



The Calgary Marathon Society Whistleblower Policy

Purpose of the Policy

The purpose of this whistleblower policy is to provide direction to the Society's stakeholders for the communicating of concerns regarding financial or operational matters. Whistleblower incidents can be reported to our Manager of Risk & Compliance, in confidence, using the online Whistleblower Form.

Definitions

A "**Whistleblower**" is any director, employee, contractor, subcontractor, agent, volunteer, donor, or member of the general public who has reported a whistleblower incident.

A "**Whistleblower Incident**" arises when any stakeholder reports a financial or operational incident of concern. Examples of Whistleblower Incidents may include, but are not limited to, the following:

- Misrepresenting program budgets
- A deliberate disregard of circumvention of Society policies
- Embezzlement of Society assets
- "Side deals" or "under the table" dealings with contractors for personal benefit

Policy Statements

The Whistleblower must communicate the Whistleblower Incident as soon as s/he becomes aware of such situation.

Whistleblower Incidents shall be communicated using the Society prescribed procedures for the submission of Whistleblower Incidents.

The Society will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate against the Whistleblower as a result of communicating a Whistleblower Incident.

The Society will not protect a Whistleblower who intentionally makes false accusations in reporting a Whistleblower Incident.

The Society shall treat all reported Whistleblower Incidents in a confidential and sensitive manner. In addition, the Whistleblower shall be provided the opportunity to remain anonymous.

Whistleblower Incident Process

Whistleblower Incidents shall be reported using the online Whistleblower Form.

The online Whistleblower Form is simultaneously sent to the Chair of the Board of Directors, the Chair of the Finance Committee of the Board, and the Chair of the Governance Committee of the Board. These three Directors shall form an ad hoc Investigations Committee.

The Investigations Committee shall determine a protocol for investigating the particular Whistleblower Incident. The investigation may involve various levels of management and the Board, depending on the severity and complexity of the incident reported.

The Investigations Committee shall prepare a report for the Board of Directors. The report will consider the Incident's validity, and significance, and ability to be proven. The Board of Directors will determine what actions to take, if any, to resolve the Whistleblower Incident. All Whistleblower Incidents will be documented and logged. The results will be communicated to the Whistleblower, if a name is provided.

Questions relating to this Whistleblower Policy should be directed to:

Nancy Farries
Governance Committee Chair
(587) 896 0553