



## Policy on Reporting of Misconduct

### 1. Scope

This policy applies to all employees, volunteers and Board members of G.R.O.W.

### 2. Purpose

G.R.O.W. is committed to ensure the organization acts in accordance with applicable laws and observes good practice standards of business and personal ethics in the conduct of its responsibilities. This policy is intended to encourage and enable employees, volunteers and Board members to raise serious concerns internally so that G.R.O.W. can address and correct inappropriate conduct and actions. The policy outlines the expectation and conditions for unethical, illegal or fraudulent conduct to be reported and addressed.

The policy sets out the duty of employees, volunteers and Board members to report misconduct, including fraud and financial impropriety, and ensure that anyone who makes a report in good faith will be protected from retaliation.

### 3. Duty to Report Misconduct

This includes wrongdoing such as but not limited to,

- a. An act or omission that creates a risk to the safety of persons.
- b. Knowingly directing or counselling a person to commit an illegal act or act in a manner contrary to the values of G.R.O.W.
- c. Providing false or misleading information or withholding material information on G.R.O.W.'s financial statements, tax documents or other public documents.
- d. Pursuit of material benefit or advantage in violation of G.R.O.W.'s Conflict of Interest Policy.
- e. Misappropriation or misuses of G.R.O.W.'s resources (e.g. funds; assets).
- f. Unauthorized alteration or manipulation of electronic records.

### 4. Acting in Good Faith

Anyone filing a complaint alleging misconduct must act in good faith and have reasonable grounds for believing the information disclosed indicates wrongdoing. Making allegations that prove not to be substantiated and which prove to have been made with malicious intent or knowingly to be false could result in disciplinary action up to and including termination.

No employee, volunteer or Board member who makes a report in good faith shall suffer retaliation<sup>1</sup>. Anyone who is found to have retaliated against someone who has made a report in good faith will be subject to discipline up to and including termination.

### 5. Reporting Procedure

G.R.O.W. encourages employees, volunteers and Board members to share their questions, concerns, suggestions or complaints with their direct report supervisor or

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<sup>1</sup> Retaliation is defined as any direct or indirect detrimental action threatened or taken against an individual.

alternatively, the Executive Director or the President. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the G.R.O.W. Executive Director.

A formal report of wrongdoing must be made in writing, be dated and include:

- a. The name of the person making the disclosure of wrongdoing;
- b. A description of the wrongdoing;
- c. The name of the person(s) alleged to have committed or is about to commit the wrongdoing;
- d. The date of the wrongdoing;
- e. Whether the wrongdoing has already been disclosed, to whom and the response received.

The written report can be made to any of:

- i. In the case of an employee:
  - a. The employee's supervisor;
  - b. The Executive Director of G.R.O.W.;
  - c. The President of G.R.O.W.
- ii. In the case of a volunteer:
  - a. The volunteer's supervisor;
  - b. The Executive Director of G.R.O.W.;
  - c. The President of G.R.O.W.
- iii. In the case of a Board member:
  - a. The President of G.R.O.W.;
  - b. The Executive Committee of G.R.O.W.

Circumstances of the investigation will determine additional requirements, if any. The complainant will receive a response to reported misconduct to acknowledge receipt, within ten business days. All reports will be investigated within thirty business days except for extenuating circumstances.

## **6. Confidentiality**

Reports of misconduct may be submitted on a confidential basis by the complainant.

Reports of misconduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **7. Compliance and Reporting to the Board**

Responsibility for investigating and resolving reports of misconduct concerning staff and volunteers will be vested in the Executive Director in consultation with the President. Responsibility for investigating and resolving reports of misconduct on the part of board members will be vested in the President in consultation with the Executive Director.

All reports of misconduct will be reported to the Board, in writing. All reports of misconduct will be kept confidential and information will be shared on a strictly need to know basis.

## **8. Protection Against Retaliation**

It is contrary to the values of G.R.O.W. for anyone to retaliate against any employee, volunteer or Board member who in good faith reports an ethics violation, or a suspected

violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of G.R.O.W.

Individuals who believe that retaliatory action has been taken against them because they have reported misconduct should forward all information and documentation to support their complaint to the Executive Director or directly to the President. If the investigation reveals a credible case of retaliation or threat, it will refer findings to the Board and recommend measures to safeguard the complainant. If there is no credible case of retaliation or threat, the complainant will be advised of other mechanisms on conflict resolution. Regardless of the outcome, the complainant will receive the outcome of the investigation in writing from the Executive Director and the Board will be fully informed in writing.

The Executive Director will receive reports of retaliation, keep a confidential record of all reports received, inform the Board and conduct a review within one month of receiving the report.

#### **9. Appeal Procedure**

Should the complainant not be satisfied with the findings, they may make a direct appeal in writing to the President within one month of receipt of the written report. Ruling from the Board will constitute the final disposition of the complaint.

#### **10. Review**

This policy is subject to review by the Governance Committee and approved by the Board every three (3) years or as required as a result of legislative changes or changes in good practice standards.

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*Date Approved*

*January 15, 2025*

*Approved By: Board of Directors*

*Next Date For Review*

*January 2028*

*To Be Reviewed By: Governance Committee*