#### Whistleblowing Policy

#### 1. General

STSPMF Code of Ethics and Conduct ("Code") requires trustees, employees and volunteers to observe high standards of organisational and personal ethics in the conduct of their duties and responsibilities.

#### 2. Reporting Responsibility

It is the responsibility of all representatives of the organisation to comply with the Code and to report violations or suspected violations in accordance with this Whistleblowing Policy.

#### 3. No Retaliation

No employee or volunteer who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse consequence. This whistleblowing policy is intended to encourage and enable employees or others to raise serious concerns within the organisation prior to seeking resolution outside the organisation.

### 4. Reporting Violations

The Code addresses the organisation's open-door policy and suggests that employees or volunteers share their concerns, suggestions or complaints with someone who can address them. In most cases, the General Manager is in the best position to address an area of concern. However, if the complainant is not comfortable in raising the concern to the General Manager or is not satisfied with the response, he/she is encouraged to bring the matter to any of the Board Trustees. The General Manager is required to report suspected violations of the Code of Conduct to the Board, who has specific and exclusive responsibility to investigate all reported violations.

## 5. Acting in Good Faith

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

# 6. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.