

Disclosure Policy

1. Introduction

Street Capital Group Inc. and its subsidiaries (collectively the “Corporation”) are committed to the highest standards of corporate governance and shareholder/investor communications. The following principles, procedures and guidelines on timely disclosure of material information and transactions in the Corporation’s securities by employees are an extension and integral part of the Corporation’s Code of Conduct and Ethical Behaviour.

The objective of the Disclosure Policy is to ensure that communications with the investing public about the Corporation are:

- Timely, factual and accurate; and
- Broadly disseminated in accordance with all applicable legal and regulatory requirements including, but not limited to, those imposed by the Office of the Superintendent of Financial Institutions, the Ontario Securities Commission and International Financial Reporting Standards.

The Disclosure Policy extends to all employees of the Corporation, its board of directors, those authorized to speak on its behalf and all other insiders. It covers disclosures in documents filed with the securities regulators, financial and non-financial disclosure, including management’s discussion and analysis (MD&A) and written statements made in the Corporation’s annual and quarterly reports, news releases, letters to shareholders, presentations by senior management and information contained on the Corporation’s website and other electronic communications. It extends to oral statements made in meetings and telephone conversations with analysts and investors, interviews with the media as well as speeches, press conferences and conference calls.

2. Disclosure Policy Committee

The Disclosure Policy Committee (the “Committee”) is responsible for all regulatory disclosure requirements and for overseeing the Corporation’s disclosure practices. The Committee currently consists of Ed Gettings, Chief Executive Officer, Lazaro DaRocha, President, Marissa Lauder, Chief Financial Officer and Corporate Secretary (Chair of Committee) and Adam Levy, EVP and Chief Compliance Officer.

It is essential that the Committee be kept fully apprised of all pending material developments in order to evaluate and discuss those events to determine the appropriateness and timing for public release of information. If it is deemed that material information should remain confidential, the Committee will determine how that inside information will be controlled.

The Committee will use experience and judgment to determine the timing for public release of material information. The Committee is responsible for ensuring appropriate systems, processes and controls for disclosure and will review and approve all news releases and core disclosure documents prior to their release or filing, including the Corporation’s MD&A.

The Committee will review and update, if necessary, this Disclosure Policy annually or as needed to ensure compliance with changing regulatory requirements. The Committee will report to the board of directors.

3. Principles of Disclosure

Material information is any information relating to the business and affairs of the Corporation that results in, or would reasonably be expected to result in a significant change in the market price or value of the Corporation’s securities or that would reasonably be expected to have a significant influence on a reasonable investor’s investment decisions.

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It is somewhat difficult to define precisely what material information is and what might not be considered to be material. Some common examples of material information may be:

- Quarterly or annual financial results.
- Discussions with another company regarding a possible acquisition, merger or divestiture.
- Sudden departure or replacement of a key executive (e.g. termination, resignation, death).
- Public or private sale of additional securities.
- Significant increases or decreases in near-term earnings prospects.
- Significant litigation.

It is the responsibility of the Committee to determine what information is material in the context of the Corporation's own unique circumstances based on its profits, assets and capitalization, the nature of its operations and many other factors and to seek professional advice as required.

In complying with the requirement to immediately disclose all material information under applicable laws and stock exchange rules, the Corporation will adhere to the following basic disclosure principles:

- Material information will be publicly disclosed immediately via news release.
- In certain circumstances, the Committee may determine that such disclosure would be unduly detrimental to the Corporation (for example, if release of the information would prejudice negotiations in a corporate transaction), in which case the information will be kept confidential until the Committee determines it is appropriate to publicly disclose. In these circumstances, the Committee may decide to file a confidential material change report with the applicable securities regulators, and will periodically (at least every 10 days) review its decision to keep the information confidential (see "Rumours").
- Disclosure must include any information the omission of which would make the rest of the disclosure misleading.
- Announcements of material information should be factual and balanced and shall contain enough detail to enable the understanding and importance of the material information.
- Unfavorable material information must be disclosed as promptly and completely as favorable information.
- There must be no selective disclosure. Previously undisclosed material information must not be disclosed to selected individuals (for example, in an investor meeting or during a telephone conversation with an analyst). If previously undisclosed material information is inadvertently disclosed, this information must be broadly disclosed immediately via news release. Pending such news release, the Corporation shall also tell those parties who have knowledge of the information that the information is material and has not been generally disclosed.
- Disclosure should be consistent among all audiences, including the investment community, the media, customers and employees.
- Disclosure on the Corporation's website alone does not constitute adequate disclosure of material information. All material information should first be disseminated by news release prior to its posting on the Corporation's website.
- Disclosure must be corrected immediately if the Corporation subsequently learns that earlier disclosure contained a material error at the time it was given.

4. Designated Spokespersons

The Corporation designates a limited number of spokespersons with authority for communication with the investment community, regulators and the media. Ed Gettings, Chief Executive Officer, and Lazaro DaRocha, President, shall be the

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official spokespersons for the Corporation. Others may, from time to time, be designated to speak on behalf of the Corporation as back-ups or to respond to specific inquiries.

Employees who are not authorized spokespersons must not respond under any circumstances to inquiries from the investment community, the media or others, unless specifically asked to do so by an authorized spokesperson. All such inquiries are to be referred to one of the designated spokespersons.

5. News Releases

Once the Committee determines that a development is material, it will authorize the issuance of a news release, unless it determines that such development must remain confidential for the time being, appropriate confidential filings are made and control of that inside information is instituted. Should a material statement inadvertently be made in a selective forum, the Corporation will immediately issue a news release in order to fully disclose the information.

If the TSX is open for trading at the time of a proposed announcement, prior notice of a news release announcing material information must be provided to the Investment Industry Regulatory Organization of Canada (IIROC) (market surveillance department) to enable a trading halt, if deemed necessary by IIROC. If a news release announcing material information is issued outside of trading hours, market surveillance must be notified before the market opens.

Annual and interim financial results and the corresponding management's discussion and analysis of financial results and operations will be publicly released following board or audit committee approval (as applicable) of the financial statements. Whenever possible, the news release shall be disseminated concurrently with the filing of the financial statements.

News releases will be disseminated through an approved news wire service that provides simultaneous national and/or international distribution. News releases will be transmitted to all stock exchange members, relevant regulatory bodies, major business wires, national financial media and the local media in areas where the Corporation has its headquarters and operations.

News releases will be posted on the Corporation's website immediately after release over the news wire. The news release page of the website shall include a notice that advises the reader that the information posted was accurate at the time of posting, but may be superseded by subsequent news releases.

6. Conference Calls

Conference calls may be held for quarterly earnings and major corporate developments, accessible simultaneously to all interested parties, some as participants by telephone and others in a listen-only mode by telephone or via a webcast over the Internet. The call, if held, will be preceded by a news release containing all relevant material information. At the beginning of the call, a Corporation spokesperson will provide appropriate cautionary language regarding any forward-looking information and direct participants to publicly available documents containing the assumptions, sensitivities and a full discussion of the risks and uncertainties applicable to the news.

The Corporation will provide advance notice of the conference call and webcast by issuing a news release announcing the date, time and topic and providing information on how interested parties may access the call and webcast. These details will be provided on the Corporation's website. In addition, the Corporation may send invitations to analysts, institutional investors, the media and others. Any non-material supplemental information provided to participants will also be posted to the website for others to view.

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If the Committee determines that selective disclosure of previously undisclosed material information has occurred during a conference call, the Corporation will immediately disclose the information broadly via news release.

7. Rumours

The Corporation does not comment, affirmatively or negatively, on rumours. This also applies to rumours on the Internet. The Corporation's spokespersons will respond consistently to any rumours, saying, "It is our policy not to comment on market rumours or speculation." Should the TSX request that the Corporation make a definitive statement in response to a market rumour, the Committee will, in consultation with the Corporation's legal counsel, consider the matter and decide whether it is appropriate to make a policy and determine the information to be released.

8. Contacts with Analysts, Investors and Media

Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered material non-public information. If the Corporation intends to announce material information, the information must be disseminated by a news release.

The Corporation recognizes that meetings with analysts and significant investors are an important element of the Corporation's investor relations program. The Corporation will meet with analysts and investors on an individual or small group basis as needed and will initiate contacts or respond to analyst and investor calls in a timely, consistent and accurate fashion in accordance with this Disclosure Policy.

The Corporation will provide only non-material information through individual and group meetings, in addition to regular publicly disclosed information. The Corporation cannot alter the materiality of information by breaking down the information into smaller, non-material components.

9. Reviewing Analysts' Reports and Models

Upon request, the Corporation may review analysts' draft research reports or financial models for factual accuracy based on publicly disclosed information. The Corporation will not confirm, or attempt to influence, an analyst's opinions or conclusions.

10. Forward Looking Information

Should the Corporation elect to disclose forward-looking information (or "FLI") in continuous disclosure documents, speeches, conference calls, etc. the following guidelines will be observed:

- The information, if deemed material, will be broadly disseminated via news release, in accordance with this Disclosure Policy.
- The information will be clearly identified as forward looking.
- The Corporation will identify all material assumptions used in the preparation of the forward-looking information.
- The information will be accompanied by a statement that identifies, in very specific terms, the risks and uncertainties that may cause the actual results to differ materially from those provided in the statement.
- The information will be accompanied by a statement that disclaims the Corporation's intention or obligation to update or revise the FLI, subject to any requirements to update under applicable laws, whether as a result of new information, future events or otherwise. Notwithstanding the disclaimer, should subsequent events prove past statements about current trends to be materially off target, the Corporation may choose to issue, or may be

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required to be issued under applicable laws, a news release explaining the reasons for the difference. In this case, the Corporation will update its guidance on the anticipated impact on revenue and earnings (or other key metrics.)

11. Responsibility for Electronic Communications

The Disclosure Policy also applies to electronic communications. Accordingly, officers and personnel responsible for written and oral public disclosures are also responsible for electronic communications.

The Committee is responsible for updating the investor relations section of the Corporation's website and for monitoring all Corporation information placed on the website to ensure that it is accurate, complete, up-to-date and in compliance with relevant securities laws. A link to the Corporation's documents filed on SEDAR shall also be posted on the Corporation's website.

Disclosure on the Corporation's website alone does not constitute adequate disclosure of information that is considered material non-public information. Any disclosure of material information on the website will be preceded by the issuance of a news release.

All continuous disclosure documents will be provided in the Investor Relations section of the Corporation's website. All information posted, including text and audiovisual material, will show the date the material was issued. Any material changes in information must be updated immediately, following issuance of a news release.

In order to ensure that no material undisclosed information is inadvertently disclosed, employees are prohibited from participating in Internet chat rooms, bulletin boards or newsgroup discussions on matters pertaining to the Corporation's activities or its securities. Additionally, employees shall not use the Internet to "tip" or discuss in any form undisclosed material information about the Corporation. Employees who encounter a discussion pertaining to the Corporation should advise a member of the Disclosure Committee immediately, so the discussion may be monitored.

12. Communication, Education and Enforcement

The Disclosure Policy extends to all employees of the Corporation, its board of directors and its authorized spokespersons. New directors, officers and employees will be provided with a copy of this Disclosure Policy and educated about its importance.

Any Employee who violates the Disclosure Policy may face disciplinary action up to and including termination of employment with the Corporation without notice. The violation of this Disclosure Policy may also violate certain securities laws, which could expose directors, officers or employees to personal liability. If it appears that an Employee may have violated such securities laws, the Corporation may refer the matter to the appropriate regulatory authorities, which could lead to fines or other penalties.

13. Consequences of Violation and Reporting

Any Employee who violates this Policy is subject to possible suspension or termination. Any Employee who assists in, or knowingly fails to report, a violation of this Policy is also subject to suspension, termination or other appropriate action. Any Employee who suspects a violation of this Policy is obliged to report such breaches directly to their supervisor or Human Resources, who will then report such breaches to the Chief Risk Officer and Chair of the Audit Committee. The employee may also choose to report such breaches anonymously in the manner set out in the Whistleblower Code.