



## WHISTLEBLOWER POLICY

### General Statement of Purpose

The Royal Canadian Golf Association, operating as Golf Canada ("Golf Canada") is committed to fostering an environment conducive to open communication within the organization regarding Golf Canada's business practices and to protecting employees or any other persons from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical conduct. To further this commitment, this policy:

1. Establishes guidance for the receipt, retention, and treatment of verbal or written reports ("Reports") received by Golf Canada regarding actions that (i) are illegal, unethical or contrary to Golf Canada's policies in respect of accounting, internal controls, auditing matters, disclosure, or business practices or (ii) constitute discrimination, harassment, violence or abuse, whether submitted by Golf Canada employees or any other persons;
2. Provides Golf Canada employees and any other persons who make a Report ("Complainant(s)") with a means to make Reports in a confidential and anonymous manner; and
3. Demonstrates Golf Canada's intention to discipline, up to and including termination of employment for just cause, any person who commits an act of retaliation or reprisal against a Complainant.

### Receipt

This policy shall be provided to Golf Canada employees and volunteers and shall be posted on the Golf Canada website. Golf Canada has designated the Chair of the Audit and Risk Management Committee or Golf Canada's Ethics Commissioner ("Recipient(s)") to be the recipient of all the Reports filed under this policy and to coordinate any necessary Golf Canada action, including investigation where required by law or otherwise determined to be warranted. For Reports regarding discrimination, harassment, violence or abuse, the Recipient will coordinate any necessary Golf Canada action with and may refer the Report to (a) the Golf Canada Ethics Commissioner, (b) Chair of the Audit & Risk Committee, or (b) the Golf Canada President, as appropriate in consideration of persons named in the Reports,, in either case, to be handled in accordance with the Golf Canada Recognition and Prevention of Discrimination, Harassment and Violence Policy or the Golf Canada Recognition and Prevention of Abuse Policy.

Should a Complainant's Report wish to name either the Chair of the Audit and Risk Management Committee, Ethics Commissioner or Golf Canada President, the Complainant is encouraged to submit their Report to an alternative Recipient. Recipients solemnly commit to confidentiality, if a Report refers to a Recipient, they shall omit communication of such Report to the named Recipient while the issue is handled in accordance with the process described under Treatment of Reports.

### Treatment of Reports

All Reports will be taken seriously and addressed promptly, discreetly and professionally. Reports may be submitted anonymously or the person submitting the Report may request to remain anonymous and their desire for anonymity will be respected to the extent appropriate or permitted by law. Discussions and any documentation respecting the Reports will be kept in strict confidence to the extent appropriate or permitted by law. Should the person submitting the Report identify himself or herself, the Recipient will communicate to the person filing the Report the steps to be taken to address the Report.

### **Retention**

Reports filed under this policy will be controlled and documented by the Chair of the Audit and Risk Management Committee who shall maintain all related documentation for six years (or such longer period as required by law). All Reports and related documentation shall be retained in secured files to which only the Audit and Risk Management Committee Chair, and any future Chairs, and legal counsel shall have full access, subject to legal obligations to otherwise disclose. If a Report is submitted to the Ethics Commission which names the Chair of the Audit and Risk Management Committee, the Ethics Commissioner shall maintain all related documentation.

### **Retaliation**

Retaliation against any employee or other person that in good faith files a Report or participates in an investigation in connection with a Report is strictly prohibited. Anyone determined to have engaged in retaliatory behavior or who fails to maintain a Complainant's anonymity if requested (and as permitted at law) may be subject to discipline, up to and including termination of employment for just cause, in the case of Golf Canada employees. Any Complainant who feels that he or she has been subjected to any behavior that violates this policy should immediately report such behavior to his or her supervisor, the Human Resources Manager, the Ethics Commissioner, or the Chair of the Audit and Risk Management Committee.

Anyone who knowingly files a misleading or false Report, or who does not have a reasonable belief as to the truth or accuracy of the Report, may be subject to discipline, up to and including termination of employment for just cause, in the case of a Golf Canada employee.

### **Review of Reports**

A summary of Reports received under this policy will be communicated to the Audit and Risk Management Committee at their regular meetings or on a more frequent basis should conditions warrant a more timely action.

### **How to Report**

If you would like to file a Report under the terms of this policy, please contact any of the following Recipients at your discretion given the context of the Report using the method that is most comfortable to the Complainant (phone, email, or mail). While not required, the Complainant is encouraged to utilize the template found in Appendix A to document the Report:

Recipient	Role	Phone	Email	Address
Rob MacDonald	Director and Chair, Audit & Risk Committee	204-755-4531	<a href="mailto:Rob.macdonald@mnp.ca">Rob.macdonald@mnp.ca</a>	2500-201 Portage Ave., Winnipeg, MB, R3B 3K6
Garrett Ball	Ethics Commissioner & Chief Financial Officer	1-800-263-0009 ext. 226 or 905-401-7331	<a href="mailto:gball@golfcanada.ca">gball@golfcanada.ca</a>	1333-1 Dorval Drive, Oakville, ON, L6M 4X7
Louis Charlie Beaulieu	President	514-892-2885	<a href="mailto:charlieb@videotron.ca">charlieb@videotron.ca</a>	57 René D'Anjou, Lorraine, QC, J6Z 4N1

## **APPENDIX A**

### **Whistleblower Policy Complainant Report Form**

The following form is recommended for use to make complaints or reports under the terms of the Whistleblower Policy of Golf Canada.

Complainant's Name: \_\_\_\_\_  
(Enter "Confidential" should the Complainant wish to submit a confidential Report).

Email Address: \_\_\_\_\_ Telephone: \_\_\_\_\_

Role or Position with Golf of Canada: \_\_\_\_\_

Description of the issue:

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Other parties involved in the issue (with contact information, if known):

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Do you wish to have the recipient keep your identity confidential? \_\_\_\_\_