

# Whistleblower Policy

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## Purpose

The Calgary Homeless Foundation (the Foundation) is committed to maintaining the highest standards of integrity, accountability, and transparency. This Whistleblower Policy provides a safe and confidential mechanism for reporting suspected wrongdoing, including fraud, misconduct, or violations of law or policy.

## Scope

This policy applies to:

- Employees
- Contractors
- Volunteers
- Members of the public
- Other stakeholders

All individuals are encouraged to report concerns related to unethical, illegal, or improper conduct affecting the Foundation.

## Reporting Channels

Reports may be submitted through:

- The confidential whistleblower hotline: (403) 214-1821
- Directly to the Treasurer
- Alternatively, employees and contractors may report to a Vice President or the CEO

All reports will be treated with discretion and confidentiality.

## Confidentiality and Anonymity

The Foundation will make every reasonable effort to protect the identity of whistleblowers. Anonymous reports are accepted; however, limited information may affect the ability to investigate.

## Investigation Process

- All complaints will be logged and reviewed by the Treasurer
- If necessary, the Treasurer, CEO, and/or VP, Finance & Operations will take immediate steps to secure relevant records
- Investigations will be conducted promptly and fairly

- If criminal activity is suspected, the matter will be referred to the Calgary Police Service, with full cooperation from the Foundation

## Recovery and Remediation

Where wrongdoing results in financial loss, the Foundation will pursue recovery through legal means, including court-ordered restitution.

## Protection Against Retaliation

No person shall retaliate against an individual who reports concerns in good faith. Prohibited reprisals include:

- Dismissal or threats thereof
- Disciplinary actions or suspension
- Harassment or abuse
- Penalties or intimidation

Any suspected retaliation must be reported immediately to the Board Chair and Treasurer and will be investigated without delay.

## False or Malicious Reports

Individuals who knowingly submit false or misleading complaints or statements may face disciplinary or legal action. The CEO or Board Chair, in consultation with legal counsel, will determine appropriate action.

## Oversight and Monitoring

- The Treasurer retains sole access to the whistleblower hotline and is responsible for monitoring, investigating, and resolving complaints
- Non-criminal findings will be referred to the CEO or Board Chair for appropriate action
- The VP, Finance & Operations will work with the Treasurer to address procedural or control weaknesses

## Administrative Responsibilities

The CEO is responsible for maintaining policies that:

- Define expected conduct
- Encourage reporting of wrongdoing
- Establish consequences for non-compliance
- weaknesses

## Confidentiality of Investigations

All individuals involved in investigations must maintain strict confidentiality. Information may only be shared with the investigative team and relevant authorities.

## Reporting and Communication

- A confidential report will be prepared at the conclusion of each investigation
- If the matter is of public interest, the Treasurer and VPFO, or a designated communications professional, will develop a strategy in consultation with the Board Chair and CEO
- Only the Board Chair, CEO, or their authorized designate may speak to the media
- The Treasurer will report investigation outcomes to external auditors annually

## Accessibility

This policy and related procedures will be published on the Foundation's website. All employees, contractors, volunteers, and stakeholders should be familiar with its contents