



WHISTLEBLOWER POLICY AND PROCEDURE

PURPOSE

To facilitate the raising of any serious concerns about Big Brothers Big Sisters of South-West Durham and Northumberland (BBBS) by employees, Board members, and others.

SCOPE

All employees, Board members and stakeholders.

POLICY STATEMENT

BBBS is committed to upholding the highest ethical standards. We do this by conducting our business with maximum integrity and by achieving full compliance with all applicable laws, rules, and regulations. In line with this commitment, BBBS provides an avenue for its employees, Board members, volunteers and other stakeholders to report any concerns they may have about the activities covered by this policy and to be assured that they will be protected from reprisal or victimization for reporting their concerns in good faith.

This policy covers instances where an employee, Board member or other stakeholder has evidence of activity by any BBBS officer, employee, Board member or consultant (including external auditors) that to his/her knowledge constitutes:

- A. Accounting, auditing, or other financial reporting fraud or misrepresentation;
- B. Violations of federal or provincial laws that could result in fines or civil damages payable by BBBS, or that could otherwise significantly harm BBBS's reputation or public image;
- C. Unethical business conduct in violation of any BBBS policy, including, but not limited to its Codes of Ethics;
- D. Danger to the health, safety, or well-being of employees, Board members and/or the general public.
- E. Harassment, retaliation, or discrimination, stemming from having reported a Reportable Activity.

For the purposes of this Policy, any of the foregoing activities shall be deemed to be a "Reportable Activity".

BBBS will not permit any employees, Board members, volunteers, consultants or external stakeholder to harass, retaliate or discriminate against any other employee, Board member, volunteer or stakeholder who, in good faith, has reported a Reportable Activity (a Complaint). Retaliation in any form will not be tolerated.

Any violation of this Policy may subject the violator to disciplinary action, which may include, in appropriate circumstances, termination of employment or legal action.

Making a complaint not in good faith will be viewed as a serious offence, and may be subject to discipline up to and including discharge of an employee, and/or the severing of the relationship with a Board member, supplier, or other stakeholder.

PROCEDURE FOR MAKING A COMPLAINT



Big Brothers Big Sisters of South-West Durham and Northumberland

To file a complaint or Reportable Activity the Complainant should complete a Whistleblower Report Form (See Appendix A). Once the form is completed it is to be sent via email to the Board Chair. The Board Chair has the responsibility of investigating such complaints and taking the appropriate action. The Board Chair, however, may refer your complaint to the Executive Director if the Reportable Activity concerns an employee other than the Executive Director or concerns a consultant retained by BBBS staff.

In the event that the complaint concerns a Reportable Activity on the part of the Board Chair the form should be sent via email to the Vice Chair. Alternatively the Whistleblower Form can be submitted via regular mail to the following address:

PRIVATE & CONFIDENTIAL

BBBS South-West Durham and Northumberland
2-157C Harwood Ave N #414
Ajax, ON L1Z 0B6

A Complainant may remain anonymous. However, in order to allow for a better investigation of a complaint, the Complainant should consider providing his/her name and contact information. Whether or not a name and contact information is provided, the substance of the complaint will be treated with utmost confidence and not discussed with others except to the minimum extent necessary to conduct a complete and fair investigation. In all cases, any person who is alleged to have conducted the Reportable Activity will be made aware of the complaint at an appropriate point during the investigation.

The Complainant should give enough information to enable a full investigation, including where and when the Reportable Activity occurred, names and titles of individuals involved, and as much other relevant detail as the Complainant can provide.

INVESTIGATION AND RESOLUTION OF COMPLAINT

The recipient of a complaint made in accordance with this policy (the "Investigator") shall be responsible for expeditiously conducting or causing to be conducted an investigation of the complaint, resolving the matter, and reporting such resolution to the Complainant. Under no circumstances will the Investigator allow such investigation or resolution or reporting to be delegated to or shared by anyone whom the Complainant identified as being or having been involved in the Reportable Activity, or whom the Investigator deems inappropriate.