

**THE GOOD SAMARITAN SOCIETY
PROCESS MANUAL**

Title: Whistleblower

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Approved: Executive Management Com

Category: Ethics

(Signature): _____

Original Date: 2008 September 9

Designation: Society Wide

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PURPOSE

In support of The Good Samaritan Society mission, vision and values the GSS Code of Ethics and Code of Conduct require the Board of Directors and all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this Whistleblower policy is to ensure organizational health, to create a climate of corporate integrity and to comply with all applicable laws and regulations.

It is the responsibility of all employees to comply with the Code of Conduct and to report violations or suspected violations in accordance with this Whistleblower policy.

DEFINITION

The term whistleblower is used with regard to the reporting of, in good faith, concerns regarding violations of The Good Samaritan Society Code of Conduct or the Code of Ethics.

POLICY

Compliance Officer (Chair of the Ethics Committee)

The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Conduct and shall advise the President/CEO, who shall direct where the issue will be discussed.

No Retaliation

No director or employee who in good faith reports a violation of the Code of Conduct (see HR-General policy – Code of Conduct) or the Code of Ethics (as in Health Ethics Guide – Catholic Health Association of Canada) shall suffer harassment, retaliation or adverse employment consequence. 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. The Good Samaritan Society Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Reporting Violations

Employees are encouraged to share their questions, concerns, suggestions or complaints with their supervisor. However, if the employee is not comfortable speaking with their supervisor or they are not satisfied with their supervisor's response, they are encouraged to speak with someone in the Human Resources Department or anyone in management whom they are comfortable in approaching. If an employee is not satisfied or comfortable with following the usual reporting channels, the employee should contact the Good Samaritan Society's Compliance Officer directly.

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Financial Matters

The audit committee of the board of directors shall address all reported concerns or complaints regarding corporate finances, accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Chair of the Finance and Audit Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential , consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the complainant and acknowledge receipt of the reported violation of suspected violation within ten business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Reporting

The Compliance Officer will report regularly to the Board through the CEO regarding all complaints to the Compliance Officer.

This policy is based on a sample made available to nonprofit organizations with the following acknowledgement.

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