



## REPORTING GUIDE

# YOUR VOICE MATTERS

SPEAK UP WITH CONFIDENCE.  
REPORT WRONGDOING OR UNETHICAL  
CONDUCT. ASK QUESTIONS SAFELY AND  
SECURELY. REMAIN ANONYMOUS.

CLEARVIEW  
CONNECTS™

SECURE AND ANONYMOUS REPORTING



# **SPEAK UP** **BE HEARD**

SUBMIT A REPORT:



GO TO [CLEARVIEWCONNECTS.COM](https://clearviewconnects.com)



CALL 1 844 804 4857 AND SPEAK  
WITH A CLEARVIEW AGENT OR LEAVE  
A VOICEMAIL REPORT.



SEND YOUR REPORT TO:

P.O. BOX 11017, TORONTO, ONTARIO M1E 1N0



# WHAT IS CLEARVIEW CONNECTS™ ?

ClearView Connects™ is an ethics reporting/whistleblowing solution that provides a secure, anonymous and confidential way for employees of GCT and its subsidiaries to raise concerns or report unethical workplace behaviour.

## HOW DOES CLEARVIEW CONNECTS™ WORK?

There are several ways that you can submit a report – choose the one that's most comfortable for you: use ClearView's online system, speak with a ClearView agent, leave a voicemail report or mail a hard copy report. You decide whether to provide your name and contact information in your report, and if you don't, ClearView will protect your anonymity. Once you submit a report, the data is stored on ClearView's highly secure servers in Canada. ClearView is committed to the highest standards of data security and privacy protection.

The ClearView system will immediately notify the Chair of the Audit Committee of GCT's Board of Directors and GCT's General Counsel (the "Reviewers"), who are responsible for ensuring reports are independently reviewed and investigated.

ClearView Connects™ makes it possible for you to communicate with GCT's Reviewers while remaining anonymous. If you submit your report through the ClearView web-based system or by speaking to a ClearView agent, you will receive a system-generated login ID and password. This will allow you to access the report you submitted to review the status of your report, add comments, ask your Reviewer questions or even attach documents. It is important to check the status of your report regularly, because your Reviewer may ask you follow-up questions and will inform you about how the report is being addressed.

ClearView won't release any information to GCT that would identify you without your consent (you may consent by including your name in your report). If you do provide identifying information, ClearView will forward it to GCT and may also be compelled by law to disclose it to legal or regulatory authorities.


As you complete your report, be careful not to include any personal details that could identify you to GCT unless you want to be identified.

## **WHAT KINDS OF ISSUES SHOULD I REPORT?**

You should report any misconduct or unethical behaviour that could harm GCT, its reputation, its employees or others. This may include:

- Falsification or destruction of business or financial records
- Misrepresentation or suppression of financial information
- Non-adherence to internal financial reporting policies or controls
- Auditor independence concerns
- Theft, embezzlement, and unlawful or improper payments
- Harassment or discrimination
- Corrupt practices including giving or receiving bribes or other improper benefits
- Conflicts of interest
- Illegal, deceptive or anti-competitive actions
- Other breaches of GCT's Code of Conduct or other compliance policies
- Retaliation or retribution against an individual who reports a concern

# SUBMIT A REPORT TO CLEARVIEW, 24/7:

 **ONLINE** Once you begin an online report, it cannot be saved and restarted. Ensure you are ready to submit your report in full.

1. Go to **<https://www.clearviewconnects.com>**.
2. Enter "GCT" in the "Submit a Report" field and click "Submit".
3. Read the Terms of Agreement and click "I Agree".
4. Read the instructions onscreen and type your report into the "Enter Report" field. You can upload attachments to accompany your report.
5. **Once uploaded, attachments cannot be edited or removed.** When you are finished, click "Next".
6. Select a category for your report. Click the drop-down arrow next to the category to select the most appropriate type of issue you are submitting. Click "Next".
7. Answer the additional questions and provide any additional information you may have. Click "Submit".
8. Your report has now been submitted and is automatically encrypted. Your IP address is not tracked.
9. Once complete, a Report ID and password will appear onscreen. This information will allow you to log back into the system to check the status of your report.

**Important: Write down your Report ID and password and do not lose it. This information is only given once when you submit your report.**

If it is lost, you will not be able to check the status of your report. In this case, you may submit a new report with reference to your original report.

 **BY PHONE** Call the Whistleblowing toll-free number 1 844 804 4857

### **Option 1: Speak with a ClearView Agent**

a) The call is not recorded, and caller ID is not used. The report is entered into the ClearView system using your exact words.

b) Once complete, you will be given a Report ID and password. This information will allow you to call back into the system to check the status of your report. **Important: Write down your login and password and do not lose it. This information is only given once when you submit your report. If it is lost, you will not be able to check the status of your report.**

### **Option 2: Leave a voicemail report**

a) Your message is entered into the ClearView system by ClearView exactly as you left it, and then your voicemail message is deleted. Caller ID is not used.

b) If you leave a voice message, you will not receive a Report ID and password and will not be able check the status of your report online.

### **BY MAIL**

1. Write your report, including as much detail as possible.
2. Put in a stamped envelope and mail to the confidential post office box at P.O. Box 11017, Toronto, Ontario, M1E 1N0.
3. Anonymous handwritten reports are transcribed into the system, and all typewritten reports are scanned and uploaded.

4. Once entered into the ClearView system, all original hard copies are destroyed. Only ClearView personnel can access the P.O. Box.

5. If the report is submitted by mail, you will not receive a Report ID and password and will not be able to check the status of your report online.

## **ONCE YOU SUBMIT A REPORT...**

The ClearView system will immediately notify GCT's Reviewers that a report has been submitted.

### **Checking the status of your report online or by telephone**

For reports submitted online or by telephone (through a live agent), ClearView Connects™ allows you to communicate with GCT's Reviewers while remaining anonymous.

Your Report ID and password will allow you to review the status of your report, add comments, ask your Reviewer questions or even attach documents.

It is important to check the status of your report regularly, because your Reviewer may ask you follow-up questions and will inform you about how the report is being addressed.

1. Go to **clearviewconnects.com** or call **1 844 804 4857**
2. Enter or provide your Report ID and password when prompted.
3. You can respond to comments or questions that were submitted by Reviewers and/or add additional information to your report.