



RINGETTE ONTARIO WHISTLEBLOWER POLICY

RINGETTE ONTARIO (RO) IS COMMITTED TO PROVIDING AN ENVIRONMENT IN WHICH THE ORGANIZATION ACTS WITHIN THE CODE OF CONDUCT, POLICIES AND APPLICABLE LAWS AND OBSERVES THE HIGHEST STANDARDS OF BUSINESS AND PERSONAL ETHICS IN CONDUCT OF ITS RESPONSIBILITIES.

1. PURPOSE

- 1.1 THE PURPOSE OF THIS POLICY IS TO ALLOW PEOPLE TO HAVE A DISCREET AND SAFE PROCEDURE BY WHICH THEY CAN DISCLOSE INCIDENTS OF WRONGDOING WITHOUT FEAR OF UNFAIR TREATMENT OR REPRISAL.

2. APPLICATION

- 2.1 THIS POLICY APPLIES TO INDIVIDUALS AND ORGANIZATIONS THAT OBSERVE OR EXPERIENCE INCIDENTS OF WRONGDOING AND REPORT SUCH INCIDENTS OR OBSERVATIONS UNDER THE EXPECTATION OF PRIVACY.
- 2.2 MATTERS REPORTED UNDER THE TERMS OF THIS POLICY MAY BE REFERRED TO BE HEARD UNDER THE *RINGETTE ONTARIO DISCIPLINE AND COMPLAINTS POLICY*, AT THE DISCRETION OF THE COMPLIANCE OFFICER.
- 2.3 MATTERS REPORTED UNDER THE TERMS OF THIS POLICY MAY BE REFERRED DIRECTLY TO LAW ENFORCEMENT AGENCIES.

3. WRONGDOING

- 3.1 WRONGDOING CAN BE DEFINED AS:

- a) VIOLATING THE LAW;
- b) INTENTIONALLY OR SERIOUSLY BREACHING OF RINGETTE ONTARIO'S *CODE OF CONDUCT AND ETHICS*;
- c) INTENTIONALLY OR SERIOUSLY BREACHING RINGETTE ONTARIO'S POLICIES FOR WORKPLACE VIOLENCE AND HARASSMENT;
- d) COMMITTING OR IGNORING RISKS TO THE LIFE, HEALTH, OR SAFETY OF A PARTICIPANT, VOLUNTEER, PERSON, OR OTHER INDIVIDUAL;
- e) DIRECTING AN INDIVIDUAL OR PERSON TO COMMIT A CRIME, SERIOUS BREACH OF A POLICY OF RINGETTE ONTARIO, OR OTHER WRONGFUL ACT; OR
- f) FRAUD.

4. PLEDGE

- 4.1 RINGETTE ONTARIO PLEDGES NOT TO DISMISS, PENALIZE, DISCIPLINE, OR RETALIATE OR DISCRIMINATE AGAINST ANY PERSON WHO DISCLOSES INFORMATION OR SUBMITS, IN GOOD FAITH, A REPORT AGAINST A PERSON UNDER THE TERMS OF THIS POLICY.



- 4.2 ANY INDIVIDUAL AFFILIATED WITH RINGETTE ONTARIO WHO BREAKS THIS PLEDGE WILL BE SUBJECT TO DISCIPLINARY ACTION.

5. **REPORTING WRONGDOING**

- 5.1 A PERSON WHO BELIEVES AN INCIDENT OF WRONGDOING HAS OCCURRED SHOULD PREPARE A REPORT THAT INCLUDES THE FOLLOWING:

- a) WRITTEN DESCRIPTION OF THE ACT OR ACTIONS THAT COMPRISE THE ALLEGED WRONGDOING, INCLUDING THE DATE AND TIME OF THE ACTION(S);
- b) IDENTITIES AND ROLES OF OTHER INDIVIDUALS OR PERSONS (IF ANY) WHO MAY BE AWARE OF, AFFECTED BY, OR COMPLICIT IN, THE WRONGDOING;
- c) WHY THE ACT OR ACTION SHOULD BE CONSIDERED TO BE WRONGDOING.

6. **AUTHORITY**

- 6.1 RINGETTE ONTARIO HAS APPOINTED THE FOLLOWING COMPLIANCE OFFICER TO RECEIVE REPORTS MADE **UNDER THIS POLICY**:

- a) CHAIR OF THE GOVERNANCE & HR COMMITTEE OR ITS DESIGNATE.

- 6.2 AFTER RECEIVING THE REPORT, THE COMPLIANCE OFFICER HAS THE RESPONSIBILITY TO:

- a) ASSURE THE PERSON OF RINGETTE ONTARIO'S **PLEDGE**
- b) CONNECT THE PERSON TO THE ALTERNATE LIAISON IF THE INDIVIDUAL FEELS THAT HE OR SHE CANNOT ACT IN AN UNBIASED OR DISCRETE MANNER DUE TO THE INDIVIDUAL'S ROLE WITH RINGETTE ONTARIO AND/OR THE CONTENT OF THE REPORT
- c) DETERMINE IF THE REPORT IS FRIVOLOUS, VEXATIOUS, OR NOT SUBMITTED IN GOOD FAITH (E.G., THE SUBMISSION OF THE REPORT IS MOTIVATED BY PERSONAL INTERESTS AND/OR THE CONTENT OF THE REPORT IS OBVIOUSLY FALSE OR MALICIOUS)
- d) DETERMINE IF RINGETTE ONTARIO'S *WHISTLEBLOWER POLICY* APPLIES OR IF THE MATTER SHOULD BE HANDLED UNDER RINGETTE ONTARIO'S *DISCIPLINE AND COMPLAINTS POLICY*
- e) DETERMINE IF THE LOCAL POLICE SERVICE BE CONTACTED
- f) DETERMINE IF MEDIATION OR ALTERNATE DISPUTE RESOLUTION CAN BE USED TO RESOLVE THE ISSUE
- g) DETERMINE IF RINGETTE ONTARIO'S EXECUTIVE DIRECTOR SHOULD OR CAN BE NOTIFIED OF THE REPORT
- h) BEGIN AN INVESTIGATION

7. **ALTERNATE LIAISON**

- 7.1 IF THE PERSON FEELS THAT THE COMPLIANCE OFFICER IS UNABLE TO ACT IN AN UNBIASED OR DISCRETE MANNER DUE TO THE INDIVIDUAL'S ROLE WITH RINGETTE ONTARIO AND/OR THE CONTENT OF THE REPORT, THE PERSON SHOULD CONTACT THE FOLLOWING INDIVIDUAL WHO WILL ACT AS AN INDEPENDENT LIAISON BETWEEN THE PERSON AND THE COMPLIANCE OFFICER:



a) BOARD DETERMINED

- 7.2 THE ALTERNATE LIAISON WILL NOT DISCLOSE THE PERSON'S IDENTITY TO THE COMPLIANCE OFFICER OR TO ANYONE AFFILIATED WITH RINGETTE ONTARIO WITHOUT THE PERSON'S CONSENT.
- 7.3 A PERSON WHO IS UNSURE IF HE OR SHE SHOULD SUBMIT A REPORT, OR WHO DOES NOT WANT TO HAVE HIS OR HER IDENTITY KNOWN, MAY CONTACT THE ALTERNATE LIAISON FOR INFORMAL ADVICE ABOUT THE PROCESS.

8. **INVESTIGATION**

- 8.1 IF THE COMPLIANCE OFFICER DETERMINES THAT AN INVESTIGATION SHOULD BE LAUNCHED, THE COMPLIANCE OFFICER MAY DECIDE TO CONTRACT AN EXTERNAL INVESTIGATOR. IN SUCH CASES, RINGETTE ONTARIO'S EXECUTIVE DIRECTOR AND/OR CHAIRPERSON MAY BE NOTIFIED THAT AN INVESTIGATION CONDUCTED BY AN EXTERNAL INVESTIGATOR IS NECESSARY WITHOUT THE NATURE OF THE INVESTIGATION, CONTENT OF THE REPORT, OR IDENTITY OF THE PERSON WHO SUBMITTED THE REPORT BEING DISCLOSED. RINGETTE ONTARIO'S EXECUTIVE DIRECTOR AND/OR CHAIRPERSON MAY NOT UNREASONABLY REFUSE THE DECISION TO CONTRACT AN EXTERNAL INVESTIGATOR.
- 8.2 AN INVESTIGATION LAUNCHED BY THE COMPLIANCE OFFICER OR BY AN EXTERNAL INVESTIGATOR SHOULD GENERALLY TAKE THE FOLLOWING FORM:
- a) FOLLOW-UP INTERVIEW WITH THE PERSON WHO SUBMITTED THE REPORT
 - b) IDENTIFICATION OF PERSONS, PARTICIPANTS, VOLUNTEERS OR OTHER INDIVIDUALS THAT MAY HAVE BEEN AFFECTED BY THE WRONGDOING
 - c) INTERVIEWS WITH SUCH-AFFECTED INDIVIDUALS
 - d) INTERVIEW WITH THE DIRECTOR(S) OR PERSON(S) AGAINST WHOM THE REPORT WAS SUBMITTED
 - e) INTERVIEW WITH THE SUPERVISOR(S) OF THE PERSON(S) AGAINST WHOM THE REPORT WAS SUBMITTED, IF APPLICABLE
- 8.3 IN ALL STAGES OF THE INVESTIGATION, THE INVESTIGATOR WILL TAKE EVERY PRECAUTION TO PROTECT THE IDENTITY OF THE PERSON WHO SUBMITTED THE REPORT AND/OR THE SPECIFIC NATURE OF THE REPORT ITSELF. HOWEVER, RINGETTE ONTARIO RECOGNIZES THAT THERE ARE SOME INSTANCES WHERE THE NATURE OF THE REPORT AND/OR THE IDENTITY OF THE PERSON WHO SUBMITTED THE REPORT WILL OR MAY BE INADVERTENTLY DEDUCED BY INDIVIDUALS PARTICIPATING IN THE INVESTIGATION.
- 8.4 THE INVESTIGATOR WILL PREPARE AN INVESTIGATOR'S REPORT – OMITTING NAMES WHENEVER POSSIBLE AND STRIVING TO ENSURE CONFIDENTIALITY – THAT WILL BE SUBMITTED TO RINGETTE ONTARIO'S EXECUTIVE DIRECTOR AND/OR CHAIRPERSON FOR REVIEW AND ACTION.

9. **DECISION**

- 9.1 WITHIN FOURTEEN (14) DAYS AFTER RECEIVING THE INVESTIGATOR'S REPORT, RINGETTE ONTARIO'S EXECUTIVE DIRECTOR AND/OR CHAIRPERSON WILL TAKE CORRECTIVE ACTION, AS REQUIRED. CORRECTIVE ACTION MAY INCLUDE, BUT IS NOT LIMITED TO INCLUDING:



- a) ENACTING AND/OR ENFORCING POLICIES AND PROCEDURES AIMED AT ELIMINATING THE WRONGDOING OR FURTHER OPPORTUNITIES FOR WRONGDOING;
- b) REVISION OF JOB DESCRIPTIONS; OR
- c) DISCIPLINE, SUSPENSION, TERMINATION, OR OTHER ACTION AS PERMITTED BY RINGETTE ONTARIO'S BYLAWS, PROVINCIAL EMPLOYMENT LEGISLATION, RINGETTE ONTARIO'S POLICIES FOR HUMAN RESOURCES, AND/OR THE PERSON'S EMPLOYMENT AGREEMENT OR CONTRACTOR AGREEMENT.

9.2 THE CORRECTIVE ACTION, IF ANY, WILL BE COMMUNICATED TO THE INVESTIGATOR WHO WILL THEN INFORM THE PERSON WHO SUBMITTED THE REPORT.

9.3 DECISIONS MADE UNDER THE TERMS OF THIS POLICY MAY BE APPEALED UNDER THE TERMS OF THE *RINGETTE ONTARIO APPEAL POLICY* PROVIDED THAT:

- a) IF THE PERSON WHO SUBMITTED THE INITIAL REPORT IS APPEALING THE DECISION, THE PERSON UNDERSTANDS THAT HIS OR HER IDENTITY MUST BE REVEALED IF HE OR SHE SUBMITS AN APPEAL, AND
- b) IF THE PERSON AGAINST WHOM THE INITIAL REPORT WAS SUBMITTED IS APPEALING THE DECISION, THAT PERSON UNDERSTANDS THAT THE IDENTITY OF THE PERSON WHO SUBMITTED THE REPORT WILL NOT BE REVEALED, AND THAT RINGETTE ONTARIO WILL ACT AS THE RESPONDENT.

10. **CONFIDENTIALITY**

10.1 CONFIDENTIALITY AT ALL STAGES OF THE PROCEDURES OUTLINED IN THIS POLICY – FROM THE INITIAL REPORT TO THE FINAL DECISION – IS ASSURED FOR ALL INDIVIDUALS (THE PERSON, THE PERSON(S) AGAINST WHOM THE REPORT IS SUBMITTED, AND THE INDIVIDUALS INTERVIEWED DURING THE INVESTIGATION). AN INDIVIDUAL WHO INTENTIONALLY BREACHES THE CONFIDENTIALITY CLAUSE OF THIS POLICY WILL BE SUBJECT TO DISCIPLINARY ACTION.

11. **POLICY REVIEW**

11.1 THIS POLICY SHALL BE REVIEWED/APPROVED BY THE BOARD OF DIRECTORS EVERY THREE YEARS.

11.1.1 THIS POLICY WAS LAST REVIEWED AND APPROVED SEPTEMBER 2023