



Golf Canada
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Golf Canada Whistle Blower Policy

General Statement of Purpose

The Royal Canadian Golf Association, operating as Golf Canada (“Golf Canada”) is committed to fostering an environment conducive to open communication within the organization regarding Golf Canada’s business practices and to protecting employees or any other person from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical conduct. In an effort to further this commitment this policy:

- establishes guidance for the receipt, retention, and treatment of verbal or written reports received by Golf Canada regarding accounting, internal controls, auditing matters, disclosure, fraud and unethical business practices, whether submitted by Golf Canada employees or any other persons (“Reports”)
- establishes guidance for providing Golf Canada employees and any other persons (“Complainant”) a means to make Reports in a confidential and anonymous manner; and
- demonstrates Golf Canada's intention to discipline, up to and including termination of employment, any person determined to commit an act of reprisal against a Complainant.

Receipt

This policy shall be provided to Golf Canada employees and volunteers and shall be posted on the Golf Canada website. Golf Canada has designated the Chair of the Audit and Risk Management Committee, (or failing the Chair, another person on the Committee designated by the President or a Vice President), to be the recipient of all the Reports filed under this policy and who will also coordinate any necessary Golf Canada action.

Retention

Reports filed under this policy will be controlled and documented by the Chairman of the Audit and Risk Management Committee who shall maintain all related

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documentation for six years. All related documentation shall be retained in secured files to which only the Audit and Risk Management Committee Chair, and any future Chairs, and legal counsel shall have full access. The Audit and Risk Management Committee Chair shall provide a written report of the complaint to the Chief Executive Officer, the Human Resources Manager and the employee/volunteer implied in the complaint.

Treatment of Reports

All Reports will be taken seriously and addressed promptly, discreetly and professionally. Reports may be submitted anonymously or the person submitting the Report may request to remain anonymous and their desire for anonymity will be respected. Discussions and any documentation respecting the Reports will be kept in strict confidence to the extent appropriate or permitted by law. Should the person submitting the Report identify himself or herself, the Chairman of the Audit and Risk Management Committee will communicate to the person filing the Report the steps to be taken to address the Report.

Retaliation

Retaliation against any employee or other person that files a Report or voices a concern under this policy is strictly prohibited. Anyone determined to have engaged in retaliatory behavior or who fails to maintain a Complainant's anonymity if requested may be subjected to discipline, which could include termination of employment. Any Complainant who feels that he or she has been subjected to any behavior that violates this policy should immediately report such behavior to his or her supervisor, the Human Resources Manager or the Chairman of the Audit and Risk Management Committee. Anyone who knowingly files misleading or false reports or who do not have a reasonable belief as to the truth or accuracy of the Report, will not be protected by this policy and may be subject to discipline, including termination of employment, if an employee.

Review of Reports

A summary of reports received under this policy will be communicated to the Audit and Risk Management Committee at their regular meetings or on a more frequent basis should conditions warrant a more timely action.

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Love the game.
Grow the game.

golfcanada.ca

Pour l'amour du golf.
Pour l'avenir du golf.



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If you would like to file a Report under the terms of this policy, please contact Roland Deveau, Chairman of the Audit and Risk Management Committee, collect at 1-902-769-7126 or at deveaur@gov.ns.ca.

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