



Canada World Youth Whistleblower Policy

Canada World Youth (CWY) requires directors, officers, employees, volunteers, partners, consultants and contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of CWY we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that CWY can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, volunteers, consultants, and contractors to report concerns about violations of CWY's Code of Conduct or suspected violations of law or regulations that govern CWY's operations. The list of reportable issues includes (but is not limited to);

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Breach of CWY's policy
- Sexual misconduct, including sexual abuse, harassment or exploitation
- Abuse or exploitation of children, vulnerable adults or beneficiaries
- Abuse of position
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- A criminal offence
- Activity which would bring the organisation into serious disrepute
- The deliberate concealment of information relating to any of the matters listed above

No Retaliation

It is contrary to the values of CWY for anyone to retaliate against any board member, officer, employee, volunteer, consultant or contractor who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the organization. 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, contract or service agreement.

Reporting Procedure

CWY has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the President and CEO or a board member (if involving the board would be appropriate). Supervisors and managers are required to report complaints or concerns about suspected ethical and legal

violations in writing to the CWY's Compliance Officer or designated employee or board member, who has the responsibility to investigate all reported complaints.

Compliance Officer

The CWY's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the President CEO and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Executive Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The CWY's Compliance Officer shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates 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 disciplinary offense.

Confidentiality

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

Handling of Reported Violations

The CWY's Compliance Officer, is the person who receives complaints and reports and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Investigation of allegation

CWY endeavours to deal with disclosures as sensitively and quickly as possible. The Director of Human Resources, as the Compliance Officer, will investigate the allegation within two weeks of the disclosure having been made. In the case of an allegation involving the Compliance Officer, the investigator will be named by the President and CEO. In the case of an allegation involving the President and CEO, the investigator will be named by the Chair of the Board, or in the case of a situation involving the Chair, the Vice-Chair.

Outcome of investigation

On completion of an investigation, appropriate action will be taken to resolve the issue, which may result in disciplinary action (including dismissal or referral to relevant authorities). The whistleblower will be informed that the issue has been resolved, and when possible, the outcome of the investigation. If they are not satisfied with the response the matter will be referred to the President and CEO, or if that person is involved in the case or if the case involves a Board member, to the Chair, or in the case of the Chair, another Board Officer.

Compliance Officer:

Name: Helene Paquet-Young

Title: Director, Finance and Administration

Contact information:

hpaquetyoung@cwj-icm.org.

Tel / Tél: 514-931-3526 #324

Toll free / Sans frais: 1-800-605-3526 #324

Fax: 514 939-2621

Policy approved by the Board of Directors on _____.