

Canada Soccer Whistleblower Policy

A. TERMINOLOGY

"Anonymous" means unknown authorship, and without designation that might lead to information about the authorship. Anonymity is not compromised by assignment of a code or other designation with which a person can communicate without revealing his or her identity.

"Submission of Concern" means any information provided to Canada Soccer, whether in the form of a concern, a demand for remedial action, or a report of a suspected violation of a policy of Canada Soccer or law.

"Confidential" means authorized for access by only those persons who have a need to know. Ordinarily, a need to know arises from an obligation to investigate or to take remedial or disciplinary action.

B. PURPOSE

Canada Soccer (the Association) requires their Directors and Employees to observe high standards of business and personal ethics. The purpose of this Whistleblower Policy (Policy) is to encourage and enable its Directors and Employees to report any action or suspected action taken within the Association that is illegal, fraudulent or in violation of a Bylaw, Rule, Regulation, or Policy of Canada Soccer.

The Risk Management Committee of the Board of Directors (the Board) of Canada Soccer is responsible for ensuring that a confidential and anonymous process exists whereby persons can express any concerns or complaints about the accuracy, fairness or appropriateness of the conduct of Canada Soccer's operations without fear of retaliation or reprisal.

C. APPLICATION OF THIS POLICY

This Policy is intended to supplement Canada Soccer's *Code of Conduct and Ethics*¹ covering conflicts of interest, gifts and hospitality, other conduct violations such as bullying and harassment, and any applicable provincial and federal laws governing whistleblowing actions.

This Policy applies to Officials, Athlete Members, Life Members, players and individuals employed or engaged by Canada Soccer. This Policy also applies to the Directors of the Provincial / Territorial Association Members, Professional Club Members or League Members or any other individuals who perform duties on behalf of these Members when the Members are engaged in soccer-related activities sanctioned by Canada Soccer.

This Policy applies to any matter which is related to the Association's business and does not relate to private acts of an individual where such acts are not connected to the business of the Association.

¹ Canada Soccer *Code of Conduct and Ethics*

D. POLICY

Where an employee or Director, acting in good faith and on the basis of reasonable belief, becomes aware of actual, suspected or intended misconduct, unlawful activity, suspicious financial management, or other accountability concerns, they have a duty to report such misconduct or incidents immediately.

An individual, acting in good faith and on the basis of reasonable belief, may refuse to carry out any order or directive which is illegal, unethical, or against policy and which is given by an individual who has direct or indirect control over their employment or position. Individuals are encouraged to consider the types of activities or behavior prohibited by Canada Soccer's Code of Conduct and Ethics for reporting under this Policy.

E. METHODS FOR FILING A SUBMISSION OF CONCERN

The following procedures are intended to ensure that any submission of concern is promptly and effectively addressed. The General Secretary shall be responsible for engaging an appropriate entity to provide individuals the opportunity to communicate their concerns confidentially and/or anonymously. All submissions of concern shall be treated as confidential, whether received anonymously or otherwise. The procedures for submission of concern, and any changes thereto, shall be made available internally and published on Canada Soccer's website.

All submissions of concern should be supported with as much factual detail as possible, including dates, names and places. Inflammatory or biased commentary should be avoided.

Options:

- (a) Canada Soccer maintains an open-door policy and suggests that employees share their questions, concerns, and suggestions with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address a concern. An employee's supervisor may be more knowledgeable about the issue and will appreciate being brought into the process. It is the supervisor's responsibility to help solve the problem;
- (b) Call the **Whistleblower Hotline 1-800-661-9675** supported with a toll-free telephone number available at all times in both English and French and handled by an independent external service provider; or
- (c) Email the **Whistleblower Email Address** whistleblower@canadasoccer.com to which submissions of concern may be forwarded, with the concern handled by an independent external service provider.

F. PROCESS TO ADDRESS CONCERNS

The Chair of the Ethics Committee and the Chair of the Risk Management Committee will receive all submissions of concern.

Although a person making an anonymous submission may be advised that protecting anonymity could hinder an effective investigation, the anonymity of the person making the submission shall be protected until the person indicates that he or she does not wish to remain anonymous. Any system established for exchanging information shall be designed to protect anonymity.

The Chair of the Risk Management Committee shall report submissions to the Risk Management Committee at each meeting of the Committee. The Risk Management Committee shall report to the Board on an annual basis. However, any submission of concern related to fraud must be brought to the attention of the Board within 24 hours.

G. ROLES & RESPONSIBILITIES

G-1: General Secretary

The General Secretary is responsible to:

- Ensure that a confidential, professional, external whistleblower service is available;
- Communicate this Policy to all employees and make it available on Canada Soccer's website; ensure that the results of any investigation are appropriately filed;
- Assist the Deputy General Secretary and the Chair of the Risk Management Committee in implementing this Policy as required;
- Ensure appropriate corrective actions and recommendations are implemented as directed; and
- Prepare a Whistleblower Report for each meeting of the Risk Management Committee and annually for the Board of Directors that identifies:
 - a) the date of receipt of each concern;
 - b) the nature of the submission;
 - c) any corrective actions that were taken; and
 - d) any additional recommendations that were made and how those recommendations have been considered.

G-2: Deputy General Secretary

The Deputy General Secretary shall:

- Assist the General Secretary and the Chair in implementing this Policy as required; and
- Ensure appropriate corrective actions and recommendations are implemented as directed.

G-3: The Chair of the Risk Management Committee

The Chair shall:

- Receive submissions of concern and communicate any allegations of fraud to the Board within 24 hours of receipt;
- Assist the General Secretary and the Deputy General Secretary in implementing this Policy as required; and
- Report to the Risk Management Committee at each meeting on all submissions.

G-4: The Chair of the Ethics Committee

The Chair shall:

- Receive submissions of concern within 24hrs of receipt;
- Carry out the necessary investigations as warranted; and
- Communicate the finding and recommendations resulting from any investigation to the Disciplinary Committee.

G-5: The Risk Management Committee

The Committee shall:

- Review a Whistleblower Report at each meeting;
- Review the Policy annually and propose updates to the Board of Directors for approval.

G-6: The Board of Directors

The Board of Directors shall:

- Review the annual Whistleblower Report;
- Review this Policy annually and recommend any proposed updates to the Board of Directors; and
- Take appropriate actions as a result of any concerns.

H. SAFEGUARDS / NON-DISCRIMINATION

H-1: No Retaliation

Individuals are expected to co-operate fully during any investigation or proceeding.

Canada Soccer will treat those persons in a confidential and sensitive manner and will not discharge, demote, suspend, threaten or harass any employee or individual, or permit disciplinary action or reprisal or discrimination, in any manner, against any individual based upon any lawful actions taken by such individual.

Any effort to retaliate against any person filing a submission in good faith is strictly prohibited and must be reported immediately to the Chair of the Ethics Committee discipline@canadasoccer.com. If an individual believes that someone who has made a report of a violation or who has cooperated in the investigation of a violation is suffering from harassment, retaliation or other adverse employment conditions, the individual shall follow the same procedures as filing a submission under this Policy.

H-2: Untrue / False Allegations

If an individual makes an allegation in good faith and the allegation is not confirmed by subsequent investigation, no action will be taken against that individual. However, if the investigation reveals that an individual has made deliberately false or malicious or vexatious allegations, such instances will be viewed as serious offences which may result in disciplinary action.

I. RETENTION OF RECORDS FOR SUBMISSIONS OF CONCERN

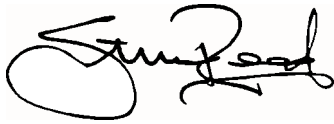
Records pertaining to a submission of concern are the property of Canada Soccer and shall be retained:

- a) in compliance with applicable laws and document retention policies; and
- b) subject to safeguards that ensure their confidentiality, and, when applicable, the anonymity of the person filing the submission of concern.

J. ENQUIRIES

Any enquiries regarding clarification, interpretation and administration of this Policy shall be directed to the Office of the General Secretary.

Adopted by the Board of Directors on September 8, 2017.



September 27th, 2017

Steven Reed
President
Canada Soccer

Date