REGINA OPEN DOOR SOCIETY
WHISTLEBLOWER PROTECTION POLICY

Regina Open Door Society Inc. requires directors, officers, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Regina Open Door Society Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees, volunteers, and others to raise serious concerns internally so that Regina Open Door Society Inc. can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of Regina Open Door Society Inc.'s code of ethics or suspected violations of law or regulations that govern Regina Open Door Society Inc.'s operations.

No Retaliation

It is contrary to the values of Regina Open Door Society Inc. for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Regina Open Door Society Inc. 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.

Reporting

Regina Open Door Society Inc. has an open-door policy and suggests that employees and volunteers share their questions, concerns, suggestions, or complaints with their supervisor(s). Supervisors/Managers/Directors are required to report complaints or concerns about suspected ethical and legal violations in writing to the Regina Open Door Society Inc.'s Compliance Officer, who has the responsibility to investigate all reported complaints. If staff have concerns about possible violations of Regina Open Door Society Inc.'s code of ethics or suspected violations of law or regulations that govern Regina Open Door Society Inc.'s operations, and if they are not comfortable speaking with their Supervisor/Manager/Director or are not satisfied with their response, they are encouraged to speak with HR or the Executive Director, or, in writing to the RODS Compliance Officer. Please see the detailed reporting procedure in the attached Whistleblower Procedure.

Compliance Officer

The Regina Open Door Society Inc.'s Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Finance Committee/Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The Regina Open Door Society Inc.'s Compliance Officer shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation 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 to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations 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 Regina Open Door Society Inc.'s Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer: Rodger Linka (RODS Board Member)

Outside Compliance Officer: Stephanie Yang Morris

RODS
WHISTLEBLOWER PROCEDURE

Reporting Responsibility

Employees have an obligation to report what they believe is a material violation of any office practice or procedure, violation of the law or RODS' policies. The types of concerns that should be reported include for the purposes of illustration and without being limited, to the following:

- Providing false or misleading information on ROD's financial documents, grant reports, returns or other public documents;
- Providing false information to or withholding material information from ROD's board of directors, auditors, accountants, lawyers or other representatives responsible for ensuring compliance with fiscal and legal responsibilities;
- Embezzlement, private benefit, or misappropriation of funds;
- Material violation of ROD's polices, including confidentiality, conflict of interest, ethics, and document retention;
- Discrimination based on race, gender, sexual orientation, ethnicity or disability;
- Harassment of any kind, including sexual harassment;
- Facilitation or concealing any of the above or similar actions.

When to use this policy

(a) There is a difference between whistleblowing and raising a grievance:

(i) Whistleblowing is where an individual has concerns about violations of Regina Open Door Society Inc.'s code of ethics or suspected violations of law or regulations that govern Regina Open Door Society Inc.'s operations. (See above in reporting responsibility)

(ii) A grievance is a complaint that generally relates to an individual's own employment position or personal circumstances at work.

(b) This policy does not set out the procedure that applies to general grievances. If an employee has a complaint about their own personal circumstances, then they should use the *Staff Policy and Procedures* (Occupational Health & Safety sections 4.1 to 4.6 inclusive) or Conflict/Problem Resolution section 3.18.

Whistleblower Reporting Procedure

Whenever possible, employees should seek to resolve concerns by reporting issues directly to their supervisor/manager or to the next level of management as needed until matters are satisfactorily resolved.

Internal Complaints

First (1) Level

An employee will report a concern with their immediate Supervisor/Manager/Director. The Supervisor/Manager/Director will report the matter to the Executive Director and Human Resources if appropriate.

Second (2) Level

An employee will report a concern to Human Resources and/or the Executive Director if the concern involves their immediate Supervisor/Manager/Director, or if they do not feel comfortable reporting to the Supervisor/Manager/Director or if a report or concern made to their immediate Supervisor/Manager/Director has not been addressed or resolved.

Third (3) Level

An employee will report a concern ***directly*** to the Regina Open Door's Compliance Officer, in writing, when:

- all internal reporting in Levels 1 & 2 did not address the alleged issue or concern
- if Human Resources or the Executive Director were unable to be objective or are involved in the allegation or concern.
- If for any reason an employee is not comfortable speaking to a Supervisor/Manager/Director/Human Resources/Executive Director or does not believe the issue is being properly addressed through steps 1 & 2, the employee may bring their concern directly to the Compliance Officer. All complaints to the Compliance Officer must be in writing and signed by the complainant.

External Complaints

An external complaint is a complaint made by a non-staff member or non-volunteer.

Complaints from clients of the organization are encouraged to make use of existing service complaint procedures established within each department. If for any reason a client-initiated complaint has not been properly addressed, the complainant is encouraged to follow the external complaints process outlined below.

All external complaints will come to the Supervisor/Manager/Director first for investigation. If the complaint has not been properly addressed or the complaint involves the Supervisor/Manager/Director, then the matter must be directed to the Human Resources and Executive Director to conduct the investigation. The complainant will report the alleged issue directly to the Regina Open Door's Compliance Officer if all internal reporting was exhausted or if the Human Resources or Executive Director were unable to be objective or if Human Resources of the Executive Director are involved in the allegation. All complaints to the Compliance Officer must be in writing and signed by the complainant.

If the concern raised is with a member of the Board of RODS, the employee or board member may raise the concern either with the Compliance Officer or the Outside Compliance Officer.

Actions of the Compliance Officer/Outside Compliance Officer (the "Officer")

Upon receipt of a complaint, the Compliance Officer or Outside Compliance Officer shall make a preliminary decision regarding the credibility of the complaint. The Officer may:

- Dismiss the complaint if it in the reasonable opinion of the Officer, lacks merit.
- Decide in their discretion if outside investigation is necessary and to cause such investigation to occur;
- Decide to whom the matter should be reported for further action, including,
    - The Executive Committee
    - The Finance Committee
    - The Human Resources Committee
    - Any other lawyer sitting on the Board of Directors solely for the purpose of consultation and advice.

Upon referral as above, the Committees listed above shall take such steps as are necessary in order to resolve the complaint.

No Retaliation

This policy is intended to encourage and enable directors, employees and volunteers to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no director, employee or volunteer who, in good faith has submitted a complaint, shall be threatened, discriminated against, or otherwise subject to retaliation or, in the case of an employee, there shall be no adverse employment consequences as a result of such report. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Acting in Good Faith

Anyone making a complaint must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or policy or a material accounting or auditing matter. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal prosecution.