

COMMUNITY FOUNDATION OF OTTAWA

POLICY

POLICY : WHISTLEBLOWER PROTECTION

Preamble:

The Community Foundation of Ottawa's Code of Conduct policy ("Code") requires the Board of Governors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all Board members and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No Board member or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

The Foundation has an open-door policy and encourages employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's manager is in the best position to address an area of concern. However, if an individual is not comfortable speaking with his or her manager or is not satisfied with the manager's response, they are encouraged to speak with anyone in management who they are comfortable approaching. Managers are required to report suspected violations to the CEO, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when the individual is not satisfied or is uncomfortable with following the organization's open-door policy, he or she should contact the CEO or the Board Chair or Vice Chair.

The CEO, as the organization's compliance officer, is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code. At his or her discretion the Executive Committee shall be advised.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be

substantiated and which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offence.

Confidentiality

Violations or suspected violations of the Code may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The CEO will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

EFFECTIVE DATE: September 30, 2008

LAST REVISED OR REVIEWED:

SUBJECT TO REVIEW: January 2013