Whistleblower Policy

Version:	May 20, 2026
Approved by Board of Governors:	June 22, 2026
Scheduled Review Date:	June 30, 2027

Definitions

1. Defined terms used in the Whistleblower Policy include:

    a) *Alternative Dispute Resolution*

    b) *Harass or Harassment*

    c) *Organization(s)*

    d) *Organizational Participant(s)*

    e) *Worker*

    f) *Workplace*

    g) *Workplace Harassment*

    h) *Workplace Violence*

Purpose

2. The *Organization* is committed to fostering an environment conducive to open communication regarding the business practices of the *Organization* and to protecting *Workers* from unlawful retaliation and discrimination for their having properly disclosed or reported illegal or unethical conduct.

3. To further this commitment, this Policy:

    a) establishes guidance for the receipt, retention and treatment of verbal or written reports received by the *Organization* from a *Worker* regarding actions that (i) are illegal, unethical or contrary to the *Organization*'s policies in respect of accounting, internal controls, disclosure, or business practices or (ii) constitute discrimination, *Harassment*, violence or abuse against a *Worker* by a Director or another *Worker*;

b) provides *Workers* who make a report with a means to make reports in a confidential and anonymous manner; and

c) demonstrates the *Organization(s)*'s intention to discipline any person who commits an act of retaliation or reprisal against a *Worker* up to and including termination of employment for just cause, in the case of employees.

Application

4. This policy only applies to *Workers* who observe, or experience incidents of wrongdoing committed by directors or by other *Workers*.

5. Incidents of wrongdoing or *Misconduct* observed or experienced by *Organizational Participants*, volunteers, spectators, parents of *Organizational Participants*, or other individuals not employed or contracted by the *Organization(s)* can be reported under the terms of the *Discipline and Complaints Policy* and/or reported to the *Organization(s)*'s Board of Directors or senior staff person to be handled under the terms of the individual Worker's Employment Agreement or Contractor Agreement, as applicable, and/or the *Organization(s)*'s policies for human resources.

6. Matters appropriately reported under the terms of this policy may be referred to be heard under the *Discipline and Complaints Policy*, at the discretion of the Compliance Officer.

7. Any violation of this Policy that may be considered *Prohibited Behaviour* or *Maltreatment* (as defined in the *UCCMS*) when the *Respondent* is an *Organizational Participant* who has been designated as a *CSSP Participant*, will be handled pursuant to the policies and procedures of the *CSSP*, subject to the rights of the *Organization(s)* as set out in the *Discipline and Complaints Policy* and any applicable *Workplace* policies.

Wrongdoing

8. Wrongdoing can be defined as:

   a) violating the law;

   b) intentionally or seriously breaching the *Code*;

   c) committing or ignoring risks to the life, health, or safety of an *Organizational Participant*, volunteer, *Worker*, or other individual;

d) directing an individual or *Worker* to commit a crime, serious breach of a policy, or other wrongful act; or

e) fraud.

Pledge

9. The *Organization* pledges not to dismiss, penalize, discipline, or retaliate or discriminate against any *Worker* who discloses information or submits, in good faith, a report against another *Worker* or director under the terms of this policy.

10. Any individual affiliated with the *Organization* who breaks this **Pledge** will be subject to disciplinary action.

Reporting Wrongdoing

11. A *Worker* who believes that a director or another *Worker* has committed an act of wrongdoing should prepare a report that includes the following:

    a) a written description of the act or actions that comprise the alleged wrongdoing, including the date and time of the action(s);

    b) the identities and roles of other individuals or *Workers* (if any) who may be aware of, affected by, or complicit in, the wrongdoing;

    c) why the act or action should be considered to be wrongdoing; and

    d) how the wrongdoing affects the *Worker* submitting the report (if applicable).

Authority

12. The following Compliance Officer has been appointed to receive reports made under this policy:

Curling Canada
Compliance Officer: Nolan Thiessen, Chief Executive Officer
1660 Vimont Court
Orleans, Ontario K4A 4J4
Email: nolan.thiessen@curling.ca

13. After receiving the report, the Compliance Officer has the responsibility to:

   a) assure the *Worker* of the **Pledge**;

   b) connect the *Worker* to the Alternate Liaison if the individual feels that they cannot act in an unbiased or discreet manner due to the individual's role with the *Organization* and/or the content of the report;

   c) determine if the report is frivolous, vexatious, or not submitted in good faith (e.g., the submission of the report is motivated by personal interests and/or the content of the report is obviously false or malicious) and, if so, inform the *Worker* that no action will be taken on the report and the reasons why the report has been considered frivolous, vexatious, or not in good faith;

   d) determine if the *Whistleblower Policy* applies or if the matter should be handled under the *Discipline and Complaints Policy or the CSSP*;

   e) determine if the local police service be contacted;

   f) determine if mediation or *Alternative Dispute Resolution* can be used to resolve the issue;

   g) determine if the *Organization*'s President and/or senior staff person should or can be notified of the report; and

   h) begin an investigation.

Alternate Liaison

14. If the *Worker* feels that the Compliance Officer is unable to act in an unbiased or discreet manner due to the individual's role with the *Organization* and/or the content of the report, the *Worker* should contact the following individual who will act as an independent liaison between the *Worker* and the Compliance Officer:

13.

Curling Canada
Alternate Liaison: Jennifer Ferris, Head of Sport Integrity and Education
1660 Vimont Court
Orleans, Ontario K4A 4J4
Email: jennifer.ferris@curling.ca

15. The Alternate Liaison will not disclose the *Worker'*s identity to the Compliance Officer or to anyone affiliated with the *Organization* without the *Worker's* consent.

16. A *Worker* who is unsure if they should submit a report, or who does not want to have their identity known, may contact the Alternate Liaison for informal advice about the process.

Investigation

17. If the Compliance Officer determines that an investigation should be launched, the Compliance Officer may decide to contract an external investigator. In such cases, the *Organization*'s President and/or senior staff person may be notified that an investigation conducted by an external investigator is necessary without the nature of the investigation, content of the report, or identity of the *Worker* who submitted the report being disclosed. The *Organization'*s President and/or senior staff person may not unreasonably refuse the decision to contract an external investigator.

18. An investigation launched by the Compliance Officer, Alternate Liaison or by an external investigator should, generally, take the following form:

    a) Follow-up interview with the *Worker* who submitted the report;

    b) Identification of *Workers*, *Organizational Participants*, volunteers or other individuals that may have been affected by the wrongdoing;

    c) Interviews with such-affected individuals;

    d) Interview with the director(s) or *Worker(s)* against whom the report was submitted; and

    e) Interview with the supervisor(s) of the *Worker(s)* against whom the report was submitted, if applicable.

19. The investigator will prepare an Investigator's Report, omitting names whenever possible and striving to ensure confidentiality, that will be submitted to the *Organization's* President and/or senior staff person for review and action.

Decision

20. Within fourteen (14) *Days* after receiving the Investigator's Report, the *Organization*'s President and/or senior staff person will take corrective action, as required. Corrective action may include, but is not limited to:

  a) enacting and/or enforcing policies and procedures aimed at eliminating the wrongdoing or further opportunities for wrongdoing;

  b) revision of job descriptions; or

  c) discipline, suspension, termination, or other action as permitted by the By-laws, applicable employment legislation, applicable policies for human resources, and/or the Worker's Employment Agreement or Contractor Agreement.

21. The corrective action, if any, will be communicated to the investigator who will then inform the *Worker* who submitted the report.

22. Decisions made under the terms of this policy may be appealed under the terms of the *Appeal Policy* provided that:

  a) if the *Worker* who submitted the initial report is appealing the decision, the *Worker* understands that their identity must be revealed if they submit an appeal; and

  b) if the director or *Worker* against whom the initial report was submitted is appealing the decision, the Worker or director understands that the identity of the *Worker* who submitted the report will not be revealed and that the *Organization* will act as the *Respondent*.

Confidentiality

23. Confidentiality at all stages of the procedures outlined in this policy – from the initial report to the final decision – is the goal for all individuals (the *Worker*, the *Worker(s)*, or director(s) against whom the report is submitted, and the individuals interviewed during the investigation). An individual who intentionally breaches the confidentiality clause of this policy will be subject to disciplinary action.

24. In all stages of the investigation, the investigator will take every precaution to protect the identity of the *Worker* who submitted the report and/or the specific nature of the report itself. However, the *Organization* recognizes that there are some instances where the nature of the report and/or the identity of the *Work*er who submitted the

report will or may be inadvertently deduced by individuals participating in the investigation.