

## **INTRODUCTION**

The Trust is committed to the highest possible standards of honesty, integrity and accountability and is supportive of its employees, officers, and directors in maintaining these standards. The Trust employees, officers, directors, and members of the general public have the right to report any unethical or unlawful activities within the organization and it is the Trust's responsibility to ensure there are clear channels of communication that allow the reporting of such activities. To meet its responsibilities, the Trust has developed this Whistle Blower Policy.

## **OBJECTIVES**

The objective of this Whistle Blower Policy is to establish procedures for the confidential receipt, retention, and treatment of complaints received from employees, officers, directors, and members of the general public regarding questionable accounting, accounting controls, auditing matters, or violations of the Trust's Director's Code of Conduct Policy or the Trust's Employee's Code of Conduct Policy. This policy covers any misconduct or wrongdoing by employees, officers, and directors of the Trust.

## **POLICY**

### **1. SUBMISSION OF COMPLAINTS**

- a) Complaints may be made directly to the President and CEO:

Johnny Strilaeff  
#300, 445 – 13 Avenue  
Castlegar, BC V1N 1G1  
[jstrilaeff@cbt.org](mailto:jstrilaeff@cbt.org)

- b) If the Complainant does not feel comfortable filing a complaint with the President and CEO, a submission may be made directly to the Chair of the Finance and Audit Committee:

Am Naqvi  
58 View Street  
Nelson BC V1L 2V5  
[anaqvi@cbt.org](mailto:anaqvi@cbt.org)

The Chair of the Finance and Audit Committee is an independent director of the Board of Directors, with no ties to management.

- c) If the Complainant does not feel comfortable filing a complaint with the President and CEO or the Chair of the Finance and Audit Committee, a submission may be made

directly to the Chair of the Board of Directors:

Rick Jensen  
1326 Southview Drive,  
Cranbrook, BC V1C 6R1  
[rijensen@cbt.org](mailto:rijensen@cbt.org)

- d) Submissions made by mail should be marked “Confidential” on the envelope.
- e) Complaints must include the identity of the Complainant. If not, the complaint may not be processed.
- f) The President and CEO, Chair of the Finance and Audit Committee, or Chair of the Board of Directors, as appropriate, will document the complaint and ensure all pertinent information has been received from the Complainant.
- g) Unless the Finance and Audit Committee or any member of the Finance and Audit Committee is the subject of the complaint, the President and CEO, Chair of the Finance and Audit Committee, or Chair of the Board of Directors, as appropriate, will forward the complaint to the Finance and Audit Committee immediately.
- h) If the Finance and Audit Committee or any member of the Finance and Audit Committee is the subject of the complaint, the President and CEO, Chair of Finance and Audit Committee, or Chair of the Board of Directors, as appropriate, will forward the complaint to the Executive Committee immediately.

## **2. ROLE OF THE AUDIT AND EXECUTIVE COMMITTEES**

- a) The Finance and Audit Committee or Executive Committee, as the case may be, will receive the complaint from the President and CEO, the Chair of the Finance and Audit Committee, or the Chair of the Board of Directors and decide what course of action will be taken.
- b) If necessary, the Finance and Audit Committee or Executive Committee will perform an investigation to establish the validity and materiality of the information received. The Finance and Audit Committee or Executive Committee may seek information or assistance and direction from whomever is deemed appropriate including, but not limited to, the Complainant, the subject of the complaint, witnesses, or external legal counsel.
- c) The committees may wish to arrange for a third party investigation. A third party investigator may provide additional expertise in questioning witnesses, assessing credibility and weighing evidence.
- d) The Chair of the Finance and Audit Committee or Executive Committee will notify the President and CEO or the Chair of the Board of Directors, as appropriate, of the results of the investigation and its recommendation of any action to be taken.
- e) Should the investigation establish that an individual within the Trust has engaged in improper conduct, immediate and appropriate corrective action will be taken by the President and CEO or the Chair of the Board of Directors, as appropriate, and may

include termination of employment or services.

- f) The President and CEO or the Chair of the Board of Directors, as appropriate, will notify the Complainant of the results of the investigation and any action taken. If the Complainant submitted his or her complaint directly to the Chair of the Finance and Audit Committee, the Chair of the Finance and Audit Committee will notify the Complainant directly of the results of the investigation and of any action taken.
- g) The Chair of the Finance and Audit Committee or Executive Committee will provide a list of all complaints to the Board of Directors at the next scheduled meeting. All complaints relating to accounting or auditing procedures and all other complaints of a serious nature will be presented to the Board of Directors immediately.

### **3. COMPLAINANT PROTECTION**

- a. A Complainant, acting in good faith and on the basis of reasonable belief, may file a complaint without fear of retaliation or adverse treatment of any kind.
- b. All complaints will be handled in timely manner.
- c. Information related to a complaint or the identity of the Complainant will be maintained in confidence except where disclosure is necessary to investigate the complaint, take disciplinary action or as required by law.
- d. Any employee, director, or officer involved in the investigation of a complaint must not disclose or discuss information regarding the complaint with any individuals not involved in the process.
- e. If the Complainant is not satisfied with the action taken, the Complainant may contact the Chair of the Board of Directors directly by mail:

Rick Jensen  
1326 Southview Drive,  
Cranbrook, BC V1C 6R1  
[rjensen@cbt.org](mailto:rjensen@cbt.org)

### **4. FALSE AND MALICIOUS ALLEGATIONS**

- a. Allegations of impropriety or unlawful activity may result in severe personal repercussions for the subject of the complaint. False or malicious allegations made by an individual will be considered a serious offence and for employees, officers, and directors, may result in termination of employment or services.