



## Protected Disclosure Policy

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### Policy

Big Brothers Big Sisters of Winnipeg is committed to 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, Big Brothers Big Sisters of Winnipeg 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 Big Brothers Big Sisters of Winnipeg officer, employee, Board member or consultant (including external auditors) that to their knowledge constitutes: Accounting, auditing, or other financial reporting fraud or misrepresentation;

- Violations of federal or provincial laws that could result in fines or civil damages payable by Big Brothers Big Sisters of Winnipeg, or that could otherwise significantly harm Big Brothers Big Sisters of Winnipeg's reputation or public image;
- Unethical business conduct in violation of any Big Brothers Big Sisters of Winnipeg policy, including, but not limited to its Codes of Ethics (Board Policy and HR Policy)
  - Danger to the health, safety, or well-being of employees, Board members and/or the general public.
  - 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".

Big Brothers Big Sisters of Winnipeg 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.

This policy will be posted on the Agency website



## **Procedure for Making a Complaint**

To file a complaint or Reportable Activity, please download and fill out the form (available on the Agency website, see Appendix III) to the Agency's address c/o The Executive Committee of the Board. They have the responsibility for investigating such complaints and taking the appropriate action.

The Committee, however, will 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 Big Brothers Big Sisters of Winnipeg staff.

A Complainant may remain anonymous. However, in order to allow for a better investigation of a complaint, the Complainant should consider providing their 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 the 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.