



Policy Title: Whistleblower Policy
Approving Body: Executive Director
Responsible Manager(s): Executive Director
Effective Date: November 20, 2024
Last Revision Date: October 8, 2025

1. Policy Overview

- 1.1. This policy sets out the guidelines and procedures for communicating events of serious concerns about WUSA¹'s operations and serves as a critical tool for protecting individuals who report activities believed to be illegal, dishonest, unethical, or otherwise improper.
- 1.2. The aim is to encourage reporting of suspected wrongdoing as soon as possible, with the assurance that their concerns will be taken seriously, without fear of reprisals even if they turn out to be mistaken.

2. Scope

- 2.1. This Policy applies to all employees, volunteers, members, and other stakeholders who have a business relationship with WUSA.

3. Whistleblower Event

- 3.1. Examples of whistleblower events include but are not limited to:
 - i. Accounting, auditing, or other financial reporting, fraud, or misrepresentation
 - ii. Miscarriage of justice
 - iii. Violations of federal or provincial laws that could result in fines or civil damages payable by WUSA, or that could otherwise significantly harm WUSA's reputation or public image
 - iv. Unethical business conduct or illegal conduct, such as theft, corruption, bribery, violence or threatened violence, and criminal damage against property.
 - v. Involvement in activities that can pose a danger to the health, environment, safety, or well-being of employees, volunteers and/or the public.
 - vi. Breach of internal policies and procedures.
 - vii. Bullying, physical/sexual harassment, and those actions impacting on dignity at work

¹ Federation of Students, University of Waterloo operating as the Waterloo Undergraduate Student Association (WUSA)

- 3.2. Note that a report can be filed even before the occurrence of the whistleblower event where there is reasonable and justifiable reason to believe that such an event is about to occur.

4. Procedure

- 4.1. A complaint may be submitted in writing to the appropriate Manager, the Executive Director, the President, Governance Manager or Human Resources.
- 4.2. The written statement should include the following information:
 - i. Description of the activity
 - ii. Date complainant became aware of the activity
 - iii. Name of individual suspected of the activity
 - iv. Steps taken (if any) prior to making the complaint or allegation
 - v. Any evidence or witness.
- 4.3. The complainant will not be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against as a result of communicating a genuine concern.
- 4.4. Anyone reporting a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed is accurate.
- 4.5. The amount of contact between the complainant and the investigating body will depend on the nature of the issue and the clarity of the information provided. The investigating body may seek further information from the complainant.
- 4.6. Any allegations that prove to have been made maliciously or intentionally false will be viewed as a serious disciplinary offense and appropriate disciplinary action (up to and including dismissal) may be taken.
- 4.7. All complaints will be treated as confidential and sensitive. In addition, the complainant shall be provided the opportunity to remain anonymous, save and except in those circumstances where the nature of the disclosure and/or the resultant investigation make it necessary to disclose identify (for example, legal investigations or proceedings). In such cases, all reasonable steps shall be taken to protect the complainant from harm as a result of having made a disclosure.

5. Investigation Process

- 5.1. An investigation will be promptly initiated once a whistleblower report has been filed. The investigation will be conducted in a fair and impartial manner, involving individuals with appropriate expertise within WUSA. The investigation process may

involve collecting evidence, interviewing relevant parties, and conducting a thorough review of the reported concerns.

- 5.2. To the extent possible and permitted by law, WUSA will maintain the confidentiality of the investigation process and the individuals involved. Disclosure of information will be limited to those who have a legitimate need to know or as required by law.
- 5.3. After completing the investigation, WUSA will take appropriate action to address the reported concerns. This may include disciplinary action, corrective measures, process improvements, or other actions deemed necessary to address the issue effectively.

6. Complaint Against Officers

- 6.1. The following protocol will apply to complaints involving officers:
 - i. Complaints against the Executive Director will be managed by the President and Legal Counsel.
 - ii. Complaints against the President will be managed by the Vice President and Legal Counsel.
 - iii. Complaints against the Vice President will be managed by the President and Legal Counsel.

7. Board Reporting

A report will be provided to the Board at the confidential session of its meeting where there has been a whistleblower event reported and the status of the investigation.

8. Compliance and Enforcement

- 8.1. Compliance with this policy is mandatory and failure to comply with the provisions of this policy may expose WUSA to significant risks, including but not limited to: operational; legal/regulatory; financial; reputational; safety and security risks. Non-compliance may therefore lead to the enforcement of disciplinary measures such as warnings, suspension, or termination, depending on the severity of the violation.
- 8.2. Anyone who becomes aware of a violation or potential violation of this policy is required to promptly report the issue to their manager, or through the whistleblower or reporting mechanism detailed in this policy.