

Engineers Without Borders: Whistleblower Policy	
Subject: Whistleblower	Date of Issue: June 19, 2018
Approved By: Boris Martin, CEO	Review Date: TBD
Scope: EWB (National Office, Board, Chapters, Fellows, Ventures or other parties acting on behalf of EWB)	Policy Number: 1.4

Purpose: We at EWB believe that we each have a role to play in upholding the highest standards of ethical behaviours for anyone involved in the organization. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Engineers Without Borders (EWB) can address and correct inappropriate conduct and actions. It is the responsibility of all board members, employees, fellows and chapter members to report concerns about violations of EWB’s code of ethics or suspected violations of law or regulations that govern EWB’s operations. This policy is also intended for external parties, in the event that an EWB employee or EWB related parties are the perpetrators of seriously concerning acts or behaviours towards anyone, internally and externally.

Policy Statement: EWB requires Directors, fellows, chapter members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of EWB, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. If, at any time, this commitment is not followed or appears in doubt, EWB will seek to identify and remedy such situations. Accordingly, it is the Policy of EWB to ensure that when an employee, fellow, chapter member or board member has reasonable grounds to believe that another EWB employee, fellow, chapter member or board member has committed, or is about to commit, any wrongdoing, financial or otherwise, these steps will be followed:

1. The employee, fellow, chapter member or Board member may disclose this information through the process detailed in this Policy;
2. The matter will be reviewed and if warranted, investigated by the designated individual/committee;
3. The employee, fellow, chapter member or Board member will be protected from reprisals;
4. The subject of the disclosure will be provided with an opportunity to respond to the allegations;
5. All parties to an investigation will be treated fairly and equitably;
6. Confidentiality will be maintained to the greatest extent legally possible;
7. If wrongdoing is found, appropriate remedial and disciplinary actions will be taken.

Reasonable grounds of a “Whistleblower Event”

For the purposes of this Policy and as defined by Federal and Provincial legislation, a Whistleblower event is triggered if any one of the following incidents occur:

1. A contravention of any Canadian Act of Parliament or of the legislature of a Province;
2. A misuse of public funds or public assets;
3. A misuse of entrusted private funds or assets
4. A gross mismanagement or omission or neglect of duty;
5. An abuse of authority;
6. Sexual misconduct;
7. An act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment;
8. A serious breach of EWB Code of Conduct;
9. Breach of fiduciary duty and/or abuse of trust;
10. Knowingly directing a person to commit a wrongdoing set out above; or
11. Concealment of any of the above or any other breach of this policy.

Reporting Violations or Concerns:

Dependent on the employee/fellow/Chapter member/Board member involved in the financial or other wrongdoing, a written statement may be submitted to the individuals in the table below. Employees are encouraged to follow channels through management first, unless they have reason to believe that management may be involved or are otherwise implicated, due to some aspect of the reporting.

Reports under this policy must be in writing. Reports of alleged violations should be factual, rather than speculative, and should contain as much specific detail as possible to allow for proper assessment. The Whistleblower should be candid and should clearly set forth all of the information that the person knows regarding the allegation or concern.

WRONGDOING WITH RESPECT TO:	SUBMISSION TO BE SENT TO:
Any EWB Employee, Fellow, Chapter Member or other Party acting on EWB’s behalf	EWB Human Resources Department concerns@ewb.ca or CEO ceo@ewb.ca or Chair of Board of Directors ewbboardchair@ewb.ca
Member of the Management Team	CEO ceo@ewb.ca

	or Chair of Board of Directors ewbboardchair@ewb.ca
CEO	Chair of Board of Directors ewbboardchair@ewb.ca or Vice-chair(s) of Board of Directors ewbboardvicechair@ewb.ca
Member of Board of Directors	Chair of Board of Directors ewbboardchair@ewb.ca or Vice-chair(s) of Board of Directors ewbboardvicechair@ewb.ca
Chair of Board of Directors	Vice-chair(s) of Board of Directors ewbboardvicechair@ewb.ca

Handling of Reports and Investigation:

Once a Whistleblowing violation or concern is brought forward to the appropriate individual an investigation will commence. Depending on the incident, the Management Team and/or Board Governance Committee, shall be responsible to ensure appropriate and expeditious action is taken to investigate the allegation, after first determining who will lead such investigation. The designated individual/committee may enlist the assistance of outside legal, accounting or other advisors, as may be appropriate to conduct the investigation. Employees may be interviewed in the case of an investigation.

Incidents will be reported to the Board of Directors during quarterly board meetings, during the applicable board committee update, with a full written report sent in the board package. In cases where the violation or incident is deemed severe enough that the board needs to be notified immediately, the Board Health Safety Wellness Committee, Finance and Audit Committee or Board Governance Committee will be notified, depending on the nature of the Whistleblowing violation or concern. The Board shall also be informed with respect to all actions taken to follow up on any matter until it is officially closed.

Director of Finance shall immediately notify the Finance and Audit Committee (FAC) of any concerns or complaint regarding corporate accounting practices, internal controls or auditing. The investigators and the Director of Finance will work with the committee until the matter is resolved.

The results of the Whistleblowing violation or concern will be shared with the Whistleblower. This will not include details of any disciplinary action, which will remain confidential to the individual concerned.

Other principles that guide this policy:

Acting in Good Faith: An individual is not required to prove the truth of an allegation, but he/she is required to act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any individual who does not act in good faith in reporting a suspected violation may be subject to disciplinary action up to and including termination of employment or relationship with EWB.

No Retaliation: It is contrary to the values of EWB for anyone to retaliate against any board member, employee, fellow or chapter member who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of EWB. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. Similarly any volunteer or Board member found to be in violation of this “No Retaliation” policy may have their relationship with EWB terminated.

Confidentiality: Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The results of the Whistleblowing violation or concern will be shared with the Whistleblower. This will not include details of any disciplinary action, which will remain confidential to the individual concerned.

Approved by:



Boris Martin, CEO

Date: June 22, 2018