

The Calgary Homeless Foundation (“Foundation”) has established a whistleblower hotline to enable employees, contractors, members of the general public, including volunteers and other stakeholders to confidentially report any suspected instance or allegation of wrongdoing to the Treasurer of the Foundation. Employees or contractors may also report such incidents to a COO/VP or the CEO.

The Foundation Board or staff, as appropriate, shall take reasonable steps to investigate any suspected acts or allegations of waste or wrongdoing without undue delay unless insufficient information is provided on an anonymous basis preventing an investigation. All complaints received by the Foundation or Treasurer shall be logged. If appropriate the Treasurer along with the CEO and/or COO shall take immediate action to prevent the theft, alteration or destruction of relevant records.

Where the results of the investigation find reasonable grounds to indicate that a fraud or criminal act may have occurred, the file will be turned over to the Calgary Police Service with full cooperation from the Foundation in any investigation.

The Foundation shall make every reasonable effort, including court ordered restitution, to pursue the recovery of Foundation losses from the offender or other appropriate source(s).

No employee or person acting on behalf of the Foundation shall take any action in reprisal against an individual making a complaint or allegation in good faith, including:

- Dismissal or threat of;
- Discipline, suspension or threat of either;
- Subject the person to any form of harassment or abuse;
- Impose any penalty, directly or indirectly, upon a complainant; and
- Intimidate or coerce the complainant.

The policy and procedures for disclosing wrongdoing shall be identified on the Foundation website. All members of the Foundation, along with employees, contractors and other stakeholders should be aware of this policy and related procedures.

Where the Foundation becomes aware of possible reprisals against an individual as a result of a report under the whistleblower policy this shall immediately be reported to the Board Chair and Treasurer. The allegations shall be subject to immediate investigation and if the investigation substantiates the allegations, the CEO, Chair of the Board and/or other executive members of the Board, as appropriate, shall be informed and the employees involved shall be subject to appropriate disciplinary action.

Any individual who knowingly makes a false or bad faith complaint or who knowingly makes a false or misleading statement during an investigation shall be subject to disciplinary or legal action. In this event, the CEO or Board Chair, in consultation with legal counsel, shall determine the action to be taken.

The Treasurer shall ensure they retain sole access to the whistleblower hotline and is responsible for monitoring the hotline and ensuring investigations, tracking and appropriate resolutions of all allegations and complaints received under the whistleblower hotline are undertaken.

When results of the investigation indicate that although there may have been inappropriate conduct or behavior and there is no criminal matter, the results shall be forwarded to the CEO or the Chair of the Board, as appropriate, for action. The Treasurer shall provide guidance to the COO to ensure the underlying causes

of procedural failure or control weakness are determined and recommendations to correct the situation and prevent further occurrences are implemented.

The CEO is responsible for ensuring that appropriate administrative policies are in place and maintained to clearly define behavior and conduct expected of employees, encourage the reporting of waste and or wrongdoing and establish sanctions for non-compliance.

Employees are required to report allegations of criminal activity, breaches of security or administrative policy to a COO/Vice President, the CEO or to the whistleblower hotline.

All employees who have knowledge of or are participants in an investigation of a complaint from the whistleblower hotline shall keep details and results of the investigation confidential. The matter shall not be discussed with anyone other than members of the investigative team and any appropriate local authorities.

At the conclusion of the investigation the lead investigator shall document the results in a confidential report. The report shall be distributed based on the circumstances of the case.

When results are of public interest, or if the public becomes aware of the investigation, the Treasurer and the COO or an independent communications professional will develop a communications strategy and inform the Board Chair, and CEO if appropriate, unless police or external counsel direct otherwise. The results of the investigation shall not be discussed with the media by any person other than the Board Chair or CEO or their authorized designate. The Treasurer shall report to the external auditors information relating to investigations conducted under this policy on an annual basis.

The whistleblower hot line number is (403) 214-1821.