

Whistleblowing Policy	Policy Number: PA-106
Last Reviewed: 2019/09/01	Next Review: 2020/09/01

Purpose: The Whistleblowing Policy aims to enable individuals to come forward with information on illegal practices or violations of organizational policies to create an ethically responsible organization. This policy aims to increase public trust and confidence, prevention, risk management, and initiates cooperative processes of mediation and alternative dispute resolution. Pinnguaq Association encourages individuals to report illegal practices or violations of organizational policies without fear of reprisals or retaliation, while ensuring the confidentiality of individuals who make good-faith reports.

Policy Statement:

1. Individuals are encouraged to disclose any information, or knowledge of illegal, immoral, unethical, practices or violations of organizational policies by employees, or stakeholders of Pinnguaq.
2. No form of reprisal or retaliation against individuals who report in good faith are acceptable. Any individual who retaliates against an individual who has made a disclosure in good faith may be subject to discipline up to and including termination.
3. Anonymity of the individual reporting in good faith will be protected when requested.
4. Any reports made by an individual that are not in good faith will be viewed seriously; including reports made for malicious or of a frivolous nature. Any individual making such a disclosure may be subject to discipline up to and including termination.
5. Disclosures will be followed up on using the Internal Complaint and Resolution Process (ICRP) [PA-006].

1. Definitions:

1.1. “Disclosures” include, but are not limited to, information concerning:

- 1.1.1. Any act that is or reasonably seems to be illegal, immoral, unethical.
- 1.1.2. An act or omission constituting a violation of Pinnguaq’s policies, standards or practices.
- 1.1.3. An act or omission constituting an offence under any territorial/provincial or federal legislation.
- 1.1.4. An act or omission that creates a substantial and specific danger to the life, health or safety of persons or to the environment.

1.1.5. Waste, fraud, abuse, misreporting, and/or gross mismanagement.

2. **Reporting Procedure:**

- 2.1. Individuals are encouraged to report incidents immediately to the Human Resource Manager or their direct supervisor.
- 2.2. Pinnguaq Association will respond to each disclosure in a timely and efficient manner using its Internal Complaint and Resolution Process (ICRP) [PA-006]

NOTE: each case is subjective due to its serious, complexity, and timeliness of disclosure, thus impacting time and resources required for investigation.