

# Calgary Downtown Association External Whistleblower Policy

Board Approved:  
September 1st 2021

## **POLICY STATEMENT**

The Calgary Downtown Association (“CDA”) is committed to upholding the highest ethical standards. We do this by conducting our business with maximum integrity and by achieving full compliance with our bylaws, rules and regulations. In line with this commitment, the CDA provides an avenue for its stakeholders, rate payers, and other members of the public to report any concerns they may have about the CDA’s activities and to be assured that they will be protected from reprisal or victimization for reporting their concerns in good faith.

This policy covers instances where a stakeholder, rate payer or other member of the public has evidence of activity by any CDA officer, employee, board member or consultant (including external auditors) that to his/her knowledge constitutes:

- A. Accounting, auditing, or other financial reporting fraud or misrepresentation;
- B. Violations of Federal or Provincial laws that could result in fines or civil damages payable by the CDA, or that could otherwise significantly harm the CDA’s reputation or public image;
- C. Unethical business conduct in violation of any CDA policy;
- D. Harassment, bullying, mistreatment, the use of threats or the making of unfair demands;
- E. Danger to the health, safety, or well-being of rate payers, volunteers, stakeholders and/or the general public; or
- F. Harassment, retaliation, or discrimination, stemming from having reported a Reportable Activity.

For the purposes of this Policy, any of the foregoing activities shall be deemed to be a “Reportable Activity”.

The CDA will not permit any officer, employee, board member or consultant to harass, retaliate or discriminate against anyone who, in good faith, has reported a Reportable Activity (a “Complainant”). Retaliation in any form will not be tolerated.

Any violation of this Policy may subject the violator to disciplinary action, which may include, in appropriate circumstances, termination of employment and/or legal action.

Making a complaint that is not in good faith will be viewed as a serious offence, and, if applicable, may be subject to discipline up to and including the severing of a relationship with a supplier or other stakeholder.

## **PROCEDURE FOR MAKING A COMPLAINT**

To file a complaint or Reportable Activity the Complainant should complete a Whistleblower Report Form (See Appendix A). Once the form is completed it is to be sent via email to the Chair of the Audit & Finance Committee of the CDA at [ChairAF@downtowncalgary.com](mailto:ChairAF@downtowncalgary.com) or alternatively, by via regular mail to the following address:

PRIVATE & CONFIDENTIAL  
Calgary Downtown Association

Suite 1440 150 9<sup>th</sup> Ave SW

Calgary, AB T2P 3H9

ATTN: Chair of the Audit & Finance Committee

In the event that the complaint concerns a Reportable Activity on the part of the Chair of the Audit & Finance Committee, the form should be sent via email to the Chair of the Board of Directors of the CDA at [chair@downtowncalgary.com](mailto:chair@downtowncalgary.com) or alternatively, by via regular mail to the following address:

PRIVATE & CONFIDENTIAL

Calgary Downtown Association

Suite 1440 150 9<sup>th</sup> Ave SW

Calgary, AB T2P 3H9

ATTN: Chair of the Board of Directors

A complainant may remain anonymous. However, in order to allow for the most thorough investigation of a complaint, the Complainant should consider providing his/her name, telephone number and any other pertinent contact information. Whether or not such contact information is provided, the substance of the complaint will be treated confidentially and not discussed with anyone except to the extent necessary to conduct a complete and fair investigation. In all cases, any person who is alleged to have conducted the Reportable Activity will be made aware of the complaint at an appropriate point during the investigation.

The Complainant should give enough information to enable a full investigation, including where and when the Reportable Activity occurred, names and titles of individual(s) involved, and as much other relevant details as the Complainant can provide.

## **INVESTIGATION AND RESOLUTION OF COMPLAINT**

Upon receipt of a complaint as set out in this policy, the recipient may either appoint an investigation committee to review the complaint or advise the board of directors of the CDA, who may appoint an investigation committee to review the complaint. The investigate committee shall be responsible for expeditiously conducting or causing to be conducted an investigation of the complaint, resolving the matter, and reporting the results of the investigation to the Complainant (if contact information is provided). Under no circumstances will the recipient of the complaint or the investigation committee allow such investigation, resolution or reporting to be delegated to or shared by anyone whom the Complainant identified as being or having been involved in the Reportable Activity.

**APPENDIX A WHISTLEBLOWER FORM**

**WHISTLEBLOWER FORM**

**Date:**

**Name (Optional):**

CDA Affiliation (Select) *Optional*

Stakeholder  Rate Payer  Member of the Public

Other

Phone Number (Optional)

E-mail Address (optional)

**Date you became aware of Reportable Activity (Complaint):**

**Describe Reportable Activity:**

**Reportable Activity is:**

- Ongoing       Completed       Unclear

**Department(s) Suspected of Reportable Activity:**

- Business Development  
 Finance / Accounting Service  
 Delivery (Programs)  
 Communications / Marketing  
 Administration  
 Management  
 Other

**Individual(s) Suspected of Reportable Activity:**

**How did you become aware of the Reportable Activity?**

**Describe any steps you took prior to completing this Report (e.g. informed a representative of CDA):**

**Name of CDA Representative Contacted (if applicable):**