

LANESBOROUGH REAL ESTATE INVESTMENT TRUST

WHISTLEBLOWER POLICY

Adopted by the Board of Trustees
of Lanesborough Real Estate Investment Trust

As of December 2011

WHISTLEBLOWER POLICY

As a publicly traded entity, the integrity, transparency and accountability of the financial, administrative and management practices of Lanesborough Real Estate Investment Trust (the “Trust”) and its subsidiaries is critical. This information guides the decisions of the board of trustees of the Trust and is relied upon by unitholders of the Trust and the financial markets. For these reasons, it is critical for the Trust (including its subsidiaries) to maintain a workplace, where concerns regarding questionable business practices can be raised without fear of any discrimination, retaliation or harassment.

All trustees, directors, officers, employees and consultants of the Trust and its subsidiaries, as applicable, are encouraged to promptly report either orally or in writing to their immediate supervisor, all evidence of activity by a trustee, director, officer, employee or consultant of the Trust or a subsidiary 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; and
- instances of corporate fraud.

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 Trust.

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, the Chair of the Audit Committee of the board of trustees of the Trust may be contacted by mail, telephone or email as follows:

Cheryl Barker
P.O. Box 166
Falcon Lake, MB R0E 0N0
Phone: 204-771-9133 or 239-213-8292

Email: cbarker@mts.net

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 promptly and thoroughly 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 Audit Committee of the board of trustees of the Trust.

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 threats respecting compensation or terms or 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 employee or person under this policy, they may file a complaint with their supervisor or with any senior officer or Chair of the Audit Committee in instances where they are uncomfortable filing the complaint with the senior officer. The Trust 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 termination in the case of a trustee, director, officer or employee or termination of the consulting contract in the case of a consultant and, if warranted, legal proceedings.

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

Revised: September 2011