



WHISTLEBLOWER POLICY

Purpose

The purpose of this Whistleblower Policy of Canadian Feed The Children (“CFTC”) is to provide direction to all current and former directors, officers, employees, contractors, consultants, agents, volunteers, donors, partners and clients of CFTC and community members (hereinafter referred to as “Stakeholders”) regarding the communication of concerns about questionable or illegal practices or activities or suspected questionable or illegal practices or activities concerning CFTC. CFTC expects anyone who has serious concerns about any aspect of the operations, programs and services of CFTC to come forward. This Policy provides a confidential procedure through which such concerns can be reported and investigated.

Scope

All CFTC Stakeholders.

Periodic Review and Amendments

This Policy is reviewed every three years by CFTC Management, FAC and Board unless otherwise required.

CFTC reserves the right to change this policy at any time. CFTC regularly reviews its whistleblower policy practices and updates its Whistleblower Policy as required. CFTC’s Whistleblower Policy will be posted on CFTC’s website.

Principles

Employees and volunteers are often the first to be aware that there may be something seriously wrong within the organization. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to CFTC. They may also fear harassment or victimisation.

This Policy is intended to emphasize CFTC’s commitment to a culture of open communication where issues and concerns may be dealt with in normal interaction, while also providing for an alternative mechanism for reporting issues of concern. This Policy is also intended to encourage and enable Stakeholders to raise their concerns internally within the organization, rather than in the first instance seeking resolution outside CFTC, so that CFTC can address and correct inappropriate conduct and actions.

This Policy is intended to provide an assurance to employees and volunteers and other Stakeholders that they can raise concerns without fear of reprisals or victimization.

This Policy supplements, and does not replace, any procedures required by law.

Examples of areas which could be covered by whistleblowing could be:

- Corrupt practices including but not limited to giving or receiving improper personal benefits;
- Misuse, misappropriation or mismanagement of CFTC funds, resources or assets;

- Accounting, auditing or other financial reporting fraud or misrepresentation;
- Conflict of interest concerns;
- Misuse of confidential information;
- A serious breach of CFTC policies;
- Unethical or illegal activities of individuals affiliated with CFTC within the scope of CFTC's operations;
- Serious violations of federal or provincial laws or regulations that could result in fines or damages payable by CFTC or that could otherwise significantly harm CFTC's reputation or public image;
- Activities which may harm the reputation or public image of CFTC.

This Policy does not cover individual employee complaints or concerns, issues or grievances relating to their employment such as the employee's compensation, job duties, performance evaluation or supervision. Nor does this Policy cover such issues as harassment, discrimination or accessibility as these matters are covered in other CFTC policies. Please refer to your employment agreement, CFTC employment related policies and documents and CFTC's organizational policies for these matters.

Reporting

The earlier a concern is raised, the easier it is to take action.

Employees

CFTC suggests that employees share their concerns with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, an employee who is not comfortable speaking with their supervisor or who is not satisfied with the supervisor's response, is encouraged to follow the procedure set out below. Supervisors and managers to whom a disclosure has been made are required to report such a disclosure to CFTC's Vice President, People.

Stakeholders

There are 3 avenues for Stakeholders to report a concern:

(1) Vice President, People of CFTC

If you are an employee or volunteer of CFTC, you may submit your concerns in writing to CFTC's Vice President, People.

(2) Chair of the Finance and Audit Committee of CFTC

If you are a director or officer of CFTC, you may submit your concerns in writing to the Chair of the Finance and Audit Committee of CFTC.

(3) President & CEO of CFTC

If you are a donor, partner, community member or other Stakeholder, you may submit your concerns in writing to the President & CEO of CFTC.

If, for any reason, a person finds it difficult to follow the reporting channels described above, they may report their concerns directly to any of the 3 people listed above or to the Chair of the CFTC Board of Directors.

A person making a disclosure may remain anonymous. However, in order to allow for a better investigation of a disclosure, you are encouraged to put your name to any concerns you report.

When reporting a concern, a person must take steps to provide as much details of the concerns as possible including details about when and where the reportable activity(ies) occurred, who was involved in the activity(ies) and any other relevant details. Individuals are encouraged to complete the Disclosure Form (**Schedule "A" hereto**) to report a concern.

Investigation

CFTC will treat all disclosures in a confidential and sensitive manner. All relevant matters, including suspected but unproved matters, will be promptly reviewed.

The action taken will depend on the nature of the disclosure. The Vice President, People, the President & CEO, the Chair of the Finance and Audit Committee or the Chair of the Board of Directors of CFTC, as appropriate, will decide on the form of investigation to be undertaken and to whom the investigation should be delegated. Where relevant, the matters raised may:

- be investigated by the Finance and Audit Committee of CFTC;
- be investigated by CFTC management;
- be referred to the local authorities;
- be referred to an appropriate external party for investigation.

CFTC acknowledges that an individual who reported a concern needs to be assured that the matter has been properly addressed. Subject to legal constraints and confidentiality, the outcome of an investigation may be communicated to the person who reported the concern and his or her supervisor, if appropriate.

The identity of the person making the disclosure will be kept confidential to the extent that it does not hinder or frustrate any investigation.

The Vice President, People and the President & CEO of CFTC have overall responsibility for the operation of this Policy and will ensure that a record is kept of concerns raised and the outcomes (but in a form which does not endanger confidentiality) for a period of not less than seven (7) years, or in an acceptable manner at the discretion of the CFTC Board of Directors. The Finance and Audit Committee of CFTC is required to advise CFTC's Board of Directors of all disclosures (and the summary results of investigations).

No Retaliation

It is contrary to the values of CFTC for anyone to retaliate, harass or discriminate against a Stakeholder who in good faith reports a concern.

CFTC will not tolerate retaliation in any form. Any retaliatory conduct should be reported using the channels described above. CFTC will take appropriate action to protect a Stakeholder who makes a disclosure in good faith.

Any staff of CFTC who retaliates against an individual who has reported a concern in good faith is subject to discipline up to and including termination of employment.

Individuals making a disclosure must be cautious to avoid false or baseless allegations. Employees and volunteers who intentionally make false or baseless allegations are subject to disciplinary action up to termination of employment, in the case of employees, and severing of the relationship, in the case of volunteers. False or baseless allegations by other Stakeholders may result in CFTC severing the relationship with such a Stakeholder.

The protection from retaliation is not intended to prohibit supervisors or managers from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Questions

For general inquiries relating to this Whistleblower Policy or to obtain contact information for the persons listed in this Policy to whom a disclosure may be made, please send an email in confidence to:

confidential@canadianfeedthechildren.ca

Schedule "A"

Disclosure Form

Your name (optional):

Department (if applicable & optional):

Supervisor (if applicable & optional):

Telephone (optional):

Email (optional):

CFTC WILL TREAT ALL REPORTS IN A CONFIDENTIAL AND SENSITIVE MANNER.

Describe reportable activity – please provide as much detail as possible:

Date you became aware of reportable activity:

Reportable activity is (please circle one):

Ongoing Completed Unclear whether ongoing or completed

Department suspected of reportable activity:

Individual(s) suspected of reportable activity:

How did you become aware of the reportable activity?

Describe steps, if any, you took prior to completing this Disclosure Form (e.g., informed supervisor, employee, etc...)

Report Submitted To:

Date:

Report Received By:

Date: