



## WHISTLEBLOWER POLICY RELATING TO REPREHENSIBLE ACTS

### INTRODUCTION

The *Société zoologique de Granby Inc.* is a non-profit organization with the mission to *Taking action to preserve wildlife.*

In order to fully carry out its mission, the *Société* has put in place modern governance guidelines to ensure that its management is fully transparent.

As part of these governance guidelines, the *Société* has established the present Whistleblower Policy Relating to Reprehensible Acts.

### 1. PURPOSE

The purpose of this policy is to prevent, report and rectify any reprehensible acts that may be committed by employees of the *Société*, including its management, or members of its board of directors, or by third parties towards the *Société*, or its employees and administrators.

### 2. REPREHENSIBLE ACTS

For the purposes of this policy, reprehensible acts are defined as breaches or violations by the *Société*, any of its employees, members of the management team or an administrator, of applicable laws and regulations, generally recognized ethical guidelines or codes of conduct, laws and regulations designed to protect animals. A reprehensible act could also be committed by a third party towards the *Société*, one of its employees or directors.

Reprehensible acts include but are not limited to the following:

- Criminal acts, for example, fraud or theft
- Important breaches relating to financial reporting or generally accepted accounting guidelines
- Information or document falsification
- Important breaches relating to workplace health and safety regulations, including those relating to animal care
- Discriminatory gestures or words, contrary to the protections granted by the *Québec Charter of Human Rights and Freedoms*
- Violations relating to environmental legislation
- Questionable business practices
- Practices that could jeopardize the reputation of the *Société*
- Any unethical practice.

### **3. RESPONSIBILITY**

The *Société's* Board of Directors' Governance Committee is responsible for implementing this policy.

To ensure the effectiveness of the policy, the Governance Committee will, among other tasks, establish procedures for receiving, processing and recording complaints and investigation files.

To this end, the Governance Committee is mandated to receive complaints, process them and, if it deems appropriate, investigate them or appoint an independent investigator.

The Governance Committee will take specific steps to ensure, at every stage of the complaint process, that no member of the Governance Committee or investigator has a conflict of interest in dealing with a complaint. If so, it will take the appropriate measures to immediately put an end to any such conflict of interest.

### **4. CODE OF ETHICS AND CURRENT RECOURSE**

Whenever possible, employees and directors of the *Société* are encouraged to report reprehensible acts through the procedures provided for in the Code of Ethics for the *Société's* Employees, or the Code of Ethics for the *Société's* Board of Directors.

As well, when possible, employees use the *Société's* internal recourse channels to denounce any reprehensible act that may have been committed by another *Société* employee.

When this is not possible or appropriate in a given circumstance, an employee of the *Société* may file a complaint under this policy with the Governance Committee.

## **5. NON-RETALIATION FOR COMPLAINTS MADE IN GOOD FAITH AND FOR WITNESSES**

No complainant, including any employee of the *Société*, will be subjected to retaliation of any kind by the *Société*, any of its employees or representatives because they have reported, in good faith, a reprehensible act, or believed it to be reprehensible for the purposes of this policy.

Likewise, no person, including any employee of the *Société*, who discloses in good faith information relating to the complaint or testifies concerning the complaint, will be subjected to retaliation of any kind by the *Société* or any of its employees or representatives.

The Governance Committee makes sure that these guidelines are complied with.

## **6. LODGING A COMPLAINT AND ANONYMITY**

Any complaint pursuant to this policy may be filed by using the link indicated on the Zoo de Granby's website.

The complaint is processed by a computer system in such a way that, if the complainant so wishes, their name, contact details and the information they disclose remain anonymous. The complainant should be informed of this possibility as soon as they access the appropriate form on the website for submitting their complaint.

The complaint can also be sent anonymously by mail, if the complainant so wishes, under a confidential cover to the following address:

**Comité de gouvernance / Governance Committee**

Société zoologique de Granby inc.

525, rue Saint-Hubert

Granby, Québec J2G 5P3

The complaint should state as many details as are relevant to ensure that it is adequately processed. In particular, the complaint should state, to the extent possible, the acts complained of, the date, the place and the names of the people involved.

**7. INVESTIGATION AND CONCLUSIONS**

The Governance Committee receives the complaint and, if applicable, determines the most appropriate method of investigation to ensure that the objectives of this policy are met. This includes, when the circumstances so require, assigning an independent investigator to the case.

Upon receiving the complaint, the Governance Committee will, if possible, contact the complainant to inform them of the complaint and to notify them that the investigation will begin shortly, or that after a preliminary review, there will be no investigation under the policy because the alleged events in the complaint are deemed insufficient or frivolous, or that the complaint will be forwarded to the appropriate authority for further investigation.

An investigation is carried out without delay, and a confidential report is prepared by or submitted to the Governance Committee. The latter makes sure that the necessary measures or remedial actions are taken with diligence by the Société's board of directors, its president or general management, as the case may warrant.

All employees of the *Société* must cooperate fully in any investigation pursuant to this policy.

The Governance Committee will, if possible, inform the complainant of the summary results of its investigation and whether any remedial action has been recommended or taken. In all cases, for confidentiality and security reasons, the investigation report will not be shared with the complainant.

As in the case of a complaint, the summary results of the investigation are disclosed to the complainant via a computerized system allowing them to remain anonymous, if they so wish.

## **8. RETENTION OF COMPLAINT AND INVESTIGATION FILES**

The Governance Committee makes sure that special security measures are implemented to ensure that filed complaints cannot be altered or deleted.

The investigation files, including the complaint, the information and documents collected, as well as the conclusions of the investigation, remain confidential. The Governance Committee is responsible for ensuring that this confidentiality is maintained and that the laws concerning the protection and retention of personal information are complied with in this regard. The investigation file will only be disclosed if the Law so requires.

## **9. POLICY PUBLICATION**

The *Société's* Sales, Marketing and Communications Department is responsible for making this policy easily accessible and identifiable on its website, so that a person wishing to make a complaint about an act that they consider reprehensible can easily find it and file a complaint through a procedure integrated into the website.

## **10. POLICY REVIEW**

This policy will be reviewed by the *Société's* board of directors every three (3) years.