



Last review: April 2021

## Whistleblower Policy

### **1. Purpose**

This Whistleblower Policy has been established to support The Parliamentary Centre's values and ethical commitments.

The Parliamentary Centre requires directors, officers, employees, and persons and organizations working at or on behalf of The Parliamentary Centre to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of The Parliamentary Centre, we must practice honesty and integrity in fulfilling our obligations and comply with all applicable laws and regulations.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that The Parliamentary Centre can address and correct inappropriate conduct.

### **2. Scope**

This policy applies to any suspected improprieties in matters relating to accounting or auditing issues, breach of the law; including but not limited to fraud, a violation of The Parliamentary Centre Code of Conduct or other ethical concerns, involving employees, contractors, vendors, or any other parties with a business or contractual relationship with The Parliamentary Centre ("violations").

### **3. Policy Reporting Procedure**

The Parliamentary Centre suggests that employees first consider sharing their questions, concerns, suggestions or complaints with their immediate supervisor. If employees are not comfortable speaking with their supervisor or are not satisfied with the supervisor's response, they are encouraged to submit a report through The Parliamentary Centre's online system.

### **Confidentiality**

Suspected or known violations may be submitted on a confidential basis by the reporter. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate follow-up or investigation.

### **No Retaliation**

It is contrary to The Parliamentary Centre's values for anyone to retaliate against any director, officer, employee, contractor or vendor who in good faith submits a report alleging a violation. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### **Acting in Good Faith**

Anyone reporting a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed is accurate. Any allegations that prove not to be substantiated and prove to have been made maliciously or intentionally false will be viewed as a serious disciplinary offence.

### **Investigation Procedure**

The Parliamentary Centre will address any allegations as thoroughly, efficiently and sensitively as possible. An appropriate person nominated by The Parliamentary Centre Director of Operations or, where necessary, The Parliamentary Centre President and CEO will investigate the allegation within two weeks of the disclosure being made. The whistleblower may be asked for further information during the investigation.

The Parliamentary Centre will liaise with the Director of Internal Audit of the Board of Directors to keep him/her advised of the ongoing investigations.

Any investigative activity required concerning reports received will be conducted without regard to the suspected wrongdoer's position/title, length of service, or relationship to The Parliamentary Centre.

### **Annual Awareness Campaign**

Every year, an employee awareness campaign of the anti-corruption policy and codes of conduct will be run across the organization, led by senior management and the board of directors.

### **Board Reporting**

The CEO will provide updates to the Executive Committee of the Board for all issues and the Audit and Finance Committee of the Board for matters involving fiduciary matters. At quarterly meetings, a list of concerns raised and remedial actions will be provided to all Board members.