



## Whistleblower Protection Policy

### 1. Introduction

The AFP Ottawa Chapter prides itself on maintaining a culture that is safe, ethical, transparent and accountable, while adhering to federal, provincial, and local laws and regulations, including the AFP Code of Ethics. As such, the Chapter has adopted a whistleblower protection policy to establish a procedure for the disclosure of wrongdoing within the AFP Ottawa Chapter, including the protection of the person(s) who disclose the wrongdoing.

In keeping with Article III of AFP Ottawa Chapter Bylaws, all matters pertaining to a breach of the AFP Code of Ethics are to be sent directly to the AFP Global Ethics Committee. The Chapter shall function in accordance with AFP Global's statement of the Role of Chapters in the AFP Ethics Process and in accordance with the AFP statement of Procedures Relating to Enforcement of the Code.

### 2. Scope

The policy applies to all AFP Ottawa Chapter members, volunteers and employees regarding the following wrongdoings in or relating to the AFP Ottawa Chapter:

- a. Contravention of federal, provincial, or municipal laws or regulations
- b. A misuse of AFP funds or assets, including questionable accounting practices; fraud or deliberate error in financial statements or recordkeeping; deficiencies of internal accounting controls; or misrepresentations to company officers or accounting staff
- c. A gross mismanagement
- d. An act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment
- e. Knowingly directing or counselling a person to commit wrongdoing as described above

### 3. Protection from Reprisal

Protected disclosure means a disclosure that is made in good faith and that is made by a member, volunteer or employee of the AFP Ottawa Chapter in accordance with this policy or when lawfully required to do so. Subject to procedural fairness, confidentiality will be maintained to the greatest extent possible.

The Chapter will take no reprisal action against a Chapter member, volunteer or employee because they have made a protected disclosure or have, in good faith, cooperated in an investigation into a disclosure. Reprisals include:

- a. A disciplinary measure
- b. The demotion of the employee or volunteer
- c. The termination of service or employment
- d. Any measure that adversely affects the employment or working conditions of the member, volunteer or employee
- e. A threat to take any of the above measures.

AFP Ottawa Chapter members, volunteers and employees owe a duty of loyalty to their Chapter which includes a responsibility to bring to the attention of the Chapter instances of wrongdoing. It is the responsibility of all directors, officers, volunteers and employees to report actual or suspected unethical conduct in accordance with this Whistleblower Policy.

The Chapter is committed to maintaining a culture that is safe, ethical, transparent and accountable, while, complying with the laws and regulations to which it is subject so as to protect its members, funds, assets, resources and reputation.

#### **4. Reporting Wrongdoing**

Accordingly, it is the policy of the Chapter to ensure that when a member, volunteer or employee has reasonable grounds to believe that a third party has committed or is about to commit any wrongdoing in the workplace, as defined in this policy, that:

- a. The member, volunteer or employee may disclose to a supervisor, manager, the Chapter President, a member of the Executive Committee, or AFP Global any information that they believe could show that a wrongdoing has been committed or is about to be committed, or that could show that they have been asked to commit a wrongdoing
- b. If the Chapter President is involved or is believed to be involved in the matter being reported, employees may, in the alternative, make a report to Association of Fundraising Professionals International Headquarters (AFP Global) legal counsel. The legal counsel will conduct an investigation and take appropriate action within a reasonable period of time. Such complaints will be held in confidence to the extent the needs of the investigation permit.
- c. If any employee reports in good faith what the employee believes to be a violation of the law and/or financial wrongdoing to the Organization, AFP Global's legal counsel, or to a federal, provincial, or local agency or assists in an investigation concerning financial wrongdoing, it is AFP Ottawa's policy that there will be no retaliation taken against the volunteer/employee.

#### **5. Investigation**

When an investigation is required, the Chapter will consult a third-party Arbitrator to facilitate an unbiased review.

If deemed necessary or the result of the investigation is unsatisfactory, the Chapter will consult AFP Global for further guidance.

**Effective Date: October 16, 2014**

**Last Revised/Reviewed: May 21, 2024**

**Subject to Review: May 21, 2027**