

FIN.05.01 Whistle Blower Policy**Intent**

This policy is intended to encourage Board members, staff, volunteers, and others to report without retribution suspected or actual occurrence of illegal, unethical or inappropriate behaviors or practices by BTC staff or volunteers or Club volunteers.

What to Report

While not an exhaustive list, the following are examples of such reportable behaviour:

- **Financial Misconduct:** This includes theft, fraud, embezzlement, misuse of funds, false financial statements, or violations of tax laws.
- **Misuse of Resources:** This includes improper use of assets, facilities, or supplies.
- **Safety Concerns:** This includes unsafe working conditions, environmental hazards, or violations of health and safety laws.
- **Discrimination or Harassment:** This includes discrimination or harassment based on race, religion, color, national origin, sex, sexual orientation, gender identity, disability, or age.
- **Conflicts of Interest:** This includes situations where personal interests conflict with the interests of the BTC
- **Breaches of Confidentiality:** This includes unauthorized disclosure of confidential information.
- **Violations of Law:** This includes any violation of applicable laws or regulations.

Policy

- The Whistle Blower should promptly report the suspected or actual event to their supervisor who shall inform the CEO and Co-Chairs of the Finance & Risk Committee. If the Whistle Blower does not have a supervisor, or would be uncomfortable or otherwise reluctant to report to their supervisor, then the Whistle Blower may report the event to the CEO or the Co-Chairs of the Finance & Risk Committee. Should any of these individuals be the alleged subject of the incident then reporting to the Chair of the Board or the Chair of the Governance Committee is appropriate.
- The Whistle Blower may report the incident with their identity or anonymously. The confidentiality of all information obtained about an incident of complaint, including identifying information about any individual involved, will be maintained throughout the investigative process unless disclosure is necessary for the purpose of the investigation, or taking corrective action, or otherwise required by law.
- The Whistle Blower shall receive no retaliation or retribution for a report that was provided in good faith and not made primarily with the intention to damage another individual or the BTC. Anyone who retaliates against the Whistle Blower (who reported an event in good faith) will be subject to discipline which may include termination of the employee or volunteer relationship.
- A Whistle Blower who makes a report that is not done in good faith is subject to discipline, which may include termination of employee or volunteer relationship or other legal means to protect the reputation of the organization, staff, Board directors, and volunteers.
- Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.

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- The CEO and the Co-Chairs of the Finance & Risk Committee, or the Chair of the Board or the Chair of the Governance Committee, as the case may be, shall within five business days of receipt of the Whistle Blower report, take action to investigate and/or resolve the issue.
- The Whistle Blower shall receive a report within 20 business days of the initial report, regarding the investigation, disposition or resolution of the issue, including an estimate of when the issue is expected to be resolved. The Whistle Blower shall receive a report when the issue is resolved. If the Whistle Blower is unsatisfied with the resolution, they may file another report with the CEO and the Board Chair. The Board Chair and the Chair of the Governance Committee will determine whether a Whistle Blower complaint should be reported to the Board, either during the investigation or when resolved or disposed of.