

Purpose:

The Business Council of Alberta (“BCA”) is committed to being honest, ethical and uncompromising in our actions including in the integrity of its financial reporting and execution of our duties. The purpose of this Whistleblower Policy is to encourage current and former employees, members, volunteers and Board members to communicate concerns of inappropriate behavior, actions or events of serious concerns about the BCA.

Policy Statement:

If at any time, the commitment to honesty, integrity and ethical behavior is not followed or appears in doubt, BCA will seek to identify and remedy such situations. Should an individual have reasonable grounds to believe that an employee, volunteer, member or board member has committed, or is about to commit, a “whistleblowing event”:

- The employee, volunteer or board member may disclose this information
- The complainant will be protected from reprisals;
- All parties to an investigation will be treated fairly and equitably;
- Confidentiality will be maintained to the greatest extent possible;
- If wrongdoing is found, appropriate remedial and disciplinary actions will be taken.

Definition – Reasonable Grounds of a “Whistleblower Event”

For the purposes of this Policy, a whistleblowing event is considered to have occurred if any one of the following incidents occurs:

- Accounting, auditing, or other financial reporting fraud or misrepresentation;
- Violations of federal or provincial laws that could result in fines or civil damages payable by BCA, or that could otherwise significantly harm BCA's reputation or public image;
- Unethical business conduct in violation of any BCA policies and/or BCA Code of Conduct;
- Danger to the health, safety, or well-being of employees, volunteers and/or the general public
- Harassment, discrimination or racism, sexism or discrimination of any kind.

Procedure

An individual is encouraged to report their concern to their immediate Supervisor or, if the individual is external to the organization, to the President or Board Chair. The recipient of a whistleblowing event must notify their direct supervisor of it, unless that individual is the focus of the event, in which case it should be provided to another individual of equal or greater position in the organization.

Where a satisfactory response is not received, or where one is uncomfortable addressing their concerns to their immediate Supervisor, a complaint may be

submitted in writing to the President, the Chair of the Board or Chair of the Audit Committee.

The written statement should include the following information:

- Description of the activity
- Date complainant became aware of the activity
- Name of individual suspected of the activity
- Steps taken (if any) prior to making complaint or allegation (i.e. spoke with supervisor)

Your written statement should be forwarded by email at whistleblower@businesscouncilab.com or by mail to:

The Chair of the Board of Directors
Business Council of Alberta
“To be opened by the Chair of the Board of Directors only”
c/o BLG

or if you wish to send your statement to BCA legal counsel:

Colin Poon
c/o BLG
Centennial Place, East Tower
1900, 520 – 3rd Ave. SW,
Calgary, AB, T2P 0R3

BLG (BCA’s legal counsel) will promptly forward, unread, any correspondence addressed in this manner to the Chair of the Board. If you would like to discuss any matter with the Board, you must indicate this in your submission and include a telephone number or email where you can be contacted if the Board deems it appropriate.

Investigation

Once a complaint is brought forward an investigation will commence. The Supervisor, President, the Chair of the Board or Chair of the Audit Committee in receipt of the complaint may enlist the assistance of other employees, legal counsel, accounting or other advisors as may be appropriate to conduct the investigation. A report will be prepared and any legal or other action will be taken as appropriate. Each complaint will be treated as confidentially as possible and with due care. The results of the investigation will be shared with the complainant to the extent possible and within reasonable time. The formal closure of a whistleblowing event review must occur with the agreement of the President and the Chair of the Board or the Chair of the Audit Committee.