

WHISTLEBLOWER AND GRIEVANCE POLICY

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Policy Statement

Cooperation Canada is committed to acting with integrity, transparency, and accountability. All employees, managers, volunteers, interns, contractors and Board Members working with or for Cooperation Canada have the right to a safe, respectful, and ethical work environment.

This policy aligns with and is guided by Cooperation Canada's Code of Ethics, Personal Code of Conduct, and the Prevention of Harassment, Discrimination, and Violence Policy and Program. This policy explains how to raise concerns about serious wrongdoing or personal workplace issues and how those concerns will be handled fairly and confidentially.

Purpose

The purpose of this policy is to:

- Encourage employees and Board Members to report serious concerns in good faith
- Explain the difference between whistleblower concerns and personal grievances
- Describe clear, safe steps for reporting concerns
- Protect individuals from retaliation when they raise concerns or participate in investigations

Scope

This policy applies to all Cooperation Canada employees, managers, volunteers, interns, contractors, and Board Members (herein the "Employees and Board Members").

Guiding Principles

All concerns raised under this policy will be handled according to the following principles:

Good faith: Concerns must be raised honestly and with reasonable belief that the information is true.

No retaliation: No one will face reprisals for raising a concern or cooperating in an investigation.

Survivor- / victim-centred approach: The safety, dignity, and choices of the person who experienced harm will be a priority, alongside minimizing re-traumatization and respecting confidentiality.

Confidentiality: Information will be shared only on a need-to-know basis.

Fairness: All parties will be treated respectfully and given an opportunity to be heard.

Timeliness: Concerns will be addressed as promptly as possible.

Definitions

Whistleblower Concerns: Whistleblowing involves reporting serious wrongdoing that affects Cooperation Canada, its reputation, its people, or the public interest. These concerns may involve legal, ethical, or safety risks.

Examples may include but are not limited to:

- Serious violations of Cooperation Canada policies
- Serious violations of Cooperations Canada's Code of Ethics
- Fraud, theft, or financial misconduct
- Serious misuse or abuse of authority
- Failure to comply with legal or regulatory obligations
- Actions that could seriously damage Cooperation Canada's reputation
- Risks to health, safety, or the physical environment

Personal Grievances: Personal grievances affect an individual directly and relate to workplace treatment or behaviour.

Examples may include but are not limited to:

- Harassment, sexual harassment, or sexual misconduct
- Discrimination based on protected grounds under the Ontario Human Rights Code
- Workplace violence or threats of violence
- Bullying or behaviour that undermines dignity, safety, rights or respect
- Violations of the Personal Code of Conduct

Detailed definitions and procedures for **harassment, discrimination, and violence complaints** are outlined in Cooperation Canada's Prevention of Harassment, Discrimination and Violence Policy.

Raising a Concern

Anyone who becomes aware of or reasonably suspects serious wrongdoing should raise the concern as soon as it is safe to do so.

How to Report

Concerns should be reported as follows:

- Employees should report concerns to their manager
- If the concern involves the manager, the employee should report concerns to the Deputy Chief Executive Officer
- If the concern involves the Deputy Chief Executive Officer, the employee should report concerns to the Chief Executive Officer

- If the concern involves the Chief Executive Officer, the employee should report concerns to the Board Co-Chairs
- If a concern involves a Board Member, employees should report concerns to the Chief Executive Officer
- Board Members should report concerns to the Board Co-Chairs
- If the concern involves one of the Co-Chairs, the Board Member should report concerns to the other Co-Chair

Informal Resolution

When appropriate and safe to do so, concerns may be raised directly by the complainant with the person who is the subject of the complaint to seek early and informal resolution. This is not required and is not appropriate in cases involving violence, harassment, abuse, or serious power imbalances.

Collective Agreement Grievances

Employees who are members of CUPE Local 3371 must follow the grievance process outlined in the Collective Agreement for complaints related to its interpretation or application. However, before starting a formal grievance, employees are encouraged to discuss the issue with their manager, where appropriate.

Resolution Options for non-Collective Agreement concerns

For concerns not covered by the Collective Agreement, the following options are available:

The person receiving the complaint will discuss available options with the complainant, which may include:

- Mediation (where appropriate)
- Investigation
- External reporting options (e.g., Ontario Human Rights Commission or law enforcement)

The person receiving the complaint will discuss available options with the complainant depending on the nature of the complaint. Options may include:

Mediation

If mediation is selected:

- A neutral mediator will work with the parties to seek resolution.
- Participation will be voluntary.
- If mediation does not resolve the issue, other options may be pursued.

Investigation Process

If investigation is selected:

Complaints should be submitted in writing using the designated complaint form (Appendix A).

Complaints should be submitted as soon as possible and no later than 30 days of the most recent occurrence of an incident other than harassment, discrimination, violence or sexual misconduct.

Complaints involving harassment, discrimination, violence or sexual misconduct should be submitted as soon as possible and no later than one year from the incident or most recent occurrence where behaviour is ongoing.

Investigation Steps

- The person who is the subject of the complaint (the “respondent”) will be informed of the complaint and provided with a copy
- The respondent will have 10 working days to provide a written response
- An investigator (internal or external) will be appointed
- The investigation will normally be completed within 90 days of receiving the complaint
- A brief summary of findings will be shared with the parties, as appropriate

Outcomes

Based on the findings, Cooperation Canada may take appropriate action, including:

- Education, information and / or coaching
- Written warnings
- Mandatory training and / or coaching
- Disciplinary action, up to and including termination
- Removal from the Board

Withdrawal of Complaints

A complainant may withdraw their complaint at any time. If a complaint is withdrawn after an investigation has begun, Cooperation Canada may still continue the investigation if required to meet legal, safety, or organizational obligations.

External Options

Nothing in this policy prevents an individual from:

- Filing a complaint with the Ontario Human Rights Commission
- Contacting law enforcement
- Seeking union representation or advice

Protection from Retaliation

Anyone who raises a concern and / or participates in an investigation in good faith will be protected from retaliation. Retaliation is a serious violation of this policy and may result in disciplinary action.

Reporting Procedure

The Chief Executive Officer and Co-Chairs will report annually to the Board on the number, nature and disposition of all complaints while ensuring that the confidentiality of individuals involved is maintained.

Policy Review

This policy will be reviewed at least annually and updated as required to ensure legal compliance and best practice.

Appendix A

Cooperation Canada Complaint Form

Employees, Board members, interns, volunteers, contractors and concerned individuals can make use of the anonymous complaint form. They can also submit a complaint using the form below.

The completed form should be submitted to the Complainant's manager, the Deputy Chief Executive Officer or Chief Executive Officer or Board Co-Chairs, as outlined in the policy.

Name and contact information of individual who is making the complaint (your name):

Name of person and contact information, if available, who is the subject of the complaint:

Details of the complaint: Please describe in as much detail as possible the nature of the complaint, including: (a) the names of the parties involved; (b) any witnesses to the incident(s); (c) the location, date and time of the incident(s); (d) details about the incident(s) (behaviour and/or words used); (e) any additional details. (Attach additional pages if required).

Relevant Documents/Evidence: Attach any supporting documents, such as emails, handwritten notes, or photographs. Physical evidence, as applicable, can also be submitted. If you are not able to attach documents and they are relevant to your complaint, please list the documents below. If someone else has relevant documents, please note that below.

Complainant Signature:

Date: