



Whistleblower Policy

General

The YMCA of Hamilton/Burlington/Brantford requires all individuals to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Association, we must practice the YMCA Core Values of Belonging, Caring, Honestly, Respect, and Responsibility in fulfilling our responsibilities and complying with all applicable laws and regulations.

Reporting Responsibility

As it is the responsibility of all individuals, including but not limited to employees, volunteers, members, participants and donors to conduct themselves in accordance with YMCA Core Values. The purpose of this policy is to provide direction to all employees, current and former directors, volunteers and partners of the YMCA of Hamilton/Burlington/ Brantford regarding the communication of concerns with respect to issues to honesty and integrity, and, in particular, of questionable financial or operational matters is also the responsibility of all individuals to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No individual who in good faith reports a violation or a suspected violation shall suffer harassment, retaliation or adverse consequences to their relationship with the YMCA. 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. This Whistleblower Policy is intended to encourage and enable all individuals to raise serious concerns within the Association rather than seeking resolution outside of the Association.

Reporting Violations or Suspected Violations

The Association's open door policy suggests that all individuals share their questions, concerns, suggestions or complaints with someone who can address them properly. In circumstances involving an employee, the employee's Coach is in the best position to address an area of concern. However, if you are not comfortable speaking with your Coach or you are not satisfied with your Coach's response, you are encouraged to speak with someone in the Human Resources Department or in a supervisory position whom you are comfortable in approaching. Coaches are required to report suspected violations to the Association's Compliance Officer, who has specific responsibility to investigate all reported violations.

For suspected fraud or theft violations, or when you are not satisfied or uncomfortable with following the Association's Open Door Policy (or may not have a "Coach" in the YMCA), individuals should contact the Vice President, Compliance Officer or CEO, directly. In circumstances involving the actions of the President & CEO, individuals may contact the Compliance Officer or the Chair of the Board of Directors.

Compliance Officer

The Association's Compliance Officer is responsible for investigating and resolving reported complaints and allegations concerning violations and shall advise the President & CEO. The Compliance Officer has direct access to the Audit, Enterprise Risk Management, Endowment Fund Committee of the Board of Directors and is required to report to the Committee at least annually on his/her compliance activity. The Association's Compliance Officer is the Vice President



of Human Resources and can be reached directly at **905-317-4931**. If you are not comfortable speaking with the Compliance Officer or if the Compliance Officer is unavailable and the matter is urgent, you may contact the President & CEO at **905-317-4919**.

Accounting and Audit Matters

The Audit, Enterprise Risk Management, Endowment Fund Committee of the Board of Directors shall address all reported concerns or complaints regarding account practices, internal controls or auditing. The Compliance Officer is responsible for ensuring that the Audit, Enterprise Risk Management, Endowment Fund Committee is notified of any such complaint(s) and will work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed constitutes a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offense subject to disciplinary action.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and to ensure fairness to YMCA staff.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.