

**WHISTLEBLOWER POLICY**  
**NOVA CANNABIS INC.**  
**Effective as and from June 21, 2021**

**PURPOSE**

The integrity, transparency and accountability of the financial, operational, administrative and management practices of Nova Cannabis Inc. (the "**Corporation**") is critical. This information guides the decisions of the board of directors of the Corporation (the "**Board**") and is relied upon by stakeholders of the Corporation and the financial markets. For these reasons, it is critical for the Corporation to maintain a workplace where concerns regarding questionable business practices can be raised without fear of any discrimination, retaliation or harassment.

This whistleblower policy (the "**Policy**") sets out procedures to address the receipt, retention and treatment of complaints received by the Corporation in respect of matters relating to fraud accounting, internal accounting controls, auditing, or public disclosure. This Policy also provides a means to protect the confidentiality and anonymity of any submission by employees or consultants of the Corporation.

**PROCEDURES**

All directors, officers, employees and consultants are encouraged to promptly report either orally or in writing to their immediate supervisor, all evidence of activity by a director, officer, employee or consultant of the Corporation that may constitute any of the following:

- questionable accounting practices;
- inadequate internal accounting controls;
- the misleading or coercion of auditors;
- disclosure of fraudulent or misleading financial information;
- instances of corporate fraud; and
- any breaches of any statute, law, legislation, rule or law governing the operations of the Corporation's business and operations.

In instances where a satisfactory response is not received from your immediate supervisor, or if you are uncomfortable addressing your concerns to your supervisor, you may contact any senior officer of the Corporation directly.

In instances where a satisfactory response is not received from such senior officer, or if you are uncomfortable addressing your concerns to a senior officer, you are asked to report the matter through our anonymous reporting hotline provided through Lighthouse Services, Inc. at 1-844-550-0007 or [www.lighthouse-services.com/novacannabis](http://www.lighthouse-services.com/novacannabis). All calls or reports submitted through the website are confidential and the identity of the person submitting the report will remain

anonymous. Alternatively, the Chair of the Audit Committee of the Corporation may be contacted by email or telephone as follows:

Mr. Thomas Bitove  
Tom@Bitove.com  
(905) 670-5560

Anonymous written or telephone communications will be accepted.

Employees and consultants are encouraged to provide as much specific information as possible including names, dates, places and events that took place, the employee's or consultant's perception of why the incident(s) may be a violation, and what action the employee or consultant recommends be taken.

All complaints under this Policy will be investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action and subject to applicable law.

All reports made to supervisors and senior officers in respect of matters specifically covered by this Policy will be reported to the Chair of the Audit Committee of the Corporation and he or she shall report same to the Board together with any reports made to him or her.

Any individual who in good faith reports such incidents described above will be protected from threats of retaliation, harassment, discharge, or other types of discrimination including but not limited to those respecting compensation, or the terms and conditions of employment, that are directly related to the disclosure of such reports. If any employee or other person believes they have been unfairly or unlawfully retaliated against in respect of a report made by such person under this Policy, they may file a complaint with their supervisor or with a senior officer in instances where they are uncomfortable filing the complaint with their supervisor. If such a person is uncomfortable filing the complaint with a supervisor or any senior officer, they may file their complaint with the Chair of the Audit Committee of the Board. The Corporation reserves the right to discipline any individual who makes an accusation without a reasonable, good faith belief in the truth and accuracy of the information or who knowingly provides false information or makes false accusations, and such discipline may result in the termination of an officer or employee or, in the case of a consultant, termination of the consulting contract and, if warranted, legal proceedings.

All directors, officers, employees and consultants have a duty to co-operate in an investigation. Should an employee or consultant fail to co-operate or provide false information in an investigation, the Corporation will take effective remedial action commensurate with the severity of the offence. This action may include disciplinary measures up to and including termination of an officer or employee or, in the case of a consultant, termination of the consulting contract and, if warranted, legal proceedings.