

Linamar Corporation Whistleblower Policy

General

The mission and values of Linamar Corporation (“Linamar”) require officers, employees and representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Linamar insists on:

- Integrity in fulfilling its responsibilities;
- Treating all individuals with dignity and respect;
- Compliance with Linamar policies, standards, practices and with applicable laws and regulations.

Purpose

The purpose of this policy is:

- To facilitate making disclosures;
- To facilitate the investigation of disclosures;
- To protect those who in good faith make disclosures.

Matter Warranting Disclosure

“Disclosures” include, but are not limited to, information concerning:

- An act or omission constituting a violation of Linamar policies, standards or practices;
- An act or omission constituting an offence under any provincial or federal legislation;
- An act or omission that creates a substantial and specific danger to the life, health or safety of persons or to the environment;
- Gross mismanagement

Reporting Responsibilities

It is the responsibility of all officers, employees and representatives to comply with the mission and values of Linamar in their officership, employment and contractual obligations, and to make disclosures when appropriate.

Making Disclosures

Linamar encourages individuals to make disclosures of the ‘Matters Warranting Disclosure’ identified above. Under normal circumstances disclosures should be made directly to supervisors, whose responsibility it is to ensure organizational integrity, compliance and accountability.

Linamar recognizes, for various reasons, it may not always be possible to make disclosures through normal channels and thus has provided a means for reporting such disclosures through the mechanism provided in this policy.

No Reprisal

An individual who retaliates, in any fashion, against someone who has made a disclosure in good faith may be subject to discipline up to and including termination.

Anonymity

Individuals are encouraged to provide their name and contact information when making a disclosure, through the email address provided, understanding that this makes it easier to investigate the disclosure. If requested, anonymity can be secured.

Disclosures not made in Good Faith

Linamar is concerned about protecting the reputation of its Officers, employees and representatives from false or malicious allegations. Linamar will therefore ensure that the necessary resources are provided to investigate any disclosure which it receives.

It is important to understand that Linamar will view seriously any disclosure which proves to be false, malicious or of a frivolous nature, and that any person making such a disclosure may be subject to discipline up to and including termination.

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How the Company will respond

Linamar will respond to each disclosure in a timely and efficient manner. It should be noted that the seriousness, complexity and timeliness of a disclosure may impact the method, resources and speed with which a disclosure is reviewed and/or investigated, and resolved.

Reporting Mechanism

Linamar.ethicspoint.com

Toll-free number: 1-888-294-5496