

## **Variety Village Whistle Blower Policy**

Effective Date: November 2014  
Revised and/or Reviewed: April 2016  
Revised and/or Reviewed: December 2017

### **Introduction:**

Variety Village and Variety-the Children's Charity (Variety) is committed to operating in compliance with all federal and provincial applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees or volunteers. This policy outlines the procedures for employees or volunteers to report actions that they reasonably believe violates a law, regulation or that constitutes fraudulent practices. The act of reporting such violations is referred to as whistle blowing. This policy applies to any matter that is related to Variety's business and does not related to the private acts of an individual not connected to the business of Variety.

It is equally important to understand what does *not* constitute whistle blowing. It is not about individual concerns, complaints, grievances or issues related to matters such as, but not limited to, employee conduct, harassment, discrimination, accessibility, copyright, intellectual property, individual health and safety, management or employee performance.

### **Disclosure:**

If an employee has a reasonable belief that an employee or Variety has engaged in any wrongdoing such as a deliberate action that violates applicable laws, or regulations, including those concerning accounting, auditing, or constitutes a fraudulent practice, misuse of public funds, an act or omission that creates a substantial and specific danger to the life, health, safety or welfare of the public or to the environment, the employee is expected to immediately disclose such information in writing to the President & CEO. If the employee does not feel comfortable reporting the President & CEO, the employee is expected to report the information in writing to the CFO.

### **Investigation:**

Such disclosures will be followed up promptly and an investigation will be conducted. Variety will strive to keep the identity of the employee making the disclosure as confidential as possible.

All employees and members of the Board of Directors, as well as suppliers are expected to cooperate fully in any investigation or other process under this policy and are responsible for providing accurate information and for participating, as appropriate, in investigations and other processes used to address concerns that are raised.

The Audit Committee of Variety's Board of Directors is responsible for oversight of the Whistle Blower Policy and be responsible for reviewing any complaints received under this policy.

**Employee Protection:**

Variety will not retaliate against an employee who, in good faith, makes a complaint/disclosure or raises a concern in accordance with this policy or discloses information to an external agency/body, against Variety or an employee of Variety on the basis of a reasonable and honest belief that the information is true and in the public interest. This would include protection from ending or threatening to end employment, disciplining or threatening to discipline, coercion or intimidation.

**Bad Faith Complaints**

If an employee makes a complaint under this policy in bad faith (intent to deceive) or knowingly provides false or materially inaccurate information, they will be subject to disciplinary action actions, including reprimand, suspension, or termination.