

Whistleblower Policy

Applies to: Employees, Directors,
Officers

Topic Owner: HR Services

Last Updated: January 26, 2021

OVERVIEW

When we observe something that is not in line with CCRW'S policies, values or practices, we do not ignore it. We report it.

Everyone is expected to comply with the **Code of Conduct** and **Off-Duty Conduct** policies in this Manual and to report serious violations or suspected violations under this Policy, before seeking resolution outside CCRW.

POLICY

CCRW is entrusted with the responsibility of providing the highest quality services and supports on behalf of our Stakeholders. We must ensure that the highest standards of business and ethical conduct, integrity and professionalism are modelled in fulfilling our responsibilities. AS such CCRW promotes a culture of transparent, open and honest communication and is committed to protecting Everyone who reports in good faith and/or files a report a complaint regarding:

- Serious violations of the Code of Conduct, other CCRW policies, legislation, and regulations
- Criminal, illegal and/or fraudulent activities
- Unethical or dishonest behaviour
- Financial or operation impropriety

Accordingly, confidential versus anonymous reporting is encouraged to facilitate an effective and timely investigation and to ensure appropriate action is taken.

RESPONSIBILITY

The Chief Operating Officer is responsible for:

- Determining whether the complaint applies to this policy or is better referred to another organizational policy.
- Determining whether a third-party independent investigation is required.
- Investigating and resolving all reported complaints and allegations concerning serious violations of the Code of Conduct, other CCRW policies, legislation, and regulations; criminal, illegal and/or fraudulent activities; unethical or dishonest behaviour; and financial or operational impropriety. Individuals who are not comfortable reporting concerns to the COO may report them to the CEO or Board Chairperson.
- Maintaining the confidentiality of all complaints, to the extent possible, and retaining appropriate records of complaints.

- Providing appropriate briefings to CCRW Executive Team as appropriate for continuous improvement e.g., external auditors, legal counsel, and funding bodies.

All Managers are responsible for reporting all written complaints to the COO.

Complainants are responsible for reporting all concerns in accordance with this policy.

The Board of Directors are responsible for receiving appropriate updates on all written complaints from the CEO and responding to any appeals of complaint findings.

PROCEDURE

DUTY TO REPORT MISCONDUCT

It is the duty of Everyone, including a member of the general public, to report misconduct or suspected misconduct, including fraud and financial impropriety to the Chief Operating Officer. This includes misconduct such as but not limited to:

- Providing false or misleading information or withholding material information on CCRW'S financial statements, funder reports, corporate filings, or other public documents
- Pursuit of material benefit or advantage in violation of CCRW'S Conflict of Interest Policy
- Misappropriation or misuse of CCRW resources such as funds or assets
- Unauthorized alteration, manipulation, or deletion of electronic records
- Unethical or unprofessional behavior at work (such as yelling, swearing etc.)
- Intimidation or pressure to perform a work task, which may be contrary to organizational policy, professional values, or obligations.

ACTING IN GOOD FAITH

Anyone filing a complaint alleging misconduct must act in good faith and have reasonable grounds for believing the information disclosed indicates wrongdoing.

Making allegations that prove not to be substantiated:

- a) Will not result in disciplinary action when the complainant acts in good faith
- b) Which prove to have been made maliciously or knowingly to be false may result in disciplinary action up to and including termination of employment

NO RETALIATION

Retaliation means any direct or indirect detrimental action threatened or taken against an individual. Anyone who is found to have retaliated against someone who has made a report in good faith may be subject to disciplining up to and including termination.

No one who makes a report in good faith will suffer retaliation.

REPORTING CONCERNS

- In most cases, a Manager or organizational contact is in the best position to address an area of concern.
- If the complainant is not comfortable speaking with their Manager or organization contact, they are encouraged to raise concerns to the Executive level or Human Resources. Management is required to report all suspected misconduct in writing to the COO.
- If the complainant is not comfortable reporting concerns to more senior management, the individual is encouraged to raise their concerns in writing to the CEO or Board Chairperson.

INVESTIGATING CONCERNS

- The COO will strive to respond to all written concerns in writing within five business days of receipt.
- If an anonymous complaint is received and the complainant is not willing to come forward the COO may be limited in their ability to conduct a thorough investigation.
- All complaints will be kept confidential, to the extent possible, and information will be shared strictly on a need-to-know basis in investigating.
- The CEO, Board Chairperson, COO, or appointed investigator will have the authority to access information as needed to complete a thorough investigation.
- The COO will strive to complete investigations within 30 business days of receipt of written concerns and will provide a summary of findings as appropriate to the parties involved.
- Should the Board, CEO or COO be implicated in a complaint, a third party may be retained to investigate the complaint.

REPORTING RETALIATION

- Everyone who believes that retaliatory action has been taken against them because they have reported misconduct should forward all information and documentation to support their complaint to the COO, CEO or Board Executive Committee, depending on the circumstance.
- Reports of retaliation will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- If the result of the investigation indicates there is a credible case of retaliation or threat of retaliation, the COO, or CEO may refer the findings to the Board and recommend measures to safeguard the interests of the complainant.
- The COO or CEO may recommend disciplinary action to be taken against the retaliator and the Executive Committee will decide on the appropriate action to be taken.
- If the investigation reveals no credible case of retaliation or threat of retaliation, the complainant will be advised or the informal mechanisms for conflict resolution.
- Regardless of the outcome, the complainant will receive the outcome of the investigation in writing from the COO and the Board will be informed of the outcome.

APPEAL PROCEDURE

Should the complainant not be satisfied with the findings of the COO, they may make a direct appeal in writing to the Board of Directors within 20 business days of the receipt of the written findings of their investigation.

The ruling of the Board of Directors will serve as the final disposition of the complaint.