

WHISTLEBLOWER POLICY

Purpose

To ensure ethical operations, to support the investigation of any suspected activity within the organization that may be unethical, illegal, fraudulent, corrupt, etc, and to allow for the safe and confidential reporting of any such activity from persons internal or external to the business to encourage the sharing of information.

Eligibility

All WCLC employees, internal and external stakeholders, and members of the public.

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Whistleblowing

WCLC defines a whistleblower as a person who voluntarily comes forward and provides information about possible past, present, or future activity within the organization that they believe is unethical, illegal, fraudulent, corrupt, etc. A whistleblower may be internal or external to WCLC. Whistleblowing allows the organization to investigate any suspected wrongdoing and ensure ethical operations.

It is not considered whistleblowing to report code of conduct related concerns such as harassment, bullying, etc (see the WCLC Code of Conduct – WCLC Employees only).

Protections

- If an employee or party external to WCLC has reason to believe someone has performed or intends to perform activities that are unethical, illegal, fraudulent, corrupt, etc. within the organization, WCLC encourages them to file a confidential report and share the information they know.
 - WCLC will keep the whistleblower's identity confidential.
 - The identities of any people against whom a disclosure is made will also be kept confidential as required to avoid unnecessary harm as a result of an investigation.
- Under [the Criminal Code of Canada Section 425.1](#), it is a criminal offence for employers to take or threaten employment-related disciplinary measures against an employee who has provided, or will provide, information to someone who enforces federal law.
- There is provincial legislation in [Manitoba](#), [Alberta](#), and [Saskatchewan](#) that protects from reprisal any employee who discloses in good faith any illegal activity at their workplace.
- Locally established protections may also apply.

Concerns & Incidents

The types of incidents and activities that can be reported include but are not limited to the following:

- Draw tampering or manipulation
- Accounting fraud

- Bribery and any form of corruption
- Corporate tax evasion
- Money laundering
- Financing of terrorist organizations
- Supply chain violations
- Environmental damage
- Danger to the public

Filing a Report

- To file a confidential whistleblowing report, [fill out the online form](#).
- The person filing the whistleblower report can decide how much personal information to provide. However, if the report does not include their name or adequate information, we may not be able to respond to the report or provide the applicable whistleblower protections.
- When a whistleblowing report is filed via the online form:
 - It will be received by the Director of HR and routed to the appropriate investigative team depending on the nature of the report. Examples of teams that could be assigned as investigators include HR, Audit, Compliance and Legal. The investigative team will assess the information provided and contact the whistleblower as and when required. The investigative team will communicate their findings directly to the President of WCLC.
 - If a member of a specific department, e.g. HR, Audit, Compliance, Legal, is the subject of the whistleblowing complaint, no member of that department will be engaged as part of the investigative team. The investigative team will communicate their findings directly to the President.
 - If any member of the WCLC Board (including the Chair) is the subject of the whistleblowing complaint, the complaint will be investigated by the Audit Committee or HR and Governance Committee depending on the nature of the complaint. If the Board member is part of either of these Committees, that Committee will be excluded from the investigation. The investigative team will communicate their findings directly to the President.
 - If the President is the subject of the whistleblowing complaint, they will not be engaged as part of the investigative team. The investigative team will communicate their findings directly to the WCLC HR and Governance Committee.

Investigations

- When a report is filed, we will assess the information and determine whether:
 - The information provided is adequate to support an investigation,
 - Further investigative steps will be conducted and/or tools will be required to establish the facts, and/or
 - Penalties are warranted or recommended as a result of the investigation's findings.
- All investigative activities are conducted privately and confidentially.
- Where circumstances apply during an investigation, the information provided in a whistleblower report may be shared:
 - To inform and/or obtain support from law enforcement
 - To administer or enforce whistleblower protections
 - To communicate information the whistleblower agrees can be shared
 - To communicate information that has already been made public

Note: In any of these circumstances, the whistleblower's identity will not be revealed.

Interpretation

For clarification and questions regarding this policy, please contact Human Resources.

Other Resources

- WCLC Code of Conduct