

Encouraging a Speak Up Culture with *IntegrityCounts*

Our organization management strives to maintain high standards of ethical and responsible business conduct. We are committed to promoting ethical and honest behaviour and ensuring that all employees feel safe and secure in their work environment. We value an environment where employees feel comfortable in raising their concerns.

In support of this commitment, we are pleased to introduce a new service that incorporates best practices in governance and will enhance and encourage an ethical workplace. This new anonymous service will be provided through an independent third party, *IntegrityCounts*, to facilitate reporting of potential misconduct, or for employees who suspect illegal or unethical behaviour relating to any of the organization' operations. These could include:

- Fraud, Theft
- Accounting Irregularities, Financial Statement Disclosure Issues
- Non-compliance with Internal Accounting Controls
- Workplace Violence
- Substance Abuse
- Discrimination, Harassment
- Falsification of Company Records
- Conflicts of Interest
- Release of Proprietary Information
- Safety/Security Violations
- Malicious Property Damage
- Breaches of other Applicable Laws (environmental, employment, health and safety laws)
- Unethical or illegal behaviour



This service is not intended to replace your direct supervisor or Human Resources as an avenue of bringing forth concerns. It is intended to provide an unbiased and anonymous outlet for reporting troubling workplace situations when you are not comfortable with the alternatives. This ethics reporting service ensures that concerns can be raised regarding inappropriate conduct, in good faith without being subjected to retaliation, harassment or discriminatory treatment and having such concerns properly investigated. Our organization recognizes that reporting such behaviour in good faith and in accordance with our ethics policy is an important aspect of each co-worker's role with the organization. Each report to the ethics reporting service will be investigated thoroughly and appropriate action taken where necessary. Whistleblower matters are reported to the President and CEO of Company and the Director of Human Resources.

Anyone with a concern or inquiry should report it directly;

- To your Manager or Supervisor
- To your Human Resources Department
- To any member of the Senior Executive team

Or using *IntegrityCounts* confidential and anonymous reporting system available

- Online at <https://integritycounts.ca/>
- Through the 24/7/365 whistleblower hotline at 1 (866) 921-6714
- Through email at company@integritycounts.ca

The process for an employee who suspects illegal or unethical behaviour is as follows:

1. Employee identifies potential wrongdoing within the workplace.
2. Employee contacts the organization's reporting hotline or submits a report online if they feel they require assistance from outside the company.
3. If the report is by phone, the contact center agent collects and transcribes the information and provides a username and password to the employee for confidential follow up.
4. Appropriate organization representatives are notified of this report and a collective decision is made on whether to proceed with further investigation.
5. Follow up – if more information is required, the organization designate may contact the employee through the Whistleblower system. The system allows for an anonymous dialogue between the employer and the whistleblower. If the employee has given personal information, they may be contacted for further assistance.
6. The case is reviewed for action.
7. Any outcomes as a result of the case are made and the case is closed.