

---

## **A. WHISTLEBLOWER POLICY**

Hospice Wellington’s Board Code of Conduct requires directors to observe high standards of business and personal ethics as they conduct their duties and responsibilities. As representatives of Hospice Wellington, we must act with honesty and integrity and comply with all applicable laws and standards. Ensuring that “whistleblowers” who disclose any illegal or unethical practices are protected from reprisal, and promptly investigating and addressing any reported concerns, promotes ethical behaviour, transparency, and accountability at Hospice Wellington.

## **B. REPORTING**

Any director who becomes aware of any actual or potential violation of laws, standards, or Hospice Wellington’s code of conduct, policies, or procedures will promptly report the matter confidentially, in writing, to the Board Chair. If a matter relates to the Chair, it should be reported to the Past Chair.

## **C. NO REPRISAL**

No director who makes a report in good faith under this policy will be subject to any reprisal. Any employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. Any board member who retaliates may be removed from the Board.

Reports are not to be made to any person outside of Hospice Wellington other than in exceptional circumstances (for example, if there is an immediate health or safety risk).

## **D. PROCEDURES**

The reporting process is set out in Hospice Wellington *Leadership Policy LT24*.

## **E. FINANCIAL, ACCOUNTING AND AUDITING MATTERS**

The Finance and Audit Committee of the Board will address all reports regarding financial matters, corporate accounting practices, internal controls, or auditing.

## **F. ACTING IN GOOD FAITH**

Anyone making a report under this policy must be acting in good faith and have reasonable grounds for believing the information they are reporting is true. Any allegations that cannot be substantiated and have been made maliciously or when they were known to be false will be viewed as a serious disciplinary matter.

## **G. CONFIDENTIALITY**

Violations or suspected violations may be reported on a confidential basis or may be submitted anonymously. Reports will be kept confidential to the greatest extent possible, consistent with the need to conduct an appropriate investigation.

#### **H. HANDLING OF REPORTED VIOLATIONS**

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

#### **I. REVIEW**

This policy will be reviewed annually by the Governance Committee, for recommendation to the Board.

**Approved by Governance Committee: June 10, 2021**

**Approved by Board of Directors: June 23, 2021**

**References:** Imagine Canada Standard #15