

## **Whistle Blower Policy**

*ALPINE CANADA ALPIN (ACA) wishes to maintain the highest standards of openness, honesty and accountability.*

### **Scope**

This policy applies equally to all employees, directors, coaches', athletes, team personnel, contractors and related personnel

N.B. Proposed Federal Whistle Blower Legislation shall be considered as adding to and strengthening this policy with the force of law. Other provincial laws and legislation shall also be considered as also augmenting this policy.

### **Policy Objective**

The policy is designed to encourage and enable those who have legitimate and serious concerns regarding the organization's conduct raise those issues in a setting free of the threat of victimization, subsequent discrimination or disadvantage.

Maintaining the strong reputation of ACA is the core intention of this policy. All those identified in the scope of this policy may be assured that concerns will be dealt with expeditiously, and in a confidential and timely manner.

### **Application**

This policy applies to real concerns about wrongdoing in relation to financial and non-financial matters within ACA.

### **Definitions**

Wrongdoing involves unlawful or illegal behavior and includes but is not limited to:

- Unlawful acts
- Questionable accounting or auditing practices
- Dangerous practices likely to cause physical harm
- Abuse of power or authority
- Discrimination

### **Filing a Complaint**

The complaint or observation should be specific, preferably written and should identify any relevant documents.

All complaints or concerns should be directly reported to your immediate supervisor or the appropriate leadership position within ACA.

Any 'person' who makes a disclosure or raises a concern under this policy will be protected, assuming:

- The information is disclosed in good faith
- Said person believes the claim to be substantially true
- None of the allegations are found to be malicious

- One is not seeking personal or financial gain

The seriousness or complexity of a complaint will have a bearing in the amount of time required to resolve the issue. Nevertheless, within ten business days of a concern being raised, the 'person' will receive a written acknowledgement of the receipt of the complaint, along with:

- A summary of initial inquiries
- Proposal on how to deal with the matter(s)
- An estimate on the time required

The complainant will have the opportunity in the ensuing five-day period to respond with suggested modifications to the proposed course of action.

### **Discipline**

In addressing the matter(s), every effort will be made to minimize the difficulties that the complainant may experience, and ACA will not attempt to apply any sanction or detriment to those who bring forward legitimate concerns regarding any wrongdoing. Confidentiality and anonymity will be respected when requested.

Unacceptable behavior that does not result in immediate dismissal may be dealt with in the following three-step manner:

1. Verbal warning
2. Written warning
3. Dismissal

ACA will consider the making of a deliberately false allegation as a serious disciplinary offence. False and vexatious allegations may be considered as harassment and may be dealt with under the Harassment and Discrimination Policy under the ACA sole discretion permitting the harasser due process as defined in the policy.

**In addition to the reporting measures outlined in the policy above**, Alpine Canada engages an independent, third-party resource to whom breaches or suspected breaches of this policy can be reported in strict confidence. This reporting option can be used in addition to or in lieu of the other reporting options mentioned above.

**All individuals who witness or believe they have witnessed, or been a victim or believe they may have been a victim of a breach of conduct, should report the incident via either channel of reporting immediately.**

Alpine Canada Alpin, third-party contact:

Ilan Yampolsky  
1.613.614.6816  
[iyampolsky@icloud.com](mailto:iyampolsky@icloud.com)