



## **Whistleblower Policy**

Mount Pleasant Group's Whistleblower Policy is intended to provide a safe and confidential mechanism for all current employees, directors, contractors and vendors of MPG to communicate concerns regarding unethical or illegal activities within the organization.

### **Policy**

The Whistleblower will promptly report the suspected or actual event in writing to management or to the Director HR. They can elect to report the event anonymously, save and except in those circumstances where the nature of the investigation makes it necessary to disclose identity.

The Whistleblower shall not receive any retaliation or retribution for a report that was provided in good faith.

Any employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Anyone who retaliates against the Whistleblower (who reported the event in good faith) will be subject to discipline up to and including termination.

Crimes against persons or property, such as assault, rape, burglary etc. will immediately be reported to local law enforcement.

### **Definitions**

A Whistleblower is someone who reports unethical or illegal behaviour. Whistleblower incidents are intended to include but are not limited to the following:

- Side deals or under the table dealings with contractors for personal benefit
- Receiving personal kickbacks or significant gifts from contractors or vendors which could create bias in the tendering process
- Inappropriate recording or reporting of revenues or expenses, or lack thereof
- Inappropriate classification of assets and/or liabilities
- Embezzlement or theft of Company assets by an individual or group of individuals
- Breach of legal obligations, rules, regulations or policy

## **Responsibilities**

### Whistleblower:

- Advise Manager/Supervisor or Director HR in writing of any knowledge of or concerns of illegal, unethical or inappropriate behaviours or practices.
- Co-operate in any internal/external investigation without retaliation as a result of such disclosure.

### Manager/Supervisor:

- Promptly submit all whistleblower reports of illegal, dishonest or fraudulent activities to the Director HR for investigation and corrective action where applicable. Assist with investigations where applicable.
- Maintain the integrity of the report and investigation by not disclosing the identity of any parties in relation to the investigation unless required by law.

### Director HR:

- Promptly review and investigate submitted reports.
- Maintain the integrity of the report and investigation by not disclosing the identity of any parties in relation to the investigation unless required by law.
- Report the event to the President(s) and in instances involving Officers of the company report the events or anything material to either the Chair of the HR & Governance Committee or the Chair of the Finance and Investment Committee.

## **Procedures**

- The Whistleblower will submit a written report to management or to the Director of HR. This report will outline to the best of their knowledge, the details of the event/situation or their suspicions of an event.
- If the report is given to a member of Management, they will immediately notify and provide documentation to the Director HR for investigation. The Manager is required to assist with investigations where applicable.
- The Whistleblower can create their own report or access a form located in the link at the bottom of the page.
- If the Whistleblower is not an employee of the organization, they will submit their report to the Director of Human Resources. (contact information is at end of policy) Alternately, if the complaint is in relation to the CEO it can be directed to the Chair of the Board of Directors. (contact information is at end of policy)
- The Director HR will discuss the report and the strategy for investigation with the President(s) and in the case of a situation involving an Officer of the company they will have the discussion with the Chair of the relevant board committee. In the

event there is a disagreement in regards to proposed strategy, either party can bring the situation to the Chair of the Board.

- Based on the severity and scope of the issue, different internal and external parties may be called upon to conduct or participate in the investigation and resolution.  
i.e. Auditors/Legal Advisors
- The Director HR will execute the agreed upon strategy.
- All relevant parties including the Whistleblower will receive a report within a reasonable timeframe regarding the investigation and resolution of the issue reported.
- Where appropriate, the Executive Committee will receive periodic activity reports
- The Board of Directors will receive an annual activity report.
- In all steps of this procedure the integrity of the report and investigation must be maintained by not disclosing the identity of any parties in relation to the investigation unless required in compliance with the law.

To contact Director HR

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To contact Chair of the Board

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[Whistleblower Form Link](#)