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## 1.0 Purpose

The policy is designed to encourage and enable those who have legitimate and serious concerns regarding the organization's conduct raise those issues in a setting free of the threat of victimization, subsequent discrimination or disadvantage. Maintaining the strong reputation of RMA is the core intention of this policy. It also sets out RMA's obligations to ensure such reports may be made safely and confidentially, to objectively investigate all reports and to inform the Board of Directors of the outcome.

## 2.0 Policy Details

### Ethical Reinforcement

The Code of Business Conduct and Ethics sets out the obligation of all employees to conduct RMASC's business affairs at the highest level of ethical integrity. You have a duty to reinforce RMASC's commitment to ethical conduct not only through your own actions but by not allowing possible unethical conduct by others to go unreported.

RMASC encourages any employee who believes an unethical business practice may be occurring at RMASC to bring it to the attention of a proper authority for investigation. All reports will be taken seriously and looked into on a fair and objective basis. Information will be handled confidentially except as necessary to conduct an investigation and take remedial action. No employee who makes a report in good faith will be subject to retaliation, harassment or discrimination, regardless of the outcome of the investigation. A record of reports will be maintained, and the Board of Directors will be informed regularly of the outcome of any investigations.

While it is essential that a reporting employee be secure from any concern about retaliation, it must be understood that reports that are themselves harassing and not made in good faith may result in disciplinary action.



## What to Report

What follows is a list of the sort of questionable practices you should report if you see or suspect them to be occurring at RMASC. This list provides an illustration, and is not intended to cover everything:

- Questionable accounting practices or the circumvention of internal controls.
- Suspected theft or fraud.
- Unethical, unprofessional or inappropriate behavior.
- Wrong or misleading information in RMASC's public disclosures.
- Harassment or discrimination in the workplace, or coercion by a supervisor.
- Improper destruction or falsification of records.
- Accidental or deliberate disclosure of confidential information.
- Violations of the law, regulations or contractual obligations.
- Misleading of auditors.
- Unsafe workplace procedures and questionable environmental practices.

## How to Report a Concern

If you have a concern about RMASC's ethical conduct or the ethical conduct of an employee, you are encouraged to report your concern to any board member or the Executive Director. If you are uncomfortable with this reporting option, you may contact the Chair of the Governance & Finance Committee of the Board.

You may make a report in person, by telephone, by e-mail or in writing. You are not required to identify yourself when making a report, but if you remain anonymous you will not be informed of the result of any investigation.



## RMASC Response to Reports

The seriousness or complexity of a complaint will have a bearing in the amount of time required to resolve the issue. Nevertheless, within ten business days of a concern being raised, the 'person' will receive a written acknowledgement of the receipt of the complaint, along with:

- A summary of initial inquiries
- Proposal on how to deal with the matter(s)
- An estimate on the time required

RMA will not attempt to apply any sanction or detriment to those who bring forward legitimate concerns regarding any wrongdoing. Confidentiality and anonymity will be respected.

Unacceptable behavior that does not result in immediate dismissal may be dealt with in the following three-step manner:

1. Verbal warning
2. Written warning
3. Dismissal

RMA will consider the making of a deliberately false allegation as a serious disciplinary offence. False and vexatious allegations may be considered as harassment and may be dealt with under the Workplace Harassment & Violence policy.

The Board Chair and Chair of the Governance & Finance Committee are responsible for maintaining a written record of all reports they receive and for undertaking an objective investigation of each report. A summary of reports received, and the results of the investigations will be provided at least quarterly to the Board. The employee making the report will also be advised as to the result of the investigation unless the report was made anonymously.



### 3.0 Policy Scope

This policy applies to Rocky Mountain Adaptive Sports Centre (“RMA”). The term “employees” is used to refer collectively to the employees, volunteers, directors and officers of RMA, and consultants, contractors and other persons engaged by RMA to act on its behalf. N.B. Proposed Federal Whistle Blower Legislation shall be considered as adding to and strengthening this policy with the force of law. Other provincial laws and legislation shall also be considered as also augmenting this policy.

### 4.0 Related Policies

POL\_3100\_ Operations Policies\_General\_Code of Business Conduct and Ethics

### 5.0 Policy Owner

Board Chair

### 6.0 Definitions

Refer to policy details.

### 7.0 Procedures

N/A

