



Whistleblowing Policy

Whistleblowers are people who act in good faith to report serious offenses or wrongdoing occurring in an organization. Examples of serious offenses include questionable accounting practices, corporate fraud, a criminal offense, a breach of legal obligation, an injustice, and a danger to the health and safety of an individual or the deliberate covering up of information pertaining to any of the aforementioned actions. Whistleblowing is separate from a complaint, which deals with the breach of an individual's rights with regards to the policy of the organization and will be dealt with under the conflict resolution policy.

All directors, volunteers, employees and consultants are encouraged to promptly report, either orally or in writing, all evidence of activity that may constitute misconduct. No person who reports a concern in good faith will be subject to retaliation or, in the case of a paid employee, adverse employment circumstances. The confidentiality of the person raising the concern will be protected and anonymous communications will be accepted. Concerns with any individual aside from the Executive Director are to be taken directly to the Executive Director. Concerns with the Executive Director are to be taken directly to the Chair and/or Vice-Chair of the Board of Directors.

Those submitting a report are encouraged to provide as much specific information as possible, including nature of concern, names, dates, places and events that took place, the whistleblower's perception of why the incident(s) may be a violation, and what action the whistleblower recommends be taken.

Any individual who in good faith reports such incidents described above will receive a response and will be protected from threats of retaliation, harassment, discharge, or other types of discrimination including but not limited to respecting compensation or terms and conditions of employment, that are directly related to the disclosure of such reports. Moreover, any person who retaliates against someone who has reported a claim in good faith is subject to discipline up to and including termination. If any person believes they have been unfairly or unlawfully retaliated against in respect of a report made under this policy, they may file a complaint with the Executive Director or with the Chair/Vice-Chair of the Board of Directors.



The individual who received the complaint will either conduct the investigation and take corrective action or appoint a suitable person to do so on their behalf. An appointed person must be in a position to take the necessary action. The person conducting the investigation will:

- Provide the whistleblower with written acknowledgement of the report within two business days if the report has not been submitted anonymously. This acknowledgement will confirm that the matter will be investigated and the timeline in which they can expect to receive a response.
- Make initial inquiries to determine whether an investigation is appropriate, and the form it should take. Some concerns may be resolved by agreed action without the need for investigation.
- Thoroughly investigate all serious allegations, retaining outside legal counsel, accountants or any other resource necessary to conduct a full investigation.
- Take the necessary action to begin the investigation within one week of the report. The length and scope of the investigation will depend on the concern, but the investigator will make every effort to conclude the investigation in a timely manner.
- Keep all information disclosed during the course of the investigation confidential, except as necessary to conduct the investigation and take any remedial action and subject to applicable law.
- Take action to resolve the concern as necessary. This may involve initiating disciplinary action, informing external authorities, amending or changing policy, or other action as appropriate. If it is found that there is not sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate to take an informal approach to dealing with the matter.
- Provide the whistleblower with a confidential follow-up for complete closure of the concern (if possible).

False Disclosures

BB4CK will treat all disclosures of inappropriate conduct or behaviours seriously and protect employees that raise concerns in good faith. However, appropriate disciplinary action or procedures may be taken against any person who is found to have made a disclosure maliciously that they know to be untrue or without reasonable grounds, up to and including termination.