

# WHISTLEBLOWER PROTECTION

## OBJECTIVE/BACKGROUND

This policy speaks to the Canadian Foodgrains Bank's commitment to safety, security, and confidentiality for people who report alleged wrongdoing on the part of those working or volunteering for, representing, or being funded by the Foodgrains Bank.

This policy is a partner policy to our *Anti-Fraud and Corruption, Harassment, Prevention of Sexual Exploitation and Abuse, Standards of Conduct, and Standards Compliance* policies and our *Complaints Mechanism*.

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## DEFINITIONS

**Whistleblower** – a person who reports any alleged wrongdoing by any person or organization working or volunteering on behalf of, representing, or being funded by the Foodgrains Bank.

**Wrongdoing** – includes, but is not limited to, a violation of Foodgrains Bank's policies/rules, government laws, or engagement in harassment, sexual abuse and exploitation, fraud, corruption, or otherwise dishonest, unethical, dangerous or improper behavior or conduct.

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## POLICY

1. Foodgrains Bank encourages reporting of wrongdoing by any person or organization working or volunteering on behalf of, representing, or being funded by the Foodgrains Bank.
2. Foodgrains Bank will protect the confidentiality of whistleblowers except where to do so would place the whistleblower at risk or where required by law.

Whistleblowers may report complaints anonymously, but must understand that anonymity may hamper the investigation of the alleged wrongdoing.

3. Foodgrains Bank will not retaliate against a whistleblower who submits a complaint in good faith, and will seek to protect whistleblowers from retaliation such as employment termination, compensation decreases, poor work assignments, public condemnation, and threats of physical harm.

If it is determined that a complaint was malicious or frivolous, the Foodgrains Bank reserves the right to take corrective or disciplinary action as appropriate to the incident and the relationship of the whistleblower to the Foodgrains Bank.

4. Foodgrains Bank will comply with applicable whistleblower laws in Canada and in countries in which we operate.

## PROCEDURES

1. The Foodgrains Bank will follow its response and investigation processes as outlined in the *Complaints Mechanism* and relevant policies in response to reports of alleged wrongdoing.
2. Any whistleblower who believes they are being retaliated against may contact the human resource director seeking protection and redress.