

		<h2 style="color: blue;">Whistleblower</h2>	<b>Policy UP (2b)</b>
<b>Policy Name:</b>	<b>Whistleblower</b>		
<b>Division:</b>	<b>Universal Policy</b>		
<b>Heading:</b>	<b>Code of Ethics</b>		
<b>Owner:</b>	<b>Governance Committee</b>		
<b>Approver:</b>	<b>Board of Directors</b>		
<b>Review Frequency:</b>	<b>Annually (after every Board and CEO change)</b>		
<b>Approval Date:</b>	<b>December 6, 2017</b>		
<b>Next Review Date:</b>	<b>June 6, 2018</b>		

## WHISTLEBLOWER POLICY

### INTENT

Habitat for Humanity Waterloo Region (HabitatWR) has a whistleblower policy to promote a working environment of high ethical standards and accountability. Internal controls and operating procedures are intended to prevent, deter, detect, identify and address unethical activities. However, at times these controls and procedures are not sufficient safeguards. A whistleblower policy provides another safeguarding mechanism and provides all stakeholders with a process for reporting questionable conduct.

### SCOPE

All Board and committee members, employees, and volunteers.

### POLICY

1. HabitatWR is responsible for fully investigating all whistleblower reports. To fulfill this mandate, HabitatWR has a designated Compliance Officer who, in the absence of another board appointed Compliance Officer, is the CEO.
2. It is the responsibility of everyone in the organization to comply with HabitatWR's Code of Ethics. It is also the responsibility of everyone in the organization to report any concerns, including:
  - unlawful acts, whether civil or criminal
  - theft, embezzlement, bribery or fraud
  - dangerous practices likely to cause physical harm or damage to any person,

- property, or the environment
  - unprofessional conduct or business/professional practices
  - conflicts of interest
  - violations of the regulations that govern HabitatWR's operations
  - failure to comply with, or efforts to circumvent, HabitatWR's internal compliance policies or controls
3. HabitatWR recommends that employees share their questions, concerns, suggestions or complaints with their supervisor.
  4. If an employee or volunteer is not comfortable speaking with their supervisor about a specific concern, or is not satisfied with their supervisor's response, they should report, in person or in writing, any concerns to the Compliance Officer or to one of the following Senior Officers.

The email [whistleblower.habitatwr@gmail.com](mailto:whistleblower.habitatwr@gmail.com) is forwarded directly to only the two Senior Officers listed below.

<p><b>Senior Officer</b> Tracey Appleton Board of Directors Chair 120 Northfield Drive East Waterloo, ON N2J 4G8 <a href="mailto:whistleblower.habitatwr@gmail.com">whistleblower.habitatwr@gmail.com</a></p>	<p><b>Senior Officer</b> Dianne Romano Finance Chair 120 Northfield Drive East Waterloo, ON N2J 4G8 <a href="mailto:whistleblower.habitatwr@gmail.com">whistleblower.habitatwr@gmail.com</a></p>	<p><b>Compliance Officer</b> Karen Redman Chief Executive Officer 120 Northfield Drive East Waterloo, ON N2J 4G8 kredman@habitatWR.ca</p>
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All submissions and reports should be marked and treated "CONFIDENTIAL".

5. Supervisors and managers are required to report any concerns in writing to the Compliance Officer or a Senior Officer.
6. Any individual filing a report should be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy. Any reports that ultimately prove to be unsubstantiated, and to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.
7. If contact information is provided with the report, the Compliance or Senior Officer will acknowledge receipt of the report within ten business days.
8. The Compliance or Senior Officer is responsible for investigating and resolving all reported complaints and, at their discretion, shall advise the CEO and/or the Finance & Audit Committee, and/or the Governance Committee, and the Board of Directors.
9. The subject of the report will be provided an opportunity to respond to allegations, and all parties to an investigation will be treated fairly.
10. No person who in good faith files a complaint shall suffer any reprisals, harassment, retaliation or adverse consequences as a result of doing so. Any individual who retaliates against someone who has reported a violation in good faith is subject to

discipline up to and including dismissal.

11. Confidentiality will be maintained to the greatest extent possible. All persons will:
  - keep information relating to any process under this Policy strictly confidential;
  - refrain from discussing any reports or the fact of their involvement, except to the extent required for the purposes of investigation and resolution.
12. The Compliance Officer is responsible for reporting to the Board of Directors no less than once annually on compliance activities (e.g., violations, investigations and outcomes).
13. This policy will be posted at all Staff and Volunteer sites and on the website.

## **RESPONSIBILITY**

All Board and committee members, employees, and volunteers are obligated to raise violations or potential violations in accordance with this policy.

The Compliance or Senior Officer contacted with the concern is responsible for initiating a review and resolving the complaint.

The Compliance Officer is responsible for reporting to the Board of Directors no less than once annually on compliance activities.

## **REFERENCES**

[UP\(2a\) Code of Ethics Policy](#)

Imagine Canada Standards Program for Canada's Charities & Nonprofits. Revised October 2014. p. 5, A15. [http://www.imaginecanada.ca/sites/default/files/standards\\_program\\_handbook\\_en\\_2015.pdf](http://www.imaginecanada.ca/sites/default/files/standards_program_handbook_en_2015.pdf).

Recommended best practice is to have a whistleblower policy that specifies that the organization will not retaliate against, and will protect the confidentiality of, individuals who make good-faith reports.