			
<b>Title:</b>	Whistleblower Policy	<b>Creation Date:</b>	February 27, 2013
<b>Policy #:</b>	B-23	<b>Revision Effective Date:</b>	July 12, 2022
<b>Category:</b>	Human Resources/Office Protocol	<b>Next Review:</b>	2025

## Whistleblower Policy

### BACKGROUND

Calgary Health Foundation (the “Health Foundation”) is a registered Canadian charity that is committed to high standards of ethical, moral and legal business conduct. The Health Foundation is further dedicated to acting in good faith with those directors, officers, committee members and employees who raise concerns regarding financial reporting, unlawful activity, or otherwise improper conduct.

### PURPOSE

The purpose of this Whistleblower Policy is to provide directors, officers, committee members and employees with an avenue to raise good faith concerns and to reassure such persons that they will be protected from reprisal, retaliation or victimization as a consequence of reporting the alleged wrongdoing.

### POLICY

The Health Foundation intends this policy to be used for serious and sensitive issues. Examples of such issues include, but are not limited to, the following:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation;
- Criminal activity, including theft or fraud;
- Improper conduct or unethical behavior, including discrimination, bullying and harassment
- Dangers to health & safety, including unsafe work practices: and
- Attempts to conceal any of the above

### PROTECTION


The Health Foundation will not take or condone any adverse action (including any adverse employment consequence) against directors, officers, committee members or employees who in good faith raise a concern in accordance with this policy. Even if an allegation is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes an allegation in bad faith or knowingly makes malicious, misleading or false disclosure, appropriate disciplinary action will be taken.

The *Criminal Code* (Canada) protects individuals from adverse employment action if they disclose any type of criminal activity undertaken by their employer. The *Freedom of Information and Protection of Privacy Act* (Alberta) protects individuals from adverse employment action if they disclose any information in accordance with this Act. This policy is intended to enhance those protections and will not interfere with the Health Foundation directors, officers, committee members or employees reporting a matter to the appropriate government or professional agency.

### PROCESS FOR RAISING A CONCERN

#### Reporting

Concerns should be reported directly to the Chief Executive Officer. In the event that an individual’s concern rises to the level that they reasonably believe that notice to the Chief Executive Officer will be disregarded or otherwise not fairly considered, the individual may report violations or suspected violations to the Chair of the Health Foundation’s Finance and Audit Committee for financial concerns, and the Chair of the Governance Committee for others. Employment related concerns should continue to be reported through leaders and the Human Resources department.

			
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If disclosure to the Chief Executive Officer or the Chair of the Health Foundation's Finance and Audit Committee or the Chair of the Governance Committee is not appropriate and/or access is limited, the discloser can disclose the improper activity to the Foundation's designated external disclosure service.

This external reporting and disclosure service can also be used by members of the public to report improper activity and can be contacted at **1-844-487-4729** or **whistleblower@thetandemteam.com**.

**Evidence**

Although a complainant is not expected to prove the truth of an allegation, they should be able to demonstrate that they have made a report in good faith.

**HOW THE REPORT OF CONCERN WILL BE HANDLED**

**Initial Inquiries**

To any of the following officers: the Chief Executive Officer, the Chair of the Finance and Audit Committee, or the Chair of the Governance Committee, will be followed by initial inquiries in consultation with legal counsel, if necessary, to determine whether or not further investigation is necessary or appropriate.

**Further Information**

The Chief Executive Officer, Chair of the Finance and Audit Committee, Chair of the Governance Committee or another officer that is not named in the allegation, appointed by either the Chair of the Finance and Audit Committee or the Chair of the Governance Committee to investigate the complaint may seek further information from any officer, director, employee, contractor, volunteer or stakeholder of the Health Foundation, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so. The actions taken by the Health Foundation with respect to a particular allegation will depend on the nature of the reported violation.

**Investigations**

Each case is unique and the Health Foundation will handle any allegation reported pursuant to this Policy respectfully and with discretion. A notice of each case will be reported immediately to either the Chair of the Finance and Audit Committee or the Chair of the Governance Committee, depending on its nature, and a summary of such complaint will be reported at the Committee's next meeting. If the facts warrant it, the Health Foundation will take corrective action or disciplinary action commensurate with the severity of the offence. In some cases, the Health Foundation may need to report matters to law enforcement authorities. To the extent possible and appropriate, a report back to the person who first raised the concern will be made.

**Confidentiality**

The Health Foundation will make every effort to treat the identity of a complainant or the subject of the complaint with an appropriate regard for confidentiality, with the understanding that the details may need to be shared with others in order to investigate such complaints properly. An external reporting and disclosure service can be used by the discloser to ensure anonymity.

**Anonymous Allegations**

Thorough investigation often depends on the ability to gather additional information. The Health Foundation encourages complainants to put their names to allegations of wrongdoing. The Health Foundation will explore anonymous allegations to the extent possible; but will weigh the prudence of continuing an investigation against the likelihood of confirming the alleged facts or circumstances from sources.

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#### REPORT TO THE BOARD

The Health Foundation will keep a database of complaints received and shall inform its Board at least annually of the number, type and disposition of complaints received.

#### APPLICABILITY/SCOPE

This policy applies to the Health Foundation's directors, officers, committee members and employees.