The Calgary Foundation “TCF” is committed to the highest standards of openness, honesty and accountability as set out in its Code of Ethics and Standards.

Board members and employees must report good faith suspicions of illegal, unethical and other inappropriate activity.

This policy is also intended to provide a method for other stakeholders (volunteers, suppliers, grant recipients, donors and consultants, for example) to voice their concerns regarding TCF’s business conduct.

**Reporting Violations**

TCF has an open-door policy and encourages employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee’s manager is in the best position to address an area of concern. However, if an individual is not comfortable speaking with his or her manager or is not satisfied with the manager’s response, they are encouraged to speak with anyone in management who they are comfortable approaching. Managers are required to report suspected violations to the CEO. When the individual is not satisfied or is uncomfortable following the organization’s open-door policy, he or she should contact any one of the CEO, the Board Chair or Vice Chair or a member of the Audit Committee directly.

Whenever practical, reports should be in writing. Reports may be submitted anonymously. However, it should be recognized that anonymity may hinder an investigation.

The CEO, as the organization’s compliance officer, is responsible for investigating and resolving all reported complaints and allegations. If the complaint or allegation involves the CEO, the Board Chair shall lead such investigation. At his/her discretion, the Board and/or the Audit Committee shall be advised.

**No Retaliation**

No person who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage raising concerns within the organization prior to seeking resolution outside the organization.
Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violations must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation and is made without malicious intent.

Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The CEO will acknowledge receipt of the reported violation or suspected violation with five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.