discipline, up to and including termination of employment.

Confidentiality

- 1. Canary encourages anyone reporting a Concern to identify themselves in order to facilitate the investigation of the Concern. However, Concerns may be submitted on a confidential basis. Canary shall take reasonable steps to protect the identity of the Canary External Stakeholder and shall keep reports of Concerns confidential to the extent possible, consistent with the need to conduct an adequate investigation. It is required that the stakeholder contact information is disclosed to Canary.

Reporting Procedures

- 1. All Concerns should be reported as soon as practicable consistent with this Policy.
 1. Concerns should be reported via the “Feedback” channel included on the homepage of Canary’s website. When reporting Concerns, the Canary External Stakeholder should describe in detail the specific facts that support the report, along with any relevant details (date, supporting evidence, etc.). The Stakeholder should also provide contact information to best reach them at. The Feedback report will be sent to Canary’s Social Action Impact Committee (“SAIC”) and Board of Directors.

Investigation of Reported Concerns

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- 1. SAIC and Board of Directors is responsible for:
 1. Promptly investigating or overseeing the investigation of each reported Concern.
 2. Advising the Board of Directors of each reported Concern.
 3. Reporting compliance activity to the full Board of Directors at each regularly scheduled Board meeting.
- 2. Acknowledgment of Receipt. An auto-email will be sent to the Stakeholder acknowledging receipt, and the "Feedback Request Response Letter" that outlines the scope of the letter, and any next steps required depending on the scenario. The SAIC and Board of Directors should send the Feedback Request Response Letter within five (5) business days.
- 3. Investigation. The SAIC and Board of Directors shall conduct a prompt, discreet, and objective review or investigation based on the submitted report. If deemed necessary in his or her sole discretion or upon the recommendation of the Social Action Impact Committee/Board of Directors, Canary may engage legal counsel, accountants, or other experts to assist in the investigation.
- 4. Resolution. The SAIC and Board of Directors shall:
 1. Recommend appropriate corrective action to the the Stakeholder, if warranted by the investigation.
 2. Oversee the implementation of a resolution based on the determination of the Board of Directors.
 3. Follow up with the reporting individual for closure of the reported Concern.
- 5. Accounting and Auditing Matters. The SAIC / Board of Directors shall immediately notify the Board of Directors of any Concerns regarding accounting practices, internal controls, or auditing, and shall work with the Board of Directors until the matter is resolved.

Periodic Reviews

- 1. To ensure that the Canary does not engage in activities that could jeopardize its reputation the Board of Directors shall conduct periodic reviews of this Policy. The SAIC / Board of Directors shall present any recommended changes, modifications, or deletions of the provisions of this Policy to the full Board of Directors at its regularly scheduled meeting following the Committee's review.