



SHEPHERD'S CARE FOUNDATION

SHEPHERD'S CARE FOUNDATION BOARD OF DIRECTORS' (BOARD) WHISTLEBLOWER POLICY

The Board of Directors has adopted a Whistleblower Policy to:

- Deter and detect illegal, unethical or otherwise improper activity (Wrongdoing) within Shepherd's Care Foundation (SCF) so as to protect the organization's mission including its resources, effectiveness, and reputation;
- Enhance the environment for residents, employees, and other stakeholders;
- Provide clear guidance for the safe disclosure of any Wrongdoing by, for, or in collaboration with a SCF Leader;
- Mitigate retaliatory action against whistleblowers and others who comply with the policy.

"Wrongdoing" means illegal, unethical or otherwise improper conduct by one or more SCF Leader including, but not limited to) one or more of the following activities:

- Fraud, including:
 - Theft, embezzlement, or misappropriation of funds or other assets;
 - Giving or receiving bribes, kickbacks, or other inappropriate payments or gifts;
 - Falsification of accounting, financial, procurement, safety, or other business records;
 - Deliberate misrepresentation of material information concerning the business affairs of SCF (e.g., relating to accounting, financial, procurement, or health and safety matters);
- Illegal conduct or action (violating any federal, provincial or municipal law);
- Gross misuse of SCF assets or resources;
- Corrupt accounting, financial reporting, procurement, or contracting practices;
- Violations of SCF Behaviour Standards, Code of Conduct, or Conflicts of Interest Policy;
- Abuse of authority;
- Conduct or action which poses a serious and immediate threat to the health, safety, or wellbeing of residents, employees, volunteers, contractors, or others;
- Retaliation; or
- Directing or counselling a person to commit a Wrongdoing described above.

A SCF Leader is a Strategic Leadership Team member including the President & CEO and/or a member of the Board of Directors and/or a non-Board Committee member.

The Board has engaged an external confidential disclosure (reporting) service (called Kingsgate) to receive confidential or anonymous reports (disclosures) of alleged Wrongdoing by one or more SCF Leader.

Any person who in good faith has reasonable grounds to believe one or more SCF



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Leader is or has been involved in Wrongdoing should, as soon as possible, report the information to Kingsgate. Reporting via Kingsgate does not alleviate a Whistleblower from any obligation they have to report pursuant to legislation (e.g., in the case of an allegation of resident abuse, as set out in *Protection for Persons in Care Act*).

Confidential or anonymous reports (disclosure) of alleged or suspected Wrongdoing can be made by anyone to Kingsgate via:

- Telephone: 587-416-4169
- Email: SCFwhistleblower@kingsgate.legal

Kingsgate does not provide legal advice or advice of any type to Whistleblowers.

A Whistleblower's report of Wrongdoing via Kingsgate should be factual, comprehensive, and as detailed as possible (e.g., include the nature of the alleged Wrongdoing, the names of person(s) alleged to be involved, the location of the alleged Wrongdoing, the date(s) of the alleged Wrongdoing, the names of potential witnesses). A lack of factual, comprehensive, and detailed information about the Wrongdoing may impact the viability of a full and fair investigation into the disclosure.

All reports of Wrongdoing will be received confidentially. To the greatest extent possible, the confidential nature of reports of Wrongdoing shall be maintained during investigative and resolution processes. However, absolute confidentiality cannot be guaranteed due to the need to conduct a full and fair investigation (e.g., the need to inform the alleged Wrongdoer(s) and possible witnesses) and the possible need to take follow-up action. In the event of substantiated Wrongdoing, corrective measures will be implemented against any Leader and may include a variety of measures. Retaliation will not be tolerated. Any Retaliation should also be reported to Kingsgate.

All reports may also be made anonymously. However, if an investigator cannot contact the Whistleblower for more information because the Whistleblower wishes to remain anonymous, it may impact the viability of a full and fair investigation. It is for this reason that it is preferred that the report of Wrongdoing include the name of the Whistleblower and their contact information.

All persons contacted to participate in the investigation and/or resolution of a report of Wrongdoing shall cooperate in good faith.

It is a violation of the Board's Whistleblower Policy to make a malicious or knowingly false report of Wrongdoing. A Whistleblower found to have maliciously or knowingly reported false allegations of Wrongdoing may face the following adverse consequences:

- Discipline or other such corrective measures (in the case of a SCF Leader or employee); and
- Legal action and/or referral of the matter to appropriate law enforcement/regulatory agencies.

When a Whistleblower in good faith, reports alleged Wrongdoing that is determined to be unsubstantiated, the Whistleblower will not face adverse consequences.