



Whistleblower Protection Policy **Approved June 2016**

PURPOSE

The Freestyle Canada (“FC”) is committed to building and preserving an open and ethical environment for all persons engaged in any paid (“**Employee**”) or volunteer capacity with the FC (“**Affiliate**”) or otherwise under the jurisdiction of the FC including without limitation (hereinafter collectively referred to as “**Employees and Affiliates**”):

- a) all athletes participating, or forming part of, any team participating in ski competitions over which FC has jurisdiction;
- b) all persons working with those teams or athletes, including coaches, medical and paramedical personnel, and other support persons;
- c) FC employees and persons under contract with the FC: and
- d) FC directors, members and volunteers;

The FC requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the FC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. All employees and affiliates are subject to the Whistleblower Protection Policy.

Reporting Responsibility

This Whistleblower Protection Policy is intended to encourage and enable employees and affiliates to raise serious concerns internally (or externally where required) so that the FC can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and affiliates to report concerns about violations of FC’s policies or suspected violations of law or regulations that govern FC’s operations.

No Retaliation

It is contrary to the values of the FC for anyone to retaliate against any board member, officer, employee or affiliate 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 the FC. An employee or affiliate who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment with cause and/or ban from the FC.

Reporting Procedure

The FC has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their immediate supervisor. If you are not



comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the CEO of the FC, or a board member. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the FC's Ethics Commissioner, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their ethics commissioner.

Ethics Commissioner

The FC's ethics commissioner is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The ethics commissioner will advise the CEO and/or the Board of Directors of all complaints and their resolution.

Accounting and Auditing Matters

The FC's ethics commissioner shall immediately notify the Board or Directors of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

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 offense.

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.

Handling of Reported Violations

The FC's ethics commissioner will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Ethics Commissioner

The Ethic Commissioner is Sport Law and Strategy Group.



JURISDICTION

This policy applies to activities and workplace that are under the jurisdiction of the National Sport Organization (“NSO”) and excludes the activities and workplaces under the jurisdiction of the Provincial / Territorial Sport Organizations (“PTSO”) and affiliated clubs.

PTSOs and Clubs will be required to adopt and implement a policy similar to this FC policy that will cover the workplace and activities under the jurisdiction of the PTSOs and Clubs.

ENFORCEMENT

Violation of any part of this policy may result in disciplinary action, up to and including the termination of employment with cause or a lifetime ban from the organization.

CONTACT

For further information please contact the CEO or the ethics commissioner:

- Bruce Robinson, CEO
- Phone: 778 237 3970
- Email: brucerobinson@freestyleski.com

- Sport Law and Strategy Group
- Phone: 647-348-3080
- Email: sji@sportlaw.ca