WHISTLEBLOWER PROTECTION POLICY

PURPOSE

The Ottawa Hospital Foundation (the "**Foundation**") requires directors, officers, employees, contractors and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All must practice honesty and integrity in fulfilling Foundation-related responsibilities and comply with all applicable laws and regulations.

The Foundation is committed to upholding these high ethical standards and integrity. In line with this commitment, the Foundation strives to provide a work environment in which our people, when they have concerns (based on their reasonable belief) that a potential violation or grave misconduct has occurred or is occurring, can raise those concerns free of discrimination, retaliation, threats or harassment. Accordingly, the Foundation strictly prohibits discrimination, retaliation, threats or harassment of any kind against any person who reports such information to the Foundation in accordance with this policy.

The purpose of this policy is to define a process which allows for anonymous and confidential reporting of anything that our people have witnessed or experienced that they believe violates the Foundation's high standards of conduct, is against the law or Foundation policies, or could be considered workplace wrongdoing. This policy brings greater accountability to all of us in maintaining an ethical workplace, and, in doing so, helps to ensure continued trust of our stakeholders and the public.

This policy will form part of the employee onboarding process for all new Foundation employees. This policy is to be reviewed annually with all Foundation staff and with the board of directors of the Foundation (the "**Board**").

SCOPE

This policy defines a process by which directors, officers, employees, contractors and volunteers can, in good faith, report issues and/or concerns in connection with a serious violation that could adversely impact the Foundation, its donors, stakeholders, employees or the public at large. Although it is impossible to list all possible violations, we would expect the following to be reported:

- a significant violation of a law, rule, regulation or policy;
- a gross mismanagement;
- a gross waste of funds;
- criminal acts and conduct;
- fraud or misappropriation, or other questionable accounting practices;
- failure to comply with legal or regulatory obligations;

- failure to comply with, or efforts to circumvent, our internal compliance policies or internal controls;
- actions that endanger health or safety or might cause environmental damage;
- theft;
- an abuse of authority; and
- actions designed to have the effect of concealing any of the above.

This policy addresses suspected ethical breaches and/or violations and is not intended to address routine human resources matters. Human resources matters should be directed/reported to the Vice-President, Finance and Administration.

DEFINITIONS

Whistleblower is an individual who discloses information that they, in good faith, reasonably believe is evidence of the violations described above.

Whistleblower Review and Screening Group consists of the President and CEO and the Vice-President, Finance and Administration. This group is responsible to conduct a merit assessment of each report to determine if an investigation should proceed, mechanism and means for investigations, and assess the safety, privacy and risk of reprisal for all parties involved. Other subject matter experts may be consulted, as appropriate.

If the suspected violation involves the President and CEO, then the **Whistleblower Review and Screening Group** consists of the Chair of the Finance and Audit Committee and the Vice President, Finance and Administration.

Wrongdoing refers to practices under the control of the employer that constitute, for example: a significant violation of any law, rule, regulation, or policy; a gross mismanagement; a gross waste of funds; an abuse of authority; a substantial and specific danger to public health and/or; a substantial and specific danger to public safety

POLICY STATEMENT

All of our people have an obligation to promptly raise a concern when they see a situation involving a violation described above. Our people do not need to be certain that a violation has occurred.

There will be no retaliation against any of our people who report an alleged allegation in good faith. Any retaliation — whether direct or indirect — against our people who raise a concern is grounds for discipline up to and including dismissal.

The Foundation has an open-door policy with its employees and encourages employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee’s manager is in the best position to address an area of concern. However, if an individual is not comfortable speaking with his or her manager or is not satisfied with the manager’s response, they are encouraged to speak with anyone in management who they are comfortable approaching. Managers are required to escalate and report Whistleblower's concerns about suspected violations to the Whistleblower Review and Screening Group.

Every effort will be made to protect confidentiality. However, staff are encouraged to identify themselves, to enable follow up and provide feedback. Any known identity and information will only be shared on a "need-to-know" basis.

The Whistleblower Review and Screening Group will follow the following process for addressing reports:

1. Each report will be fairly examined by the Whistleblower Review and Screening Group.
2. The Whistleblower Review and Screening Group will initiate and/or coordinate investigation of the report with an aim to maintain confidentiality of the Whistleblower and sensitivity of the report to the greatest extent as possible.
3. The investigative team will recommend corrective action, if necessary.
4. The executive management team will be advised of any Whistleblower report impacting their portfolio and will be responsible to ensure that appropriate action/remediation is taken.
5. The Whistleblower, if known, will be provided feedback on the investigation outcome, as appropriate.
6. The Whistleblower Review and Screening Group is responsible for maintaining the status of all reports.
7. Significant allegations will be brought to the attention of the Chair of the Board immediately, followed by the Board.

Any Whistleblower filing a 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 or which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offence.

CONTACT INFORMATION

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RELATED POLICIES / LEGISLATION

Confidentiality and Conflict of Interest

REFERENCES

N/A

APPROVED

Approved by the Board at its meeting.