



<b>Policy Name:</b>	Whistleblower Policy		
<b>Policy Number:</b>	HR006	<b>Policy Type:</b>	Board
<b>Original Approval:</b>	June 2019	<b>Review Cycle:</b>	5 years
<b>Last Approval:</b>	September 2021	<b>Last Review:</b>	September 2021

### 1.0 Purpose

The ESIO is committed to maintaining the highest standard of quality, integrity, honesty and accountability. In line with this commitment, the ESIO provides an avenue for employees, volunteers and other stakeholders to raise concerns they may have about subjects covered by this Policy and to be assured that in making complaints they will be protected from reprisal or victimization for raising concerns in good faith.

This Policy does not apply to complaints of ESIO employees relating to human resource issues such as unsatisfactory employee feedback, performance evaluations or work assignment, unless these issues are considered retaliatory actions for a complaint of Reportable Activity or participation in an investigation.

### 2.0 Definitions

**Whistleblower:** any past or present employees, volunteers, or vendors who makes a complaint of Reportable Activity in accordance with this policy.

**Reportable Activity:** violations of laws, policies, procedures, regulations, and ethical standards, including (but not limited to):

- Unlawful act – civil or criminal
- Breach of Code of Conduct, Code of Ethics, Confidentiality and Conflict of Interest
- Breach or failure to comply with ESIO policy or procedures
- Dangerous practices that violate health and safety policies and procedures in the workplace or could cause harm to property or persons
- Violations of rights of others
- Concealment of wrongdoing after becoming aware it exists

### 3.0 Responsibility

The ESIO commits to taking all reports seriously and completing the investigation process in a timely manner.

The ESIO will not tolerate, or allow any indirect or direct reprisal or harassment against a Whistleblower or participant in an investigation . Any retaliatory action will be considered serious misconduct and may be subject to sanctions including:

- Disciplinary action up to and including termination of employment.
- Severing of the relationship with a volunteer or vendor. Discipline in accordance with ESIO's governing documents.

Whistleblowers and participants in an investigation have a responsibility to provide information in good faith. Complaints of a Reportable Activity not made in good faith will be viewed as serious misconduct and may be subject to sanction including:

- Discipline up to and including termination of employment.
- Severing of the relationship with a volunteer or vendor.
- Discipline in accordance with ESIO's governing documents.

### **3.1 Procedure –Complaint of Reportable Activity**

A Whistleblower may submit a complaint of Reportable Activity in writing to:

- the Finance Director
- to the CEO in cases where concerns involve the Finance Director
- to the Board Chair where concerns involved the CEO, Board Director or Board Committee volunteer

The complaint of Reportable Activity should provide the following:

- An outline of the known or suspected wrongdoing.
- Details of where, when and how it occurred.
- Names of those suspected to be involved.
- Names of anyone who may have relevant information.
- Details of how the Whistleblower came to know about the suspected activity.
- Names of anyone that the Whistleblower has discussed or reported this incident to.

### **3.2 Procedure - Investigation**

The ESIO commits to initiating an investigation within five working days of the complaint being received.

Upon receiving the complaint of a Reportable Activity, the action taken will depend on the nature of the Reportable Activity. The individual receiving the complaint may refer the matter to, or seek the assistance of employees or others. However, under no circumstances will a matter be referred to an individual who is the subject of any Reportable Activity or is otherwise an inappropriate person to assist with the investigation.

An individual who is the subject of the Reportable Activity will receive disclosure of the allegations against them and will be given a full and fair opportunity to respond.

Subject to any legal constraints and the confidential nature of the investigation, the Whistleblower will be informed of the general outcome of the investigation, however they will not receive information that is deemed confidential.

Complaints of a Reportable Activity and investigation reports will be retained in a manner that is appropriate to maintain the privacy of the information.

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