



Whistleblower Policy

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Approved by: CEO

Approval date: April 2020

Review date: Every 2 years

1. Purpose

SEARMS Code of Conduct (the Guidelines) describe the standards of conduct required of board members, employees and associated officers of SEARMS. To ensure a reputation for honesty and integrity of SEARMS' financial reporting, SEARMS requires directors, officers and employees to observe high standard of business and personal ethics in the conduct of their duties and responsibilities.

The Whistleblower Policy ("the Policy) is designed as a control to help safeguard the integrity of SEARMS financial reporting, its business dealings and to support adherence with the Guidelines.

The Policy is intended to encourage and enable employees and others to raise serious concerns internally so that SEARMS can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of SEARMS' code of ethics or suspected violations of law or regulations that govern SEARMS' operations.

The Policy require all directors, officers and employees to report concerns including incidents of retaliation against someone raising concerns in good faith. It is in the interest of all stakeholders of SEARMS that such concerns be reported so that they can be properly addressed. The purpose of this Policy is to provide a series of options for reporting concerns. This reporting can be done confidentially through a number of channels, including an independent third party that allows for anonymous reporting.

As employees and representatives of SEARMS, SEARMS must practice honesty, integrity and cultural sensitivity in fulfilling their responsibilities and comply with all applicable laws and regulations.

2. Scope

This Policy applied to all directors, officers and employees of SEARMS. This includes the responsibility to report concerns through the proper reporting channels and the protection against retaliation for reports made in good faith.

3. Types of concerns to be reported

Acting in good faith

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

Financial Reporting:

Examples include: Falsification or destruction of business or financial records, misrepresentation or suppression of financial information, non-adherence to internal financial reporting policy/controls, including management over-rides, and auditor independence concerns.

Suspected Fraudulent Activity:

Examples include: Theft, defalcation, and unlawful or improper payments.

Breaches of the Guidelines and other compliance policies

Examples include: corrupt practice including giving or receiving bribes or other improper benefits, conflict of interest concerns, illegal, deceptive or anti-competitive sales practices, other violations of governing regulations, and non-adherence to internal compliance policies.

Retaliation or retribution against an individual who reports a concern

Examples include: statements, conduct or actions involving discharging, demoting, suspending, harassing or discriminating against an individual reporting a concern in good faith in accordance with this Policy.

4. Disclosure process

In order to obtain protection under the legislation the employee must first reasonably believe that the disclosure concerns one or more of the following:

- A criminal offence that has been, is being, or is likely to be committed.
- A person including his/her employer who is failing to comply with their legal obligations
- A miscarriage of justice has occurred, is occurring, or is likely to occur
- The individual's health and safety has been, is being, or is likely to be jeopardised
- Environmental damage has occurred, is occurring, or is likely to occur and
- The employer is concealing information about any of these

5. Reporting channels

There are several channels through which all directors, officers and employees may report their concerns under the Policy Consideration should be given to the nature of the concern in choosing the most appropriate channel.

All employees/officers of SEARMS, are required to report complaints or concerns about suspected ethical and legal violations in writing to the CEO, who has the responsibility to investigate all reported complaints.

Chain of Communication - SEARMS has established procedures to enable employees to escalate concerns to the CEO of SEARMS. Should the matter involve the CEO, Staff can report directly to the Chair of the Finance and Audit Committee.

6. Regulatory compliance

Regulatory compliance concerns, or concerns related to breaches of the Guidelines or other compliance policies, can be escalated directly to the General Manager of SEARMS.

SEARMS is committed to investigate all credible complaints. However, all parties should be aware that reporting anonymously can limit the ability of SEARMS to thoroughly investigate a report if insufficient information is provided.

7. Investigation

Upon receipt of a concern, the CEO of SEARMS will evaluate the severity of the concerns to determine whether internal or external investigation is required.

The CEO will then assign the investigation accordingly and maintain oversight of the investigation to ensure appropriate and timely resolution.

All findings to be presented to the Board:

- Significant concerns will be raised to the Board and investigated by either the CEO or assigned member of the Board.
- The CEO will report quarterly, or more frequently as required, to the Board on the results of investigations of concerns.
- Guidelines violations and regulatory compliance matters of a significant nature will be reported by the CEO as appropriate.

To the Claimant:

- The status/resolution of the investigation will be communicated to the Claimant, where possible.

8. Protection from retaliation

As stated in the guidelines, SEARMS will protect from retaliation any director, officer or employee who raises issues or reports concerns in good faith in accordance with the methods described in accordance with this Policy.

Retaliation against any Individual, who raises a concern in good faith, will not be tolerated. It is contrary to the values of SEARMS for anyone to retaliate against any board member, officer, Employee or volunteer who in good faith reports an ethics violation, or a suspected violation

of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of SEARMS.

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.

Provisions - Confidentiality

Violations or suspected violations may be submitted 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.

See also:

Conflict of Interest Policy
Code of Conduct Policy
Delegations Policy
Contractor Procurement Policy
Risk Policy and Plan