

**Greater KW Chamber of Commerce
Whistleblower Protection Policy
October 28, 2025**

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1. Purpose

The Chamber of Commerce is committed to maintaining the highest standards of ethical and legal conduct. This policy provides a framework for reporting concerns about suspected wrongdoing and ensures individuals are protected from reprisal or retaliation for doing so in good faith.

This policy aims to:

- Encourage responsible disclosure of unethical, illegal, or improper conduct
- Protect whistleblowers from retaliation
- Support timely and fair resolution of reported concerns

2. Scope

This policy applies to:

- Employees
- Officers and Directors
- Contractors and Volunteers
- Any person acting in a fiduciary or representative role on behalf of the Chamber

3. Definitions

1. **Whistleblower:** A person who discloses information about suspected wrongdoing in good faith.
2. **Wrongdoing:** Includes but is not limited to:
 - Breach of chamber policy or Code of Conduct
 - Fraud, theft, or misuse of funds
 - Abuse of power or authority
 - Forgery, falsification of records
 - Dangerous or unsafe practices
 - Unlawful acts (civil or criminal)
3. **Retaliation:** Any adverse employment or association-related action taken against someone for reporting wrongdoing or cooperating in an investigation.
4. **Appropriate Authority:** Any delegated employee or volunteer who has the authority to make final decisions regarding the employees, wrongdoing, harassment claims, and resulting actions.

4. Application

This Whistleblower Protection Policy applies when an individual becomes aware of, or reasonably suspects, serious misconduct, wrongdoing, or unethical behavior that may have legal, financial, reputational, or systemic implications for the Chamber of Commerce.

This policy is distinct from the Chamber's Code of Conduct, which addresses interpersonal behavior, civility, respect, and general professional conduct expected in Chamber-affiliated activities.

A concern that originates as a Code of Conduct issue may escalate and become subject to this Whistleblower Policy when any one or more of the following thresholds is met:

- The alleged misconduct involves fraud, criminal activity, breach of law, or gross mismanagement
- There is an abuse of position or misuse of Chamber resources or authority
- The issue presents a significant risk to the Chamber's financial integrity, public trust, or organizational reputation
- The subject of the complaint holds a leadership or fiduciary position (e.g., CEO, Board member)
- The complainant has reason to believe that reporting through normal channels may lead to retaliation, cover-up, or conflict of interest
- The concern involves systemic or repeated violations of conduct that may indicate a pattern or culture of misconduct

Concerns that do not meet these thresholds, such as isolated acts of incivility, misunderstandings, or minor breaches of etiquette, should continue to be addressed through the Code of Conduct review process.

The Appropriate Authority receiving the initial report has the discretion to determine whether the matter falls under this policy, in consultation with the Executive Committee or a qualified third party if necessary.

5. Reporting Procedures

A. How to Report

Individuals may report concerns by contacting the:

- Their supervisor or manager (for employees)
- The CEO
- The Chair of the Board
- The Secretary of the Board (especially if the CEO or Chair is involved)

Reports may be made verbally or in writing. Written reports are encouraged for clarity and documentation.

B. Anonymous Reports

Anonymous disclosures will be accepted but may limit the Chamber's ability to investigate thoroughly. All reports will be treated with sensitivity and discretion.

6. Protection from Retaliation

The Chamber strictly prohibits retaliation. Anyone who retaliates against a whistleblower or a witness involved in an investigation will be subject to disciplinary action, up to and including termination of employment or revocation of membership. This protection does not extend to malicious or knowingly false allegations.

7. Investigation Process

A. Initial Review

- Upon receipt of a report, the Appropriate Authority (e.g., Chair of the Board or delegate, as outlined in the Chain of Authority) will assess whether the matter qualifies for review under this policy. The Chain of Authority refers to the following:
 - The CEO, OR (if not appropriate because named in the complaint)
 - The Chair of the Board, OR
 - The Secretary of the Board, OR (especially if the CEO or Chair is named in the complaint)
 - A Vice-chair (if in the rare circumstance that all three are named in the complaint)
- If warranted, an investigation will be initiated within 10 business days.

B. Investigation Standards

- Investigations will be conducted fairly, impartially, and confidentially
- Parties involved will be given the opportunity to respond
- The goal is resolution within 30 calendar days, where feasible

C. Outcomes

- A written report will be prepared summarizing findings, conclusions, and any recommended corrective actions
- The complainant (if known) and the respondent will be advised of the outcome, subject to legal and privacy limitations

8. Informal Resolution Option

If appropriate, the Appropriate Authority may offer an informal resolution process where both parties agree. When possible and appropriate, concerns may be addressed through informal conversation, clarification and collaborative resolution before triggering a formal review. No disciplinary action will occur, and records will be kept confidential and outside the personnel file.

9. Use of Independent Third Party

The Appropriate Authority may, at their discretion, retain the services of a qualified, independent third party (e.g., legal counsel, governance consultant, or HR professional) to receive complaints, conduct investigations, and/or advise on the interpretation and resolution of findings. This measure may be taken to ensure impartiality, preserve confidentiality, or provide specialized expertise.

10. False Allegations

Deliberate misuse of this policy, including knowingly false or malicious reports, is a serious violation. Such actions may result in disciplinary measures, including termination of employment or revocation of membership with the chamber of commerce.

11. Confidentiality & Records Retention

- All whistleblower complaints and investigations will be handled with the utmost confidentiality
- Investigation records will be retained securely for a minimum of 5 years
- Access is limited to the Secretary, Board Chair, CEO, and legal counsel as required

12. Oversight & Review

The Governance Committee is responsible for:

- Reviewing policy effectiveness three years
- Recommending updates to the Board

13. Policy Communication

This policy will be posted internally and externally, included in employee onboarding materials, and reviewed with board and committee members annually.

*Approved by the Greater Kitchener Waterloo Board of Directors on [October xx, 2025]
Next Review Date: [October xx, 2028]*