

Safe Disclosure Policy

Policy - HR - 1801

Approved - October 22, 2009

No alteration to this policy will be authorized without the documented approval of the Board of Directors of the Westerner Exposition Association.

Statement

Westerner Exposition Association (“Westerner Park”) has a commitment to integrity, ethical behaviour and compliance with all applicable laws and regulations.

Purpose

This Safe Disclosure Policy establishes a procedure that allows employees of Westerner Park, volunteers and other interested persons, hereinafter referred to as “reporting persons”, to anonymously and confidentially, or otherwise, submit their concerns to the Chair of Westerner Park’s Finance, Investment & Audit Committee regarding illegal or unethical behaviour, including questionable accounting practices, internal accounting controls or auditing matters, without fear of retaliation.

This Safe Disclosure Policy is intended to encourage and enable reporting persons to raise serious concerns within Westerner Park prior to seeking resolution outside of the organization.

Reporting Responsibility

It is the responsibility of all directors, officers, volunteers and employees to comply with the Code of Conduct Policy and report violations or suspected violations in accordance with this Safe Disclosure Policy.

Reporting Procedures

Reporting persons are encouraged to speak with their supervisor, manager or other appropriate Association personnel regarding observed illegal, unethical or other behaviour which compromises Westerner Park’s policies or reputation.

Employees who are not comfortable approaching their superiors with their concerns, or believe that their concerns are not being appropriately addressed by senior management, or other interested persons who have no direct access to management, may contact the Chair of Westerner Park’s Finance, Investment & Audit Committee on a **confidential** basis by:



Reporting Procedures Continued

Telephone* Chair
Finance, Investment & Audit Committee
Direct Line - 403.341.7946 Extension 7000

Email** safedisclosure@westerner.ab.ca

Mail Chair, Finance, Investment & Audit Committee
Westerner Park
4847A - 19 Street,
Red Deer, AB T4R 2N7

Please mark all correspondence as **HIGHLY CONFIDENTIAL**.

Management shall provide ongoing reports of all complaints received to the Chair, Finance, Investment & Audit Committee.

* Information updated as required and is considered current.

** Secure and confidential email accessible by the Chair of Finance, Investment & Audit ONLY.

Handling of Complaints

To ensure that a reporting person is protected from reprisal, a request for anonymity will be respected to the extent that it does not result in the violation of the rights of another person.

Westerner Park will make good faith efforts to protect the confidentiality of any reporting person provided, however, Westerner Park or its employees and agents shall be permitted to reveal the reporting person's identity and confidential information to the extent necessary to permit a thorough and effective investigation. Reporting persons filing complaints should ensure that any complaint includes sufficient detail to allow substantiation and investigation. Related documents, dates and identity of parties involved should also be provided.

The effectiveness of an investigation and follow-up to any submitted report may be improved if the investigator can seek clarification and further information from the person submitting a report. For those who are unwilling, or unable to provide their name when submitting a report, this procedure permits complete anonymity. Individuals wishing to maintain anonymity may impede the investigation.

At his/her discretion, the Chair of the Westerner Park Finance, Investment & Audit Committee may engage independent, professional assistance or consultation, at the expense of Westerner Park, and/or may seek consultation with the President of Westerner Park.



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Page 3

Protection of Individuals Making Disclosures

No reporting person who in good faith reports a violation shall suffer harassment, retaliation or adverse consequences. 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.

Any retaliation against any person submitting a concern, and/or participating in an investigation in good faith, is strictly prohibited and should be reported immediately to the Chair of the Westerner Park Finance, Investment & Audit Committee. Any allegations of retaliation will be investigated and dealt with in accordance with this policy.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of policy.

Malicious Disclosure

Any reporting person who knowingly makes 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 offense and subject to appropriate disciplinary action up to and including termination, if applicable.

