TCC Inc.

HUMAN RESOURCES POLICIES

Whistleblower Policy

Part Two – Expectations

Date: June 2019

Reviewed:	**Approved:**
Jun. 2019 - Legal	**Jun. 2019 – Governance**
	Jun. 2019 – Board of Directors
	Nov. 2020 – Board of Directors
	Nov. 2021 – Board of Directors

PURPOSE

The purpose of this Whistleblower Policy is to encourage current employees, volunteers and Board members to communicate events of serious concern about Toronto Children's Care Inc. (TCC Inc.) dba Ronald McDonald House Charities Toronto and to come forward in good faith with information on illegal or unlawful practices or violations of adopted Chapter policies. It also specifies that TCC Inc. will protect the individual who reported their concerns from retaliation and identifies those to whom such information can be reported.

Having a policy that encourages people to report their concerns without fear of retaliation is critical to good governance. In certain cases, it may also be a legal requirement. TCC Inc. will consider any reprisal against a reporting individual an act of misconduct subject to disciplinary procedures. A "reporting individual" is one who, in good faith, reports a suspected act of misconduct in accordance with this policy.

POLICY STATEMENT

TCC Inc. is always committed to conducting itself with honesty and integrity. If, at any time, this commitment is not followed or appears in doubt, TCC Inc. will seek to identify and remedy such situation. Accordingly, it is the Policy of TCC Inc. to ensure that when an individual has reasonable grounds to believe that an employee, volunteer, or board member has committed, or is about to commit, a TCC Inc. whistleblowing event:

- The employee, volunteer or board member must disclose this information;
- The complainant will be protected from reprisal;
- All parties to an investigation will be treated fairly and equitability;
- Confidentiality will be maintained to the greatest extent possible and in accordance with applicable laws;
- If wrongdoing is found, appropriate remedial and disciplinary actions will be taken.

This Policy will be applied in accordance with applicable laws.

DEFINITION – REASONABLE GROUNDS OF A "WHISTLEBLOWER EVENT"

For the purposes of this Policy, a complaint may be submitted if an incident occurs such as:

- Accounting, auditing, or other financial reporting fraud or misrepresentation;
- Violations of federal or provincial laws that could result in fines or civil damages payable by TCC Inc. or that could otherwise significantly harm TCC Inc.'s reputation or public image;
- Unethical business conduct in violation of any TCC Inc. policies and/or TCC Inc.'s Code of Conduct;
- Danger to the health, safety, or well-being of employees, volunteers and/or the general public.

PROCEDURE

A complaint may be submitted in writing to the CEO, the Chairman of the Board, or Chair of the Finance and Audit Committee referred to below as "Officers"**.**

The complaint may be relayed verbally if documented and signed by the complaining party that the written statement is an accurate capture of their complaint. The written statement should include the following information:

- Description of the activity;
- Date complainant became aware of the activity;
- Name of individual suspected of the activity;
- Steps taken (if any) prior to making complaint or allegation (i.e. spoke with supervisor).

1. The statement shall be addressed in writing to one, two or the three Officers listed below via email or regular mail. The complainant shall expect a confirmation of receipt of the complaint within 5 business days.
2. The complainant will not be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against as a result of communicating a concern in good faith. Any TCC Inc. employee, found to be in violation of this policy when dealing with a complainant, may be subject to disciplinary action up to and including termination of employment. Similarly, any volunteer or Board member found to be in violation of this policy when dealing with a complainant may have their relationship with TCC Inc. terminated.
3. An individual is not required to prove the truth of an allegation, but he/she is required to act in good faith, and to provide enough information to the person contacted in order to show the complaint has reasonable grounds for concern. The amount of contact between the complainant and the investigating body will depend on the nature of the issue and the clarity of the information provided. The investigating body may seek further information from the complainant.
4. Any individual who does not act in good faith in reporting a whistleblower event may be subject to disciplinary action up to and including termination of employment or termination of their relationship with TCC Inc., as applicable.
5. All complaints, and the identity of the complainant, will be treated as confidential to the extent possible, consistent with the need to conduct an appropriate investigation and consistent with applicable laws.

INVESTIGATION

Once a complaint is brought forward, an investigation will commence. The Officer(s), in receipt of the complaint, may enlist the assistance of other employees, legal counsel, accounting or other advisors as may be appropriate to conduct the investigation. A report will be prepared, and any legal or other action will be taken as appropriate. Each complaint will be treated as confidentially as possible in accordance with applicable laws. The results of the investigation will be shared with the complainant as permitted by applicable law.

APPLICABILITY

This Policy applies to all current employees, volunteers, and Board members of TCC Inc.