	Corporate Policy Manual	
	Document Number:	CPM 0.29
	Document Owner	D. Rodzik Jr
	Effective Date:	07/03/2023
	Revision Number:	6
	Page Number:	1 of 2
WHISTLE BLOWER PROTECTION		

1.0 PURPOSE

This procedure is designed to provide basic guidelines for all personnel to follow when the need to report illegal or illicit activity.

2.0 SCOPE

2.1 This Whistleblower Protection Policy applies to all of The Narmco Group’s staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors, each of whom shall be entitled to protection.

3.0 PROCEDURE


3.1 A protected person shall be encouraged to report **information relating to illegal practices or violations of policies** of the The Narmco Group (a “Violation”) that such person in good faith has reasonable cause to believe is credible. Information shall be reported to the Human Resources/Labour Relations Counsel (“Counsel”) unless the report relates to the Counsel, in which case the report shall be made to the Corporate Human Resources Manager who shall be responsible to deal with the information.

3.2 Anyone reporting a Violation must act in good faith, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

3.3 Investigating Information. The Counsel shall promptly investigate each such report and prepare a written report to Executive Management using the resources and people available to them. In connection with such investigation all persons entitled to protection shall provide the Counsel with credible information. All actions of the Counsel in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

3.4 Confidentiality: The Narmco Group encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously by calling the anonymous hotline established by the The Narmco Group for this purpose. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the The Narmco Group or law enforcement to conduct an adequate investigation.

3.5 Protection from Retaliation: No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy.

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	Page Number:	2 of 2
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- 3.6 Any individual within the Narmco Group who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.
- 3.7 Counsel will communicate with a complainant about the status of the complaint when requested.
- 3.8 **This Policy is not to be used to report anything but illegal practices or violations of Policies.** Incidents of Harassment and Workplace Violence are to be reported using the appropriate procedures. General complaints about the workplace should be directed to the appropriate person or process which may include filing a grievance under a collective agreement.
- 3.9 Reports can be made by calling Ext. 1413 internally or externally at 519-960-0135. You can also email hotline@narmco.com.

4.0 REVIEW AND REVISIONS

- 4.1 These policies and programs will be reviewed annually by Corporate Human Resources, in collaboration with Plant and/or Corporate resources and revise as necessary.

E-Revision #	Date	Revision Description
01	06/17	Initial Release
02	06/20	Review
03	05/21	Updated Paragraph 2.9
04	08/21	Review
05	08/22	Review
06	07/23	updated to new format