



February 2023

WHISTLEBLOWER

Introduction

La Leche League Canada (LLLC) requires its representatives, both employees and volunteers, to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of LLLC must practice honesty and integrity in fulfilling their responsibilities, and must comply with *LLLC By-laws and Policies* and LLL policy and all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage anyone who suspects that a participant in any LLLC department or activity has committed a financial infraction or violation of law to raise these concerns within the organization. The purpose of this policy is to allow LLLC to investigate and resolve internally any suspected violations of the financial procedures or laws that govern LLLC operations. External systems of justice remain available should the complainant consider that making use of them is warranted.

Retaliation

No person will be discharged, threatened, or discriminated against in any manner for disclosing or threatening to disclose to an LLLC or LLL representative any activity, policy, or practice of LLLC that the person perceives to be violations of law and/or other regulations.

Reporting Procedure

LLLC has an open-door policy and suggests that LLLC representatives share their questions, concerns, suggestions, or complaints with the LLLC Board of Directors. If the reporting person is not comfortable contacting the Board or is not satisfied with the Board's response, then the reporting person must contact the Conflict Resolution Team and follow the *Conflict Resolution Process*. The LLLC Board of Directors is responsible for ensuring that all complaints about illegal conduct or financial impropriety are investigated and resolved.

Accounting and Auditing Matters

The LLLC Board of Directors shall immediately notify the Finance Committee of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing, and shall work with the committee until the matter is resolved.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the matter raised is a financial infraction or violation of law. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations were false, will be viewed as a serious disciplinary offense.

Confidentiality

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

Handling of Reported Violations

Confirmation of receipt of the report should be made promptly to the complainant by the person handling the complaint. All reports will be investigated promptly, and appropriate corrective action will be taken if warranted by the investigation.

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