



**Big Brothers Big Sisters**  
of the Pembina Valley

## WHISTLEBLOWER POLICY

Big Brothers Big Sisters of Morden-Winkler (BBBSMW) is committed to upholding the highest ethical standards. We do this by conducting service with maximum integrity and by achieving full compliance with all applicable laws, rules and regulations. In line with this commitment, BBBSMW provides an avenue for its employees, Board members and other stakeholders to report any concerns they may have about the activities covered by this policy and to be assured that they will be protected from reprisal or victimization for reporting their concerns in good faith.

This policy covers instances where an employee, Board member, volunteer or other stakeholder has evidence of activity by any BBBS officer, employee, Board member or consultant (including external auditors) that to his/her knowledge constitutes:

- Accounting, auditing, or other financial reporting fraud or misrepresentation;
- Violations of federal or provincial laws that could result in fines or civil damages payable by BBBSMW, or that could otherwise significantly harm the organizations reputation or public image;
- Unethical business conduct in violation of any BBBSMW policy;
- Harassment, bullying, mistreatment, the use of threats or the making of unfair demands by any employee(s) or Board member(s);
- Danger to the health, safety, or well-being of employees, Board members and/or the general public; or
- Harassment, retaliation, or discrimination, stemming from having reported a Reportable Activity.

For the purposes of this Policy, any of the foregoing activities shall be deemed to be a "Reportable Activity".

BBBSMW will not permit any employees or Board members or consultants to harass, retaliate or discriminate against any other employee, volunteer or stakeholder who, in good faith, has reported a Reportable Activity (a Complainant). Retaliation in any form will not be tolerated.

Any violation of this Policy may subject the violator to disciplinary action, which may include, in appropriate circumstances, termination of employment and/or legal action.

Making a complaint not in good faith will be viewed as a serious offence, and may be subject to discipline up to an including discharge of an employee, and/or the severing of the relationship with a Board member, supplier or other stakeholder.

## PROCEDURE FOR MAKING A COMPLAINT

To file a complaint or Reportable Activity the Complainant should complete a Whistleblower Report Form (See Appendix A). Once the form is completed it is to be sent via email to the Board President by mail or email. The Board President has the responsibility for investigating such complaints and taking the appropriate action. The Board President, however, may refer your complaint to the Executive Director if the Reportable Activity concerns an employee other than the Executive Director or concerns a consultant retained by BBBS staff.

In the event that the complaint concerns a Reportable Activity on the part of the Board President, the form should be sent to the Board Vice-President by mail or email. Alternatively, the Whistleblower Form can be submitted via regular mail to the following address:

### PRIVATE & CONFIDENTIAL

Big Brothers Big Sisters of the Pembina Valley  
Box 450  
Winkler, MB  
R6W 4A6  
ATTN: Board President/Vice-President

A complainant may remain anonymous. However, in order to allow for a better investigation of a complaint, the Complainant should consider providing his/her name, telephone number and any other pertinent contact information. Whether or not such contact information is provided, the substance of the complaint will be treated with utmost confidence and not discussed with others except to the extent necessary to conduct a complete and fair investigation. In all cases, any person who is alleged to have conducted the Reportable Activity will be made aware of the complaint at an appropriate point during the investigation.

The Complainant should give enough information to enable a full investigation, including where and when the Reportable Activity occurred, names and titles of individual(s) involved, and as much other relevant details as the Complainant can provide.

## INVESTIGATION AND RESOLUTION OF COMPLAINT

The recipient of a complaint made in accordance with this policy (the Investigator) shall be responsible for expeditiously conducting or causing to be conducted an investigation of the complaint, resolving the matter, and reporting such resolution to the Complainant. Under no circumstances will the Investigator allow such investigation or resolution or reporting to be delegated to or shared by anyone whom the Complainant identified as being or having been involved in the Reportable Activity, or whom the Investigator deems inappropriate.