



## WHISTLEBLOWER POLICY

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Approved by resolution of the Board of the Architectural Woodwork Manufacturers Association of Canada ("AWMAC") and adopted and made effective on October 27, 2020.

### 1. STATEMENT

Where an employee, contractor or volunteer of AWMAC (a "**Participant**"), acting in good faith and based on a reasonable belief, becomes aware of actual, suspected or intended misconduct, unlawful activity, suspicious financial management, or other accountability concerns (a "**Violation**"), they have a duty to report such Violation(s), as soon as learning of them, in accordance with this Whistleblower Policy (the "**Policy**").

A Participant of AWMAC, acting in good faith and based on a reasonable belief, may refuse to carry out any order or direction which is illegal, unethical, or against company policy and which is given by an individual who has direct or indirect control over the Participant's activities (a "**Refusal**").

Participants are expected to co-operate fully during any investigation or proceeding related to any Violation or Refusal under this Policy.

This Policy applies to and is binding on all AWMAC Participants and shall apply throughout the course of their participation in, and activities with, AWMAC. The obligations of the Participants are legally binding and are, among other good and valuable consideration, in consideration of the Participants being permitted to fill their role within AWMAC.

### 2. PURPOSE

2.1. The purpose of this Policy is:

- a) to provide Participants with a framework whereby they can (and are obligated to) disclose any knowledge of actual or intended Violations; and
- b) to provide Participants who provide such disclosure and who are acting in good faith, and based on a reasonable belief, with protection from any form of retaliation or threat of retaliation when they do provide such disclosure or make a Refusal.

### 3. NO RETALIATION CLAUSE

3.1. No Participant who in good faith reports a Violation or undertakes a Refusal shall suffer harassment, retaliation or adverse consequence. A Participant who retaliates against someone who has reported a Violation or undertaken a Refusal is subject to disciplinary action, including but not limited to termination of their position with AWMAC. This Whistleblower Policy is intended to encourage Participants to raise serious concerns within the organization and it is vital that Participants not fail to raise such concerns due to fears of reprisal.



#### **4. REPORTING VIOLATIONS**

- 4.1. This policy addresses AWMAC's open-door policy and suggests that Participants share their questions, concerns, suggestions or complaints with someone who can address them properly. This policy requires and obligates Participants to report Violations or suspected Violations immediately, and gives Participants the ability to partake in a Refusal where the circumstances allow.
- 4.2. All Participants should contact the Executive Director, or in the case of the Violation or Refusal relating to the Executive Director, the President, to address an area of concern. If the Participant is not comfortable speaking with the Executive Director, or is not satisfied with the response, the Participant is encouraged to speak with the President. If the Participant is not comfortable speaking with the President or is not satisfied with the response, the Participant is encouraged to speak with the Vice-President.
- 4.3. Individuals who receive reports of a Violation in confidence are required to report suspected or actual Violation(s) immediately.

#### **5. CONFIDENTIALITY**

- 5.1. Violations or suspected Violations may be submitted on a confidential basis by the complainant or submitted anonymously to the respective authority, as described above. Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

#### **6. INVESTIGATIONS**

- 6.1. AWMAC will ensure that guidance is available to anyone who receives information about a Violation and that appropriate procedures are in place for investigating and reporting the same. Every Violation reported will be promptly and thoroughly investigated.

#### **7. REPORTING OF UNLAWFUL CONDUCT**

- 7.1. Nothing in this policy is meant to take precedence over a Participant's duties under federal or provincial law, or common law. Any unlawful misconduct or incident which may affect public safety should be reported to the proper, lawful authorities immediately.