



POLICY: WHISTLEBLOWER

Approved by Board of Directors: 26-Aug-2021

Introduction and Policy Statement

Achieving CAUSE Canada's mission and mandate to work alongside the extreme poor, helping them overcome the barriers that keep them hungry, uneducated and without access to medical support and empowering individuals to find dignity and justice in its fullest sense requires all of us to perform with the highest personal and professional conduct.

CAUSE Canada is committed to maintaining the highest possible standard of conduct and integrity in all its activities. We do this by conducting our work in compliance with Cause Canada Code of Conduct and related policies, applicable laws, rules, and regulations.

It is the duty and responsibility of any Cause Canada employee or related personnel (as defined in Section 3) to report any suspected violations or violations of illegal, unethical, or inappropriate events, behaviours, or practices in their association with CAUSE Canada in accordance with this policy. This policy serves as a guide on how suspected violations can be reported, the protections against retaliation for reporting, and how CAUSE Canada will address the receipt of suspected violations.

Scope

This policy applies globally to all CAUSE Canada employees and related personnel, acting on behalf of CAUSE Canada, or at CAUSE Canada's direction, during and outside normal work hours. In countries where the following policy contravenes local legislation, the local legislation must be followed, with guidance from the Canadian Head Office. CAUSE Canada's policy will apply if more stringent than local legislation.

This policy is intended to support and enable suspected violations of CAUSE Canada's Code of Conduct and associated policies, abuse of authority, mismanagement of funds, discriminatory behavior, danger to health and safety, or other illegal conduct, in good faith and without the fear of retaliation, so that CAUSE Canada can address inappropriate conduct and actions in a timely manner.

Anyone reporting a suspected violation must be acting in good faith and have reasonable grounds for believing the information being disclosed indicates a suspected violation. Any allegations that prove to have been made maliciously, or are known to be false, will be viewed as a serious disciplinary offence that could lead to sanctions up to and including termination of employment, severing of contract or relationship with CAUSE Canada.

No person who reports a violation in good faith shall suffer retaliation or adverse employment consequences for reporting in accordance with this policy. Reports of retaliation should be made to the Executive Director and will be investigated promptly. Anyone who is found to have retaliated against an individual who has made a report in good faith will be subject to disciplinary action up

to and including termination of employment, severing of contract or relationship with CAUSE Canada.

Definition of Terms:

- **Potential unethical incident:** any action by any CAUSE Canada employee or related personnel that is considered by the observer or victim to be illegal, fraudulent, or dishonest, or which falls outside the standards of practice defined by CAUSE Canada's Code of Conduct.
- **Whistleblowing:** an action which occurs when any CAUSE Canada employee or related personnel raises a concern or suspected violation related to financial or operational matters within the organization.
- **CAUSE Canada employees and related personnel:** All employees in Canada and overseas, CAUSE Canada Board members, volunteers, students, interns, consultants, contractors, and representatives of partner organizations engaged by CAUSE Canada; including those in partnership, sub-grant, or sub-recipient agreements with CAUSE Canada.

Procedures for Reporting a Violation

Any Cause Canada employee or related personnel who wishes to report a violation or suspected violation of illegal, unethical or inappropriate events, behaviours or practices in their association with CAUSE Canada are required to:

- File a written complaint with the Executive Director of CAUSE Canada at: ethics@cause.ca
- The Executive Director is required to immediately report the matter to the Chair of the Board of Directors.
- In the case that the Executive Director may be a subject in the complaint, individuals may contact the Chair of the Board directly to file a complaint.

Following the receipt of a complaint:

- The Chair shall forward all complaint reports to the Executive Committee to determine required actions including an internal investigation ensuring methodological expediency and integrity.
- All reports will be treated as confidential and sensitive. Information will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.
- The Executive Director or Chair will respond to the complainant to acknowledge receipt of the complaint within ten business days. All reports will be investigated within 30 business days.

The Executive Director is responsible for investigating and resolving all complaints submitted and is required to submit a full report to the Board, outlining the issue, investigation outcomes and the recommended resolution of the complaint. Where a report of an alleged incident involves the Executive Director, the Board Chair is responsible for investigating and resolving the complaint.

In the case that an allegation or complaint is made regarding corporate accounting practices, internal controls, financial reporting, or auditing the Executive Director or Chair will immediately notify the Finance and Audit Committee of the Board. The Executive Director or Chair will then work with the committee to investigate and resolve the situation.



Reporting of Retaliation

Individuals who believe that retaliatory action has been taken against them or threatened because they have reported an incident in accordance with this policy will forward all information and documentation to support their complaint to the Executive Director. Reports of retaliation are to be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation. If necessary, appropriate measures to safeguard the complainant will be taken.

The findings and any recommendations of the investigation will be provided to the Executive Committee. The Executive Committee will determine the appropriate actions to be taken.

The outcome of the investigation will be shared in writing from the Executive Director or the Chair of the Board as appropriate. If the investigation reveals no credible case of retaliation or threat of retaliation, the complainant will be advised and alternative avenues for conflict resolution will be determined.

Confidentiality

Concerns regarding violations or suspected violations may be submitted on a confidential basis by the person who has the concern. Reports of violations or suspected violations will be kept confidential to the extent possible consistent with the need to conduct a thorough investigation.

Annual confirmation

All CAUSE Canada employees and related personnel are required to confirm in writing, on an annual basis, that they have reviewed and agree to comply to the terms of this Policy.