

<b>Commissionaires Nova Scotia Publications</b>	Document # CNS-004	Date Effective 26 January 2021
	Author(s) Leadership Team	Approval CEO
Document Title <b>Whistleblower Policy</b>		

In accordance with *CNS-001: Statement of Principles*, we embody the principles of openness, transparency and respect in dealing with colleagues, clients and the communities we work in. To reinforce our position as a positive contributor to our community, we have developed an anonymous reporting system to facilitate the handling of very serious ethical matters.

## Purpose

Last resort. The system described in this policy should be considered an approach of last resort. *CNS-HR-WI-003: Requests & Matters for Resolution* outlines a multi-level process permitting employees to bring forward concerns and matters for resolution in the ordinary course of business. The process below should only be used if the ordinary reporting mechanisms have been tried and failed, or if personal safety can only be assured through an anonymous process.

Permitted use. This process may be used to report credibly suspected or planned instances of the following serious wrongdoing by any employee, contractor or representative of Commissionaires Nova Scotia:

- a) a criminal offence or breach of civil law;
- b) a breach of any statutory code of practice;
- c) corruption or fraud;
- d) a miscarriage of justice;
- e) behaviour endangering the health and safety of any person;
- f) behaviour damaging or potential damaging to the environment; or
- g) attempts to cover up the occurrence or likely occurrence of any of the above.

Prohibited use. This process may not be used to submit complaints about perceived poor performance, workplace disputes, or management decisions the reporter disagrees with. Inappropriate complaints submitted via this process will be returned to the reporter to address through the Matters for Resolution process. Abuse of this process to defame colleagues anonymously or to seek personal benefit is a serious violation of our principles of integrity and professionalism.

## Report Submission

Ethics hotline. Reports may be submitted by email to [ethics-hotline@commissionaires.ns.ca](mailto:ethics-hotline@commissionaires.ns.ca) or by voicemail at 902-429-8101 ext. 260. While anonymous complaints are permitted, they must include enough relevant detail to permit proper investigation. If the reporter discloses their identity, it will be kept confidential unless they provide permission for it to be disclosed to other specified individuals for the purposes of investigation. An investigation on the report will be carried out and reported to the CEO.

Reports implicating the CEO. In the case of reports specifically implicating the CEO, the report may be submitted by email to [ceo-ethics-hotline@commissionaires.ns.ca](mailto:ceo-ethics-hotline@commissionaires.ns.ca). Messages to this address will be forwarded to designated members of the Board of Governors for investigation.

## **Responsibilities**

All employees will report concerns about the serious ethical issues described above either through the Matters for Resolution process or the Whistleblower process.

The CEO will share and act on investigation reports as appropriate.

The Board of Governors will investigate ethical reports implicating the CEO.

## **Related Policies**

*CNS-001: Statement of Principles*

## **Related Work Instructions**

*CNS-HR-WI-003: Requests & Matters for Resolution*