103-401-503-001
Whistleblower Code

1. Purpose

The purpose of this code is to provide employees with a process to report concerns regarding actual or possible violations of Street Capital's Code of Conduct and Ethical Behaviour (Code of Conduct), or an issue that may affect the business or reputation of Street Capital Group Inc., Street Capital Bank of Canada, and its affiliated entities (collectively referred to as "Street Capital" or the "Corporation"), to the Chair of the Audit Committee of the Board of Directors of Street Capital for review and investigation.

2. Scope / Applicability

This Whistleblower Code applies to Street Capital, its Directors, Officers, and Employees and pertains to all products and services provided by Street Capital and all dealings between the Corporation and any third party.

This Whistleblower Code should be read in conjunction with other Corporation documents, policies, and procedures that address various topics that may or may not be set forth in this Whistleblower Code including:

- Code of Conduct and Ethical Behaviour
- Employee Handbook
- Fraud Management Policy
- Privacy Code
- Anti-Money Laundering and Anti-Terrorist Financing Corporate Policy
- Securities Trades by Corporation Personnel Policy
- Disclosure Policy

3. Principles

Street Capital and its directors, officers, executives, full time, part time and temporary employees (collectively "employees") are expected to adopt the highest standards of professionalism, honesty, integrity and ethical behavior.

For these reasons, Street Capital must maintain a workplace where employees are able to report, without fear of retaliation, on alleged wrongdoing or misconduct, which may occur or be suspected of occurring at Street Capital. This Whistleblower Code is consistent with, and aligned to the Code of Conduct.

This Whistleblower Code is provided to employees at hiring. Employees are also required to review and acknowledge this Whistleblower Code annually.

Failure to follow this Whistleblower Code, unless otherwise required by law, may result in the termination of employment for just cause/willful misconduct. This includes whistleblowing to an external source, including but not limited to the media, prior to exhausting the mechanisms afforded under this Whistleblower Code.

4. Reporting Concerns

This Whistleblower Code addresses four major categories of potential wrongdoing or misconduct:

1. Financial Accounting Policies, Accounting Controls and Audit Allegations
   - These allegations include those regarding the circumvention or attempted circumvention of internal accounting controls or that would otherwise constitute a violation to accounting standards.
2. Legal and Regulatory Allegations
   - Breaches (real or attempted) to legal and regulatory requirements applicable to Street.
3. Breaches to the Code of Conduct
   - Any real or attempted breaches to the Code of Conduct, if the employee who raised the concern is not satisfied with the manner or process in which the concern was addressed and/or the result of the investigation.
4. Retaliatory Acts
   - Retaliation against employees who allege misconduct related to the above allegations.

If employees become aware of breaches in the Code of Conduct, compliance with legal and regulatory requirements, questionable accounting, internal accounting controls, or auditing matters, and/or retaliation against employees who allege misconduct, they must immediately report those facts in accordance with the requirements of the Code of Conduct. The Code of Conduct permits these facts to be reported to an employee's immediate supervisor or the Human Resources Department. The recipients of such complaints will forward them promptly to the Chair of the Audit Committee and the Chief Risk Officer.

Employees may also submit concerns confidentially via email to AuditCommitteeChair@streetcapital.ca. or anonymously by mail by completing a Whistleblower Report (Appendix A) in accordance with this Whistleblower Code, and addressing the report as follows:

Privileged and Strictly Confidential
Attn: Chair of the Audit Committee
1 Yonge Street, Suite 2401
Toronto, ON
M5E 1E5

Envelopes so marked will be forwarded unopened to the Chair of the Audit Committee.

Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. Because of the inability of investigators to interview anonymous whistleblowers, it may be more difficult to evaluate the allegations and, therefore, less likely to cause an investigation to be initiated.

5. Treatment of Complaints

All complaints will be treated as confidential. The anonymity of the person making the complaint will be maintained unless Street Capital is compelled to reveal the individual's identity by judicial or other legal process, or until the individual indicates that he or she does not wish to remain anonymous.

The Chair of the Audit Committee will inform the Committee, in summary form or otherwise, of all complaints received, with an initial assessment as to the appropriate treatment of each complaint. Assessment,

investigation, and evaluation of complaints will be conducted by, or at the direction of, the Audit Committee. If deemed appropriate, the Committee may engage at Street Capital's expense independent advisors, such as outside counsel and accountants unaffiliated with Street Capital's auditor.

Following investigation and evaluation for a complaint, the Chair of the Audit Committee will report to the Committee on recommended disciplinary or remedial action, if any. The action determined by the Committee to be appropriate under the circumstances will then be brought to the Board or to the appropriate members of Senior Management for authorization or implementation, respectively. If the action taken to resolve a complaint is deemed by the Audit Committee to be material or otherwise appropriate for inclusion in the minutes of the meetings of the Committee, it will be so noted in the minutes.

If an allegation is determined to be false and made maliciously or for personal gain, disciplinary action may be taken against the employee.

Any effort to retaliate against any person making a complaint in good faith is strictly prohibited and will be reported immediately to the Chair of the Audit Committee.

6. Retention of Records of Complaints

Records pertaining to a complaint are the property of Street Capital and will be retained:

a. in compliance with applicable laws and document retention policies;
b. subject to safeguards that ensure their confidentiality, and, when applicable, the anonymity of the person making the complaint; and
c. in such manner as to maximize their usefulness to Street Capital's overall compliance program.

APPENDIX A

WHISTLEBLOWER REPORT

DATE REPORTED:	
TO:	The Chair of the Audit Committee of the Board of Directors 1 Yonge Street, Suite 2401 Toronto, ON M5E 1E5
BY:	*Please provide your contact details if this report is not being submitted anonymously.* NAME: EMAIL: TELEPHONE NUMBER:

Please provide details regarding the allegations pertaining to a suspected or actual, unlawful or inappropriate misconduct relating to financial allegations, legal and regulatory allegations, breaches of the Code of Conduct and Ethical Behavior and retaliation.

Please include specific details including the names of all persons associated with this concern, witnesses, dates, locations, how the concern was discovered, and any other information which may be relevant for an investigation or fact finding to be conducted.