



CLEARLY CANADIAN CORPORATION
(the "Company")

WHISTLEBLOWER POLICY

Procedures for the Submission of Complaints or Concerns regarding Accounting, Internal Accounting Controls and Auditing Matters

Clearly Canadian Corporation is committed to building and maintaining a good reputation in the market through the ethical behaviour of our personnel and contractors and the proper and effective functioning of our accounting and control system.

In support of this commitment, the Company provides a confidential and anonymous reporting process for the Company employees, contractors, agents and other third parties to report concerns and complaints regarding, accounting, internal controls and auditing matters as well as serious violations of any Company policy, fraud, or serious misconduct. Employees are responsible for reporting any of these matters to the Audit Committee using the Whistleblower policy and procedures outline below.

1. The Company has designated the Business Ethics Officer ("The Officer") to be responsible for administering these procedures for the receipt, retention and treatment of complaints or concerns received by the Company regarding accounting, internal accounting controls or auditing matters in respect of the Company, including, but not limited to, concerns regarding questionable accounting or auditing practices on behalf of the Audit Committee of its board of directors.
2. Any person including employee of the Company or third party may on a confidential and anonymous basis submit complaints or concerns regarding accounting, internal accounting controls or auditing matters in respect of the Company by setting out such complaints or concerns in an email to a confidential mailbox to the Business Ethics Officer. If the complainant would like to discuss the matter directly with the Business Ethics Officer, the complainant should include a telephone number at which he or she can be contacted in his or her submission to the Officer. All submissions in writing to the Business Ethics Officer should be sent to a mailbox as follows:

Whistleblower@clearly.ca

3. Any communications regarding complaints or concerns about accounting, internal accounting controls or auditing matters in respect of the Company submitted by employees to the Committee will be treated as confidential.

4. Any complaints or concerns that are made directly to management, whether openly, confidentially or anonymously, shall be promptly reported to the Business Ethics Officer. The complaints will be investigated under the direction of the Audit Committee.
5. If the complaint or concern is a serious matter with material impact on, or involving the Company's Senior Management, the Officer will report the issue to the Audit Committee of Clearly Canadian Corporation within 24 hours from the time it is received.
6. The Officer shall determine what internal resources or professional assistance, if any, is required in order to conduct a full investigation with the Audit Committee's approval.
7. The Officer shall promptly investigate the complaint and shall report the result of the investigation in writing, to the Audit Committee at the end of each quarter.
8. The Company must retain all whistleblower complaints or concerns for a period of seven (7) years.
9. The Company will not tolerate any termination or retaliation by any person or group, directly or indirectly, against anyone who, in good faith, makes a complaint, raises a concern or provides assistance to the investigation.
10. The investigation shall not reveal the identity of any person who makes a good faith complaint or concern and who asks that his or her identity remain confidential.
11. Nothing herein shall be construed to protect a person from the consequences of their own wrongdoing however a person's self disclosure or wrongdoing that is not independently discovered through investigation shall be taken into account when considering the consequences to such person.