



Title: Ethics Reporting Policy	Policy No.: R 2.1
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1.0 Purpose

This policy provides the framework for reporting improper activity, and other situations of concern that go against YMCA's Ethical Conduct Policy.

2.0 Persons Affected

This policy applies to all employees, volunteers and interns (student placements).

3.0 Policy

We uphold high ethical standards that justify this trust through an ongoing commitment to our values and dedication to transparency, openness and accountability. Staff and volunteers are expected to report any situation they may become aware of that may appear to involve an improper activity.

The ethics reporting procedure helps uphold YMCA commitments by providing a variety of ways to report improper activity or other concerns in important areas, and by providing protection against reprisal for anyone who makes a report or disclosure in good faith.

In no case shall anyone who reports incidents in good faith face reprisal or discipline. Acts of reprisal include, but are not limited to, coercion, threats, violence, workload reassignments, denial of promotion or pay increase, or any other manner of retaliation. Any acts of retaliation should be reported immediately to Human Resources.

Reports are kept confidential to the extent possible. In most cases in order to be able to act on a report, some information may be communicated to others who have a need to know. There may be situations where legal obligations are involved, and the identity of those familiar with the facts needs to be disclosed to the authorities.

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4.0 Definitions

Improper activity is any activity at the workplace that is in violation of a law or regulation or YMCA policy and procedure including, but not limited to, a wrongdoing, breach of or non-compliance with an accounting, legal, regulatory, contractual, YMCA policy or procedure, or other obligation.

Conflict of Interest refers to a situation where an employee's personal relationship(s) or financial interest(s) are or could be at odds with the YMCA's best interests. Refer to the YMCA Conflict of Interest Policy for further details and information.

Good faith reporting is making a report or disclosure in good conscience with an honest belief, for the purpose of remedying an improper activity or condition at the workplace.

Protection against reprisal means that no YMCA staff may retaliate against or disadvantage in any way the employment or volunteer activity of anyone who makes a report in good faith, or threaten, harass, discriminate against employment including compensation, terms, promotion, or otherwise isolate or negatively treat anyone who makes a report in good faith, even if after further investigation of a report or disclosure was not deemed an improper activity requiring action.

5.0 Responsibilities

5.1 All staff and volunteers are required to:

- 5.1.1 Conduct YMCA business in a legal and ethical manner at all times in keeping with the YMCA Ethical Conduct Policy.
- 5.1.2 Report immediately to their manager or hotline service provider any known or suspected improper activity, or report on behalf of another staff or volunteer or external party any concern involving a staff member, volunteer, supplier, or other party doing business with the YMCA.
- 5.1.3 Maintain strict confidentiality by not discussing the disclosure with other individuals.
- 5.1.4 Respect the reputation of individuals by not making a trivial or malicious allegation or report, which may be motivated by ulterior or personal motives.

5.2 Senior Managers and supervisors are required to:

- 5.2.1 Promote a culture of open communication where issues and concerns can be dealt with at the workplace and ensure staff and volunteers are aware of the processes available to report concerns including known or suspected improper activity.
- 5.2.2 Protect from reprisal any staff or volunteer who reports in good faith.
- 5.2.3 Handle responsibly any report or disclosure from a staff member or volunteer or other party doing business with the YMCA by:
 - 5.2.3.1 Ensuring disclosures are reviewed and reported to the

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appropriate GM / VP / SVP or member of CEO Council in a timely fashion. Management shall ensure investigation when required, and appropriate action is taken to correct the situation.

- 5.2.4** Provide follow-up with the individual who reports suspected improper activity, by obtaining additional information if needed to evaluate or investigate the report.

6.0 Procedures

- 6.1** An employee or volunteer who knows of or suspects improper activity at the workplace shall follow the steps outlined below:

6.1.1 Reporting a concern:

- 6.1.1.1** Raise a concern directly with a supervisor, or the person or function affected or whose duty it is to look after the matter, or their supervisor once removed. Specific information includes names, dates, places, events that took place, the individual's perception of why the incident(s) may be an improper activity or violation of an obligation, and if applicable, what action the individual expects or recommends be taken.

- 6.1.1.2** If necessary, reporting anonymously is possible however, the staff or volunteer should keep in mind that reporting anonymously limits the YMCA's ability to evaluate or investigate the report or disclosure.

- 6.1.1.3** If regarding a conflict of interest, refer to the YMCA Conflict of Interest Policy in Operating Policies for specific details on how to report and respond to a conflict of interest situation.

- 6.1.1.4** If it is not possible to raise a concern directly, or the individual prefers to report a concern externally, the individual may submit a report to the hotline service provider: WhistleBlower Security, a third party, confidential reporting system, by any one of the following ways:

- 6.1.1.4.1** Online through a secure web site at: www.whistleblowersecurity.com (secure website)

- 6.1.1.4.2** By phone through a YMCA of Greater Toronto dedicated toll-free number: 1-866-921-6714

- 6.1.1.4.3** By email at: ymcagta@whistleblowersecurity.com

- 6.1.1.4.4** By mail through the confidential post office box at: WhistleBlower Security Inc., PO Box 91880, West Vancouver, BC V7V 4S4

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6.1.2 Review and Investigation: Provided that sufficient information has been provided through the report or disclosure, the person to whom the report has been made will determine if it is within their ability to handle it and, if not, the matter shall be referred to the appropriate senior manager.

6.1.2.1 The report will be reviewed to determine the appropriate action, and if sufficient information has been provided, management may have the matter investigated in consultation with HR and legal counsel as needed.

6.1.2.2 The staff member or volunteer making a report or disclosure shall be told of the status of their report or disclosure, unless there are legal or other overriding obligations to consider.

6.1.2.3 The Audit Committee shall receive a summary of all reports made under the YMCA's Ethics Reporting Policy at least annually.

7.0 References and Links / Related Documents including links to Management Practices

- YMCA Conflict of Interest Policy in YMCA Operating Policies

8.0 Review/Revision History

Date	Revision No.	Revision Type	Reference Section(s)
November 1, 2022	4.0	Minor	Update to contact information. Revised definitions
March 2, 2021	3.0	Minor	
June 2019	2.0	Minor	
January 1, 2009	1.0	New Policy	N/A