

# Whistleblower Policy

The Winnipeg Foundation is committed to lawful and ethical behaviour in all its activities and requires its Board, volunteers, and employees to act in accordance with all applicable laws, regulations and Foundation policies when conducting their duties and responsibilities.

## Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable Board, volunteers and employees to raise any serious Foundation-related concerns internally so The Foundation can address and correct inappropriate conduct and actions. It is the responsibility of Board members, volunteers and employees to report concerns about suspected violations of The Foundation's Code of Ethics, Conflict of Interest Policy, or any other policy of The Foundation, or suspected violations of law or regulations that govern The Foundation's operations.

Whistleblower incidents may include, but are not limited to the following:

- Providing false or misleading information on financial documents, grant reports, statutory reporting or other public documents;
- Providing false information or withholding material information from The Foundation's Board of Directors, auditors, lawyers or other representatives responsible for ensuring compliance with The Foundation's fiscal and legal responsibilities;
- Misappropriation of funds, breach of fiduciary duty and/or abuse of trust;
- Non-compliance or breach of legal obligations, rules, regulations or policy;
- Non-compliance of Foundation policies respecting discrimination;
- Retaliation against individuals who make a complaint, in good faith, under this Whistleblower Policy.

## Reporting Violations

The Foundation has an open door policy and encourages the Board, volunteers and employees to share their concerns with their immediate supervisor. If a concern pertains to their immediate supervisor, or the complainant feels the matter has grounds to be taken further, they are encouraged to share their concerns with the [Board Chair](#). If a concern pertains to the Board Chair, the matter is to be directed to the [Treasurer](#).

A complainant may express concerns either verbally or in writing. If a report is provided verbally it must be confirmed again in writing, and should include specifics such as date, time, and nature of any violation. All reports will be investigated to the fullest extent possible.



## Confidentiality

Violations or suspected violations may be submitted on a confidential basis. All efforts will be made to respect confidentiality; however, depending on the nature and severity of a violation or the scope of investigation required, confidentiality cannot be guaranteed.

## Protection from Retaliation

No Board member, volunteer or employee, who in good faith reports a violation pursuant to this Whistleblower Policy shall suffer retaliation, intimidation or adverse positional consequence for so reporting. Any Board member, volunteer or employee who retaliates against an individual who has reported a violation in good faith or who, in good faith, has cooperated in the investigation of a violation, is subject to discipline, which may include termination of employment or volunteer status.

## Authority

The Board Chair is responsible for investigating, or causing an investigation to occur, and concluding all reported complaints. The Board Chair will advise the Board on an ongoing basis of any concerns raised in accordance with this Whistleblower Policy. The Board Chair may retain outside legal counsel, accountants, private investigators or other resources they feel is necessary to conduct a full and complete investigation of any complaints.

If the complaint relates to the Board Chair, the matter will be brought to the attention of the Treasurer, who will have the same rights and obligations as are set out in this Whistleblower Policy as if it were a complaint being dealt with by the Board Chair.

The Board of Directors will be provided with an annual report on complaints under this Whistleblower Policy.

## Handling of Reported Violations

The Board Chair, or in their absence, their designate, will acknowledge receipt of a complaint within 48 hours of receipt. The subject of the complaint will be contacted for their response and the matter will be investigated and concluded on an expeditious basis.

## Documentation

All documentation with respect to a complaint will be held in confidence unless authorized otherwise in accordance with regulatory or legal requirements. All relevant documentation, including reports, discussions and supporting information shall remain in the control and custody of the Board Chair, or as directed by them.

## Contact Info

Board Chair: [chair@wpgfdn.org](mailto:chair@wpgfdn.org)

Board Treasurer: [treasurer@wpgfdn.org](mailto:treasurer@wpgfdn.org)

